



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

File

May 6, 1999

Scott H. Osbourn
Senior Environmental Engineer
Florida Power Corporation
3201 34th Street South
St. Petersburg, Florida 33711

Re: Bartow Plant Annual Compliance Testing

Dear Mr. Osbourn:

This letter authorizes Florida Power Corporation to conduct a "one time only test" in 1999 of Bartow Unit 1 without the operation of the electrostatic precipitator. The purpose of the test is to provide documentation to the Department that Bartow Unit 1 is capable of meeting all applicable particulate matter emissions limits without the control device in operation. In addition, the test results will allow the Department to determine potential applicability of the Compliance Assurance Monitoring rule as it relates to the electrostatic precipitator. Florida Power Corporation has committed to the continued operation and maintenance of the electrostatic precipitator and this test is to be in addition to the normal annual compliance test conducted with the operation of the electrostatic precipitator.

If you have any other questions, please contact Edward J. Svec at 850/921-8985.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/s

cc: Mr. Bill Thomas, P.E., FDEP SWD
Mr. Jerry Kissel, P.E., FDEP SWD
Mr. Gary Robbins, PDEM
Mr. Bill Proses, FDEP SWD

*5/6/99 cc: Reading File
Ed Svec*



RECEIVED

February 24, 1999

MAR 02 1999

Mr. Clair Fancy, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

BUREAU OF AIR REGULATION

BAR conference room

Dear Mr. Fancy:

March 17 (10-12 noon, 1-3 p.m.)

Re: Status of Title V Permits

As you know, several of Florida Power Corporation's (FPC) Title V permits remain in the Initial Draft or Revised Draft stages and progress is being made very slowly. This is no one's fault in particular; it's difficult to establish any momentum when the involved parties are processing so many permits and some of the issues (e.g., periodic monitoring) are moving targets. As you and Mr. Scott Osbourn recently discussed, it may be helpful if all involved parties at FPC and the Department were to meet at one time to discuss any remaining unresolved issues.

FPC proposes, with your concurrence, to arrange for a one- or two-day meeting between FPC and the Department to resolve issues associated with the following Title V permits that remain in either the Initial Draft or Revised Draft stage: Anclote, Bartow, Crystal River, Suwannee, Tiger Bay, Bayboro and the University of Florida. It would be desirable to have you, Scott Sheplak and the permit engineers responsible for these facilities in attendance. Mr. Scott Osbourn and I will represent FPC.

It is FPC's desire to advance these Title V permits to the Final Permit stage as expeditiously as possible. FPC has recently requested additional extensions of time on the above-mentioned permits until April 1, 1999 and would like to resolve these permits prior to that date. We will contact you in the next day or two to coordinate a meeting date. If you should have any questions in the meantime, please contact either Scott Osbourn at (727) 826-4258 or me at (727) 826-4334.

Sincerely,

[Handwritten signature of J. Michael Kennedy]

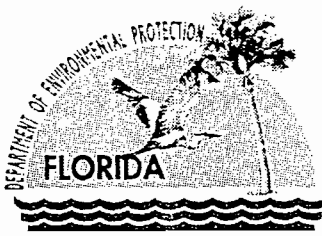
J. Michael Kennedy, O.E.P.
Manager, Air Programs

cc: Scott Sheplak
Doug Beason, OGC
Jeffrey Brown, OGC
Robert Manning, HGS&S

processor

Anclote Mike
Bartow Ed
Crystal Ed
Suwannee Bruce
Tiger Bay Jonathan
Bayboro Ed
UofF Bruce

{ See responses to FPC comments for Bartow or Crystal River for consistency }



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

January 28, 1999

Mr. W. Jeffrey Pardue, C.E.P.
Director, Environmental Services
Florida Power Corporation
P.O. Box 14042
St. Petersburg, FL 33733

Re: Response to Comments
File No. 1030011-002-AV
Bartow Plant, Pinellas County

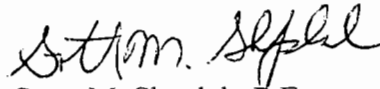
Dear Mr. Pardue:

In addition to the Department's original responses to your comments addressed in our letter dated January 25, 1999, we will revise the Statement of Basis and the description in **Section III. A.** for Unit 1 to read, as follows:

Unit No. 1 is a front-fired, fossil fuel steam generator which produces 120 megawatts, electric, power. The maximum heat input rate is 1,220 million Btu per hour and the unit fires No. 6 fuel oil, No. 2 fuel oil, and on-specification used oil. Particulate matter emissions are controlled by a General Electric Services, Inc. Model 1-BAB1.2X37(9)36.0-434-4.3P electrostatic precipitator (ESP) consisting of five fields in depth. The application for the permit to construct indicates this ESP was designed to operate when utilizing a coal/oil mixture, which is no longer burned by FPC. The permittee claims, moreover, because Unit 1 is oil-fired, this unit is capable of meeting the applicable particulate matter and opacity limits in Conditions A.7. and A.8. without the use of the ESP and, therefore, the provisions of 40 CFR Part 64 do not apply. A Durag Model 281 Continuous Emissions Monitor for opacity with a recorder is used for continual observation of stack opacity. Unit 1 began commercial service in 1958.

If you have any questions or require any additional information, please call me at 850/921-9532 or Edward J. Svec at 850/921-8985.

Sincerely,



Scott M. Sheplak, P.E.
Administrator
Title V Section

SMS/es

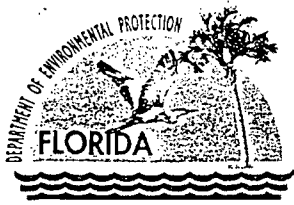
copy to:

Ken Kosky, P.E., Golder Associates

Mr. Bill Thomas, P.E., DEP Southwest District, Air Section

Mr. Gary Robbins, PCDEM, Air Quality Division

1/29/99 cc: Ed Svec
Reading File



Ed SVEC

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

March 27, 1998

Mr. Scott H. Osbourn
Senior Environmental Engineer
Florida Power Corporation
P.O. Box 14042
St. Petersburg, FL 33733

Re: Comments on DRAFT Title V Permit
File No. 1030011-002-AV
Bartow Plant, Pinellas County

Dear Mr. Osbourn:

We received your comments dated November 11, 1997 on the Draft Title V permit for the Bartow Plant. The following comments are in response to your comments. We included revised language where necessary to clearly show the revisions or changes to the permit. We often did not include the revised language when we agreed with the requested change. Nothing in the following changes will require the publication of a new Notice of Intent to Issue, nor will they prevent the issuance of the Proposed permit.

Please advise if your comments have been adequately addressed, or if you have comments on the other changes so that we may proceed to the Proposed permit stage. If you should have any questions, please call Edward J. Svec at 850/921-8985.

Sincerely,

A handwritten signature in cursive script that reads "Scott M. Sheplak".

Scott M. Sheplak, P.E.
Administrator
Title V Section

SMS/es

attachment

copy to:

Mr. W. Jeffrey Pardue, C.E.P., FPC
Ken Kosky, P.E., Golder Associates
Mr. Bill Thomas, P.E., DEP Southwest District, Air Section
Mr. Gary Robbins, PCDEM, Air Quality Division

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 1030011-002-AV

Page 1 of 16

I. Public Notice.

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" to Florida Power Corporation for the Bartow Plant located at Weedon Island, St. Petersburg, Pinellas County was clerked on October 1, 1997. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in the Tampa Tribune on November 18, 1997. The DRAFT Title V Air Operation Permit was available for public inspection at the Pinellas County Department of Environmental Management Air Quality Division in Clearwater and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on December 18, 1997.

II. Public Comment(s).

Comments were received and the DRAFT Title V Operation Permit was changed. The comments were not considered significant enough to reissue the DRAFT Title V Permit and require another Public Notice. Comments were received from two respondents during the 30 (thirty) day public comment period. Listed below is each comment letter in the chronological order of receipt and a response to each comment in the order that the comment was received. The comment(s) will not be restated. Where duplicative comments exist, the original response is referenced.

A. Letter from Mr. Gary Robbins, Pinellas County Department of Environmental Management Air Quality Division dated October 17, 1997, and received on October 22, 1997.

1.R: The Department agrees with the comment and as a result the rule cite for **Section II. Facility-wide Conditions.**, specific condition **2.** is changed as follows:

From: **2. Not federally enforceable.** General Pollutant Emission Limiting Standards.
Objectionable Odor Prohibited. No person shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.; and, Pinellas County Ordinance No. 89-70, Subpart 6.620, as amended]

To: **2. Not federally enforceable.** General Pollutant Emission Limiting Standards.
Objectionable Odor Prohibited. No person shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.; and, Pinellas County Ordinance 97-05, Section 33, Sec. 58-178]

2.R: The Department disagrees with the comment. The applicable requirement for frequency of testing in Rule 62-297.310(7), F.A.C. states that “During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for...”. The test date can be agreed upon by the regulatory agency and the permittee but there is no rule basis for establishing a specific testing date. The condition will remain as noticed.

3.R: The Department agrees with the comment, except for specific condition E.19. which will remain as noticed. As a result of the comment, the following changes are made:

From:

A.28., E.18., C.15., and D.13. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

.....

A.35., B.23., and D.14. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

.....

A.36. In order to document continuing compliance with specific condition A.11., the permittee

.....

(h) The total of used oil burned at the facility for the most recent consecutive 12-month period. These records shall be recorded in a permanent form suitable for inspection by the Department upon request, and shall be retained for at least a five year period.

[40 CFR 279.65 & 66; 40 CFR 761.20(3)(b); and, Rule 62-4.070(3), F.A.C.]

B.21. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.]

C.7. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

C.18. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

[Rule 62-297.310(8), F.A.C.]

E.18. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, the owner or operator shall notify the Department's Southwest District Office, if a generator is located in Pasco County, in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

To:

A.28., B.18., C.15., and D.13. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which

9. The owner or operator shall notify the PCDEM, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the PCDEM, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the PCDEM.

.....

A.35., B.23., and D.14. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the PCDEM on the results of each such test.
- (b) The required test report shall be filed with the PCDEM as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the PCDEM to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

.....

A.36. In order to document continuing compliance with specific condition A.11., the permittee

....

- (h) The total of used oil burned at the facility for the most recent consecutive 12-month period. These records shall be recorded in a permanent form suitable for inspection by the PCDEM upon request, and shall be retained for at least a five year period.

[40 CFR 279.65 & 66; 40 CFR 761.20(3)(b); and, Rule 62-4.070(3), F.A.C.]

B.21. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify PCDEM in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by PCDEM.

[Rule 62-210.700(6), F.A.C.]

C.7. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by PCDEM for longer duration.

[Rule 62-210.700(1), F.A.C.]

C.18. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with PCDEM on the results of each such test.
- (b) The required test report shall be filed with PCDEM as soon as practical but no later than 45 days after the last sampling run of each test is completed.

[Rule 62-297.310(8), F.A.C.]

E.18. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, the owner or operator shall notify the PCDEM, if a generator is located in Pinellas County, in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the PCDEM.

[Rule 62-210.700(6), F.A.C.]

4.R: This specific condition was carried over from the current operating permits for the three emissions units. The condition states that for the purpose of the annual operating report, particulate matter emissions are calculated using the particulate matter stack test results and the other pollutants are estimated using emission factors and fuel usage. Since there are no required stack tests for the other pollutants cited in the condition, the Department fails to see how stack test results are used to calculate emissions of the other pollutants. The condition will remain unchanged.

5.R: The Department agrees with the comment and will change specific conditions **A.41.** and **D.15.**, as follows:

From:

A.41. E.U. ID No. -001 Operation and Maintenance Plan. The 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 Operation and Maintenance (O&M) Plan, dated 10/04/93 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. A timetable of routine weekly, bi-weekly, or monthly observations of the pollution control device.
3. A list of the type and quantity of the required spare parts which are stored on the premises for the pollution control device.
4. A record log which shows at a minimum when maintenance was performed, what maintenance was performed, and by whom.

[Rule 62-296.700(6), F.A.C.; and Pinellas County Ordinance No. 89-70, Subpart 2.230, as amended]

D.15. Not Federally Enforceable. Operation and Maintenance Plan. The permittee shall follow the Operation and Maintenance (O&M) Plan received June 4, 1993 and on file with the PCDEM. 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. Timetable for routine maintenance of the pollution control device as specified by the manufacturer.
3. A timetable of routine weekly, bi-weekly, or monthly observations of the pollution control device.
4. A list of the type and quantity of the required spare parts which are stored on the premises for the pollution control device.
5. A record log which shows at a minimum when maintenance was performed, what maintenance was performed, and by whom.

[Pinellas County Ordinance No. 89-70, Section 3, Subpart 2.230(1) & (2), adopted January 2, 1990]

To:

A.41. E.U. ID No. -001 Operation and Maintenance Plan. The 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 Operation and Maintenance (O&M) Plan, dated 10/04/93 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. A timetable of routine weekly, bi-weekly, or monthly observations of the pollution control device.
3. A list of the type and quantity of the required spare parts which are stored on the premises for the pollution control device.
4. A record log which shows at a minimum when maintenance was performed, what maintenance was performed, and by whom.

[Rule 62-296.700(6), F.A.C.; and Pinellas County Ordinance 97-05, Section 22, Sec. 58-128]

D.15. Not Federally Enforceable. Operation and Maintenance Plan. The permittee shall follow the Operation and Maintenance (O&M) Plan received June 4, 1993 and on file with the PCDEM. 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. Timetable for routine maintenance of the pollution control device as specified by the manufacturer.
3. A timetable of routine weekly, bi-weekly, or monthly observations of the pollution control device.
4. A list of the type and quantity of the required spare parts which are stored on the premises for the pollution control device.
5. A record log which shows at a minimum when maintenance was performed, what maintenance was performed, and by whom.

[Pinellas County Ordinance 97-05, Section 22, Sec. 58-128]

6.R: See response **A.2.R:**, above.

7.R: See response **A.2.R:**, above.

B. Letter from Mr. Scott Osbourn, Florida Power Corporation dated November 11, 1997, and received on November 24, 1997.

General Comments

1.R: The Department agrees with the comment. See the following section where this comment is addressed.

2.R: The Department acknowledges the comment. A copy of the public notice and the proof of publication has been sent to the attention of Mr. Scott Osbourn.

3.R: The Department agrees with the comment and the following change is made to the Table of Contents:

From:

- III. Emissions Unit(s) and Conditions
 - A. Emissions Units -001 No. 1 Unit, Fossil Fuel Fired Steam Generator..... 6 - 21
with Electrostatic Precipitator
 - 002 No. 2 Unit, Fossil Fuel Fired Steam Generator
 - 003 No. 2 Unit, Fossil Fuel Fired Steam Generator

To:

- III. Emissions Unit(s) and Conditions
 - A. Emissions Units -001 No. 1 Unit, Fossil Fuel Fired Steam Generator..... 6 - 21
with Electrostatic Precipitator
 - 002 No. 2 Unit, Fossil Fuel Fired Steam Generator
 - 003 No. 3 Unit, Fossil Fuel Fired Steam Generator

4.R: The Department agrees with the comment. See the following section where this comment is addressed.

Section II. Facility-wide Comments

5.R: The Department agrees with the comment and the following changes are made to Section II., Facility-wide Conditions:

From:

2. Not federally enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.; and, Pinellas County Ordinance 97-05, Section 33, Sec. 58-178]

To:

2. Not federally enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.; and, Pinellas County Ordinance 97-05, Section 33, Sec. 58-178]

6.R: The request to change condition 3 of the Facility-wide Conditions is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

7.R: Pursuant to rule change, the term “exempt” will be changed to “insignificant” where appropriate throughout the permit.

8.R: The request to change condition 7 of the Facility-wide Conditions is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

Section III. Subsection A.

9.R: The Department disagrees with the comment. The Department has addressed the issue of the electrostatic precipitator in a letter dated June 24, 1996 which references “PSD Applicability Determination - Bartow Unit No. 1 PSD”, so no change will be made.

10.R: The requested change is not consistent with other permits issued by this office, so no change will be made.

11.R: The Department acknowledges the comment. In response, the Department will add the following permitting note:

Add:

{Permitting Note: 40 CFR 761.20, dated March 18, 1996, defines “quantifiable level” of PCBs as 2 parts per million.}

In addition, the Federal rule was incorrectly cited and will be changed from 40 CFR 271.20(e)(3) to 40 CFR 761.20(e)(3).

12.R: The Department agrees with the comment and as a result of the comment, condition A.6. is changed as follows:

From:

A.6. Visible Emissions - Soot Blowing and Load Change. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit’s rated capacity and which occurs at a rate of 0.5 percent per minute or more.

Visible emissions above 60 percent opacity shall be allowed for not more than 4, six (6) - minute periods, during the 3-hour period of excess emissions allowed under this subparagraph, for boiler cleaning and load changes, at units which have installed and are operating, or have committed to install or operate, continuous opacity monitors.

[Rules 62-210.700(3) and 62-296.702(2)(b), F.A.C.]

To:

A.6. Visible Emissions - Soot Blowing and Load Change. Visible emissions resulting from boiler cleaning (soot blowing) and load change shall be permitted provided the duration of such excess emissions shall not exceed 3 hours in any 24-hour period and visible emissions shall not exceed 60 percent opacity, and providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of the excess emissions shall be minimized.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

Visible emissions above 60 percent opacity shall be allowed for not more than 4, six (6) - minute periods, during the 3-hour period of excess emissions allowed under this subparagraph, for boiler cleaning and load changes, at units which have installed and are operating, or have committed to install or operate, continuous opacity monitors.

Particulate matter emissions shall not exceed an average of 0.3 lbs. per million Btu heat input during the 3-hour period of excess emissions allowed by this subparagraph.

[Rules 62-210.700(3) and 62-296.702(2)(b), F.A.C.]

13.R: The request to change condition **A.7.** is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

14.R: The request to change condition **A.9.** is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

15.R: The Department feels that the used oil conditions are consistent with the other permits issued by this office.

16.R: The operating permit for this emissions unit specifies that an opacity monitor is required for determining compliance with the opacity standard. The condition will remain as noticed.

17.R: The Department agrees with the comment. Specific condition **A.19.** will be changed as follows:

From:

A.19. Visible emissions. The test method for visible emissions shall be:

a. E.U. ID Nos. -001, -002 and -003 EPA Method 9, incorporated in Chapter 62-297, F.A.C.

b. E.U. ID No. -001 Continuous opacity monitor.

[Rule 62-296.702(3)(a)1., F.A.C.; and, AO 52-233149]

To:

A.19. Visible emissions. The test method for visible emissions shall be:

a. E.U. ID Nos. -001, -002 and -003 EPA Method 9, incorporated in Chapter 62-297, F.A.C.

b. E.U. ID No. -001 Continuous opacity monitor.

[Rule 62-296.702(3)(a), F.A.C.; and, AO 52-233149]

18.R: The request to change condition **A.26.** is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

19.R: The request to change condition A.28. is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

20.R: The request to change condition A.32. is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

21.R: The requirements in condition A.39. were established by the compliance authority and will remain.

22.R: The facility is within the area of influence of a particulate matter maintenance area and this applicable requirement will remain.

23.R: See response B.9.R:, above.

Section III. Subsection B.

24.R: The Department assumes the comment addresses condition B.17. rather than condition A.26. See response B.18.R:, above.

25.R: The request to change conditions B.18. and B.20. is not consistent with other permits issued by this office, and the conditions as written are clear, so no changes will be made.

Section III. Subsection C.

26.R: The request to change condition C.1. is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

27.R: The Department agrees with the comment and the following change will be made:

From:

C.9. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery. See specific condition C.12.
[Rule 62-213.440, F.A.C.]

To:

C.9. **Not federally enforceable.** The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery. See specific condition C.12.
[Rule 62-213.440, F.A.C.]

28.R: The process variable required to be determined is heat input. The condition is an applicable requirement.

29.R: This language is contained in the emissions units' current operating permits. Since the applicant did not request capacity to be defined as 95 to 100 percent of the peak heat input rate, as specified in the guidance document, the condition will remain as noticed.

30.R: The Department assumes the comment addresses condition **C.14.** rather than condition **A.26.** See response **B.18.R.;** above.

31.R: See response **B.21.R.;** above.

Section III. Subsection D.

32.R: The applicant had previously requested that particulate matter emissions not exceed 1.0 pound per hour and 0.35 ton per year, see condition **D.4.,** in order to escape the requirements of RACT for particulate matter. This limits the transfer of flyash to 700 hours per year. The condition will remain as noticed.

33.R: The request to change condition **D.4.** is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

34.R: The process rate is described in condition **D.1.** The condition will remain as noticed.

35.R: The request to change condition **D.7.** is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

36.R: The request to change condition **D.8.** is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

37.R: See response **B.18.R.;** above.

38.R: The request to change conditions **D.11., D.12., D.13.** and **D.14.** is not consistent with other permits issued by this office, and the conditions as written are clear, so no changes will be made.

Section III. Subsection E.

39.R: The Department disagrees that condition **E.22.** contains no requirements requiring compliance. This condition supports a source obligation made by the permittee to escape PSD review. However, in order to make this subsection more consistent with the other permits which address the three relocatable diesel generators, the following changes are made:

From:

Subsection E. This section addresses the following emissions unit(s).

<u>E.U.</u>	<u>Brief Description</u>
<u>ID No.</u> -xxx	Relocatable Diesel Fired Generator(s)

These relocatable emissions units are Caterpillar Model 3508-DITA 820 kilowatt diesel generators. The maximum heat input is 25.74 million Btu per hour (MMBtu/hour) while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum rating of 2460 kilowatts. Emissions from the generators are uncontrolled. The generators may be relocated at any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Higgins Plant, Shore Drive, Oldsmar, Pinellas County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. The future FPC Polk County Site, County Road 555, 1 mi. southwest of Homeland, Polk County.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. Each generator has its own stack.}

E.1. Permitted Capacity. The maximum operation heat input rate for each generator shall not exceed 25.74 million Btu per hour.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

E.3. Methods of Operation - Fuels. Only new low sulfur No. 2 fuel oil shall be fired in the combustion turbine(s).
[Rule 62-213.410, F.A.C.]

E.4. Hours of Operation. The hours of operation expressed as "engine-hours" shall not
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, AO 09-205952.]

E.5. Visible Emissions. Visible emissions from each generator
[Rule 62-296.320(4)(b)1., F.A.C.; and, AO 09-205952.]

E.6. Sulfur Dioxide - Sulfur Content. The sulfur content of the new No. 2 fuel oil shall not exceed 0.50 percent, by weight.
[Requested in initial Title V permit application dated June 12, 1996; and, AC 09-202080.]

E.13. Operating Rate During Testing. Testing of emissions shall be conducted with the generator(s) operating at 90 to 100 percent of the maximum fuel firing rate of 186.3 gallons per hour. If it is impracticable to test at permitted capacity, an emissions unit may be tested [Rules 62-297.310(2), F.A.C.; and, Permit AO 09-205952.]

E.17. After each relocation, each generator shall be tested within 30 days of startup for opacity and the fuel shall be analyzed for the sulfur content. See specific conditions B.6, B.9, and B.12. [Rules 62-4.070(3) and 62-297.310(7)(b),F.A.C.; and, AO 09-205952.]

E.21. To demonstrate compliance with specific condition E.6., records of the sulfur content, [Rule 62-297.310(8), F.A.C.; and, AO 09-205952.]

E.22. Specific conditions in construction permit AC 09-202080, limiting [Rule 62-212.400(2)(g), F.A.C.; and, AC 09-202080 and AO 09-205952.]

To:

Subsection E. This section addresses the following emissions unit(s).

Facility ID No.	E. U. ID No.	Brief Description
7775047	-001	Three relocatable diesel fired generators, rated at 0.82 MW, 8.58 mmBtu/hr while being fueled by 62.1 gallons of new number 2 fuel oil per hour, with emissions exhausted through a 15 ft. stack.

These relocatable emissions units are Caterpillar Model 3508-DITA 820 kilowatt diesel generators. The generators may be relocated to any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Higgins Plant, Shore Drive, Oldsmar, Pinellas County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. The future FPC Polk County Site, County Road 555, 1 mi. southwest of Homeland, Polk County.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. Each generator has its own stack. This section of the permit is only applicable when the generator(s) is(are) located at the Bartow Facility.}

E.1. Permitted Capacity. The maximum heat input rate for each generator shall not exceed 8.58 million Btu per hour.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

E.3. Methods of Operation - Fuels. Only new No. 2 fuel oil with a maximum sulfur content of 0.5% by weight shall be fired in the diesel generator(s).

[Rule 62-213.410, F.A.C. and, AC 09-202080.]

E.4. Hours of Operation. The hours of operation expressed as “engine-hours” shall not

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, AC 09-202080.]

E.5. Visible Emissions. Visible emissions from each generator

[Rule 62-296.320(4)(b)1., F.A.C.; and, AC 09-202080.]

Monitoring of Operations

E.6. Fuel Sulfur Analysis. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor or permittee upon each fuel delivery. See specific conditions **E.12.** and **E.21.**

[Rule 62-213.440, F.A.C.]

E.13. Operating Rate During Testing. Testing of emissions shall be conducted with the generator(s) operating at 90 to 100 percent of the maximum fuel firing rate of 62.1 gallons per hour, for each generator. If it is impracticable to test at permitted capacity, an emissions unit may be tested.....

[Rule 62-297.310(2), F.A.C.; and, AC 09-202080.]

E.17. After each relocation, each generator shall be tested within 30 days of startup for opacity and the fuel shall be analyzed for the sulfur content. See specific conditions **E.3.**, **E.9.**, and **E.12.**

[Rules 62-4.070(3) and 62-297.310(7)(b), F.A.C.; and, AO 09-205952.]

E.21. To demonstrate compliance with specific condition **E.3.**, records of the sulfur content,

[Rule 62-297.310(8), F.A.C.; and, AC 09-202080.]

E.22. Specific conditions in construction permit AC 09-202080, limiting

[Rule 62-212.400(2)(g), F.A.C.; and, AC 09-202080.]

Section IV. Acid Rain Part.

40.R: Condition A.1.a refers to the application by referencing the date of FPC’s application, so no change will be made.

41.R: The requested deletion of condition A.5. is not consistent with other permits issued by this office, so the condition will not be deleted.

42.R: The request to move condition A.4. to the facility-wide section of the permit is not consistent with other permits issued by this office, so the condition will not be moved.

Appendix U-1, List of Unregulated Emissions Units and/or Activities.

43.R: The list of unregulated emissions units and/or activities was compiled from information submitted in the permit application. If the applicant feels there is duplication or the information submitted was incorrect, the Department will require a statement from the responsible official which identifies the items needing correction and a certification that the information is accurate. Otherwise the appendix will remain as noticed.

Permit Summary Tables, Table 1-1.

44.R: The Department will make all necessary corrections to Tables 1-1 and 2-1 to reflect the changes made in responding to the comments from both PCDEM and FPC.

C. Title V permitting formats were updated due to recent rule changes and after considering comments received from the electric utilities. This permit reflects these changes. A brief summary of the changes is below.

1. Recent rule changes changed "exempt activities" to "insignificant activities." Rules 62-213.430(6), F.A.C. and 62-210, F.A.C., reflecting this change went into effect November 13, 1997.

a. The department inserted a condition in Appendix TV-1 clarifying that a Title V source can add an "insignificant activity" at its facility in accordance with the criteria under Rule 62-213.430(6), F.A.C., and include it in the Title V permit's list of "insignificant activities" at the next renewal, in accordance with Rule 62-213.430(6), F.A.C. See condition number 40.

b. Appendix E-1 has been changed to Appendix I-1, and the language of this appendix was revised to refer to insignificant emissions units where appropriate.

c. Appendix U-1 has been revised to refer to insignificant emissions units instead of exempt emissions units.

2. Several changes were made to Appendix TV-1 to reflect the rule changes discussed above, and to properly identify conditions that are not federally enforceable.

a. The following additional rules have been marked as "not federally enforceable":

62-4.030, F.A.C., General Prohibition, (see condition number 1.)

62-4.220, F.A.C., Operation Permit for New Sources, (see condition number 14.)

62-210.300(5), F.A.C., Notification of Startup, (see condition number 19.)

b. Appendix TV-1, now carries a version date of "12/02/97".

3. Since the issuance of the PROPOSED permit was delayed by extensions of time to file for hearing past the first of the year, the following dates are changed, as follows:

From: **Effective Date:** January 1, 1998
 Renewal Application Due Date: July 5, 2002
 Expiration Date: December 31, 2002

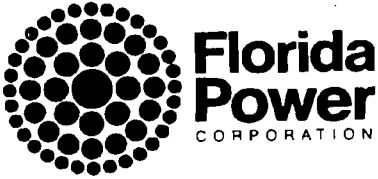
To: **Effective Date:** January 1, 1999
 Renewal Application Due Date: July 5, 2003
 Expiration Date: December 31, 2003

D. Document(s) on file with the permitting authority:

- Letter received October 17, 1997, from Mr. Gary Robbins.
- Letter received November 24, 1997, from Mr. Scott Osbourn.

III. Conclusion.

The permitting authority hereby issues the PROPOSED Permit No.: 1030011-002-AV, with any changes noted above.



March 24, 1998

Ms. Kathy Carter, Clerk
Office of General Counsel
Florida Department of Environmental Protection
Room 638
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

RECEIVED

MAR 30 1998

**BUREAU OF
AIR REGULATION**

Dear Ms. Carter:

RE: Florida Power Corporation, Bartow Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 1030011-002-AV

On October 6, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until March 31, 1998. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including April 30, 1998.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (813) 866-5158.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue", written over a circular scribble.

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

A handwritten signature in black ink, appearing to read "Robert Manning", written in a cursive style.

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC

3/30/98 cc: Scott Sheplak
Ed Svec

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

~~SECRET~~
RECEIVED

APR 10 1998

BUREAU OF
AIR REGULATION

FLORIDA POWER CORPORATION,

Petitioner,

vs.

OGC CASE NO. 97-1835

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

_____/

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, Florida Power Corporation, to grant an extension of time to file a petition for an administrative hearing on Application No. 1030011-002-AV. See Exhibit 1.


Respondent, State of Florida Department of Environmental Protection, has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until April 30, 1998, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Mail Station 35, Department of Environmental Protection, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 6th day of April, 1998, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


F. PERRY ODOM
General Counsel

Douglas Building, MS #35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (904) 488-9314

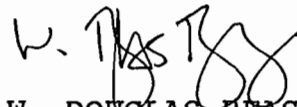
CERTIFICATE OF SERVICE

I CERTIFY that a true copy of the foregoing was mailed to:

W. Jeffrey Pardue, C.E.P.
Director
Florida Power Corporation
3201 Thirty-fourth Street South
St. Petersburg, FL 33733

on this 9th day of April, 1998.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


W. DOUGLAS BEASON
Assistant General Counsel
Florida Bar No. 379239

Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (904) 488-9730



RECEIVED

MAR 24 1998

Dept. of Environmental Protection
Office of General Counsel

March 24, 1998

Ms. Kathy Carter, Clerk
Office of General Counsel
Florida Department of Environmental Protection
Room 638
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

Dear Ms. Carter:

RE: Florida Power Corporation, Bartow Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 1030011-002-AV

On October 6, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until March 31, 1998. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including April 30, 1998.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (813) 866-5158.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue", written over a circular stamp.

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

A handwritten signature in black ink, appearing to read "Robert Manning", written in a cursive style.

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC

RECEIVED

MAR 17 1998

BUREAU OF
AIR REGULATION

Mr. EL Svec

to: EL

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

FLORIDA POWER CORPORATION,
Petitioner,

vs.

OGC CASE NO. 97-1835

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, Florida Power Corporation, to grant an extension of time to file a petition for an administrative hearing on Application No. 1030011-002-AV. See Exhibit 1.

Respondent, State of Florida Department of Environmental Protection, has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until March 31, 1998, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Mail Station 35, Department of Environmental Protection, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 10th day of March, 1998, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


F. PERRY ODOM
General Counsel

Douglas Building, MS #35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (904) 488-9314


CERTIFICATE OF SERVICE

I CERTIFY that a true copy of the foregoing was mailed
to:

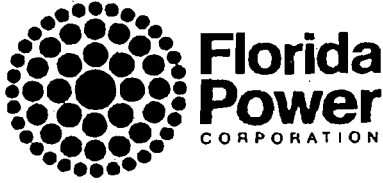
W. Jeffrey Pardue, C.E.P.
Director
Florida Power Corporation
3201 Thirty-fourth Street South
St. Petersburg, FL 33733

on this 10th day of March, 1998.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

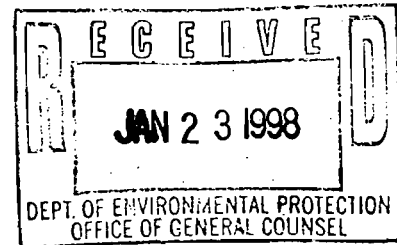

W. DOUGLAS BEASON
Assistant General Counsel
Florida Bar No. 379239

Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (904) 488-9730



January 23, 1998

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
Room 638
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000



Dear Ms. Carter:

RE: Florida Power Corporation, Bartow Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 1030011-002-AV OGC NO. 97-1835

On October 6, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until January 30, 1998. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including February 27, 1998.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue".

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

A handwritten signature in black ink, appearing to read "Robert A. Manning".

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC



3/2

EASvec

February 26, 1998

Ms. Kathy Carter, Clerk
Office of General Counsel
Florida Department of Environmental Protection
Room 638
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

Dear Ms. Carter:

RE: Florida Power Corporation, Bartow Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 1030011-002-AV

On October 6, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until February 27, 1998. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including March 31, 1998.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (813) 866-5158.

Sincerely,

A handwritten signature in cursive script, appearing to read "W. Jeffrey Pardue".

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

A handwritten signature in cursive script, appearing to read "Robert A. Manning".

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC



December 30, 1997

Ms. Kathy Carter, Clerk
Office of General Counsel
Florida Department of Environmental Protection
Room 638
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

Dear Ms. Carter:

RE: Florida Power Corporation, Bartow Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 1030011-002-AV

On October 6, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until January 8, 1998. In a discussion with Mr. Robert Manning, Mr. Ed Svec of the Department agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including January 30, 1998.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (813) 866-5158.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue", written over a horizontal line.

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

A handwritten signature in black ink, appearing to read "Robert A. Manning", written over a horizontal line.

Robert A. Manning, Esq. *firm*
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC

RECEIVED

JAN 02 1998

**BUREAU OF
AIR REGULATION**

**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

FLORIDA POWER CORPORATION,

Petitioner,

vs.

OGC CASE NO. 97-1835

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, Florida Power Corporation, to grant an extension of time to file a petition for an administrative hearing on Application No. 1030011-002-AV. See Exhibit 1.

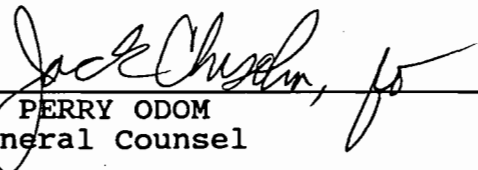
Respondent, State of Florida Department of Environmental Protection, has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until January 2, 1998, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Mail Station 35, Department of Environmental Protection, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 9th day of December, 1997, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


F. PERRY ODOM
General Counsel

Douglas Building, MS #35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (904) 488-9314

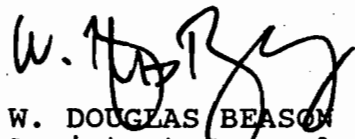
CERTIFICATE OF SERVICE

I CERTIFY that a true copy of the foregoing was mailed to:

W. Jeffrey Pardue, C.E.P.
Director
Florida Power Corporation
3201 Thirty-fourth Street South
St. Petersburg, FL 33733

on this 12th day of December, 1997.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


W. DOUGLAS BEASON
Assistant General Counsel
Florida Bar No. 379239

Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (904) 488-9730

97-1835 P.3



October 20, 1997

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
2800 Blair Stone Rd.
Tallahassee, FL 32399-2400

Dear Ms. Carter:

RE: Florida Power Corporation, Bartow Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 1030011-002-AV

On October 6, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including November 6, 1997.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP



December 4, 1997

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
Room 638
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

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DEC 08 1997

BUREAU OF
AIR REGULATION

Dear Ms. Carter:

RE: Florida Power Corporation, Bartow Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 1030011-002-AV

On October 6, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until December 8, 1997. Mr. Scott Osbourn of my staff has had discussions with Mr. ~~Scott Sheplak~~ of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including January 20, 1998.

Clair
Fancy

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC

12/8/97 cc: Scott Sheplak
Ed Svec



November 11, 1997

RECEIVED

NOV 24 1997

**BUREAU OF
AIR REGULATION**

Mr. Scott M. Sheplak, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Florida Power Corporation, Bartow Facility
DRAFT Title V Permit No. 1030011-002-AV

Dear Mr. Sheplak:

On behalf of Florida Power Corporation (FPC), attached are comments regarding the DRAFT Title V permit for the Bartow Facility as identified above. FPC appreciates the Department's efforts in processing this permit and understands the need to resolve these issues in as timely a manner as possible. In this regard, DEP agreed to grant FPC's Request for Extension of Time until December 8, 1997. If we are unable to reach a resolution of these comments within this time period, we would appreciate the opportunity to file an additional Request for Extension of Time. Accordingly, please contact me at (813) 866-5158 as soon as you have had a chance to review these comments to set up either a telephone or in-person conference. Thank you again for your consideration of our comments.

Sincerely,

Scott H. Osbourn,
Senior Environmental Engineer

cc: Clair Fancy, P.E., DEP
Ed Svec DEP
Ken Kosky, P.E., Golder Associates
Robert Manning, HGS&S

**FLORIDA POWER CORPORATION
COMMENTS ON DRAFT TITLE V PERMIT
BARTOW FACILITY**

General Comments

1. FPC understands that Appendix TV-1, Title V Conditions, is expected to be revised within the next few weeks. FPC requests that its Title V permit reflect the most up-to-date version of this Appendix.
2. FPC understands that DEP will publish the Intent to Issue Title V Air Operation Permit. Because the applicant is ultimately responsible for the publication of the Intent to Issue, FPC requests that DEP provide a copy of the Notice intended to be published, as well as proof of publication.
3. On the Table of Contents page, Section III, Emission Unit A -003, the emission unit number should be "No. 3 Unit," instead of "No. 2 Unit."
4. On the placard page, FPC expects the need for the following revisions: (1) the "Effective Date" should be changed to January 1, 1999, (2) the "Renewal Application Due Date" should be changed to July 5, 2003, and (3) the "Expiration Date" should be changed to December 31, 2003.

Section II., Facility-wide Conditions.

1. Condition 2. FPC requests the following revision: **"No person shall not cause, suffer, allow, or permit"**
2. Condition 3. For clarity and to make this Condition specific to FPC's Bartow Facility, FPC requests that Condition 3. be edited as follows:

~~Except as otherwise provided in this permit for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause~~

Also, because the reference to Chapter 62-297 in the last sentence of Condition 2. appears to be misplaced, FPC requests Condition 2. be edited as follows: **"EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C."**

3. Condition 6. In the context of this permit, how does DEP intend to respond to EPA's comments regarding the need to change the phrase "exempt" to "insignificant"?
4. Condition 7. For clarity, FPC requests that the first sentence of this Condition be edited as follows: **"The permittee shall not allow no person to store, pump,"**

Section III. Subsection A.

1. FPC requests that the third sentence in the description to Unit 1 be deleted because there is no federally enforceable requirement mandating the use of an ESP for this unit and the original basis for installing and utilizing the ESP no longer exists. Specifically, FPC originally installed the ESP to control particulate emissions while firing a coal/oil mixture (COM). FPC has not fired COM since 1987 and this fuel was not included as a segment in FPC's Title V application for this source. FPC's construction permit clearly states that the "Use of the precipitator is not required when burning 100% fuel oil" (Condition 1. from AC 52-36102 (issued March 18, 1981)), although subsequent operation permits for the Bartow Unit 1 arguably conflict with this federally enforceable construction permit condition. Based on DARM guidance document DARM PER , "conditions in air operation permits that are extraneous to the conditions that were in the construction permits . . . may be reviewed and corrected in the Title V permit to reflect proper application of the Department's rules." Accordingly, FPC requests that all "extraneous" language in the Title V permit requiring the use of an ESP during periods of firing 100% fuel oil be deleted.

FPC also requests DEP confirmation that prospective nonuse and removal of the ESP cannot trigger PSD or NSPS requirements; if desired, this confirmation can be mutually understood when the above amendments are made to the Title V permit. This conclusion is justified because, as noted above, the ESP was "required" under the construction permit only "to remove particulate matter generated from burning a combination of oil and coal fuel," and the use of the ESP expressly was not required when 100% oil is burned. Therefore, nonuse of the ESP in connection with FPC's return to 100% fuel oil would simply be a return to the circumstances predating the use of the coal/oil fuel, and would be fully consistent with federally enforceable requirements applicable to Unit No. 1. Just as reverting to burning 100% oil without the ESP was permissible (without triggering PSD or NSPS) when the construction permit was originally issued, the same outcome is warranted now.

2. Condition A.1. FPC requests that the reference to No. 6 fuel oil as "new" be deleted because there is no basis for this adjective. FPC understands that No. 2 fuel oil may sometimes need to be referred to as "new" to differentiate it from used oil, but this is not the case for No. 6 oil. Also, FPC requests that the citation to Rules 62-296.405 and 62-296.702 in this Condition be deleted because there is no apparent basis for their inclusion.

3. Condition A.3. FPC requests that this Condition be deleted because it is redundant to Condition A.1. If needed, the narrative condition at the bottom of page 7 could simply be added to Condition A.1. Also, FPC requests that the language "**any quantifiable levels of PCBs**" be deleted everywhere it appears in this permit and replace with the phrase "**PCBs in quantities greater than 2 ppm.**" This clarification is reflected in the cited references to 40 CFR Part 271.

4. Condition A.6. FPC requests that all of Rule 62-210.700(3), F.A.C. be included either in this Condition or in between Conditions A.15. and A.16.

5. Condition A.7. For clarification, FPC requests the following revisions to this Condition: "**Particulate matter emissions shall not exceed the following during steady state operations, as measured in accordance with Condition A.20 ~~by applicable compliance methods:~~**" Also, the allowable TPY figures for particulate should reflect 21 hr/day at 0.1 lb/MMBtu and 3 hr/day at 0.3 lb/MMBtu. These figures would then be 668 TPY for Unit 1, 721.1 TPY for Unit 2, and 1,210.5 TPY for Unit 3.

6. Condition A.9. For clarification, FPC requests the following revision: "**When burning liquid fuel . . . as measured in accordance with Condition A. 21. by applicable compliance methods.**"

7. Condition A.11. FPC requests that all Title V permit conditions relating to burning used oil be substantially similar to comparable provisions for FPC's other facilities that burn used oil.

8. Condition A.19. The opacity monitors on the three steam units were required by Part 75 of the Acid Rain rules. The appropriate method for determining compliance with the Department's opacity rules is DEP Method 9. FPC requests that the reference to the use of the opacity monitor for Unit 1 be deleted.

9. Condition A.19. The citation to Rule 62-296.702(3)(a)1., F.A.C. is incorrect. Subparagraph 1. does not exist.

10. Condition A.26. Because this permit specifies the compliance method, FPC requests the following amendment: "**2. Opacity Compliance Tests. ~~When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, . . .~~**"

11. Condition A.28. For clarification and to make this Condition specific to FPC's Bartow facility, FPC requests the following revisions: "**(a)4. ~~During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order or this permit, the applicant owner or operator of each emissions unit shall have a formal compliance test conducted for: a. visible emissions; b. Particulate matter; and c. SO₂, if EPA methods 6, 6A, 6B or 6C are utilized to determine compliance. See Condition A.29.~~**" FPC requests that the remainder of paragraph (a)4. be deleted.

12. Condition A.32. The language in paragraph (c) is unclear and appears unwarranted. FPC requests that it be removed.

13. Condition A.39. FPC requests that this Condition be deleted because AP-42 emission factors may change or the mechanism for reporting emissions in the AOR may change. There should be no need for this Condition.

14. Condition A.40. FPC requests that the "Process Parameters" provisions in this Condition be deleted because they are either redundant to other Title V permit conditions or unnecessary. Also, the last sentence of this Condition should be revised as follows: "**Records of inspection . . . shall be made available to the Department or PCDEM for inspection upon request.**"

15. Condition A.41. In accordance with FPC's request to remove the requirement for operation of the ESP for Unit 1, this requirement should be deleted as well.

Section III. Subsection B.

1. Condition A.26. Because this permit specifies the compliance method, FPC requests the following amendment: "**2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method,**"

2. Conditions B.18. and B.20. Because there is only a visible emissions and fuel sulfur content limit on this unit, FPC requests the deletion of the following provisions of Condition B.18.: (1) paragraph (a)2., (a)4.b., (a)4.c., (a)5.; and all of Condition B.20.

Section III. Subsection C.

1. Condition C.1. For clarification and simplification, FPC requests that this Condition simply list "714" as the heat input for each peaking unit for all fuels. Also, specific language should be included in this Condition clarifying that the maximum heat input is based on temperature.

2. Condition C.9. This Condition should be marked "Not Federally Enforceable" because the limit for which it is determining compliance is Not Federally Enforceable.

3. Condition C.10. This Condition should be deleted because there are no standards for which process variables are required to be determined.

4. Condition C.13. This language should reflect the latest DEP guidance regarding the use of heat input curves for compliance testing.

5. Condition A.26. Because this permit specifies the compliance method, FPC requests the following amendment: "**2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method,**"

6. Condition C.19. FPC requests that this Condition be deleted because AP-42 emission factors may change or the mechanism for reporting emissions in the AOR may change. There should be no need for this condition.

Section III. Subsection D.

1. Condition D.3. The 700 hr/yr limitation for the transfer of flyash is inappropriate and should be deleted. The five percent opacity standard provides reasonable assurance that the hourly particulate limit is being attained. An annual limitation on hours is unnecessary. Further, in accordance with all previous comments concerning the ESP, use of the flyash system and all associated limitations will be unnecessary.

2. Condition D.4. For clarification, FPC requests the following language be added to the end of this Condition: "See Condition D.7."

3. Condition D.6. This Condition should be deleted because there are no process variables to determine.

4. Condition D.7. For clarification, FPC requests that the first sentence of this condition be deleted because there is no compliance determination requirement for particulate matter.

5. Condition D.8. For clarification, FPC requests the following revision: "EPA Method 9, incorporated by reference in Chapter 62-297, shall be used to determine opacity compliance pursuant to Chapter 62-297, F.A.C.

6. Condition D.11. Because this permit specifies the compliance method, FPC requests the following amendment: "**2. Opacity Compliance Tests. ~~When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method,~~**"

7. Conditions D.11., D.12., D.13., and D.14. Because there is only a visible emission limit on this unit, FPC requests the deletion of the following provisions in Condition D.11.: paragraphs (b), (c), (d), and (e); all of Condition D.12.; paragraphs (a)4.b., (a)4.c., and (c) in Condition D.13.; and paragraph (c) in Condition D.14.

Section III. Subsection E.

1. The provisions governing the operation of these relocatable generators when they are located at the Bartow facility should be essentially identical to the provisions contained in FPC's Title V permits for Crystal River, Anclote, and Higgins. Also, Condition E.22. should be deleted because there is no requirement for which FPC must comply.

Section IV. Acid Rain Part

1. Condition A.1.a. should reference the actual application that FPC submitted rather than DEP's form number.

2. Conditions A.5. This condition imposes no requirements and therefore should be deleted.

3. Condition A.4. Because this Condition applies to all requirements and units at the Bartow facility, FPC requests that it be moved to the facility-wide section of this permit.

Appendix U-1, List of Unregulated Emissions Units and/or Activities.

1. The listing of the storage tanks in this Appendix appears to contain several duplications. The application listed the same tanks in the list of all exempt/unregulated/trivial units and in the separate list of tanks.

Appendix S. Permit summary Tables

Table 1-1

1. FPC requests that these Tables be revised to reflect the requested revisions in comments above. For example, the annual particulate totals for the three steam units should be revised to reflect soot blowing, as previously commented. Also, a statement should accompany the table to indicate that the emission totals for the combustion turbines are "per turbine".



October 20, 1997

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
2800 Blair Stone Rd.
Tallahassee, FL 32399-2400

Dear Ms. Carter:

RE: Florida Power Corporation, Bartow Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 1030011-002-AV

On October 6, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including November 6, 1997.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Pardue", written over a circular scribble.

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

A handwritten signature in black ink that reads "Robert A. Manning".

Robert A. Manning, Esq.
Hopping Green Sams & Smith

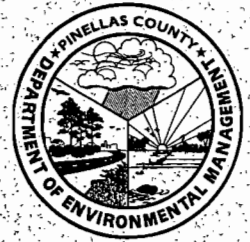
cc: Scott Sheplak, DEP

10/22/97 cc: Scott Sheplak
Ed Srec



PINELLAS COUNTY DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

AIR QUALITY DIVISION
300 SOUTH GARDEN AVENUE
CLEARWATER, FLORIDA 33756



COMMISSIONERS
ROBERT B. STEWART - CHAIRMAN
BARBARA SHEEN TODD - VICE CHAIRMAN
CALVIN D. HARRIS
SALLIE PARKS
STEVE SEIBERT

PHONE: (813) 464-4422
FAX: (813) 464-4420
SUNCOM: 570-4422
SUNCOMFAX: 570-4420

October 17, 1997

Ed Svec
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

OCT 22 1997

BUREAU OF
AIR REGULATION

Re: Florida Power Corporation, Bartow 1030011-002-AV, Draft Permit

Mr. Svec:

This office has reviewed the draft permit (Intent to Issue), for the above mentioned facility. Requested changes are:

- 1. Change the Pinellas rule cite, for objection odor, on Page 4, Section II, Facility-wide Conditions, to read "Pinellas County Ordinance 97-05, Section 33, Sec. 58-178. This ordinance is being incorporated into Pinellas County Code. If this is done prior to permit issuance, DEP will be given the new cite.
2. Since the Utility Boilers already have established baseline test dates, we recommend that wording be included in condition A.28.4., such as: "Test the Utility Boilers annually, within 60 day prior to:

Table with 2 columns: Emission Unit, Base Test Date. Rows: EU 001 (March 15 and September 15), EU 002 (September 15), EU 003 (September 15)

- 3. In condition A.35., A.36., B.18., B.21., B.23., C.7., C.15., C.18. D.13, D.14., E.18., E.19., change the references from the Department to PCDEM, or the Department and PCDEM, or the Department or PCDEM, as appropriate. Note: Should PCDEM be added to Appendix A-1, Abbreviations?



4. In condition A.39, the condition states "...the permittee shall calculate annual particulate matter emissions by multiplying the particulate matter stack test results by the hours of operation... From the inventory side, the annual emissions are determined by taking the test results (for both steady state and excess emissions) and create emission factors for the emission unit in pounds/MMBtu or pounds/1000 gallons. These emission factors are then used to calculate annual emissions, based on the amount of fuel burned during steady state and excess emissions operations.
5. Change the Pinellas rule cite in A.41., and D.15., to read "Pinellas County Ordinance 97-05, Section 22, Sec. 58-128. This ordinance is being incorporated into Pinellas County Code. If this is done prior to permit issuance, DEP will be given the new cite.
6. Since the Pipeline Heating Boiler already has established baseline tests of May 31st, we recommend that wording be included in condition B.18.4., such as: "Test the Pipeline Heating Boiler for visible emissions annually, within 60 day prior to May 31".
7. Since the Peakers already have established baseline tests of February 1st, we recommend that wording be included in condition D.13.4., such as: "Test the Peaking Units for visible emissions annually, within 60 day prior to February 1".

If you have any questions, contact this office at (813) 464-4422 or Suncom 570-4422.

Sincerely,



Gary Robbins, Environmental Program Manager
Air Quality Division

cc: PF(0011), RF

10/22/97 cc = Ed Svec

**PUBLIC NOTICE OF
INTENT TO ISSUE TITLE V
AIR OPERATION PERMIT
STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION**

Title V DRAFT Permit No.:
1030011-002-AV
Bartow Plant
Pinellas County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Florida Power Corporation for the Bartow Plant located at Weedon Island, St. Petersburg, Pinellas County. The applicant's name and address are: Florida Power Corporation, 3201 34th Street South, St. Petersburg, Florida 33711.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V, DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

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 (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 904/488-9730; Fax: 904/487-4938). Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. A petitioner must 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 applicable 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
(b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;

(d) A statement of the material facts disputed by the petitioner, if any;

(e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;

(f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

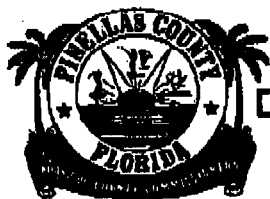
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such 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.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 401 M. Street, SW, Washington, D.C. 20460.

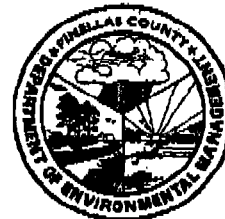
A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive,
Suite 4
Tallahassee, Florida 32301
Telephone: 904/488-1344
Fax: 904/922-6979
Affected District/Local Program:
Pinellas County Department of Environmental Management
Air Quality Division
300 South Garden Avenue
Clearwater, Florida 34616
Telephone: 813/464-4422
Fax: 813/464-4420

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 904/488-1344, for additional information.



PINELLAS COUNTY DEPARTMENT OF ENVIRONMENTAL MANAGEMENT AIR QUALITY DIVISION 300 SOUTH GARDEN AVENUE CLEARWATER, FLORIDA 33766



COMMISSIONERS ROBERT B. STEWART - CHAIRMAN BARBARA SHEEN TODD - VICE CHAIRMAN CALVIN D. HARRIS SALLIE PARKS STEVE SEIBERT

PHONE: (813) 464-4422 FAX: (813) 464-4420 SUNGOM: 570-4422 SUNCOMFAX: 570-4420

October 17, 1997

Ed Svec Department of Environmental Protection 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Re: Florida Power Corporation, Bartow 1030011-002-AV, Draft Permit

Mr. Svec:

This office has reviewed the draft permit (Intent to Issue), for the above mentioned facility. Requested changes are:

- 1. Change the Pinellas rule cite, for objection odor, on Page 4, Section II, Facility-wide Conditions, to read "Pinellas County Ordinance 97-05, Section 33, Sec. 58-178. This ordinance is being incorporated into Pinellas County Code. If this is done prior to permit issuance, DEP will be given the new cite.
2. Since the Utility Boilers already have established baseline test dates, we recommend that wording be included in condition A.28.4., such as: "Test the Utility Boilers annually, within 60 day prior to:

Table with 2 columns: Emission Unit, Base Test Date. Rows: EU 001 (March 15 and September 15), EU 002 (September 15), EU 003 (September 15)

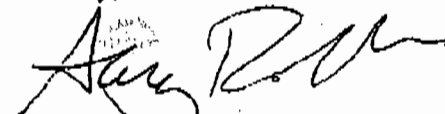
- 3. In condition A.35., A.36., B.18., B.21., B.23., C.7., C.15., C.18. D.13, D.14., E.18., E.19., change the references from the Department to PCDEM, or the Department and PCDEM, or the Department or PCDEM, as appropriate. Note: Should PCDEM be added to Appendix A-1, Abbreviations?



4. In condition A.39. the condition states ...the permittee shall calculate annual particulate matter emissions by multiplying the particulate matter stack test results by the hours of operation... From the inventory side, the annual emissions are determined by taking the test results (for both steady state and excess emissions) and create emission factors for the emission unit in pounds/MMBtu or pounds/1000 gallons. These emission factors are then used to calculate annual emissions, based on the amount of fuel burned during steady state and excess emissions operations.
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6. Since the Pipeline Heating Boiler already has established baseline tests of May 31st, we recommend that wording be included in condition B.18.4., such as: "Test the Pipeline Heating Boiler for visible emissions annually, within 60 day prior to May 31".
7. Since the Peakers already have established baseline tests of February 1st, we recommend that wording be included in condition D.13.4., such as: "Test the Peaking Units for visible emissions annually, within 60 day prior to February 1".

If you have any questions, contact this office at (813) 464-4422 or Suncom 570-4422.

Sincerely,



Gary Robbins, Environmental Program Manager
Air Quality Division

cc: PF(0011), RF

10/20/97 cc - Ed Svec



October 2, 1997

RECEIVED

OCT 06 1997

BUREAU OF
AIR REGULATION

Scott M. Sheplak, P.E.
Florida Department of Environmental Regulation
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Dear Mr. Shepiak:

Re: Relocatable Diesel Generators Associated with FPC's Crystal River, **Bartow,**
Anclote and Higgins Plant Sites

Please find enclosed a revised air permit for relocatable diesel generators to be used at the above-referenced facilities. Originally, the permit was written for three specific diesel generators that were leased for an outage at FPC's Crystal River nuclear unit. The federally enforceable limit on fuel flow (i.e., 186.3 gal/hr total) was necessary to avoid new source review. As the diesel generators specifically referenced in the permit may not always be necessary or even available, FPC had requested that the permit be amended to make the language more generic. The intent of the federal enforceability is still preserved.

Language in this revised permit is consistent with the comments that have been made by FPC regarding these generators as they have been described in Title V permits for the above-referenced facilities. Transmittal of this permit is intended to supplement FPC's original applications for these plant sites and to further support previous comments made regarding these generators.

If you should have any questions, please do not hesitate to contact me at (813) 866-5158.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott H. Osbourn", written in a cursive style.

Scott H. Osbourn
Senior Environmental Engineer

Enclosure

cc: Ken Kosky, Golder Associates
Robert Manning, HGS&S



Department of Environmental Protection

RECEIVED

SEP 30 1997

Environmental Svcs
Department

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

In the matter of an
Application for Permit by:

Mr. W. Jeffrey Pardue, CEP
Director, Environmental Services
Department
Florida Power Corporation
3201 34th Street South
St. Petersburg, FL 33711 /

DEP File No.: 0170004-006-AO
Counties: Citrus, Pasco,
Pinellas, Polk, &
Sumter

Enclosed is permit number 0170004-006-AO for the operation of the relocatable diesel generators which can operate in the above counties. Procedures for administrative hearing, mediation, and variance/waiver are described below.

Administrative Hearing

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this permit. A petitioner must 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 (or a request for mediation, as discussed below) 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 of the Florida Statutes, or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

- (d) A statement of the material facts disputed by the petitioner if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the permit.

Because the administrative action or proposed action addressed in this hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation

A person whose substantial interests are affected by the Department's permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information:

- (a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any;
- (b) A statement of the preliminary agency action;
- (c) A statement of the relief sought; and
- (d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this permit or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following:

- (a) The names, addresses, and telephone numbers of any persons who may attend the mediation;
- (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time;
- (c) The agreed allocation of the costs and fees associated with the mediation;

- (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation;
- (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen;
- (f) The name of each party's representative who shall have authority to settle or recommend settlement; and
- (g) The signatures of all parties or their authorized representatives.

As provided in section 120.573 of the Florida Statutes, the timely agreement of all parties to mediate will toll the time limitations imposed by sections 120.569 and 120.57 for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such a modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under sections 120.569 and 120.57 remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

Variance/Waiver

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under section 120.542 of the Florida Statutes. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to this permit.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;

- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in section 120.542(2) of the Florida Statutes, and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

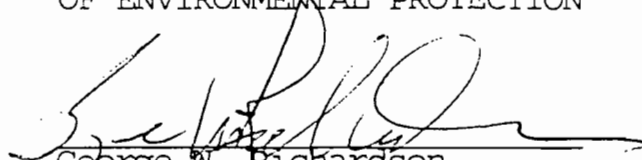
Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of EPA and by the person under the Clean Air Act unless and until Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permit is final and effective on the date filed with the Clerk of the Department unless a timely petition for an administrative hearing is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, F.A.C., or a party requests mediation as an alternative remedy before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. Upon timely filing of a petition or a request for an extension of time to file the petition or a request for mediation, this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate procedure, with the Clerk of the Department in the Office of General Counsel, Douglas Building, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


George W. Richardson
Air Permitting Engineer
Southwest District

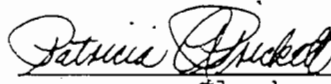
cc: Kennard F. Kosky, P.E., Golder Associates, Inc.
Pinellas County Department of Environmental Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT ISSUANCE was sent to the addressee by certified mail and all copies were sent by regular mail before the close of business on 9/29/97 to the listed persons, unless otherwise noted.

Clerk Stamp

FILING AND ACKNOWLEDGEMENT FILED,
on this date, pursuant to Section
120.52(7), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.


Clerk

9/29/97
Date



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

PERMITTEE:

Florida Power Corporation
3201 34th Street South
St. Petersburg, FL 33711 /

Permit No.: 0170004-006-AO
Amendment Date:
Expiration Date: 3/31/97
Counties: Citrus, Pasco,
Pinellas, Polk &
Sumter
Project: Relocatable Diesel
Generators

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204 through 62-297 and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the operation of one to three relocatable diesel generators rated at a maximum total of 2,460 kw (2.46 mw). The maximum total heat input rate is 25.74 MMBTU/hour (186.3 gallons/hour of diesel fuel). The diesel generators burn new/virgin No 2 diesel fuel oil having a maximum sulfur content of 0.5% by weight. The diesel generators may be located at any Florida Power Corporation facility listed below:

- Locations:
- (1) The Crystal River Plant, Powerline Road
Red Level, Citrus County.
 - (2) The Anclote Plant, Anclote Road, west of Alternate
19, Tarpon Springs, Pinellas County.
 - (3) The Bartow Plant, Weedon Island,
St. Petersburg, Pinellas County.
 - (4) The Higgins Plant, Shore Drive, Oldsmar,
Pinellas County.
 - (5) The Bayboro Plant, 13th Avenue & 2nd Street South,
St. Petersburg, Pinellas County.
 - (6) The Wildwood Reclamation Facility, State Road 462,
1 mile east of US 301, Wildwood, Sumter County.
 - (7) The FPC Polk County Site, County Road 555, 1 mile
southwest of Homeland, Polk County.

Facility ID No.: 0004

Emission Unit ID No.:
012-Diesel Generators



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

PERMITTEE:

Florida Power Corporation
3201 34th Street South
St. Petersburg, FL 33711 /

Permit No.: 0170004-006-AO
Amendment Date:
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Generators

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- Locations:
- (1) The Crystal River Plant, Powerline Road
Red Level, Citrus County.
 - (2) The Anclote Plant, Anclote Road, west of Alternate
19, Tarpon Springs, Pinellas County.
 - (3) The Bartow Plant, Weedon Island,
St. Petersburg, Pinellas County.
 - (4) The Higgins Plant, Shore Drive, Oldsmar,
Pinellas County.
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 - (6) The Wildwood Reclamation Facility, State Road 462,
1 mile east of US 301, Wildwood, Sumter County.
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southwest of Homeland, Polk County.

Facility ID No.: 0004

Emission Unit ID No.:
012-Diesel Generators

PERMITTEE:
Florida Power Corporation

Permit No.: 0170004-006-AO
Project: Relocatable Diesel
Generators

Amends Permit No.: AO09-205952

Note: Please reference Permit No., Facility No., and Emission Unit ID in all correspondence, test report submittals, applications, etc.

1. A part of this permit is the attached 15 General Conditions [Rule 62-4.160, F.A.C.].
2. Visible emissions from each of the diesel generators shall not be equal to or exceed 20% opacity [Rule 62-296.320((4)(b), F.A.C.].
3. Florida Power Corporation shall not discharge air pollutants which cause or contribute to an objectionable odor [Rule 62-296.320(2), F.A.C.].
4. The hours of operation expressed as "engine-hours" shall not exceed 2,970 in any consecutive 12 month period. The hours of operation expressed as "engine-hours" shall be the summation of the individual hours of operation of each diesel generator [Permit AC09-202080].
5. Florida Power corporation is permitted to burn only new/virgin No. 2 diesel fuel oil having a maximum sulfur content not to exceed 0.5% by weight in the diesel generators [Permit AC09-202080].
6. The total heat input rate to all diesel generators shall not exceed 25.74 MMBTU/hour (186.3 gallons/hour) [Permit AC09-202080].
7. Florida Power Corporation shall notify the Department, in writing, at least 15 days prior to the date on which any diesel generator is to be relocated. The notification shall specify:
 - (A) which diesel generator, by serial number, is being relocated;
 - (B) which location the diesel generator is being relocated from;
 - (C) which location the diesel generator is being relocated to; and
 - (d) the approximate startup date at the new location.

If a diesel generator is to be relocated within Pinellas County, then Florida Power Corporation shall provide the same notice to the Pinellas County Department of Environmental Management, Air Quality Division [Rule 62-4.070(3), F.A.C.].

PERMITTEE:
Florida Power Corporation

Permit No.: 0170004-006-AO
Project: Relocatable Diesel
Generators

8. Test each diesel generator for the following pollutants on an annual basis within 30 days of the relocation date. Within 45 days of testing, submit a copy of the test data to the Air Compliance Section of the Department's Southwest District Office and the Pinellas County Department of Environmental Management, Air Quality Division for each diesel generator located in Pinellas County [Rules 62-297.310(7) and 62-297.310(8)(b), F.A.C.].

- (X) Opacity
- (X) Fuel Sulfur Analysis

9. After each relocation, test each relocated diesel generator for then following pollutants within 30 days of startup. Within 45 days of testing, submit a copy of the test data to the Air Compliance Section of the Department's Southwest District Office and the Pinellas County Department of Environmental Management, Air Quality Division for each diesel generator located in Pinellas County [Rules 62-297.310(7) and 62-297.310(8)(b), F.A.C.].

- (X) Opacity
- (X) Fuel Sulfur Analysis

10. Compliance with the emission limitations specified in Specific Condition No. 2 shall be determined using EPA Method 9. The test method is contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The Method 9 compliance test shall be conducted by a certified observer and be a minimum of 30 minutes. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A.

11. Testing of each diesel generator shall be accomplished while the diesel generator is being operated within 90 to 100% of the maximum fuel firing rate in gallons per hour. Failure to submit the actual operating rate during the test may invalidate the test data [Rule 62-4.070(3), F.A.C.].

12. The permittee shall notify the Air Compliance Section of the Department's Southwest District Office and the Pinellas County Department of Environmental Management, Air Quality Division, if applicable, at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted (Rule 62-297.340(1)(i), F.A.C.).

PERMITTEE:
Florida Power Corporation

Permit No.: 0170004-006-AO
Project: Relocatable Diesel
Generators

13. Compliance with Specific Condition No. 4 shall be documented by record keeping. At a minimum, the records shall indicate the daily hours of operation of each individual diesel generator expressed as "engine-hours", and a cumulative total hours of operation expressed as "engine-hours" for each month. The records shall be recorded in a permanent form suitable for inspection and shall be retained for at least the most recent 2 years and be made available for inspection by the Department or the Pinellas County Department of Environmental Management, Air Quality Division, if applicable, upon request [Rule 62-4.070(3), F.A.C.,].

14. In order to document continuing compliance with the sulfur content limitations, in % by weight, the permittee shall keep records of either vendor provided as-shipped analysis or an analysis of as-received samples taken at the plant. The analysis shall be determined by ASTM Methods ASTM D4057-88 and ASTM D129-91, ASTM D2622-94 or ASTM D4294-90 adopted by reference in Rule 62-297.440(1), F.A.C. The records shall be recorded in a permanent form suitable for inspection and shall be retained for at least the most recent 2 years and be made available for inspection by the Department or the Pinellas County Department of Environmental Management, Air Quality Division, if applicable, upon request [Rule 62-4.070(3), F.A.C.,].

15. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320(4)(c), F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling.

16. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297 & 62-4 or any other requirements under federal, state, or local law [Rule 62-210.300, F.A.C.,].

17. Florida Power Corporation shall submit to the Air Section of the Department's Southwest District Office each calendar year on or before March 1, completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility," for the preceding calendar year (Rule 62-210.370(3)(a)2., F.A.C.). The Report shall contain at a minimum the following information:

- (A) the location of each diesel generator, by serial number, at the end of the preceding calendar year;

PERMITTEE:
Florida Power Corporation

Permit No.: 0170004-006-AO
Project: Relocatable Diesel
Generators

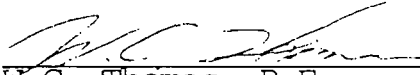
Specific Condition No. 17 continued:

- (B) the annual amount of fuel burned in each diesel generator, by serial number;
- (C) the annual hours of operation of each diesel generator, by serial number;
- (D) the annual hours of operation expressed in "engine-hours", as defined in Specific Condition No. 4;
- (E) a copy of the fuel sulfur content records required by Specific Condition No. 14 for the preceding calendar year;
- (F) annual emissions of particulate, PM₁₀, carbon monoxide, SO₂, and NOx based on actual diesel generator operation and fuel usage (provide a copy of the calculation sheets and the basis for calculations);
- (G) any changes in the information contained in the permit application.

If any diesel generator operated within Pinellas County at any time during the preceding calendar year, then Florida Power Corporation shall provide a copy of the AOR to the Pinellas County Department of Environmental Management, Air Quality Division.

18. At least 60 days prior to the expiration date of this operation permit, the permittee shall submit at least two copies of DEP Short Form No. 62-210.900(2), for the renewal of this operating permit along with the processing fee established in Rule 62-4.050(4), F.A.C., and a copy of the latest compliance tests to the Air Permitting Section of the Department's Southwest District Office and one copy to the Pinellas County Department of Environmental Management, Air Quality Division, if applicable [Rule 62-4.090(1), F.A.C.].

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



W.C. Thomas, P.E.
District Air Program
Administrator
Southwest District

ATTACHMENT - GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

GENERAL CONDITIONS:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

GENERAL CONDITIONS:

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Date: 10/6/97 4:10:39 PM
From: Elizabeth Walker TAL
Subject: New posting
To: See Below

There is a new posting available on the Florida Website.

FPC-BARTOW PLANT 1030011002AV DRAFT

The notification letter is encoded and attached. If you have any questions, please let me know.

Thanks,
Elizabeth

Florida's DRAFT Permit Electronic Notification Cover Memorandum

TO: Yolanda Adams, U.S. EPA Region 4
CC: Carla E. Pierce, U.S. EPA Region 4
THRU: Scott Sheplak, P.E., Bureau of Air Regulation *sm*
FROM: Edward J. Svec, Permit Engineer *Edward J. Svec*
DATE: 10/02/97
RE: U.S. EPA Region 4 DRAFT Title V Operation Permit Review

The following DRAFT Title V operation permit(s) and associated documents have been posted on the DEP World Wide Web Internet site for your review. Please provide any comments via Internet E-mail, to Scott Sheplak, at "Sheplak_S@dep.state.fl.us".


<u>Applicant Name</u>	<u>County</u>	<u>Method of Transmittal</u>	<u>Electronic File Name(s)</u>
Florida Power Corporation Bartow Plant	Pinellas	INTERNET	1030011p.zip

This zipped file contains the following electronic files:

- sob.doc
- 1030011i.doc
- 1030011d.doc
- 10300111.xls
- 10300112.xls
- 1030011e.doc
- 1030011u.doc
- 1030011h.doc

MEMORANDUM

TO: Scott M. Sheplak, P.E.

FROM: Edward J. Svec 

DATE: September 29, 1997

Re: Intent package for DRAFT Permit No.: 1030011-002-AV
Florida Power Corporation
Bartow Plant

Permit Clock: Today is ARMS Day 34
Default Date (Day 90): November 23, 1997

The Bartow Plant consists of three, Rule 62-296.405 oil fired boilers (Unit 1 is equipped with an ESP); a pipeline heating boiler (Rule 62-296.406); four pre-Subpart GG gas peaking turbines; a flyash silo system; and three relocatable diesel generator units. The plant is in the area of influence of the Tampa particulate matter maintenance area and as such, the boilers carry additional conditions which identify operating parameters and O&M activities. The three boilers are also allowed to combust up to a total of 14.85 million gallons of on-specification used oil per year. This permit is for the initial Title V air operation permit for the subject facility.

Additional information was requested on May 20, 1997 and the response was received on August 25, 1997. Comments were not received from the District office.

This facility reported that each emissions unit was in compliance at the time of the application.

I recommend that this Intent to Issue be sent out as attached.

EJS/

[electronic file name: 10300111.mem]

STATEMENT OF BASIS

Florida Power Corporation
Bartow Plant
Facility ID No.: 1030011
Pinellas County

Initial Title V Air Operation Permit
DRAFT Permit No.: 1030011-002-AV

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This facility consists of three fossil fuel fired steam generators subject to Phase II Acid Rain, a pipeline heating boiler, four gas turbine peaking units, a flyash silo and relocatable diesel generators that can be located at various Florida Power Corporation power plants, as needed.

Unit No. 1 is a front-fired, fossil fuel steam generator which produces 120 megawatts, electric, power. The maximum heat input rate is 1,220 million Btu per hour and the unit fires No. 6 fuel oil, No. 2 fuel oil, and on-specification used oil. Particulate matter emissions are controlled by a General Electric Services, Inc. Model 1-BAB1.2X37(9)36.0-434-4.3P electrostatic precipitator consisting of five fields in depth. A Durag Model 281 Continuous Emissions Monitor for opacity with a recorder is used for continual observation of stack opacity. Unit 1 began commercial service in 1958.

Unit No. 2 is a tangential-fired fossil fuel fired steam generator which produces 120 megawatts, electric, power. The maximum heat input rate is 1,317 million Btu per hour and the unit fires No. 6 fuel oil, No. 2 fuel oil, on-specification used oil, and propane. Emissions from Unit No. 2 are uncontrolled. Unit 2 began commercial service in 1961.

Unit No. 3 is a tangential-fired fossil fuel fired steam generator which produces 225 megawatts, electric, power. The maximum heat input rate is 2,211 million Btu per hour and the unit fires No. 6 fuel oil, natural gas, No. 2 fuel oil, on-specification used oil, and propane. Emissions from Unit No. 2 are uncontrolled. Unit 3 began commercial service in 1963.

The Bartow-Anclote Pipeline Heating Boiler is used to heat fuel oil being transferred from the Bartow Plant to the Anclote Plant. The boiler's maximum heat input rate is 15.5 million Btu per hour firing natural gas, No. 2 fuel oil, or propane. Emissions from the boiler are uncontrolled.

The turbines are natural gas and/or No. 2 fuel oil fired combustion turbines manufactured by General Electric (model number MS7000) and are designated as Gas Turbine Peaking Units #P-1, #P-2, #P-3 and #P-4. The manufacturers fuel flow and heat input ratings for each turbine are 5,174 gallons per hour of No. 2 fuel oil, or 714 million cubic feet per hour of natural gas (corresponds to approximately 714 million Btu per hour). The actual heat input rate of the

turbine is a function of the ambient temperature. These combustion turbines are used as peaking units during peak demand times, during emergencies, and during controls testing, to run a nominal 56 MW generator (each). Emissions from the combustion turbines are uncontrolled.

The Unit No. 1 Flyash System has a design transfer capacity of 4,000 pounds of flyash per hour to the storage silo. Emissions from the storage silo are controlled by a Flakt, Inc. Model 90-UKE-16 Arrangement II baghouse. The baghouse contains 16 filter bags, each having a cloth filtration area of 157.0 square feet. The vent fan capacity is 235.0 standard cubic feet per minute.

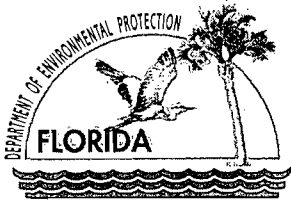
The relocatable emissions units are Caterpillar Model 3508-DITA 820 kilowatt diesel generators. The maximum heat input is 25.74 million Btu per hour (MMBtu/hour) while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum rating of 2460 kilowatts.

Emissions from the generators are uncontrolled. The generators may be relocated at any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Higgins Plant, Shore Drive, Oldsmar, Pinellas County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. The future FPC Polk County Site, County Road 555, 1 mi. southwest of Homeland, Polk County.

Also included in this permit are miscellaneous unregulated/exempt emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1997, this facility is a major source of hazardous air pollutants (HAPs).



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

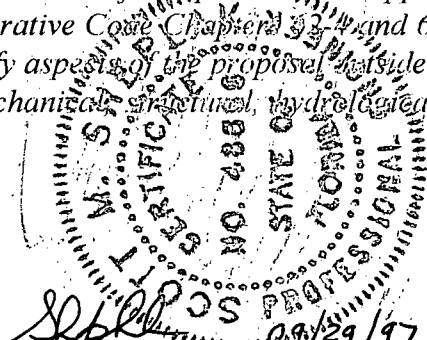
P.E. Certification Statement

Permittee:
Florida Power Corporation
P.L. Bartow Plant

DRAFT Permit No.: 1030011-002-AV
Facility ID No.: 1030011

Project type: Initial Title V Air Operation Permit

I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).



Scott M. Sheplak
Scott M. Sheplak, P.E. date: 09/29/97
Registration Number: 0048866

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-1344
Fax: 850/922-6979

Is your RETURN ADDRESS completed on the reverse side?

SENDER: ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
3. Article Addressed to: Mr. W. Jeffery Pardue Director, Environmental Services Department Florida Power Corporation 3201 34th Street South St. Petersburg, Florida 33711	4a. Article Number P 263 585 100	
5. Received By: (Print Name)		4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD
6. Signature: (Addressee or Agent) X Frank Chap...		7. Date of Delivery 10/6/97
8. Addressee's Address (Only if requested and fee is paid)		8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

PS Form 3811, December 1994

Domestic Return Receipt

P 263 585 100

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

PS Form 3800, April 1995

Sent to	
Mr. W. Jeffery Pardue	
Street & Number	
3201 34th Street South	
Post Office, State, & ZIP Code	
St. Petersburg, Florida 33711	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	
10/01/97 - DRAFT PERMIT	
FPC - Bartow Plant	
ID#1030011-002-AV	



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

September 30, 1997

W. Jeffery Pardue
Director, Environmental Services Department
Florida Power Corporation
3201 34th Street South
St. Petersburg, Florida 33711

Re: DRAFT Title V Permit No.: 1030011-002 -AV
Bartow Plant

Dear Mr. Pardue:

One copy of the DRAFT Title V Air Operation Permit for the Bartow Plant located at Weedon Island, St. Petersburg, Pinellas County, is enclosed. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" is also included.

The Department will publish the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" as soon as possible. This issue is important in order for you to receive your Title IV Acid Rain permit by January 1, 1998, pursuant to the Clean Air Act and Section 403.0872, Florida Statutes.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Scott M. Sheplak, P.E., at the above letterhead address. If you have any other questions, please contact Edward Svec at 850/488-1344.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/s

Enclosures

cc: Ms. Carla E. Pierce, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)
Ms. Yolanda Adams, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

In the Matter of an
Application for Permit by:

Florida Power Corporation
3201 34th Street South
St. Petersburg, Florida 33711

DRAFT Permit No.: 1030011-002-AV
Bartow Plant
Pinellas County

INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit (copy of DRAFT Permit enclosed) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Florida Power Corporation, applied on June 14, 1996, to the permitting authority for a Title V air operation permit for the Bartow Plant located at Weedon Island, St. Petersburg, Pinellas County.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit is required to commence or continue operations at the described facility.

The permitting authority intends to issue this Title V air operation permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.0872, F.S., and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." However, the Department will publish the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" as soon as possible. This issue is important in order for you to receive your Title IV Acid Rain permit by January 1, 1998, pursuant to the Clean Air Act and Section 403.0872, F.S.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the enclosed Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

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 (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 904/488-9730; Fax: 904/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any other person must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. A petitioner must 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207, F.A.C.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

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 notice of intent. 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.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this

state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

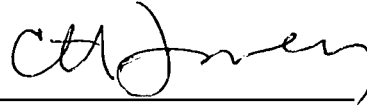
Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must

meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 401 M. Street, SW, Washington, D.C. 20460.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**



C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the DRAFT permit) and all copies were sent by certified mail before the close of business on 10/1/97 to the person(s) listed:

W. Jeffery Pardue, FPC

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the DRAFT permit) were sent by U.S. mail on the same date to the person(s) listed:

Kennard Kosky, PE, Golder Associates, Inc.
Scott Osbourn, Sr., FPC
Bill Thomas, PE, FDEP SWD
Peter Hessling, PCDEM

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT were sent by U.S. mail on the same date to the person(s) listed:

Gail Kamaras, Legal Environmental Assistance Foundation

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency Clerk, receipt of which is hereby acknowledged.

Barbara J. Boutwell 10/1/97
(Clerk) (Date)

Florida Power Corporation
Bartow Plant
Facility ID No.: 1030011
Pinellas County

Initial Title V Air Operation Permit
DRAFT Permit No.: 1030011-002-AV

Permitting Authority:

State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 904/488-1344
Fax: 904/922-6979

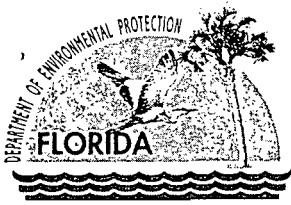
Compliance Authority:

Pinellas County Department of Environmental Management
Air Quality Division
300 South Garden Avenue
Clearwater, Florida 34616
Telephone: 813/464-4422
Fax: 813/464-4420

Initial Title V Air Operation Permit
DRAFT Permit No.: 1030011-002-AV

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Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

Permittee:

Florida Power Corporation
3201 34th Street South
St. Petersburg, Florida 33711

DRAFT Permit No.: 1030011-002-AV

Facility ID No.: 1030011

SIC Nos.: 49, 4911

Project: Initial Title V Air Operation Permit

This permit is for the operation of the Bartow Plant. This facility is located on Weedon Island, St. Petersburg, Pinellas County; UTM Coordinates: Zone 17, 342.4 km East and 3,082.6 km North; Latitude: 27° 52' 10" North and Longitude: 82° 35' 59" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix U-1, List of Unregulated Emissions Units and/or Activities
Appendix E-1, List of Exempt Emissions Units and/or Activities
APPENDIX TV-1, TITLE V CONDITIONS (version dated 08/11/97)
APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)
TABLE 297.310-1, CALIBRATION SCHEDULE (version dated 10/07/96)
Phase II Acid Rain Application/Compliance Plan received December 22, 1995
Alternate Sampling Procedure: ASP Number 97-B-01
OGC Order No. 86-1577
OGC Order No. 87-1261

Effective Date: January 1, 1998

Renewal Application Due Date: July 5, 2002

Expiration Date: December 31, 2002

Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/sms/es

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of three fossil fuel fired steam generators subject to Phase II Acid Rain, a pipeline heating boiler, four gas turbine peaking units, a flyash silo and relocatable diesel generators that can be located at various Florida Power Corporation power plants, as needed.

Also included in this permit are miscellaneous unregulated/exempt emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1997, this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-001	No. 1 Unit, Fossil Fuel Fired Steam Generator with Electrostatic Precipitator
-002	No. 2 Unit, Fossil Fuel Fired Steam Generator
-003	No. 3 Unit, Fossil Fuel Fired Steam Generator
-004	Bartow-Anclote Pipeline Heating Boiler
-005	Gas Turbine Peaking Unit #P-1
-006	Gas Turbine Peaking Unit #P-2
-007	Gas Turbine Peaking Unit #P-3
-008	Gas Turbine Peaking Unit #P-4
-009	Flyash Storage Silo with Baghouse
-xxx	Relocatable Diesel Fired Generator(s)

Unregulated Emissions Units and/or Activities
{See Appendix U-1}

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/ID Number Changes

These documents are on file with the permitting authority:

Initial Title V Permit Application received June 14, 1996

Additional Information Request dated May 20, 1997

Additional Information Response received August 25, 1997

Letter Dated June 24, 1996 Re: PSD Applicability Determination - Bartow Unit No. 1 PSD

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-1, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}
2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.; and, Pinellas County Ordinance No. 89-70, Subpart 6.620, as amended]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]
4. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:
 - a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and
 - b. certification forms and/or RMPs according to the promulgated rule schedule.[40 CFR 68]
5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]
6. Exempt Emissions Units and/or Activities. Appendix E-1, List of Exempt Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

7. Not federally enforceable. General Pollutant Emission Limiting Standards. Volatile Organic Compounds Emissions or Organic Solvents Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

[Rule 62-296.320(1)(a), F.A.C.]

8. Not federally enforceable. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: maintenance of paved areas as needed, regular mowing of grass and care of vegetation, and limiting access to plant property by unnecessary vehicles.

[Rule 62-296.320(4)(c)2., F.A.C.; and, proposed by applicant in the initial Title V permit application received June 14, 1996.]

9. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

10. The permittee shall submit all compliance related notifications and reports required of this permit to the Pinellas County Department of Environmental Management (PCDEM) office:

Pinellas County Department of Environmental Management
Air Quality Division
300 South Garden Avenue
Clearwater, Florida 34616
Telephone: 813/464-4422
Fax: 813/464-4420

11. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Operating Permits Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9099
Fax: 404/562-9095

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions units.

E.U.

<u>ID No.</u>	<u>Brief Description</u>
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-001	No. 1 Unit, Fossil Fuel Fired Steam Generator with Electrostatic Precipitator
-002	No. 2 Unit, Fossil Fuel Fired Steam Generator
-003	No. 3 Unit, Fossil Fuel Fired Steam Generator

Unit No. 1 is a front-fired, fossil fuel steam generator which produces 120 megawatts, electric, power. The maximum heat input rate is 1,220 million Btu per hour and the unit fires No. 6 fuel oil, No. 2 fuel oil, and on-specification used oil. Particulate matter emissions are controlled by a General Electric Services, Inc. Model 1-BAB1.2X37(9)36.0-434-4.3P electrostatic precipitator consisting of five fields in depth. A Durag Model 281 Continuous Emissions Monitor for opacity with a recorder is used for continual observation of stack opacity. Unit 1 began commercial service in 1958.

Unit No. 2 is a tangential-fired fossil fuel fired steam generator which produces 120 megawatts, electric, power. The maximum heat input rate is 1,317 million Btu per hour and the unit fires No. 6 fuel oil, No. 2 fuel oil, on-specification used oil, and propane. Emissions from Unit No. 2 are uncontrolled. Unit 2 began commercial service in 1961.

Unit No. 3 is a tangential-fired fossil fuel fired steam generator which produces 225 megawatts, electric, power. The maximum heat input rate is 2,211 million Btu per hour and the unit fires No. 6 fuel oil, natural gas, No. 2 fuel oil, on-specification used oil, and propane. Emissions from Unit No. 2 are uncontrolled. Unit 3 began commercial service in 1963.

{Permitting note(s): The emissions units are regulated under Acid Rain, Phase II; Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with more than 250 million Btu per Hour Heat Input; Rule 62-296.700, F.A.C. Reasonably Available Control Technology (RACT) Particulate Matter; and, Rule 62-296.702, F.A.C. Fossil Fuel Steam Generators.}

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum operation heat input rates are as follows:

<u>E.U. ID No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel</u>
-001	1,220	new No. 6 fuel oil
	1,220	On-specification used oil
-002	1,317	new No. 6 fuel oil
	1,317	On-specification used oil
-003	2,211	new No. 6 fuel oil
	2,266	Natural gas
	2,211	On-specification used oil
	2,266	Natural gas and new No. 6 fuel oil and/or on-specification used oil with a maximum of 2,211 MMBtu/hr from the new No. 6 fuel oil and/or on-specification used oil

[Rules 62-4.160(2), 62-210.200(PTE), 62-296.405 and 62-296.702, F.A.C.]

A.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **A.24.**
[Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation. Fuels. The only fuels allowed to be burned are:

<u>E.U. ID No.</u>	<u>Fuel</u>
-001	new No. 6 fuel oil
	No. 2 fuel oil
	On-specification used oil
-002	new No. 6 fuel oil
	No. 2 fuel oil
	On-specification used oil
-003	Propane
	new No. 6 fuel oil
	Natural gas
	No. 2 fuel oil
	On-specification used oil

Each emissions units may burn the allowed fuels either alone or in any combination. On-Specification used oil containing any quantifiable levels of PCBs can only be fired when the emissions unit is at normal operating temperatures.

[Rule 62-213.410, F.A.C.; and, 40 CFR 271.20(e)(3)]

A.4. Hours of Operation. These emissions units may operate continuously, i.e., 8,760 hours/year.
[Rule 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.5. Visible Emissions. Visible emissions shall not exceed 40 percent opacity.
[Rules 62-296.405(1)(a) and 62-296.702(2)(b), F.A.C.; and, OGC Order Nos. 86-1577 & 87-1261]

A.6. Visible Emissions - Soot Blowing and Load Change. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

Visible emissions above 60 percent opacity shall be allowed for not more than 4, six (6) - minute periods, during the 3-hour period of excess emissions allowed under this subparagraph, for boiler cleaning and load changes, at units which have installed and are operating, or have committed to install or operate, continuous opacity monitors.

[Rules 62-210.700(3) and 62-296.702(2)(b), F.A.C.]

A.7. Particulate Matter. Particulate matter emissions shall not exceed the following , as measured by applicable compliance methods:

<u>E.U. ID No.</u>	<u>lb/MMBtu heat input</u>	<u>lb/ hr</u>	<u>Tons per Year</u>
-001	0.1	122.0	534.4
-002	0.1	131.7	576.9
-003	0.1	221.1	968.6

[Rules 62-296.405(1)(b), 62-296.700(4)(b) and 62-296.702(2)(a), F.A.C.]

A.8. Particulate Matter - Soot Blowing and Load Change. Particulate matter emissions shall not exceed an average of the following during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

<u>E.U. ID No.</u>	<u>lb/MMBtu heat input</u>	<u>lb/ hr</u>
-001	0.3	366.0
-002	0.3	395.1
-003	0.3	663.3

[Rules 62-210.700(3) and 62-296.700(4)(b), F.A.C.]

A.9. Sulfur Dioxide. When burning liquid fuel, sulfur dioxide emissions shall not exceed 2.75 pounds per million Btu heat input, as measured by applicable compliance methods.
 [Rule 62-296.405(1) (c)1.j., F.A.C.]

A.10. Sulfur Dioxide - Sulfur Content. The new No. 6 fuel oil sulfur content shall not exceed 2.5 percent, by weight. The sulfur content of the on-specification used oil shall not exceed 2.5 percent by weight. See specific condition **A.22**.
 [Rule 62-296.405(1)(e)3., F.A.C.; and, AO 52-216412, AO 52-216413 & AO 52-233149]

A.11. “On-Specification” Used Oil. Only “on-specification” used oil shall be fired in these units. The quantity of on-specification used oil fired in emissions units -001, -002 and -003 shall not exceed a total of 14.85 million gallons per consecutive 12-month period and 2.475 million gallons per month. “On-specification” used oil is defined as used oil that meets the 40 CFR 279 (Standards for the Management of Used Oil) specifications listed below. Used oil that does not meet all of the following specifications is considered “off-specification” oil and shall not be fired.

<u>CONSTITUENT / PROPERTY-*</u>	<u>ALLOWABLE LEVEL</u>
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash Point	100 °F minimum
PCBs	less than 50 ppm**

* As determined by approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

** Used oil shall not be blended to meet this requirement.

[40 CFR 279.11; 40 CFR 761.20; and, AO 52-216412, AO 52-216413 & AO 52-233149]

A.12. “On-Specification” Used Oil. Before accepting from each marketer the first shipment of on-specification used oil with a PCB concentration above the detectable level, the permittee shall provide each marketer with a one-time written and signed notice certifying that the permittee will burn the used oil in a qualified combustion device. The notice must state that EPA or a RCRA-delegated state agency has been given a description of the used oil management activities at the facility and that an industrial boiler or furnace will be used to burn the used oil with PCB concentrations above the detectable level. The description of the used oil management activities shall be submitted to the Administrator, Hazardous Waste Regulation Section, Florida Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

[40 CFR 279.61 and 40 CFR 761.20(e)(3)(ii)]

A.13. “On-Specification” Used Oil. Each shipment or on-site generated batch of used oil shall be sampled and analyzed for the constituents listed in specific condition **A.11**. A claim that the used oil does not contain quantifiable levels of PCBs must be documented by analysis or other information. The first person making the claim that the used oil does not contain PCBs is responsible for furnishing the documentation. The documentation can be tests, personal or special knowledge of the source and composition of the used oil, or a certification from the person generating the used oil claiming that the used oil contains no detectable PCBs.

[40 CFR 761.20(e)(2); and, Rule 62-4.070(3), F.A.C.]

Excess Emissions

A.14. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

A.15. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.

[Rule 62-210.700(2), F.A.C.]

A.16. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

A.17. Sulfur Dioxide. The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor or the permittee upon each fuel delivery. This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions **A.10., A.21. and A.22.**

[Rule 62-296.405(1)(f)1.b., F.A.C.]

A.18. Determination of Process Variables.

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.19. Visible emissions. The test method for visible emissions shall be:

a. **E.U. ID Nos. -001, -002 and -003** EPA Method 9, incorporated in Chapter 62-297, F.A.C.

b. **E.U. ID No. -001** Continuous opacity monitor.

[Rule 62-296.702(3)(a)1., F.A.C.; and, AO 52-233149]

A.20. Particulate Matter. The test methods for particulate emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17.

[Rules 62-296.405(1)(e)2., 62-297.401 and 62-296.702(3)(b), F.A.C.]

A.21. Sulfur Dioxide. The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedences of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. **The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, as an alternate sampling procedure authorized by permit, the permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor or the permittee upon each fuel delivery. See specific conditions A.10. and A.22.**

[Rules 62-213.440, 62-296.405(1)(e)3. and 62-297.401, F.A.C.; and, AO 52-216412, AO 52-216413 & AO 52-233149]

A.22. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

A.23. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

A.24. Operating Rate During Testing. Testing of emissions shall be conducted while firing new No. 6 fuel oil or new No. 6 fuel oil/on-specification used oil with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity; an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.; and AO 52-216412, AO 52-216413 & AO 52-233149]

A.25. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

A.26. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, attached as part of this permit.

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

[Rule 62-297.310(4), F.A.C.]

A.27. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

A.28. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid for more than 400 hours other than during startup.
3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62- 210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
 - a. Did not operate; or
 - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
 - a. Visible emissions, if there is an applicable standard;
 - b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
 - c. Each NESHAP pollutant, if there is an applicable emission standard.
5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.
9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.
[Rule 62-297.310(7), F.A.C.; and, SIP approved]

A.29. Frequency of Compliance Tests. E.U. ID No.-001 was authorized by order of the Department Secretary dated December 7, 1982 (OGC File Number 82-0564) to test particulate matter emissions and visible emissions every six months with a 40 percent opacity limit. Failure of this emissions unit to meet either the particulate standard or the opacity standard in the future shall constitute grounds for revocation of this authorization and a return to more frequent testing.
[OGC Order No. 87-1261]

A.30. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rule 62-297.310(7)(a)4., F.A.C.]

A.31. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

A.32. Compliance with the “on-specification” used oil requirements will be determined as follows:

- (a) Analysis of a sample collected from each batch delivered for firing; or,
- (b) The new batch delivery is from a collection site that has an acceptable analysis already on file with the facility and the analytical results are assumed by the facility for the batch.
- (c) For quantification purposes, the highest concentration of each constituent as determined by any analysis is assumed to be the concentration of the constituent of the blended used oil.

See specific condition **A.11.**

[AO 52-216412, AO 52-216413 & AO 52-233149]

Record keeping and Reporting Requirements

A.33. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the PCDEM in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the PCDEM.

[Rule 62-210.700(6), F.A.C.]

A.34. Submit to the PCDEM a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years.

[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

A.35. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- (b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
 - 1. The type, location, and designation of the emissions unit tested.
 - 2. The facility at which the emissions unit is located.
 - 3. The owner or operator of the emissions unit.
 - 4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.

5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

A.36. In order to document continuing compliance with specific condition **A.11.**, the permittee shall maintain the following records:

- (a) The quantity of used oil accepted, the date of acceptance, and the receiving tank ID No.
- (b) The name, address, and EPA identification number (if applicable) of all transporters and generators or processors/re-refiners of the used oil delivered to the facility.
- (c) A copy of the notice to EPA or a RCRA-delegated state agency and a copy of the one-time written notice provided to each marketer.
- (d) Results of the analyses required in specific condition **A.11.**
- (e) Documentation that the used oil contains below detectable levels of PCBs, if claimed, including the name and address of the person making the claim.
- (f) The date, time Unit No., and a statement of the status of the unit (startup, normal operating, or shutdown) when burning used oil containing detectable levels of PCBs. Records of percent full load shall be made available, if requested.
- (g) The monthly total of used oil burned at the facility (based on monthly receipts).
- (h) The total of used oil burned at the facility for the most recent consecutive 12-month period.

These records shall be recorded in a permanent form suitable for inspection by the Department upon request, and shall be retained for at least a five year period.

[40 CFR 279.65 & 66; 40 CFR 761.20(3)(b); and, Rule 62-4.070(3), F.A.C.]

A.37. The permittee shall include in the “Annual Operating Report for Air Pollutant Emitting Facility” a summary of the on-specification used oil analyses for the calendar year and a statement of the total quantity of on-specification used oil received and fired during the calendar year.

[Rule 62-4.070(3), F.A.C.; and, AO 52-216412, AO 52-216413 & AO 52-233149]

A.38. Compliance with the oil sulfur content and the sulfur dioxide emissions limitations of specific conditions **A.9.** and **A.10.** shall be documented by the permittee through submittal of quarterly reports of the Bartow Plant monthly average fuel oil sulfur content, heat content and the resulting sulfur dioxide emission rate in pounds per million Btu heat input. These quarterly reports shall be submitted to PCDEM within 30 days of the end of each calendar quarter.

[Rule 62-4.070(3), F.A.C.; and AO 52-216412, AO 52-216413 & AO 52-233149]

A.39. 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. Until further notice by the Department the permittee shall calculate particulate matter emissions by multiplying the particulate matter stack test results by the hours of operation. Other annual emissions shall be determined by multiplying the annual fuel use by the following emissions factors:

E.U. ID No. -001

Pollutant	No. 6 fuel oil (lb/1000 gal)
SO ₂	157(S)
CO	5
NO _x	67
VOC	0.76

E.U. ID No. -002

Pollutant	No. 6 fuel oil (lb/1000 gal)
SO ₂	157(S)
CO	5
NO _x	42
VOC	0.76

E.U. ID No. -003

Pollutant	No. 6 fuel oil (lb/1000 gal)	Natural Gas (lb/MMcf)
SO ₂	157(S)	0.6
CO	5	5
NO _x	42	550
VOC	0.76	1.4

[AO 52-216412, AO 52-216413 & AO 52-233149]

Miscellaneous Requirements

A.40. Process Parameters.

	E.U. ID No. -001	E.U. ID No. -002	E.U. ID No. -002
Heat Input Rate	1,220 MMBtu/hr (maximum)	1,317 MMBtu/hr (maximum)	2,266 MMBtu/hr (maximum)
Fuel	New No. 6 fuel oil with a sulfur content of 2.5%, by weight (maximum) and on-specification used oil with a sulfur content of 2.5%, by weight (maximum)	New No. 6 fuel oil with a sulfur content of 2.5%, by weight (maximum) and on-specification used oil with a sulfur content of 2.5%, by weight (maximum)	New No. 6 fuel oil with a sulfur content of 2.5%, by weight (maximum) and on-specification used oil with a sulfur content of 2.5%, by weight (maximum) (also natural gas when available)
Fuel Firing Rate	7,854 gal/hr (187 BBL/hr) new No. 6 fuel oil and/or on-specification used oil (maximum)	8,778 gal/hr (209 BBL/hr) new No. 6 fuel oil and/or on-specification used oil (maximum)	14,742 gal/hr (351 BBL/hr) new No. 6 fuel oil and/or on-specification used oil, 2.2 MMCF/hr natural gas (maximum)
Ash Content	As sampled	As sampled	As sampled
Steam Temperature	1,000°F	1,000°F	1,000°F
Steam Pressure	1,850 psi	1,850 psi	2,050 psi
Steam Flow Rate	900,000 lb/hr	919,600 lb/hr	1,423,500 lb/hr
Stack Height	300 ft	300 ft	300 ft
Boiler Manufacturer	Babcock & Wilcox	Combustion Engineering	Combustion Engineering
Burner Arrangement	Front fired	Tangential fired	Tangential fired

Inspection and Maintenance Program.

- (a) Scheduled during major outages: Boilers, controls, auxiliaries, burners and duct work are to be inspected and repaired as necessary. All parts are to be inspected, cleaned and replaced as necessary.
- (b) Scheduled during non-peak load periods in Spring and Fall: This schedule is affected by forced outage requirements.

(c) the following operating parameters are to be continuously monitored and maintained at appropriate levels to produce efficient fuel combustion:

1. fuel flow rate
2. fuel temperature
3. fuel pressure
4. air flow rate
5. steam flow rate
6. steam temperature
7. steam pressure

(d) Plant operators are to monitor, adjust and record the following operating parameters at least once per day to assure efficient plant operation:

1. temperatures (superheat, reheat, and fuel)
2. flows (steam, feedwater, and fuel)
3. unit load

(e) fuel oil quality is to be checked prior to delivery and a daily sample taken each day the facility is operated for a monthly composite analysis. Fuel oil analysis (by ASTM Methods) is to be analyzed for the following:

1. heat content (Btu/gal)
2. sulfur content (%S by weight)
3. density
4. API gravity

Records of inspection, maintenance, and performance parameters shall be retained a minimum of five years and shall be made available for inspection upon request.

[Rule 62-296.700 (6)(d), F.A.C.; and, AO 52-216412, AO 52-216413 & AO 52-233149]

A.41. E.U. ID No. -001 Operation and Maintenance Plan. The 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 Operation and Maintenance (O&M) Plan, dated 10/04/93 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. A timetable of routine weekly, bi-weekly, or monthly observations of the pollution control device.
3. A list of the type and quantity of the required spare parts which are stored on the premises for the pollution control device.
4. A record log which shows at a minimum when maintenance was performed, what maintenance was performed, and by whom.

[Rule 62-296.700(6), F.A.C.; and Pinellas County Ordinance No. 89-70, Subpart 2.230, as amended]

Section III. Emissions Unit(s) and Conditions.

Subsection B. This section addresses the following emissions unit(s).

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-004	Bartow-Anclote Pipeline Heating Boiler

The Bartow-Anclote Pipeline Heating Boiler is used to heat fuel oil being transferred from the Bartow Plant to the Anclote Plant. The boiler's maximum heat input rate is 15.5 million Btu per hour firing natural gas, No. 2 fuel oil, or propane. Emissions from the boiler are uncontrolled.

{Permitting note(s): The emissions unit is regulated under Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with Less than 250 million Btu per Hour Heat Input}

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum operation heat input rate is 15.5 million Btu per hour. [Rules 62-4.160(2), 62-210.200(PTE) and 62-296.406, F.A.C.]

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **B.16.** [Rule 62-297.310(2), F.A.C.]

B.3. Methods of Operation. Fuels. This boiler is permitted to fire only the following fuels and at the maximum rates shown:

Fuel	Maximum % Sulfur	Maximum MMBtu/hr	Maximum Fuel Usage
Natural Gas	--	15.5	15 Mcf/hr
No. 2 Fuel Oil*	0.5% by weight	15.5	110 gal/hr
Propane	--	15.5	191 gal/hr

* New No. 2 fuel oil only (waste or recycled oil is not allowed)
[Rule 62-213.410, F.A.C.; and, AO 52-244478]

B.4. Hours of Operation. This emissions unit may operate continuously, i.e., 8,760 hours/year. [Rule 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.5. Visible Emissions. Visible emissions shall not exceed 20 percent opacity, except for one two-minute period per hour during which opacity shall not exceed 40 percent.
[Rule 62-296.406(1), F.A.C.; and, AO 52-244478]

B.6. Visible emissions - Soot Blowing and Load Change. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.
[Rule 62-210.700(3), F.A.C.]

B.7. Sulfur Dioxide - Sulfur Content. The new No. 2 fuel oil sulfur content shall not exceed 0.5 percent, by weight. See specific condition **B.15.**
[Rule 62-296.406(3), F.A.C.; and, AO 52-244478]

Excess Emissions

B.8. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

B.9. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.
[Rule 62-210.700(2), F.A.C.]

B.10. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

B.11. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.12. Visible emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. See specific condition **B.13.**

[Rules 62-213.440 and 62-297.401, F.A.C.]

B.13. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

- a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
- b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.]

B.14. Sulfur Dioxide. The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor or the permittee upon each fuel delivery. This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions **B.7.** and **B.15.**

[Rule 62-296.406(3), F.A.C.]

B.15. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition.

[Rules 62-213.440 and 62-297.440, F.A.C.]

B.16. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

B.17. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4), F.A.C.]

B.18. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid for more than 400 hours other than during startup.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
 - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
- a. Visible emissions, if there is an applicable standard;
 - b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
 - c. Each NESHAP pollutant, if there is an applicable emission standard.
5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.
9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
- (b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
- (c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.
[Rule 62-297.310(7), F.A.C.; and, SIP approved]

B.19. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
 - b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
 - c. only liquid fuel(s) for less than 400 hours per year.
- [Rule 62-297.310(7)(a)4., F.A.C.]

B.20. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

Record keeping and Reporting Requirements

B.21. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

B.22. All recorded data shall be maintained on file by the Source for a period of five years.

[Rule 62-213.440, F.A.C.]

B.23. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.

8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection C. This section addresses the following emissions unit(s).

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-005	Gas Turbine Peaking Unit #P-1
-006	Gas Turbine Peaking Unit #P-2
-007	Gas Turbine Peaking Unit #P-3
-008	Gas Turbine Peaking Unit #P-4

These emissions units are natural gas and/or No. 2 fuel oil fired combustion turbines manufactured by General Electric (model number MS7000) and are designated as Gas Turbine Peaking Units #P-1, #P-2, #P-3 and #P-4. The manufacturers fuel flow and heat input ratings for each turbine are 5,174 gallons per hour of No. 2 fuel oil, or 714 million cubic feet per hour of natural gas (corresponds to approximately 714 million Btu per hour). The actual heat input rate of the turbine is a function of the ambient temperature. These combustion turbines are used as peaking units during peak demand times, during emergencies, and during controls testing, to run a nominal 56 MW generator (each). Emissions from the combustion turbines are uncontrolled.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. These emissions units are not subject to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines. Each combustion turbine has its own stack. Each combustion turbine began commercial operation in 1972.}

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

C.1. Permitted Capacity. The maximum operation heat input rates are as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
P-1	714	Natural Gas
	714	No. 2 Fuel Oil
P-2	714	Natural Gas
	714	No. 2 Fuel Oil
P-3	714	Natural Gas
	714	No. 2 Fuel Oil
P-4	714	Natural Gas
	714	No. 2 Fuel Oil

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

C.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition C.13.
[Rule 62-297.310(2), F.A.C.]

C.3. Methods of Operation - Fuels. Only natural gas and/or new No. 2 fuel oil shall be fired in the combustion turbines. New No. 2 fuel oil is defined as fuel oil that has been refined from crude oil and has not been used and which may or may not contain additives.
[Rule 62-213.410(1), F.A.C.; and, AO 52-253215A, AO 52-253216A, AO 52-253217A, and AO 52-253218A]

C.4. Hours of Operation. These emissions units may operate continuously, i.e., 8,760 hours/year
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, AO 52-253215A, AO 52-253216A, AO 52-253217A, and AO 52-253218A]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

C.5. Visible Emissions. Visible emissions from each turbine shall not be equal to or greater than 20 percent opacity.
[Rule 62-296.320(4)(b)1., F.A.C.; and, AO 52-253215A, AO 52-253216A, AO 52-253217A, and AO 52-253218A]

C.6. Not federally enforceable. Sulfur Dioxide - Sulfur Content. The sulfur content of the No. 2 fuel oil shall not exceed 0.5 percent, by weight.
[AO 52-253215A, AO 52-253216A, AO 52-253217A, and AO 52-253218A]

Excess Emissions

C.7. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

C.8. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

C.9. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery. See specific condition **C.12**.
[Rule 62-213.440, F.A.C.]

C.10. Determination of Process Variables.

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

C.11. The test method for visible emissions shall be EPA Method 9, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C.
[Rules 62-204.800, 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

C.12. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or latest edition.
[Rules 62-213.440 and 62-297.440, F.A.C.]

C.13. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the peak heat input rate based on the average ambient temperature during the test. The peak heat input rate is defined by a graph of Fuel Heat Input verses Ambient Temperature for each gas turbine. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rules 62-297.310(2), F.A.C.; and, AO 52-253215A, AO 52-253216A, AO 52-253217A, and AO 52-253218A]

C.14. Applicable Test Procedures.

(a) Required Sampling Time.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2.c., F.A.C.]

C.15. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
- b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;
8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; SIP approved]

- C.16. Visible Emissions Testing - Annual.** By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:
- a. only gaseous fuels; or
 - b. gaseous fuels in combination with any amount of liquid fuels for less than 400 hours per year; or
 - c. only liquid fuels for less than 400 hours per year.

[Rules 62-297.310(7)(a)4. & 8., F.A.C.]

Recordkeeping and Reporting Requirements

C.17. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the PCDEM in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

C.18. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- (b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

[Rule 62-297.310(8), F.A.C.]

C.19. Not Federally Enforceable. Operating Reports. The annual operating report shall be based on the following:

- (a) The Btu heating value, sulfur content (percent by weight), API gravity and density of the fuel being fired in the peaking units, shall be based on a weighted 12-month average (calendar year) and be calculated from the fuel delivery receipts and the vendors fuel oil analysis.
- (b) Until further notice by the PCDEM, Florida Power Corporation shall calculate annual emissions (pounds per hour and tons per year), for the Annual Operating Report, by multiplying the total million Btu from fuel usage by the following emissions factors:

Emissions Factors for No. 2 Fuel Oil	
	<u>Pound per MMBtu</u>
Particulate Matter (PM)	0.061 (Total)
PM ₁₀	0.48PM
Carbon Monoxide	0.048
Sulfur Dioxide	1.01(S)
Nitrogen Oxides	0.698
Hydrocarbons (TOC)	0.017

“S” denotes sulfur content, percent by weight. The sulfur dioxide emissions shall be based on a weighted 12-month average “S” value.

[AO 52-253215A, AO 52-253216A, AO 52-253217A, and AO 52-253218A]

Section III. Emissions Unit(s) and Conditions.

Subsection D. This section addresses the following emissions unit(s).

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-009	Flyash Storage Silo with Baghouse

The Unit No. 1 Flyash System has a design transfer capacity of 4,000 pounds of flyash per hour to the storage silo. Emissions from the storage silo are controlled by a Flakt, Inc. Model 90-UKE-16 Arrangement II baghouse. The baghouse contains 16 filter bags, each having a cloth filtration area of 157.0 square feet. The vent fan capacity is 235.0 standard cubic feet per minute.

{Permitting notes: This emissions unit is regulated under Rule 62-210.300, F.A.C., Permits Required. The emissions unit is not subject to Rule 62-296.700, F.A.C. Reasonably Available Control Technology (RACT) Particulate Matter because the emissions unit emits less than one ton per year of particulate matter.}

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

D.1. Permitted Capacity. The maximum permitted flyash transfer rate to the storage silo shall not exceed 4,000 pounds per hour.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, Initial Title V application received June 14, 1996]

D.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **D.9.**
[Rule 62-297.310(2), F.A.C.]

D.3. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. Transfer of flyash to the silo shall not exceed to 700 hours per year.
[Rule 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

D.4. Particulate Matter. At the request of the permittee to qualify for an exemption from the Reasonably Available Control Technology, Particulate Matter requirements of Rule 62-296.700, F.A.C., the maximum allowable emission rate of particulate matter shall not exceed 1.0 pound per hour and 0.35 ton per year.

[Initial Title V application received June 14, 1996; and, AO 52-232464]

D.5. Visible Emissions. Visible emissions shall not exceed five (5) percent opacity.

[Initial Title V application received June 14, 1996; and, AO 52-232464]

Monitoring of Operations

D.6. Determination of Process Variables.

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

D.7. Particulate Matter. The test methods for particulate emissions shall be EPA Method 5 incorporated by reference in Chapter 62-297, F.A.C. **The permittee has elected to accept an alternate standard of five (5) percent opacity to waive the particulate matter compliance test requirement.** See specific condition D.5.

[Rules 62-213.440 and 62-297.620(4), F.A.C.]

D.8. Visible Emissions. EPA Method 9 shall be used to determine opacity compliance pursuant to Chapter 62-297, F.A.C.
[Rule 62-213.440, F.A.C.]

D.9. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rules 62-297.310(2) & (2)(b), F.A.C.]

D.10. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.
[Rule 62-297.310(3), F.A.C.]

D.11. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, attached as part of this permit.

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube. [Rule 62-297.310(4), F.A.C.]

D.12. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit. [Rule 62-297.310(6), F.A.C.]

D.13. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62- 210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
- b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;
- b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
- c. Each NESHAP pollutant, if there is an applicable emission standard.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.
[Rule 62-297.310(7), F.A.C.; and, SIP approved]

Recordkeeping and Reporting Requirements

D.14. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.

7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
 8. The date, starting time and duration of each sampling run.
 9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
 10. The number of points sampled and configuration and location of the sampling plane.
 11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
 12. The type, manufacturer and configuration of the sampling equipment used.
 13. Data related to the required calibration of the test equipment.
 14. Data on the identification, processing and weights of all filters used.
 15. Data on the types and amounts of any chemical solutions used.
 16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
 17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
 18. All measured and calculated data required to be determined by each applicable test procedure for each run.
 19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
 20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
 21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.
- [Rules 62-213.440 and 62-297.310(8), F.A.C.]

Miscellaneous Requirements

D.15. Not Federally Enforceable. Operation and Maintenance Plan. The permittee shall follow the Operation and Maintenance (O&M) Plan received June 4, 1993 and on file with the PCDEM. 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. Timetable for routine maintenance of the pollution control device as specified by the manufacturer.
3. A timetable of routine weekly, bi-weekly, or monthly observations of the pollution control device.
4. A list of the type and quantity of the required spare parts which are stored on the premises for the pollution control device.
5. A record log which shows at a minimum when maintenance was performed, what maintenance was performed, and by whom.

[Pinellas County Ordinance No. 89-70, Section 3, Subpart 2.230(1) & (2), adopted January 2, 1990]

Section III. Emissions Unit(s) and Conditions.

Subsection E. This section addresses the following emissions unit(s).

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-xxx	Relocatable Diesel Fired Generator(s)

These relocatable emissions units are Caterpillar Model 3508-DITA 820 kilowatt diesel generators. The maximum heat input is 25.74 million Btu per hour (MMBtu/hour) while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum rating of 2460 kilowatts. Emissions from the generators are uncontrolled. The generators may be relocated at any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Higgins Plant, Shore Drive, Oldsmar, Pinellas County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. The future FPC Polk County Site, County Road 555, 1 mi. southwest of Homeland, Polk County.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. Each generator has its own stack.}

The following specific conditions apply to the emissions units listed above regardless of location:

Essential Potential to Emit (PTE) Parameters

E.1. Permitted Capacity. The maximum operation heat input rate for each generator shall not exceed 25.74 million Btu per hour.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

E.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition E.13.
[Rule 62-297.310(2), F.A.C.]

E.3. Methods of Operation - Fuels. Only new low sulfur No. 2 fuel oil shall be fired in the combustion turbine(s).
[Rule 62-213.410, F.A.C.]

E.4. Hours of Operation. The hours of operation expressed as “engine-hours” shall not exceed 2970 hours in any consecutive 12 month period. The total hours of operation expressed as “engine-hours” shall be the summation of the individual hours of operation of each generator.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, AO 09-205952.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

E.5. Visible Emissions. Visible emissions from each generator shall not be equal to or greater than 20 percent opacity.
[Rule 62-296.320(4)(b)1., F.A.C.; and, AO 09-205952.]

E.6. Sulfur Dioxide - Sulfur Content. The sulfur content of the new No. 2 fuel oil shall not exceed 0.50 percent, by weight.
[Requested in initial Title V permit application dated June 12, 1996; and, AC 09-202080.]

Excess Emissions

E.7. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

E.8. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

E.9. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor or permittee upon each fuel delivery. See specific condition **E.12.**

[Rule 62-213.440, F.A.C.]

E.10. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

E.11. The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C.

[Rules 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

E.12. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s).

[Rules 62-213.440 and 62-297.440, F.A.C.]

E.13. Operating Rate During Testing. Testing of emissions shall be conducted with the generator(s) operating at 90 to 100 percent of the maximum fuel firing rate of 186.3 gallons per hour. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operations may be limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Failure to submit the actual operating rate may invalidate the test.
[Rules 62-297.310(2), F.A.C.; and, Permit AO 09-205952.]

E.14. Applicable Test Procedures.

(a) Required Sampling Time.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2.c., F.A.C.]

E.15. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
- b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;
8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.
9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. For each generator located in Pinellas County, FPC shall provide the same notification to the Air Quality Division of the Pinellas County Department of Environmental Management.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; SIP approved; and, AO 09-205952.]

E.16. Visible Emissions Testing - Annual. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning liquid fuels for less than 400 hours per year.

[Rules 62-297.310(7)(a)4. & 8., F.A.C.]

E.17. After each relocation, each generator shall be tested within 30 days of startup for opacity and the fuel shall be analyzed for the sulfur content. See specific conditions B.6, B.9, and B.12.

[Rules 62-4.070(3) and 62-297.310(7)(b), F.A.C.; and, AO 09-205952.]

Recordkeeping and Reporting Requirements

E.18. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, the owner or operator shall notify the Department's Southwest District Office, if a generator is located in Pasco County, in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

E.19. Test Reports.

(a) Each generator shall be tested on an annual basis within 30 days of the date October 25.

(b) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(c) The required test report shall be filed with the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management, if a generator is located in Pinellas County, as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(d) The test reports for a unit that has been relocated shall be submitted to the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management, if a generator is located in Pinellas County, within 45 days of testing.

[Rule 62-297.310(8), F.A.C.; and, AO 09-25952.]

E.20. To demonstrate compliance with specific condition **E.4.**, records shall indicate the daily hours of operation for each of the generators, the daily hours of operation expressed as "engine-hours" and the cumulative total hours of operation expressed as "engine-hours" for each month. The records shall be maintained for a minimum of 5 years and made available to the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management upon request.

[Rules 62-213.440 and 62-297.310(8), F.A.C.; and, AO 09-205952.]

E.21. To demonstrate compliance with specific condition **E.6.**, records of the sulfur content, in percent by weight, of all the fuel burned shall be kept based on either vendor provided as-delivered or as-received fuel sample analysis. The records shall be maintained for a minimum of 5 years and made available to the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management upon request.

[Rule 62-297.310(8), F.A.C.; and, AO 09-205952.]

Source Obligation

E.22. Specific conditions in construction permit AC 09-202080, limiting the “engine hours”, were accepted by the applicant to escape Prevention of Significant Deterioration review. If Florida Power Corporation requests a relaxation of any of the federally enforceable emission limits in this permit, the relaxation of limits may be subject to the preconstruction review requirements of Rule 62-212.400(5), F.A.C., as though construction had not yet begun. [Rule 62-212.400(2)(g), F.A.C.; and, AC 09-202080 and AO 09-205952.]

E.23. Florida Power Corporation shall notify the Department’s Southwest District Office, in writing, at least 15 days prior to the date on which any diesel generator is to be relocated. The notification shall specify the following;

- a. which generator, by serial number, is being relocated,
- b. which location the generator is being relocated from and which location it is being relocated to, and
- c. the approximate startup date at the new location.

If a diesel generator is to be relocated within Pinellas County, then Florida Power Corporation shall provide the same notification to the Air Quality Division of the Pinellas County Department of Environmental Management.

[Rule 62-4.070(3), F.A.C.; and, AC 09-202080]

Section IV. This section is the Acid Rain Part.

Operated by: Florida Power Corporation
ORIS code: 634

Subsection A. This subsection addresses Acid Rain, Phase II.

The emissions unit(s) listed below are regulated under Acid Rain, Phase II.

E.U.

ID No. Brief Description

- 001 No. 1 Unit, Fossil Fuel Fired Steam Generator with Electrostatic Precipitator
- 002 No. 2 Unit, Fossil Fuel Fired Steam Generator
- 003 No. 3 Unit, Fossil Fuel Fired Steam Generator

A.1. The Phase II permit application(s) submitted for this facility, as approved by the Department, [is/are] a part of this permit. The owners and operators of these Phase II acid rain unit(s) must comply with the standard requirements and special provisions set forth in the application(s) listed below:

- a. DEP Form No. 62-210.900(1)(a), dated July 1, 1995
 [Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

A.2. Sulfur dioxide (SO₂) allowance allocations requirements for each Acid Rain unit are as follows:

<u>E.U. ID</u> <u>No.</u>	<u>EPA ID</u>	<u>Year</u>	2000	2001	2002
-001	01	SO ₂ allowances, under Table 2 or 3 of 40 CFR Part 73	2785*	2785*	2785*
-002	02	SO ₂ allowances, under Table 2 or 3 of 40 CFR Part 73	2941*	2941*	2941*
-003	03	SO ₂ allowances, under Table 2 or 3 of 40 CFR Part 73	5383*	5383*	5383*

* The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2 or 3 of 40 CFR 73.]

A.3. Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

1. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.400(3), F.A.C.

2. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.

3. Allowances shall be accounted for under the Federal Acid Rain Program.

[Rule 62-213.440(1)(c), F.A.C.]

A.4. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within 60 (sixty) days after the end of the calendar year. {See condition 51., APPENDIX TV-1, TITLE V CONDITIONS}

[Rule 62-214.420(11), F.A.C.]

A.5. Comments, notes, and justifications:

None

Appendix U-1, List of Unregulated Emissions Units and/or Activities.

Florida Power Corporation
Bartow Plant

DRAFT Permit No.: 1030011-002-AV
Facility ID No.: 1030011

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘exempt emissions units’.

E.U. ID

<u>No.</u>	<u>Brief Description of Emissions Units and/or Activity</u>
-xxx	General Boiler Building - Emergency diesel generator (basement) - 300 gallon fuel oil tank
-xxx	North Terminal - Diesel engine - Cummings 175 hp - 150 gallon No. 2 oil tank
-xxx	South Terminal - Gasoline tank, filling station
-xxx	South Terminal - No. 2 oil storage tank
-xxx	Turbine - Solvent Storage - Navee cleaner storage tank (4X4X4)
-xxx	Gas Turbine 1, 2, 3, and 4 - Lube oil vent with demister
-xxx	Gas Turbine 1, 2, 3, and 4 - Underground 2,600 gallon lube oil storage tank
-xxx	Gas Turbine 1, 2, 3, and 4 - 500 gallon waste oil storage tank
-xxx	Fuel Storage - Tank No. 1, 2 and 3 - 150,000 bbls No. 6 fuel oil
-xxx	Fuel Storage - Tank No. 4 and 5 - 200,000 bbls No. 6 fuel oil
-xxx	Fuel Storage - Tank No. 6 - 100,000 bbls No. 2 fuel oil
-xxx	Fuel Storage - Tank No. 7 and 8 - 259,000 bbls No. 6 fuel oil
-xxx	Flyash Handling System - Flyash disposal
-xxx	General Site - Two, 500 gallon propane gas tanks for Unit 2 and 3 ignitors
-xxx	Tank No. CT#01(2R), CT#02(3R), and CT#03(4R), CT#04(5R) - 5,509 gallons waste oil
-xxx	Tank No. CT#6(11) - 4,118,142 gallons No. 2 fuel oil
-xxx	Tank No. #1(1R) - 1,008 gallons unleaded gasoline
-xxx	Tank No. #2(16) - 34,128 gallons No. 2 fuel oil
-xxx	Tank No. #4(7) - 6,354,768 gallons No. 6 fuel oil
-xxx	Tank No. #12 - 100 gallons diesel - emergency fire pump
-xxx	Tank No. #13 - 200 gallons diesel - emergency generator
-xxx	Tank No. #15(6) - 550 gallons diesel - vehicle
-xxx	Tank No. #16(19) - 65,460 gallons fuel additive
-xxx	Tank No. Boiler Day Tk(15) - 18,675 gallons No. 2 fuel oil
-xxx	Tank No. Terminal #1(9) - 6,329,232 gallons No. 6 fuel oil
-xxx	Tank No. Terminal #2(10) - 8,447,544 gallons No. 6 fuel oil
-xxx	Tank No. Terminal #3(12) - 10,540,740 gallons No. 6 fuel oil
-xxx	Tank No. Terminal #4(13) - 10,542,294 gallons No. 6 fuel oil
-xxx	Tank No. Substation #1 and Substation #2 - 16,002 gallons cable oil

Appendix E-1, List of Exempt Emissions Units and/or Activities.

Florida Power Corporation
Bartow Plant

DRAFT Permit No.: 1030011-002-AV
Facility ID No.: 1030011

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Full Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining whether a facility containing such emissions units or activities would be subject to any applicable requirements. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., are also exempt from the permitting requirements of Chapter 62-213, F.A.C., provided such emissions units and activities also meet the exemption criteria of Rule 62-213.430(6)(b), F.A.C. The below listed emissions units and/or activities are hereby exempt pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

1. Water Laboratory solvent use and hood-chemical analyses for water
2. Water Laboratory flammable chemical storage cabinet
3. Machine Shop sand blaster, drill press, welding, lathes, hand-held tools, ect.
4. General Boiler Building fire protection equipment
5. North Terminal - Diesel fire pump building flammable liquid cabinet
6. North Terminal - Foam Building Nat. foam XL - 3%; 2,600 gallons
7. South Terminal - Machine Shop sand blaster, drill press, welding, lathes, hand-held tools, ect.
8. Turbine - Fire Protection CO2 fire system
9. Fuel Storage foam fire protection system
10. General Site surface coating <6.0 gallons per day
11. General Site brazing, soldering and welding

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Table 1-1, Summary of Air Pollutant Standards and Terms

Florida Power Corporation
Bartow Plant

DRAFT Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.	Brief Description
[-001]	No. 1 Unit, Fossil Fuel Fired Steam Generator with Electrostatic Precipitator
[-002]	No. 2 Unit, Fossil Fuel Fired Steam Generator
[-003]	No. 3 Unit, Fossil Fuel Fired Steam Generator

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
PM [EU-001]	All	8,760	0.1 lb/MMBtu	122.0	534.4			Rules 62-296.405(1)(b), 62-296.700(4)(b) & 62-296.702(2)(a)	A.7.
PM [EU-002]	All	8,760	0.1 lb/MMBtu	131.7	576.9			Rules 62-296.405(1)(b), 62-296.700(4)(b) & 62-296.702(2)(a)	A.7.
PM [EU-003]	All	8,760	0.1 lb/MMBtu	221.1	968.6			Rules 62-296.405(1)(b), 62-296.700(4)(b) & 62-296.702(2)(a)	A.7.
PM [EU-001]	All	8,760	0.3 lb/MMBtu	366.0				Rules 62-210.700(3) & 62-296.700(4)(b)	A.8.
PM [EU-002]	All	8,760	0.3 lb/MMBtu	395.1				Rules 62-210.700(3) & 62-296.700(4)(b)	A.8.
PM [EU-003]	All	8,760	0.3 lb/MMBtu	663.3				Rules 62-210.700(3) & 62-296.700(4)(b)	A.8.
SO ₂ [EU-001]	Liquid	8,760	2.75 lb/MMBtu			3,355.0	14,694.9	Rule 62-296.405(1)(c)1.j.	A9.
SO ₂ [EU-002]	Liquid	8,760	2.75 lb/MMBtu			3,821.75	15,863.28	Rule 62-296.405(1)(c)1.j.	A9.
SO ₂ [EU-003]	Liquid	8,760	2.75 lb/MMBtu			6,080.25	26,631.5	Rule 62-296.405(1)(c)1.j.	A9.
SO ₂	Liquid	8,760	2.5% by weight sulfur					Rule 62-296.405(1)(a)3.	A10.
VE	All	8,760	40% opacity					Rule 62-296.405(1)(a) & OGC Orders #6-1577 & 87-1261	A.5.
VE	All	3 hr/24 hr	60% opacity					Rule 62-210.700(3)	A.6.

Notes:

* The "Equivalent Emissions" listed are for informational purposes only.

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Table 1-1, Summary of Air Pollutant Standards and Terms

Florida Power Corporation
Bartow Plant

DRAFT Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. **Brief Description**
[-004] Bartow-Anclote Pipeline Heating Boiler

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
SO ₂	Liquid	8,760	0.5% by weight sulfur			8.52	37.34	Rule 62-296.406(3)	B.7.
VE	All	8,760	20% except 40% 2 min/hr					Rule 62-296.406(1)	B.5.
VE	All	3 hr/24 hr	60% opacity					Rule 62-210.700(3)	B.6.

Notes:
* The "Equivalent Emissions" listed are for informational purposes only.

[electronic file name: 10300111.xls]

Table 1-1, Summary of Air Pollutant Standards and Terms

Florida Power Corporation
Bartow Plant

DRAFT Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.	Brief Description
I-005]	Gas Turbine Peaking Unit #P-1
I-006]	Gas Turbine Peaking Unit #P-2
I-007]	Gas Turbine Peaking Unit #P-3
I-008]	Gas Turbine Peaking Unit #P-4

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions *		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
SO ₂	Liquid	8,760	0.5% by weight sulfur			392.7	1,720.0	AO52-253215A, 253216A, 253217A & 253218A	C.6.
VE	All	8,760	20% opacity					Rule 62-296.320(4)(b)1.	C.5.

Notes:
* The "Equivalent Emissions" listed are for informational purposes only.

[electronic file name: 10300111.xls]

Table 1-1, Summary of Air Pollutant Standards and Terms

Florida Power Corporation
Bartow Plant

DRAFT Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. **Brief Description**
[-009] Flyash Silo with Baghouse

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
PM		8,760 w/ 700 transferring		1.0	0.35			Applicant request & A052-232464	D.4.
VE		8,760	5% opacity					Applicant request & A052-232464	D.5.

Notes:
* The "Equivalent Emissions" listed are for informational purposes only.

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Table 1-1, Summary of Air Pollutant Standards and Terms

Florida Power Corporation
Bartow Plant

DRAFT Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. Brief Description
[-xxx] Relocatable Diesel Fired Generator(s)

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
SO ₂	Liquid	2,970	0.5% by weight Sulfur			14.16	21.02	Applicant request & AC09-202080	E.4. & E.6.
VE	All	2,970	20% opacity					Applicant request & A009-205952	E.5.

Notes:
* The "Equivalent Emissions" listed are for informational purposes only.

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Table 2-1, Summary of Compliance Requirements

Florida Power Corporation
Bartow Plant

DRAFT Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.	Brief Description
I-001]	No. 1 Unit, Fossil Fuel Fired Steam Generator with Electrostatic Precipitator
I-002]	No. 2 Unit, Fossil Fuel Fired Steam Generator
I-003]	No. 3 Unit, Fossil Fuel Fired Steam Generator

Pollutant Name or Parameter	Fuels)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	
						Yes	See permit condition(s)
VE EUI-001]	All	EPA Method 9	6 months	3/16 & 9/16	60 min	Yes	A.19., A.29.and A.30.
VE EUI-002 & -003]	All	EPA Method 9	Annual	5/28 & 4/28	60 min		A.19.and A.30.
PM EUI-001]	All	EPA Method 17, 5, 5B or 5F	6 months	3/16 & 9/16	1 hr		A.20., A.29.and A.31.
PM EUI-002 & -003]	All	EPA Method 17, 5, 5B or 5F	Annual	5/28 & 4/28	1 hr		A.20.and A.31.
SO ₂	Liquid	EPA Method 6, 6A, 6B, or 6C; or fuel analysis	Annual	w/ PM test	1 hr		A.21.and A.22.
Used oil	On-specification	EPA SW-846	each batch				A.11., A.12., A.13., & A.32.

Notes:

* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

** CMS [=] continuous monitoring system

Electronic file name: 10300112.xls

Table 2-1, Summary of Compliance Requirements

Florida Power Corporation
Bartow Plant

DRAFT Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. **Brief Description**
I-004] Bartow-Anclote Pipeline Heating Boiler

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	
							See permit condition(s)
VE SO ₂	All Liquid	DEP Method 9 ASTM Methods	Annual each delivery	31-May	30 min		B.12. & B.13. B.14. & B.15.

Notes:

* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

** CMS [=] continuous monitoring system

[electronic file name: 10300112.xls]

Table 2-1, Summary of Compliance Requirements

Florida Power Corporation
Bartow Plant

DRAFT Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.	Brief Description
[-005]	Gas Turbine Peaking Unit #P-1
[-006]	Gas Turbine Peaking Unit #P-2
[-007]	Gas Turbine Peaking Unit #P-3
[-008]	Gas Turbine Peaking Unit #P-4

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)

Notes:
 * The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.
 **CMS [=] continuous monitoring system

[electronic file name: 10300112.xls]

Table 2-1, Summary of Compliance Requirements

Florida Power Corporation
Bartow Plant

DRAFT Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. **Brief Description**
[-009] Flyash Storage Silo with Baghouse

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS **	
							See permit condition(s)
PM		EPA Method 5	Renewal	16-Mar	1 hr		D.7.
VE		EPA Method 9	Annual	16-Mar	30 min		D.8.

Notes:
 * The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.
 **CMS [=] continuous monitoring system

[electronic file name: 10300112.xls]

Table 2-1, Summary of Compliance Requirements

Florida Power Corporation
Bartow Plant

DRAFT Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. **Brief Description**
[-xxx] Relocatable Diesel Fired Generator(s)

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	See permit condition(s)	
						CMS **	
VE SO ₂	Liquid	EPA Method 9 ASTM Methods	Annual each delivery	30 days from startup	30 min		E.11. E.12.

Notes:
 * The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.
 ** CMS [=] continuous monitoring system

[electronic file name: 10300112.xls]

Appendix H-1, Permit History/ID Number Changes

Florida Power Corporation
P. L. Bartow

DRAFT Permit No.: 1030011-002-AV
Facility ID No.: 1030011

Permit History (for tracking purposes):

E.U.

<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u> ^{1,2}	<u>Revised Date(s)</u>
-001	Bartow Plant Unit #1	AO52-233149	12/29/93	12/28/98		02/19/97
-002	Bartow Plant Boiler #2	AO52-216412	01/26/93	09/16/98		02/19/97
-003	Bartow Plant Boiler #3	AO52-216413	01/27/93	09/16/98		08/16/95 02/19/97
-004	Bartow Pipeline Heater Boiler	AO52-244478	04/18/94	04/18/99		
-005	Gas Turbine Peaking Unit #P-1	AO52-253215	11/23/94	11/01/99		01/13/97
-006	Gas Turbine Peaking Unit #P-2	AO52-253216	11/23/94	11/01/99		01/13/97
-007	Gas Turbine Peaking Unit #P-3	AO52-253217	11/23/94	11/01/99		01/13/97
-008	Gas Turbine Peaking Unit #P-4	AO52-253218	11/23/94	11/01/99		01/13/97
-009	Flyash Storage Silo w/Baghouse	AO52-232464	08/30/93	08/26/98		
-xxx	Relocatable Diesel Generator(s)	AO09-205952		03/31/97		

(if applicable) ID Number Changes (for tracking purposes):

From: Facility ID No.: 40PNL520011

To: Facility ID No.: 1030011

Notes:

1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.

2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

Florida Power Corporation
Bartow Plant
Facility ID No.: 1030011
Pinellas County

Initial Title V Air Operation Permit
DRAFT Permit No.: 1030011-002-AV

Permitting Authority:

State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 904/488-1344
Fax: 904/922-6979

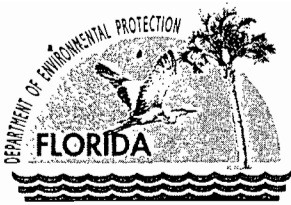
Compliance Authority:

Pinellas County Department of Environmental Management
Air Quality Division
300 South Garden Avenue
Clearwater, Florida 34616
Telephone: 813/464-4422
Fax: 813/464-4420

Initial Title V Air Operation Permit
DRAFT Permit No.: 1030011-002-AV

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Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

Permittee:

Florida Power Corporation
3201 34th Street South
St. Petersburg, Florida 33711

DRAFT Permit No.: 1030011-002-AV

Facility ID No.: 1030011

SIC Nos.: 49, 4911

Project: Initial Title V Air Operation Permit

This permit is for the operation of the Bartow Plant. This facility is located on Weedon Island, St. Petersburg, Pinellas County; UTM Coordinates: Zone 17, 342.4 km East and 3,082.6 km North; Latitude: 27° 52' 10" North and Longitude: 82° 35' 59" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix U-1, List of Unregulated Emissions Units and/or Activities
Appendix E-1, List of Exempt Emissions Units and/or Activities
APPENDIX TV-1, TITLE V CONDITIONS (version dated 08/11/97)
APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)
TABLE 297.310-1, CALIBRATION SCHEDULE (version dated 10/07/96)
Phase II Acid Rain Application/Compliance Plan received December 22, 1995
Alternate Sampling Procedure: ASP Number 97-B-01
OGC Order No. 86-1577
OGC Order No. 87-1261

Effective Date: January 1, 1998

Renewal Application Due Date: July 5, 2002

Expiration Date: December 31, 2002

Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/sms/es

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Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of three fossil fuel fired steam generators subject to Phase II Acid Rain, a pipeline heating boiler, four gas turbine peaking units, a flyash silo and relocatable diesel generators that can be located at various Florida Power Corporation power plants, as needed.

Also included in this permit are miscellaneous unregulated/exempt emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1997, this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-001	No. 1 Unit, Fossil Fuel Fired Steam Generator with Electrostatic Precipitator
-002	No. 2 Unit, Fossil Fuel Fired Steam Generator
-003	No. 3 Unit, Fossil Fuel Fired Steam Generator
-004	Bartow-Anclote Pipeline Heating Boiler
-005	Gas Turbine Peaking Unit #P-1
-006	Gas Turbine Peaking Unit #P-2
-007	Gas Turbine Peaking Unit #P-3
-008	Gas Turbine Peaking Unit #P-4
-009	Flyash Storage Silo with Baghouse
-xxx	Relocatable Diesel Fired Generator(s)

Unregulated Emissions Units and/or Activities
{See Appendix U-1}

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/ID Number Changes

These documents are on file with the permitting authority:

Initial Title V Permit Application received June 14, 1996

Additional Information Request dated May 20, 1997

Additional Information Response received August 25, 1997

Letter Dated June 24, 1996 Re: PSD Applicability Determination - Bartow Unit No. 1 PSD

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-1, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}
2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.; and, Pinellas County Ordinance No. 89-70, Subpart 6.620, as amended]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]
4. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:
 - a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and
 - b. certification forms and/or RMPs according to the promulgated rule schedule.[40 CFR 68]
5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]
6. Exempt Emissions Units and/or Activities. Appendix E-1, List of Exempt Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

7. Not federally enforceable. General Pollutant Emission Limiting Standards. Volatile Organic Compounds Emissions or Organic Solvents Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
[Rule 62-296.320(1)(a), F.A.C.]

8. Not federally enforceable. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: maintenance of paved areas as needed, regular mowing of grass and care of vegetation, and limiting access to plant property by unnecessary vehicles.
[Rule 62-296.320(4)(c)2., F.A.C.; and, proposed by applicant in the initial Title V permit application received June 14, 1996.]

9. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

10. The permittee shall submit all compliance related notifications and reports required of this permit to the Pinellas County Department of Environmental Management (PCDEM) office:

Pinellas County Department of Environmental Management
Air Quality Division
300 South Garden Avenue
Clearwater, Florida 34616
Telephone: 813/464-4422
Fax: 813/464-4420

11. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Operating Permits Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9099
Fax: 404/562-9095

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions units.

E.U.

ID No. Brief Description

- | | |
|------|---|
| -001 | No. 1 Unit, Fossil Fuel Fired Steam Generator with Electrostatic Precipitator |
| -002 | No. 2 Unit, Fossil Fuel Fired Steam Generator |
| -003 | No. 3 Unit, Fossil Fuel Fired Steam Generator |

Unit No. 1 is a front-fired, fossil fuel steam generator which produces 120 megawatts, electric, power. The maximum heat input rate is 1,220 million Btu per hour and the unit fires No. 6 fuel oil, No. 2 fuel oil, and on-specification used oil. Particulate matter emissions are controlled by a General Electric Services, Inc. Model 1-BAB1.2X37(9)36.0-434-4.3P electrostatic precipitator consisting of five fields in depth. A Durag Model 281 Continuous Emissions Monitor for opacity with a recorder is used for continual observation of stack opacity. Unit 1 began commercial service in 1958.

Unit No. 2 is a tangential-fired fossil fuel fired steam generator which produces 120 megawatts, electric, power. The maximum heat input rate is 1,317 million Btu per hour and the unit fires No. 6 fuel oil, No. 2 fuel oil, on-specification used oil, and propane. Emissions from Unit No. 2 are uncontrolled. Unit 2 began commercial service in 1961.

Unit No. 3 is a tangential-fired fossil fuel fired steam generator which produces 225 megawatts, electric, power. The maximum heat input rate is 2,211 million Btu per hour and the unit fires No. 6 fuel oil, natural gas, No. 2 fuel oil, on-specification used oil, and propane. Emissions from Unit No. 2 are uncontrolled. Unit 3 began commercial service in 1963.

{Permitting note(s): The emissions units are regulated under Acid Rain, Phase II; Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with more than 250 million Btu per Hour Heat Input; Rule 62-296.700, F.A.C. Reasonably Available Control Technology (RACT) Particulate Matter; and, Rule 62-296.702, F.A.C. Fossil Fuel Steam Generators.}

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum operation heat input rates are as follows:

<u>E.U. ID No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel</u>
-001	1,220	new No. 6 fuel oil
	1,220	On-specification used oil
-002	1,317	new No. 6 fuel oil
	1,317	On-specification used oil
-003	2,211	new No. 6 fuel oil
	2,266	Natural gas
	2,211	On-specification used oil
	2,266	Natural gas and new No. 6 fuel oil and/or on-specification used oil with a maximum of 2,211 MMBtu/hr from the new No. 6 fuel oil and/or on-specification used oil

[Rules 62-4.160(2), 62-210.200(PTE), 62-296.405 and 62-296.702, F.A.C.]

A.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **A.24.** [Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation. Fuels. The only fuels allowed to be burned are:.

<u>E.U. ID No.</u>	<u>Fuel</u>
-001	new No. 6 fuel oil
	No. 2 fuel oil
	On-specification used oil
-002	new No. 6 fuel oil
	No. 2 fuel oil
	On-specification used oil
-003	Propane
	new No. 6 fuel oil
	Natural gas
	No. 2 fuel oil
	On-specification used oil
	Propane

Each emissions units may burn the allowed fuels either alone or in any combination. On-Specification used oil containing any quantifiable levels of PCBs can only be fired when the emissions unit is at normal operating temperatures.

[Rule 62-213.410, F.A.C.; and, 40 CFR 271.20(e)(3)]

A.4. Hours of Operation. These emissions units may operate continuously, i.e., 8,760 hours/year.
[Rule 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.5. Visible Emissions. Visible emissions shall not exceed 40 percent opacity.
[Rules 62-296.405(1)(a) and 62-296.702(2)(b), F.A.C.; and, OGC Order Nos. 86-1577 & 87-1261]

A.6. Visible Emissions - Soot Blowing and Load Change. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

Visible emissions above 60 percent opacity shall be allowed for not more than 4, six (6) - minute periods, during the 3-hour period of excess emissions allowed under this subparagraph, for boiler cleaning and load changes, at units which have installed and are operating, or have committed to install or operate, continuous opacity monitors.

[Rules 62-210.700(3) and 62-296.702(2)(b), F.A.C.]

A.7. Particulate Matter. Particulate matter emissions shall not exceed the following , as measured by applicable compliance methods:

<u>E.U. ID No.</u>	<u>lb/MMBtu heat input</u>	<u>lb/ hr</u>	<u>Tons per Year</u>
-001	0.1	122.0	534.4
-002	0.1	131.7	576.9
-003	0.1	221.1	968.6

[Rules 62-296.405(1)(b), 62-296.700(4)(b) and 62-296.702(2)(a), F.A.C.]

A.8. Particulate Matter - Soot Blowing and Load Change. Particulate matter emissions shall not exceed an average of the following during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

<u>E.U. ID No.</u>	<u>lb/MMBtu heat input</u>	<u>lb/ hr</u>
-001	0.3	366.0
-002	0.3	395.1
-003	0.3	663.3

[Rules 62-210.700(3) and 62-296.700(4)(b), F.A.C.]

A.9. Sulfur Dioxide. When burning liquid fuel, sulfur dioxide emissions shall not exceed 2.75 pounds per million Btu heat input, as measured by applicable compliance methods.
 [Rule 62-296.405(1) (c)1.j., F.A.C.]

A.10. Sulfur Dioxide - Sulfur Content. The new No. 6 fuel oil sulfur content shall not exceed 2.5 percent, by weight. The sulfur content of the on-specification used oil shall not exceed 2.5 percent by weight. See specific condition **A.22.**
 [Rule 62-296.405(1)(e)3., F.A.C.; and, AO 52-216412, AO 52-216413 & AO 52-233149]

A.11. “On-Specification” Used Oil. Only “on-specification” used oil shall be fired in these units. The quantity of on-specification used oil fired in emissions units -001, -002 and -003 shall not exceed a total of 14.85 million gallons per consecutive 12-month period and 2.475 million gallons per month. “On-specification” used oil is defined as used oil that meets the 40 CFR 279 (Standards for the Management of Used Oil) specifications listed below. Used oil that does not meet all of the following specifications is considered “off-specification” oil and shall not be fired.

<u>CONSTITUENT / PROPERTY-*</u>	<u>ALLOWABLE LEVEL</u>
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash Point	100 °F minimum
PCBs	less than 50 ppm**

* As determined by approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

** Used oil shall not be blended to meet this requirement.

[40 CFR 279.11; 40 CFR 761.20; and, AO 52-216412, AO 52-216413 & AO 52-233149]

A.12. "On-Specification" Used Oil. Before accepting from each marketer the first shipment of on-specification used oil with a PCB concentration above the detectable level, the permittee shall provide each marketer with a one-time written and signed notice certifying that the permittee will burn the used oil in a qualified combustion device. The notice must state that EPA or a RCRA-delegated state agency has been given a description of the used oil management activities at the facility and that an industrial boiler or furnace will be used to burn the used oil with PCB concentrations above the detectable level. The description of the used oil management activities shall be submitted to the Administrator, Hazardous Waste Regulation Section, Florida Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

[40 CFR 279.61 and 40 CFR 761.20(e)(3)(ii)]

A.13. "On-Specification" Used Oil. Each shipment or on-site generated batch of used oil shall be sampled and analyzed for the constituents listed in specific condition **A.11**. A claim that the used oil does not contain quantifiable levels of PCBs must be documented by analysis or other information. The first person making the claim that the used oil does not contain PCBs is responsible for furnishing the documentation. The documentation can be tests, personal or special knowledge of the source and composition of the used oil, or a certification from the person generating the used oil claiming that the used oil contains no detectable PCBs.

[40 CFR 761.20(e)(2); and, Rule 62-4.070(3), F.A.C.]

Excess Emissions

A.14. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

A.15. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.

[Rule 62-210.700(2), F.A.C.]

A.16. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

A.17. Sulfur Dioxide. The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor or the permittee upon each fuel delivery. This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions **A.10., A.21. and A.22.**

[Rule 62-296.405(1)(f)1.b., F.A.C.]

A.18. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.19. Visible emissions. The test method for visible emissions shall be:

a. E.U. ID Nos. -001, -002 and -003 EPA Method 9, incorporated in Chapter 62-297, F.A.C.

b. E.U. ID No. -001 Continuous opacity monitor.

[Rule 62-296.702(3)(a)1., F.A.C.; and, AO 52-233149]

A.20. Particulate Matter. The test methods for particulate emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17.

[Rules 62-296.405(1)(e)2., 62-297.401 and 62-296.702(3)(b), F.A.C.]

A.21. Sulfur Dioxide. The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedences of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. **The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, as an alternate sampling procedure authorized by permit, the permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor or the permittee upon each fuel delivery.** See specific conditions A.10. and A.22.
[Rules 62-213.440, 62-296.405(1)(e)3. and 62-297.401, F.A.C.; and, AO 52-216412, AO 52-216413 & AO 52-233149]

A.22. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition.
[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

A.23. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.
[Rule 62-297.310(1), F.A.C.]

A.24. Operating Rate During Testing. Testing of emissions shall be conducted while firing new No. 6 fuel oil or new No. 6 fuel oil/on-specification used oil with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.; and AO 52-216412, AO 52-216413 & AO 52-233149]

A.25. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

A.26. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, attached as part of this permit.

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

[Rule 62-297.310(4), F.A.C.]

A.27. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

A.28. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid for more than 400 hours other than during startup.
3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62- 210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
 - a. Did not operate; or
 - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
 - a. Visible emissions, if there is an applicable standard;
 - b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
 - c. Each NESHAP pollutant, if there is an applicable emission standard.
5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.
9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.
[Rule 62-297.310(7), F.A.C.; and, SIP approved]

A.29. Frequency of Compliance Tests. E.U. ID No.-001 was authorized by order of the Department Secretary dated December 7, 1982 (OGC File Number 82-0564) to test particulate matter emissions and visible emissions every six months with a 40 percent opacity limit. Failure of this emissions unit to meet either the particulate standard or the opacity standard in the future shall constitute grounds for revocation of this authorization and a return to more frequent testing.
[OGC Order No. 87-1261]

A.30. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rule 62-297.310(7)(a)4., F.A.C.]

A.31. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

A.32. Compliance with the “on-specification” used oil requirements will be determined as follows:

- (a) Analysis of a sample collected from each batch delivered for firing; or,
- (b) The new batch delivery is from a collection site that has an acceptable analysis already on file with the facility and the analytical results are assumed by the facility for the batch.
- (c) For quantification purposes, the highest concentration of each constituent as determined by any analysis is assumed to be the concentration of the constituent of the blended used oil.

See specific condition **A.11.**

[AO 52-216412, AO 52-216413 & AO 52-233149]

Record keeping and Reporting Requirements

A.33. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the PCDEM in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the PCDEM.

[Rule 62-210.700(6), F.A.C.]

A.34. Submit to the PCDEM a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years.

[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

A.35. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- (b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
 - 1. The type, location, and designation of the emissions unit tested.
 - 2. The facility at which the emissions unit is located.
 - 3. The owner or operator of the emissions unit.
 - 4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.

5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

A.36. In order to document continuing compliance with specific condition **A.11.**, the permittee shall maintain the following records:

- (a) The quantity of used oil accepted, the date of acceptance, and the receiving tank ID No.
- (b) The name, address, and EPA identification number (if applicable) of all transporters and generators or processors/re-refiners of the used oil delivered to the facility.
- (c) A copy of the notice to EPA or a RCRA-delegated state agency and a copy of the one-time written notice provided to each marketer.
- (d) Results of the analyses required in specific condition **A.11.**
- (e) Documentation that the used oil contains below detectable levels of PCBs, if claimed, including the name and address of the person making the claim.
- (f) The date, time Unit No., and a statement of the status of the unit (startup, normal operating, or shutdown) when burning used oil containing detectable levels of PCBs. Records of percent full load shall be made available, if requested.
- (g) The monthly total of used oil burned at the facility (based on monthly receipts).
- (h) The total of used oil burned at the facility for the most recent consecutive 12-month period.

These records shall be recorded in a permanent form suitable for inspection by the Department upon request, and shall be retained for at least a five year period.

[40 CFR 279.65 & 66; 40 CFR 761.20(3)(b); and, Rule 62-4.070(3), F.A.C.]

A.37. The permittee shall include in the "Annual Operating Report for Air Pollutant Emitting Facility" a summary of the on-specification used oil analyses for the calendar year and a statement of the total quantity of on-specification used oil received and fired during the calendar year.

[Rule 62-4.070(3), F.A.C.; and, AO 52-216412, AO 52-216413 & AO 52-233149]

A.38. Compliance with the oil sulfur content and the sulfur dioxide emissions limitations of specific conditions **A.9.** and **A.10.** shall be documented by the permittee through submittal of quarterly reports of the Bartow Plant monthly average fuel oil sulfur content, heat content and the resulting sulfur dioxide emission rate in pounds per million Btu heat input. These quarterly reports shall be submitted to PCDEM within 30 days of the end of each calendar quarter.

[Rule 62-4.070(3), F.A.C.; and AO 52-216412, AO 52-216413 & AO 52-233149]

A.39. 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. Until further notice by the Department the permittee shall calculate particulate matter emissions by multiplying the particulate matter stack test results by the hours of operation. Other annual emissions shall be determined by multiplying the annual fuel use by the following emissions factors:

E.U. ID No. -001

Pollutant	No. 6 fuel oil (lb/1000 gal)
SO ₂	157(S)
CO	5
NO _x	67
VOC	0.76

E.U. ID No. -002

Pollutant	No. 6 fuel oil (lb/1000 gal)
SO ₂	157(S)
CO	5
NO _x	42
VOC	0.76

E.U. ID No. -003

Pollutant	No. 6 fuel oil (lb/1000 gal)	Natural Gas (lb/MMcf)
SO ₂	157(S)	0.6
CO	5	5
NO _x	42	550
VOC	0.76	1.4

[AO 52-216412, AO 52-216413 & AO 52-233149]

Miscellaneous Requirements

A.40. Process Parameters.

	E.U. ID No. -001	E.U. ID No. -002	E.U. ID No. -002
Heat Input Rate	1,220 MMBtu/hr (maximum)	1,317 MMBtu/hr (maximum)	2,266 MMBtu/hr (maximum)
Fuel	New No. 6 fuel oil with a sulfur content of 2.5%, by weight (maximum) and on- specification used oil with a sulfur content of 2.5%, by weight (maximum)	New No. 6 fuel oil with a sulfur content of 2.5%, by weight (maximum) and on- specification used oil with a sulfur content of 2.5%, by weight (maximum)	New No. 6 fuel oil with a sulfur content of 2.5%, by weight (maximum) and on- specification used oil with a sulfur content of 2.5%, by weight (maximum) (also natural gas when available)
Fuel Firing Rate	7,854 gal/hr (187 BBL/hr) new No. 6 fuel oil and/or on- specification used oil (maximum)	8,778 gal/hr (209 BBL/hr) new No. 6 fuel oil and/or on- specification used oil (maximum)	14,742 gal/hr (351 BBL/hr) new No. 6 fuel oil and/or on- specification used oil, 2.2 MMCF/hr natural gas (maximum)
Ash Content	As sampled	As sampled	As sampled
Steam Temperature	1,000°F	1,000°F	1,000°F
Steam Pressure	1,850 psi	1,850 psi	2,050 psi
Steam Flow Rate	900,000 lb/hr	919,600 lb/hr	1,423,500 lb/hr
Stack Height	300 ft	300 ft	300 ft
Boiler Manufacturer	Babcock & Wilcox	Combustion Engineering	Combustion Engineering
Burner Arrangement	Front fired	Tangential fired	Tangential fired

Inspection and Maintenance Program.

- (a) Scheduled during major outages: Boilers, controls, auxiliaries, burners and duct work are to be inspected and repaired as necessary. All parts are to be inspected, cleaned and replaced as necessary.
- (b) Scheduled during non-peak load periods in Spring and Fall: This schedule is affected by forced outage requirements.

(c) the following operating parameters are to be continuously monitored and maintained at appropriate levels to produce efficient fuel combustion:

1. fuel flow rate
2. fuel temperature
3. fuel pressure
4. air flow rate
5. steam flow rate
6. steam temperature
7. steam pressure

(d) Plant operators are to monitor, adjust and record the following operating parameters at least once per day to assure efficient plant operation:

1. temperatures (superheat, reheat, and fuel)
2. flows (steam, feedwater, and fuel)
3. unit load

(e) fuel oil quality is to be checked prior to delivery and a daily sample taken each day the facility is operated for a monthly composite analysis. Fuel oil analysis (by ASTM Methods) is to be analyzed for the following:

1. heat content (Btu/gal)
2. sulfur content (%S by weight)
3. density
4. API gravity

Records of inspection, maintenance, and performance parameters shall be retained a minimum of five years and shall be made available for inspection upon request.

[Rule 62-296.700 (6)(d), F.A.C.; and, AO 52-216412, AO 52-216413 & AO 52-233149]

A.41. E.U. ID No. -001 Operation and Maintenance Plan. The 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 Operation and Maintenance (O&M) Plan, dated 10/04/93 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. A timetable of routine weekly, bi-weekly, or monthly observations of the pollution control device.
3. A list of the type and quantity of the required spare parts which are stored on the premises for the pollution control device.
4. A record log which shows at a minimum when maintenance was performed, what maintenance was performed, and by whom.

[Rule 62-296.700(6), F.A.C.; and Pinellas County Ordinance No. 89-70, Subpart 2.230, as amended]

Section III. Emissions Unit(s) and Conditions.

Subsection B. This section addresses the following emissions unit(s).

E.U.

ID No. Brief Description

-004 Bartow-Anclote Pipeline Heating Boiler

The Bartow-Anclote Pipeline Heating Boiler is used to heat fuel oil being transferred from the Bartow Plant to the Anclote Plant. The boiler's maximum heat input rate is 15.5 million Btu per hour firing natural gas, No. 2 fuel oil, or propane. Emissions from the boiler are uncontrolled.

{Permitting note(s): The emissions unit is regulated under Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with Less than 250 million Btu per Hour Heat Input}

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum operation heat input rate is 15.5 million Btu per hour. [Rules 62-4.160(2), 62-210.200(PTE) and 62-296.406, F.A.C.]

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **B.16.** [Rule 62-297.310(2), F.A.C.]

B.3. Methods of Operation. Fuels. This boiler is permitted to fire only the following fuels and at the maximum rates shown:

Fuel	Maximum % Sulfur	Maximum MMBtu/hr	Maximum Fuel Usage
Natural Gas	--	15.5	15 Mcf/hr
No. 2 Fuel Oil*	0.5% by weight	15.5	110 gal/hr
Propane	--	15.5	191 gal/hr

* New No. 2 fuel oil only (waste or recycled oil is not allowed)
[Rule 62-213.410, F.A.C.; and, AO 52-244478]

B.4. Hours of Operation. This emissions unit may operate continuously, i.e., 8,760 hours/year. [Rule 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.5. Visible Emissions. Visible emissions shall not exceed 20 percent opacity, except for one two-minute period per hour during which opacity shall not exceed 40 percent.
[Rule 62-296.406(1), F.A.C.; and, AO 52-244478]

B.6. Visible emissions - Soot Blowing and Load Change. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.
[Rule 62-210.700(3), F.A.C.]

B.7. Sulfur Dioxide - Sulfur Content. The new No. 2 fuel oil sulfur content shall not exceed 0.5 percent, by weight. See specific condition **B.15**.
[Rule 62-296.406(3), F.A.C.; and, AO 52-244478]

Excess Emissions

B.8. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

B.9. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.
[Rule 62-210.700(2), F.A.C.]

B.10. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

B.11. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.12. Visible emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. See specific condition **B.13.**

[Rules 62-213.440 and 62-297.401, F.A.C.]

B.13. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

- a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
- b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.]

B.14. Sulfur Dioxide. The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor or the permittee upon each fuel delivery. This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions B.7. and B.15.

[Rule 62-296.406(3), F.A.C.]

B.15. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition.

[Rules 62-213.440 and 62-297.440, F.A.C.]

B.16. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

B.17. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4), F.A.C.]

B.18. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid for more than 400 hours other than during startup.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
 - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
- a. Visible emissions, if there is an applicable standard;
 - b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
 - c. Each NESHAP pollutant, if there is an applicable emission standard.
5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.
9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
- (b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
- (c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.
[Rule 62-297.310(7), F.A.C.; and, SIP approved]

B.19. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rule 62-297.310(7)(a)4., F.A.C.]

B.20. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

Record keeping and Reporting Requirements

B.21. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

B.22. All recorded data shall be maintained on file by the Source for a period of five years.

[Rule 62-213.440, F.A.C.]

B.23. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.

8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection C. This section addresses the following emissions unit(s).

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-005	Gas Turbine Peaking Unit #P-1
-006	Gas Turbine Peaking Unit #P-2
-007	Gas Turbine Peaking Unit #P-3
-008	Gas Turbine Peaking Unit #P-4

These emissions units are natural gas and/or No. 2 fuel oil fired combustion turbines manufactured by General Electric (model number MS7000) and are designated as Gas Turbine Peaking Units #P-1, #P-2, #P-3 and #P-4. The manufacturers fuel flow and heat input ratings for each turbine are 5,174 gallons per hour of No. 2 fuel oil, or 714 million cubic feet per hour of natural gas (corresponds to approximately 714 million Btu per hour). The actual heat input rate of the turbine is a function of the ambient temperature. These combustion turbines are used as peaking units during peak demand times, during emergencies, and during controls testing, to run a nominal 56 MW generator (each). Emissions from the combustion turbines are uncontrolled.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. These emissions units are not subject to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines. Each combustion turbine has its own stack. Each combustion turbine began commercial operation in 1972.}

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

C.1. Permitted Capacity. The maximum operation heat input rates are as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
P-1	714	Natural Gas
	714	No. 2 Fuel Oil
P-2	714	Natural Gas
	714	No. 2 Fuel Oil
P-3	714	Natural Gas
	714	No. 2 Fuel Oil
P-4	714	Natural Gas
	714	No. 2 Fuel Oil

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

C.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition C.13.
[Rule 62-297.310(2), F.A.C.]

C.3. Methods of Operation - Fuels. Only natural gas and/or new No. 2 fuel oil shall be fired in the combustion turbines. New No. 2 fuel oil is defined as fuel oil that has been refined from crude oil and has not been used and which may or may not contain additives.
[Rule 62-213.410(1), F.A.C.; and, AO 52-253215A, AO 52-253216A, AO 52-253217A, and AO 52-253218A]

C.4. Hours of Operation. These emissions units may operate continuously, i.e., 8,760 hours/year
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, AO 52-253215A, AO 52-253216A, AO 52-253217A, and AO 52-253218A]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

C.5. Visible Emissions. Visible emissions from each turbine shall not be equal to or greater than 20 percent opacity:
[Rule 62-296.320(4)(b)1., F.A.C.; and, AO 52-253215A, AO 52-253216A, AO 52-253217A, and AO 52-253218A]

C.6. Not federally enforceable. Sulfur Dioxide - Sulfur Content. The sulfur content of the No. 2 fuel oil shall not exceed 0.5 percent, by weight.
[AO 52-253215A, AO 52-253216A, AO 52-253217A, and AO 52-253218A]

Excess Emissions

C.7. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

C.8. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

C.9. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery. See specific condition **C.12**.
[Rule 62-213.440, F.A.C.]

C.10. Determination of Process Variables.

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

C.11. The test method for visible emissions shall be EPA Method 9, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C.
[Rules 62-204.800, 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

C.12. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or latest edition.
[Rules 62-213.440 and 62-297.440, F.A.C.]

C.13. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the peak heat input rate based on the average ambient temperature during the test. The peak heat input rate is defined by a graph of Fuel Heat Input versus Ambient Temperature for each gas turbine. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rules 62-297.310(2), F.A.C.; and, AO 52-253215A, AO 52-253216A, AO 52-253217A, and AO 52-253218A]

C.14. Applicable Test Procedures.

(a) Required Sampling Time.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2.c., F.A.C.]

C.15. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
- b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;

8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; SIP approved]

C.16. Visible Emissions Testing - Annual. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:

- a. only gaseous fuels; or
- b. gaseous fuels in combination with any amount of liquid fuels for less than 400 hours per year; or
- c. only liquid fuels for less than 400 hours per year.

[Rules 62-297.310(7)(a)4. & 8., F.A.C.]

Recordkeeping and Reporting Requirements

C.17. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the PCDEM in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

C.18. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

[Rule 62-297.310(8), F.A.C.]

C.19. Not Federally Enforceable. Operating Reports. The annual operating report shall be based on the following:

(a) The Btu heating value, sulfur content (percent by weight), API gravity and density of the fuel being fired in the peaking units, shall be based on a weighted 12-month average (calendar year) and be calculated from the fuel delivery receipts and the vendors fuel oil analysis.

(b) Until further notice by the PCDEM, Florida Power Corporation shall calculate annual emissions (pounds per hour and tons per year), for the Annual Operating Report, by multiplying the total million Btu from fuel usage by the following emissions factors:

Emissions Factors for No. 2 Fuel Oil	
	<u>Pound per MMBtu</u>
Particulate Matter (PM)	0.061 (Total)
PM ₁₀	0.48PM
Carbon Monoxide	0.048
Sulfur Dioxide	1.01(S)
Nitrogen Oxides	0.698
Hydrocarbons (TOC)	0.017

“S” denotes sulfur content, percent by weight. The sulfur dioxide emissions shall be based on a weighted 12-month average “S” value.

[AO 52-253215A, AO 52-253216A, AO 52-253217A, and AO 52-253218A]

Section III. Emissions Unit(s) and Conditions.

Subsection D. This section addresses the following emissions unit(s).

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-009	Flyash Storage Silo with Baghouse

The Unit No. 1 Flyash System has a design transfer capacity of 4,000 pounds of flyash per hour to the storage silo. Emissions from the storage silo are controlled by a Flakt, Inc. Model 90-UKE-16 Arrangement II baghouse. The baghouse contains 16 filter bags, each having a cloth filtration area of 157.0 square feet. The vent fan capacity is 235.0 standard cubic feet per minute.

{Permitting notes: This emissions unit is regulated under Rule 62-210.300, F.A.C., Permits Required. The emissions unit is not subject to Rule 62-296.700, F.A.C. Reasonably Available Control Technology (RACT) Particulate Matter because the emissions unit emits less than one ton per year of particulate matter.}

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

D.1. Permitted Capacity. The maximum permitted flyash transfer rate to the storage silo shall not exceed 4,000 pounds per hour.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, Initial Title V application received June 14, 1996]

D.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **D.9.**
[Rule 62-297.310(2), F.A.C.]

D.3. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. Transfer of flyash to the silo shall not exceed to 700 hours per year.
[Rule 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

D.4. Particulate Matter. At the request of the permittee to qualify for an exemption from the Reasonably Available Control Technology, Particulate Matter requirements of Rule 62-296.700, F.A.C., the maximum allowable emission rate of particulate matter shall not exceed 1.0 pound per hour and 0.35 ton per year.

[Initial Title V application received June 14, 1996; and, AO 52-232464]

D.5. Visible Emissions. Visible emissions shall not exceed five (5) percent opacity.

[Initial Title V application received June 14, 1996; and, AO 52-232464]

Monitoring of Operations

D.6. Determination of Process Variables.

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

D.7. Particulate Matter. The test methods for particulate emissions shall be EPA Method 5 incorporated by reference in Chapter 62-297, F.A.C. **The permittee has elected to accept an alternate standard of five (5) percent opacity to waive the particulate matter compliance test requirement.** See specific condition **D.5.**

[Rules 62-213.440 and 62-297.620(4), F.A.C.]

D.8. Visible Emissions. EPA Method 9 shall be used to determine opacity compliance pursuant to Chapter 62-297, F.A.C.
[Rule 62-213.440, F.A.C.]

D.9. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rules 62-297.310(2) & (2)(b), F.A.C.]

D10. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.
[Rule 62-297.310(3), F.A.C.]

D.11. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, attached as part of this permit.

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube. [Rule 62-297.310(4), F.A.C.]

D.12. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit. [Rule 62-297.310(6), F.A.C.]

D.13. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62- 210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
- b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;
- b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
- c. Each NESHAP pollutant, if there is an applicable emission standard.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; and, SIP approved]

Recordkeeping and Reporting Requirements

D.14. Test Reports

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.

7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
 8. The date, starting time and duration of each sampling run.
 9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
 10. The number of points sampled and configuration and location of the sampling plane.
 11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
 12. The type, manufacturer and configuration of the sampling equipment used.
 13. Data related to the required calibration of the test equipment.
 14. Data on the identification, processing and weights of all filters used.
 15. Data on the types and amounts of any chemical solutions used.
 16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
 17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
 18. All measured and calculated data required to be determined by each applicable test procedure for each run.
 19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
 20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
 21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.
- [Rules 62-213.440 and 62-297.310(8), F.A.C.]

Miscellaneous Requirements

D.15. Not Federally Enforceable. Operation and Maintenance Plan. The permittee shall follow the Operation and Maintenance (O&M) Plan received June 4, 1993 and on file with the PCDEM. 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. Timetable for routine maintenance of the pollution control device as specified by the manufacturer.
3. A timetable of routine weekly, bi-weekly, or monthly observations of the pollution control device.
4. A list of the type and quantity of the required spare parts which are stored on the premises for the pollution control device.
5. A record log which shows at a minimum when maintenance was performed, what maintenance was performed, and by whom.

[Pinellas County Ordinance No. 89-70, Section 3, Subpart 2.230(1) & (2), adopted January 2, 1990]

Section III. Emissions Unit(s) and Conditions.

Subsection E. This section addresses the following emissions unit(s).

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-xxx	Relocatable Diesel Fired Generator(s)

These relocatable emissions units are Caterpillar Model 3508-DITA 820 kilowatt diesel generators. The maximum heat input is 25.74 million Btu per hour (MMBtu/hour) while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum rating of 2460 kilowatts. Emissions from the generators are uncontrolled. The generators may be relocated at any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Higgins Plant, Shore Drive, Oldsmar, Pinellas County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. The future FPC Polk County Site, County Road 555, 1 mi. southwest of Homeland, Polk County.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. Each generator has its own stack.}

The following specific conditions apply to the emissions units listed above regardless of location:

Essential Potential to Emit (PTE) Parameters

E.1. Permitted Capacity. The maximum operation heat input rate for each generator shall not exceed 25.74 million Btu per hour.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

E.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **E.13.**

[Rule 62-297.310(2), F.A.C.]

E.3. Methods of Operation - Fuels. Only new low sulfur No. 2 fuel oil shall be fired in the combustion turbine(s).
[Rule 62-213.410, F.A.C.]

E.4. Hours of Operation. The hours of operation expressed as “engine-hours” shall not exceed 2970 hours in any consecutive 12 month period. The total hours of operation expressed as “engine-hours” shall be the summation of the individual hours of operation of each generator.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, AO 09-205952.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

E.5. Visible Emissions. Visible emissions from each generator shall not be equal to or greater than 20 percent opacity.
[Rule 62-296.320(4)(b)1., F.A.C.; and, AO 09-205952.]

E.6. Sulfur Dioxide - Sulfur Content. The sulfur content of the new No. 2 fuel oil shall not exceed 0.50 percent, by weight.
[Requested in initial Title V permit application dated June 12, 1996; and, AC 09-202080.]

Excess Emissions

E.7. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

E.8. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

E.9. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor or permittee upon each fuel delivery. See specific condition **E.12.**

[Rule 62-213.440, F.A.C.]

E.10. Determination of Process Variables.

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

E.11. The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C.

[Rules 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

E.12. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s).

[Rules 62-213.440 and 62-297.440, F.A.C.]

E.13. Operating Rate During Testing. Testing of emissions shall be conducted with the generator(s) operating at 90 to 100 percent of the maximum fuel firing rate of 186.3 gallons per hour. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operations may be limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Failure to submit the actual operating rate may invalidate the test.
[Rules 62-297.310(2), F.A.C.; and, Permit AO 09-205952.]

E.14. Applicable Test Procedures.

(a) Required Sampling Time.

2. **Opacity Compliance Tests.** When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2.c., F.A.C.]

E.15. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate; or

b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

a. Visible emissions, if there is an applicable standard;

8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. For each generator located in Pinellas County, FPC shall provide the same notification to the Air Quality Division of the Pinellas County Department of Environmental Management.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; SIP approved; and, AO 09-205952.]

E.16. Visible Emissions Testing - Annual. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning liquid fuels for less than 400 hours per year.

[Rules 62-297.310(7)(a)4. & 8., F.A.C.]

E.17. After each relocation, each generator shall be tested within 30 days of startup for opacity and the fuel shall be analyzed for the sulfur content. See specific conditions B.6, B.9, and B.12.

[Rules 62-4.070(3) and 62-297.310(7)(b), F.A.C.; and, AO 09-205952.]

Recordkeeping and Reporting Requirements

E.18. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, the owner or operator shall notify the Department's Southwest District Office, if a generator is located in Pasco County, in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.]

E.19. Test Reports.

- (a) Each generator shall be tested on an annual basis within 30 days of the date October 25.
- (b) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- (c) The required test report shall be filed with the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management, if a generator is located in Pinellas County, as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (d) The test reports for a unit that has been relocated shall be submitted to the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management, if a generator is located in Pinellas County, within 45 days of testing.
[Rule 62-297.310(8), F.A.C.; and, AO 09-25952.]

E.20. To demonstrate compliance with specific condition **E.4.**, records shall indicate the daily hours of operation for each of the generators, the daily hours of operation expressed as "engine-hours" and the cumulative total hours of operation expressed as "engine-hours" for each month. The records shall be maintained for a minimum of 5 years and made available to the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management upon request.
[Rules 62-213.440 and 62-297.310(8), F.A.C.; and, AO 09-205952.]

E.21. To demonstrate compliance with specific condition **E.6.**, records of the sulfur content, in percent by weight, of all the fuel burned shall be kept based on either vendor provided as-delivered or as-received fuel sample analysis. The records shall be maintained for a minimum of 5 years and made available to the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management upon request.
[Rule 62-297.310(8), F.A.C.; and, AO 09-205952.]

Source Obligation

E.22. Specific conditions in construction permit AC 09-202080, limiting the “engine hours”, were accepted by the applicant to escape Prevention of Significant Deterioration review. If Florida Power Corporation requests a relaxation of any of the federally enforceable emission limits in this permit, the relaxation of limits may be subject to the preconstruction review requirements of Rule 62-212.400(5), F.A.C., as though construction had not yet begun. [Rule 62-212.400(2)(g), F.A.C.; and, AC 09-202080 and AO 09-205952.]

E.23. Florida Power Corporation shall notify the Department’s Southwest District Office, in writing, at least 15 days prior to the date on which any diesel generator is to be relocated. The notification shall specify the following:

- a. which generator, by serial number, is being relocated,
- b. which location the generator is being relocated from and which location it is being relocated to, and
- c. the approximate startup date at the new location.

If a diesel generator is to be relocated within Pinellas County, then Florida Power Corporation shall provide the same notification to the Air Quality Division of the Pinellas County Department of Environmental Management.

[Rule 62-4.070(3), F.A.C.; and, AC 09-202080]

Section IV. This section is the Acid Rain Part.

Operated by: Florida Power Corporation
ORIS code: 634

Subsection A. This subsection addresses Acid Rain, Phase II.

The emissions unit(s) listed below are regulated under Acid Rain, Phase II.

E.U.

ID No. Brief Description

- 001 No. 1 Unit, Fossil Fuel Fired Steam Generator with Electrostatic Precipitator
- 002 No. 2 Unit, Fossil Fuel Fired Steam Generator
- 003 No. 3 Unit, Fossil Fuel Fired Steam Generator

A.1. The Phase II permit application(s) submitted for this facility, as approved by the Department, [is/are] a part of this permit. The owners and operators of these Phase II acid rain unit(s) must comply with the standard requirements and special provisions set forth in the application(s) listed below:

- a. DEP Form No. 62-210.900(1)(a), dated July 1, 1995
 [Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

A.2. Sulfur dioxide (SO₂) allowance allocations requirements for each Acid Rain unit are as follows:

<u>E.U. ID</u> <u>No.</u>	<u>EPA ID</u>	<u>Year</u>	<u>2000</u>	<u>2001</u>	<u>2002</u>
-001	01	SO2 allowances, under Table 2 or 3 of 40 CFR Part 73	2785*	2785*	2785*
-002	02	SO2 allowances, under Table 2 or 3 of 40 CFR Part 73	2941*	2941*	2941*
-003	03	SO2 allowances, under Table 2 or 3 of 40 CFR Part 73	5383*	5383*	5383*

* The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2 or 3 of 40 CFR 73.]

A.3. Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

1. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.400(3), F.A.C.

2. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.

3. Allowances shall be accounted for under the Federal Acid Rain Program.

[Rule 62-213.440(1)(c), F.A.C.]

A.4. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within 60 (sixty) days after the end of the calendar year. {See condition 51., APPENDIX TV-1, TITLE V CONDITIONS}

[Rule 62-214.420(11), F.A.C.]

A.5. Comments, notes, and justifications:

None