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DEC 26 2003

BUREAU OF AIR REGULATION

December 22, 2003

Mr. Wayne Martin
Pinellas County Department of Environmental Management
Air Quality Division
300 S. Garden Ave.
Clearwater, Florida 34616

Re: Visible Emissions Test Report
Higgins Peaking Units 1, 2, 3, and 4
Title V Air Operation Permit No. 1030012-002-AV

Dear Mr. Martin:

Please find enclosed a report of visible emissions testing performed on Progress Energy Florida's Higgins Peaking Units 1, 2, 3, and 4 while operating on fuel oil. Testing was conducted on December 2 and 17, 2003 by Ms. Debbie Telemeco-Anders and Mr. Loyde Fry of our air test team.

The enclosed test report also serves as an attachment to the facility's title v permit renewal application, submitted to the agency on July 1, 2002. The units were not able to operate on fuel oil during prior to the renewal application submittal.

Should you have any questions, please do not hesitate to call Ms. Debbie Telemeco-Anders at (727) 826-4136.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matt Lydon', written over a horizontal line.

Matthew Lydon
Environmental Specialist

cc: Mr. Scott Sheplak
Mr. Joel Smolen

**Source Test Report
for
Visible Emissions Evaluation**

**Higgins
Combustion Turbine
UNITS P1 – P4**

**Title V Air Operating Permit
No. 1030012-002-AV**

December 18, 2003

Prepared by:

**Environmental Services Section
Progress Energy Corporation
100 Central Avenue
MAC BB1A
St. Petersburg, FL 33701
(727) 826-4136**

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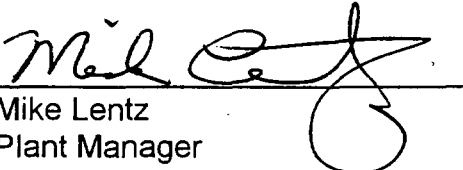
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To the best of my knowledge, all applicable field procedures and calculations comply with Florida Department of Environmental Protection requirements, and all test data and plant operating data are true and correct.


Mike Lentz
Plant Manager

12/19/03
Date

1.0 INTRODUCTION

1.0 INTRODUCTION

The Environmental Services Section, Progress Energy Corporation has performed visible emissions (VE) compliance testing on its Higgins, Combustion Turbines Units P1 – P4 in Pinellas County, Florida. The testing occurred on December 2 and December 17, 2003.

EPA Method 9 testing was performed by Ms. Debbie Telemeco-Anders, VE Certification No. 309490 (certification expiration date: February 19, 2004) and Mr. Loyde Fry, VE Certification No. 309489 (certification expiration date: February 19, 2004), to satisfy conditions of the Florida Department of Environmental Protection permit indicated below.

Title V Air Permit	Source Name	Source Numbers
No.1030012-002-AV	Higgins Combustion Turbines	P1 – E.U. -004 P2 – E.U. -005 P3 – E.U. -006 P4 – E.U. -007

2.0 SUMMARY AND DISCUSSION OF RESULTS

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For the Higgins Combustion Turbine Units P1 – P4, the highest six-minute average opacities are summarized below. The VE data sheets and the observer's certifications are located in Appendix A. The graph noting the maximum heat input versus ambient temperature for the peaking units are included in Appendix B.

Source	Highest Average 6-minute Opacity	Unit Load (MW)	Average Ambient Temperature (°F)	Fuel Flow (Gal / Hr)	Btu / gal	Expected Min / Max Heat Input (MMBtu/Hr)	Unit Heat Input (MMBtu/Hr)
P1 E.U. -004	18.1	29	58	3300	137,381	482 / 535	453
P2 E.U. -005	19.8	26	75	3120	137,381	466 / 490	429
P3 E.U. -006	16.9	32	73	3420	137,381	524 / 552	470
P4 E.U. -007	16.0	33	75	3480	137,381	521 / 548	478

The sources were found to be in compliance.

3.0 FIELD AND ANALYTICAL PROCEDURES

3.0 FIELD AND ANALYTICAL PROCEDURES

The observer, qualified in accordance with EPA Method 9, used the following procedures for visually determining the opacity of emissions.

1. The qualified observer stood at a distance sufficient to provide a clear view of the emissions, with the sun oriented in the 140-degree (°) sector to his back. Consistent with maintaining the above requirement, the observer made his observations from a position such that his line of vision was approximately perpendicular to the plume direction. The observer's line of sight did not include more than one plume at a time when multiple stacks were involved.
2. The observer recorded the name of the plant, emission location, type of facility, observer's name and affiliation, and the date on the field data sheet. The time, estimated distance to the emission location, approximate wind direction, estimated wind speed, description of the sky condition (presence and color of clouds), and plume background were recorded on a field data sheet at the time opacity readings were initiated and completed.
3. Opacity observations were made at the point of greatest opacity in that portion of the plume where condensed water vapor is not present. The observer did not look continuously at the plume, but instead observed the plume momentarily at 15-second intervals.
4. Opacity observations were recorded to the nearest 5 percent at 15-second intervals on the Visible Emission Observation Form. A minimum of 24 observations were recorded. Each momentary observation recorded was deemed to represent the average opacity of emissions for a 15-second period.
5. Opacity is determined as an average of 24 consecutive observations recorded at 15-second intervals (i.e., highest 6-minute average). To find the average, the observations recorded on the field data sheet are divided into sets of 24 consecutive observations. A set is composed of any 24 consecutive observations. Sets need not be consecutive in time, and in no case shall two sets overlap. For each set of 24 observations, the average is calculated by summing the opacity of the 24 observations and dividing this sum by 24. If an applicable standard specifies an averaging time requiring more than 24 observations, the average is calculated for all observations made during the specified time period. The average opacity is recorded on a field data sheet.

APPENDIX A

VISIBLE EMISSION TEST DATA



RECORD OF VISUAL DETERMINATION OF OPACITY

SOURCE/PROCESS INFORMATION

OBSERVATION RECORD

FACILITY NAME: Higgins Power Plant

SOURCE NAME: E.U. I.D. - 004 P1 PERMIT NUMBER: 1030012-002-AV

LOCATION ADDRESS: 998 East Shore Drive

CITY: Oldsmar STATE: FL ZIP:

UNIT LOAD: 29 MW HEAT INPUT: 453 MM Btu/hr

CONTROL EQUIPMENT: NA OPERATING MODE: AUTO

FUEL TYPE/RATE: #2 fuel oil PERMITTED RATE: 4032 gal/hr

DESCRIBE EMISSION POINT: Top of stack

HEIGHT ABOVE GROUND LEVEL: 50 FT HEIGHT OF OBSERVATION POINT: 6 FT

DATE	HOUR	MINUTE	STACK A				STACK B				
			0	15	30	45	0	15	30	45	
12/17	10	25	15	15	20	15					
		1	20	20	25	20					
		2	15	15	20	20					
		3	20	15	15	20					
		4	15	25	20	15					
	30	5	15	15	20	15					
		6	20	15	15	20					
		7	15	15	20	15					
		8	20	15	15	15					
		9	15	20	20	15					
	35	10	15	20	15	20					
		11	20	20	15	15					
		12	15	15	15	20					
		13	20	15	15	15					
		14	15	15	15	15					
	40	15	20	20	15	15					
		16	15	20	15	15					
		17	15	15	15	15					
		18	20	15	20	20					
		19	15	15	20	15					
	45	20	15	15	20	15					
		21	15	20	15	15					
		22	20	20	20	15					
		23	20	15	15	15					
		24	15	20	20	20					
	50	25	15	20	20	15					
		26	20	15	15	15					
		27	15	15	15	15					
		28	20	15	15	15					
		29	15	15	15	15					
	55	30	20	20	15	15					
		31	15	15	20	20					
		32	15	15	15	15					
		33	15	15	20	15					
		34	20	15	20	15					
	1100	35	20	15	20	15					
		36	20	20	20	15					
		37	15	15	15	15					
		38	15	15	20	15					
		39	20	15	15	20					
	1105	40	20	20	25	20					
		41	20	20	20	20					
		42	20	15	20	15					
		43	15	15	20	15					
		44	15	20	15	20					
	1110	45	15	15	15	15					
		46	15	15	20	15					
		47	15	20	20	15					
		48	15	15	20	20					
		49	20	20	15	15					
	1115	50	15	20	15	15					
		51	20	15	20	15					
		52	15	20	15	15					
		53	15	15	15	15					
		54	15	15	20	20					
	1120	55	20	20	15	15					
		56	20	15	15	20					
		57	15	15	15	15					
		58	15	15	20	20					
	1124	59	15	20	20	15					

EMISSIONS DESCRIPTION

DESCRIBE EMISSIONS: START CONTINUOUS END CONTINUOUS

PLUME COLOR: black PLUME TYPE: CONING

WATER DROPLETS PRESENT: Yes No IF YES, IS PLUME Attached Detached

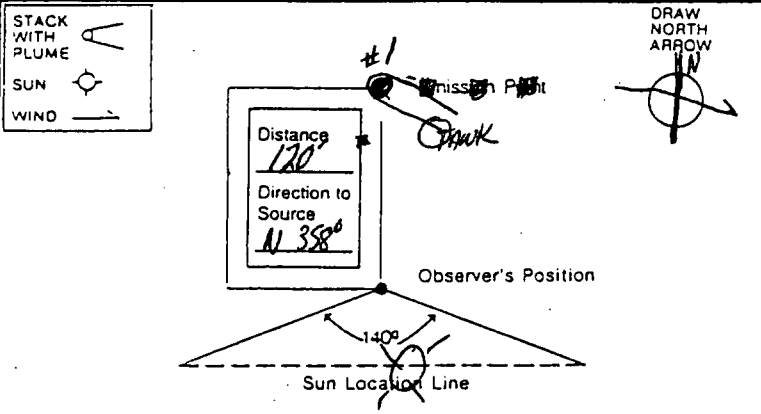
METEOROLOGICAL INFORMATION

BACKGROUND: START clouds END sky/clouds START gray END blue/gray

SKY CONDITIONS - CLOUD COVER: START overcast END pt cloudy AMBIENT TEMPERATURE: START 58° END 58°

WIND SPEED: START 20-30 mph END 15-25 mph WIND DIRECTION: START W-NW END WNW

OBSERVATION DATA, SITE DIAGRAM



SUMMARY OF AVERAGE OPACITY

SET NUMBER	TIME		OPACITY	
	START	END	SUM	AVERAGE
24	1101	1107	435	18.1

COMPLIANCE INFORMATION

RANGE OF OPACITY READINGS: MAXIMUM 20 MINIMUM 15

HIGHEST 8 MINUTE AVERAGE: 18.1

COMMENTS: 55/58 - 1020 55/58 - 1115 L 8°
54/58 - 1045
54/58 - 1100

OBSERVER: Loude Fry DATE: 12/17/03

OBSERVER'S SIGNATURE: Loude Fry

OBSERVER CERTIFICATION NUMBER: 309489 EXPIRATION DATE: 2/19/04



RECORD OF VISUAL DETERMINATION OF OPACITY

SOURCE/PROCESS INFORMATION

OBSERVATION RECORD

FACILITY NAME: **Higgins Power Plant**

SOURCE NAME: **E.U.ID-005 P2** PERMIT NUMBER: **1030012-002-AV**

LOCATION ADDRESS: **998 EAST Shore Drive**

CITY: **Oldsmar** STATE: **FL** ZIP:

UNIT LOAD: **26 MW** HEAT INPUT: **429 MMBtu/hr.**

CONTROL EQUIPMENT: **NONE** OPERATING MODE: **Auto**

FUEL TYPE/RATE: **#2 Fuel oil** PERMITTED RATE: **4032 gal/hr.**

DESCRIBE EMISSION POINT: **Top of stack**

HEIGHT ABOVE GROUND LEVEL: **50 FT** HEIGHT OF OBSERVATION POINT: **6 FT**

DATE		STACK A 2				STACK B			
DATE	TIME	0	15	30	45	0	15	30	45
12-2-03	1326	0	10	15	15				
	7	1	15	15	15				
	8	2	20	15	15				
	9	3	15	15	20				
	1330	4	20	20	20				
	1	5	15	20	15				
	2	6	15	15	20				
	3	7	20	15	15				
	4	8	20	20	20				
	5	9	20	15	15				
	6	10	20	20	20				
	7	11	20	20	20				
	8	12	20	20	20				
	9	13	20	20	20				
	1340	14	20	20	20				
	1	15	20	20	20				
	2	16	20	20	20				
	3	17	20	15	20				
	4	18	20	15	20				
	5	19	20	20	20				
	6	20	20	20	20				
	7	21	20	15	20				
	8	22	20	20	15				
	9	23	20	20	15				
	1350	24	20	20	20				
	1	25	20	20	20				
	2	26	15	20	20				
	3	27	20	15	20				
	4	28	20	20	20				
	5	29	20	20	20				
	6	30	15	20	20				
	7	31	20	20	20				
	8	32	20	20	15				
	9	33	20	20	20				
	1400	34	20	20	20				
	1	35	20	20	20				
	2	36	20	20	20				
	3	37	20	20	15				
	4	38	20	20	20				
	5	39	20	20	20				
	6	40	20	20	20				
	7	41	20	20	20				
	8	42	15	15	15				
	9	43	15	15	10				
	1410	44	15	15	20				
	1	45	20	15	20				
	2	46	20	20	15				
	3	47	20	20	20				
	4	48	20	20	15				
	5	49	15	15	15				
	6	50	15	15	20				
	7	51	15	15	20				
	8	52	20	20	20				
	9	53	15	20	15				
	1420	54	20	20	20				
	1	55	20	20	15				
	2	56	15	20	20				
	3	57	20	20	20				
	4	58	20	20	20				
	5	59	20	20	20				

EMISSIONS DESCRIPTION

DESCRIBE EMISSIONS: **CONTINUOUS** START **CONTINUOUS** END **CONTINUOUS**

PLUME COLOR: **black** PLUME TYPE: **lofting**

WATER DROPLETS PRESENT: Yes No IF YES, IS PLUME? Attached Detached

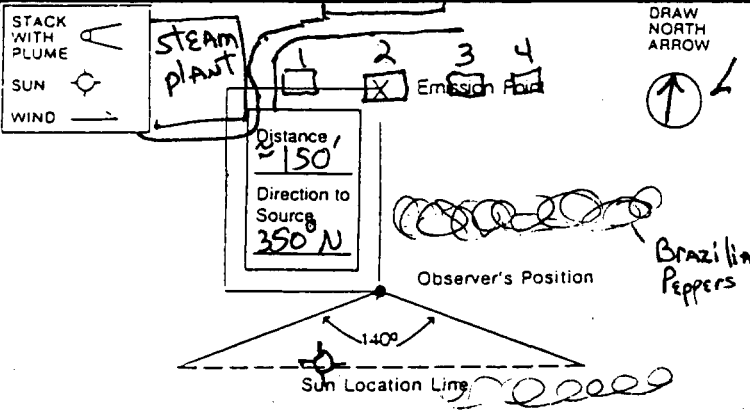
METEOROLOGICAL INFORMATION

BACKGROUND: START **sky** END **sky** BACKGROUND COLOR: START **blue** END **blue**

SKY CONDITIONS - CLOUD COVER: START **clear** END **clear** AMBIENT TEMPERATURE: START **75°F** END **75°F**

WIND SPEED: START **5-10** END **5-10** WIND DIRECTION: START **NE** END **NE**

OBSERVATION DATA, SITE DIAGRAM



SUMMARY OF AVERAGE OPACITY

SET NUMBER	TIME		OPACITY	
	START	END	SUM	AVERAGE
	1337	1343	475	19.79

COMPLIANCE INFORMATION

RANGE OF OPACITY READINGS: MAXIMUM **20** MINIMUM **10**

HIGHEST 5 MINUTE AVERAGE: **20**

COMMENTS: **7°L**

Time	Wet	Dry
1325	65	75
1343	64	74
1358	65	75
1413	65	74
1425	65	75

OBSERVER: **Debbie Telemeco-Anders** DATE: **12-2-03**

OBSERVER'S SIGNATURE: *Debbie Telemeco-Anders*

OBSERVER CERTIFICATION NUMBER: **309490** EXPIRATION DATE: **2/19/04**



RECORD OF VISUAL DETERMINATION OF OPACITY

SOURCE/PROCESS INFORMATION

OBSERVATION RECORD

FACILITY NAME: Higgins Power Plant

SOURCE NAME: F.U.I.D No. -006 PERMIT NUMBER: 1030012-002-AD

LOCATION ADDRESS: 998 EAST Shore Drive

CITY: Oldsmar STATE: FLA ZIP: _____

UNIT LOAD: 32 MW HEAT INPUT: 470 MM Btu/hr.

CONTROL EQUIPMENT: NONE OPERATING MODE: AUTO

FUEL TYPE/RATE: NO. 2 Fuel oil PERMITTED RATE: 4494 gal/hr

DESCRIBE EMISSION POINT: Top of stack

HEIGHT ABOVE GROUND LEVEL: 50 FT HEIGHT OF OBSERVATION POINT: 6 FT

DATE	HOUR	MINUTE	STACK A 3				STACK B			
			0	15	30	45	0	15	30	45
12/02	1520	0	15	15	15	15				
		1	15	15	20	20				
		2	15	15	15	15				
		3	20	20	20	15				
		4	15	15	15	15				
		5	15	20	20	20				
		6	20	15	15	15				
		7	15	15	15	15				
		8	15	15	15	15				
		9	15	15	20	15				
	1530	10	15	15	15	15				
		11	15	15	15	15				
		12	15	15	15	15				
		13	15	15	15	15				
		14	15	15	15	15				
		15	15	15	15	15				
		16	20	20	15	15				
		17	15	15	15	15				
		18	15	15	15	15				
		19	15	15	15	15				
	1540	20	15	15	15	15				
		21	15	20	15	15				
		22	15	15	15	15				
		23	15	15	15	15				
		24	15	20	15	15				
		25	15	15	15	15				
		26	15	15	15	15				
		27	15	15	15	15				
		28	20	15	15	15				
		29	15	15	15	15				
	1550	30	15	15	15	15				
		31	15	15	15	15				
		32	15	15	15	15				
		33	10	15	15	15				
		34	10	15	15	10				
		35	15	15	15	20				
		36	15	15	15	15				
		37	15	10	10	15				
		38	10	15	15	15				
		39	10	15	10	10				
	1600	40	15	15	10	15				
		41	10	15	10	15				
		42	15	15	15	15				
		43	15	15	15	15				
		44	15	15	15	15				
		45	15	15	15	15				
		46	10	10	10	15				
		47	15	15	15	15				
		48	15	15	15	15				
		49	15	15	15	15				
	1610	50	15	15	15	15				
		51	15	15	15	15				
		52	15	15	15	15				
		53	15	15	15	15				
		54	15	15	15	15				
		55	15	15	15	15				
		56	15	15	15	15				
		57	15	15	15	15				
		58	15	15	15	15				
	1619	59	15	15	15	15				

EMISSIONS DESCRIPTION

DESCRIBE EMISSIONS: START continuous END continuous

PLUME COLOR: black PLUME TYPE: lifting

WATER DROPLETS PRESENT: Yes No IF YES, IS PLUME Attached Detached

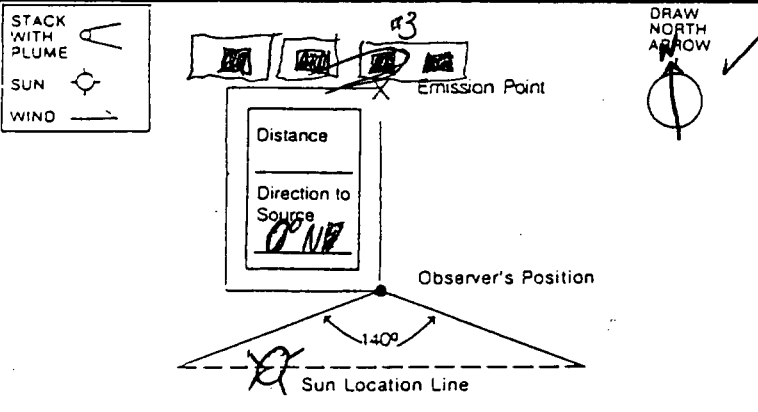
METEOROLOGICAL INFORMATION

BACKGROUND: START sky END sky BACKGROUND COLOR: START blue END blue

SKY CONDITIONS - CLOUD COVER: START clear END clear AMBIENT TEMPERATURE: START 74° END 72°

WIND SPEED: START 5-10 mph END 10-15 mph WIND DIRECTION: START NE END NE

OBSERVATION DATA, SITE DIAGRAM



SUMMARY OF AVERAGE OPACITY

SET NUMBER	TIME		OPACITY	
	START	END	SUM	AVERAGE
	1521	1527	405	16.88

COMPLIANCE INFORMATION

RANGE OF OPACITY READINGS: MAXIMUM 20 MINIMUM 10

HIGHEST 6 MINUTE AVERAGE: 16.88

COMMENTS: 6/7/04 1518 6/7/02 1600 7° L
6/7/04 1530 6/7/02 1615
6/7/04 1545

OBSERVER: Loude Fry DATE: 12/02/03

OBSERVER'S SIGNATURE: Loude Fry

OBSERVER CERTIFICATION NUMBER: 307489 EXPIRATION DATE: 2/19/04



RECORD OF VISUAL DETERMINATION OF OPACITY

SOURCE/PROCESS INFORMATION

OBSERVATION RECORD

FACILITY NAME: Higgins Power Plant

SOURCE NAME: FUID No - 007 PERMIT NUMBER: 1030012-002-AV

LOCATION ADDRESS: 998 East Shore Drive

CITY: Oldsmar STATE: FLA ZIP: _____

UNIT LOAD: 33MW HEAT INPUT: 478 MMBtu/hr.

CONTROL EQUIPMENT: NONE OPERATING MODE: AUTO

FUEL TYPE/RATE: No 2 fuel oil PERMITTED RATE: 4494 gal/hr

DESCRIBE EMISSION POINT: top of stack

HEIGHT ABOVE GROUND LEVEL: 50 FT HEIGHT OF OBSERVATION POINT: 6 FT

DATE <u>12/02</u>		STACK A <u>4</u>				STACK B			
HOUR	MINUTE	0	15	30	45	0	15	30	45
1328	0	15	15	10	15				
	1	15	15	15	15				
	2	10	15	20	15				
	3	15	15	15	15				
	4	10	15	15	20				
	5	15	15	15	15				
	6	15	15	15	15				
	7	20	15	15	15				
	8	15	15	10	15				
	9	15	15	15	20				
1338	10	20	15	15	15				
	11	10	15	15	15				
	12	15	15	15	15				
	13	15	15	15	15				
	14	15	15	20	20				
	15	15	15	15	15				
	16	15	15	15	15				
	17	15	15	15	15				
	18	15	15	15	20				
	19	20	15	20	15				
1348	20	15	15	15	10				
	21	15	15	15	15				
	22	15	15	15	15				
	23	15	15	15	15				
	24	15	15	15	15				
	25	15	15	15	15				
	26	15	15	15	15				
	27	15	15	15	15				
	28	15	15	15	15				
	29	15	15	15	15				
1358	30	15	15	15	15				
	31	15	20	20	15				
	32	15	15	15	15				
	33	15	15	15	15				
	34	15	15	15	15				
	35	15	15	15	15				
	36	15	10	10	10				
	37	10	10	15	15				
	38	15	15	15	15				
1408	39	10	15	15	15				
1408	40	15	15	15	15				
	41	15	15	15	15				
	42	15	15	15	15				
	43	15	15	15	10				
	44	10	10	15	10				
	45	10	10	10	15				
	46	15	15	15	15				
	47	10	10	10	15				
	48	15	15	15	15				
	49	15	15	15	15				
1418	50	15	15	15	15				
	51	15	15	15	15				
	52	15	15	15	10				
	53	10	15	15	10				
	54	10	15	15	15				
	55	15	15	15	15				
	56	10	10	15	15				
	57	15	15	15	15				
	58	15	15	15	15				
1427	59	15	15	15	15				

EMISSIONS DESCRIPTION

DESCRIBE EMISSIONS: _____

START: continuous END: continuous

PLUME COLOR: black PLUME TYPE: lofting

WATER DROPLETS PRESENT: Yes No

IF YES, IS PLUME: Attached Detached

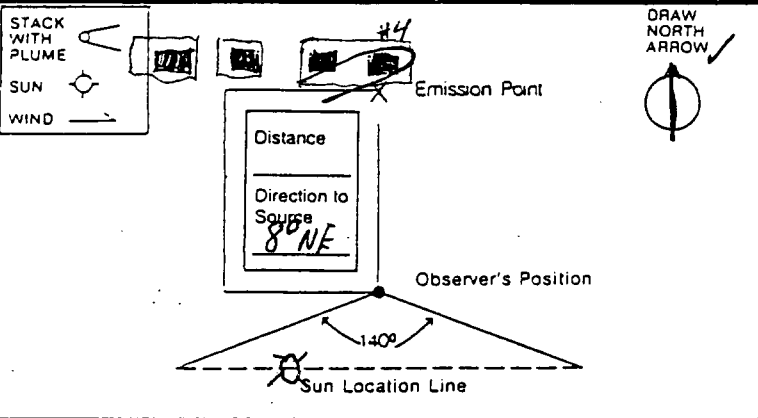
METEOROLOGICAL INFORMATION

BACKGROUND: blue (sky) END: blue (sky) BACKGROUND COLOR: blue END: blue

SKY CONDITIONS - CLOUD COVER: clear END: pt cloudy AMBIENT TEMPERATURE: 75 END: 75

WIND SPEED: 5-10 mph END: 5-10 mph WIND DIRECTION: NE END: NE

OBSERVATION DATA, SITE DIAGRAM



SUMMARY OF AVERAGE OPACITY

SET NUMBER	TIME		OPACITY	
	START	END	SUM	AVERAGE
	1342	1348	385	16.04

COMPLIANCE INFORMATION

RANGE OF OPACITY READINGS: MAXIMUM 20 MINIMUM 10

HIGHEST 5 MINUTE AVERAGE: 16.04

COMMENTS: 69/75 1328 69/75 1416 L 70
69/75 1344 69/75 1426
69/75 1358

OBSERVER: Louche FNY DATE: 12/02/03

OBSERVER'S SIGNATURE: Louche FNY

OBSERVER CERTIFICATION NUMBER: 309489 EXPIRATION DATE: 2/19/04

APPENDIX B

**Fuel Oil Analysis and Graph of Heat Input vs.
Temperature**

FLORIDA POWER CORPORATION
CENTRAL CHEMICAL LABORATORY
15760 WEST POWERLINE STREET
CRYSTAL RIVER, FL 34428
TEL: 352-563-4463; EXT: 5239
MICROWAVE: 240-5239 MAC CN77

Higgins Unit (s):
Sample Date: 5/23/2003 Sample Number: FO-9220
Type of Fuel: No. 2 oil
Enter the type of Sample: Gas Turbine

RESULTS*

API Gravity @ 60°F:	35.1		
%S:	0.38		
Density (@ 60° F):	0.8489		
Density (lb/gal):	7.0722		
HHV, BTU/lb:	19,426	% ASH:	
HHV, BTU/gal:	137,381	% Carbon:	87.4
HHV, BTU/bbl:	5,770,002	% Hydrogen:	12.9
LHV, BTU/lb:	18,331	% Nitrogen:	0.1
LHV, BTU/gal:	129,637	% Water:	
LHV, BTU/bbl:	5,444,754		

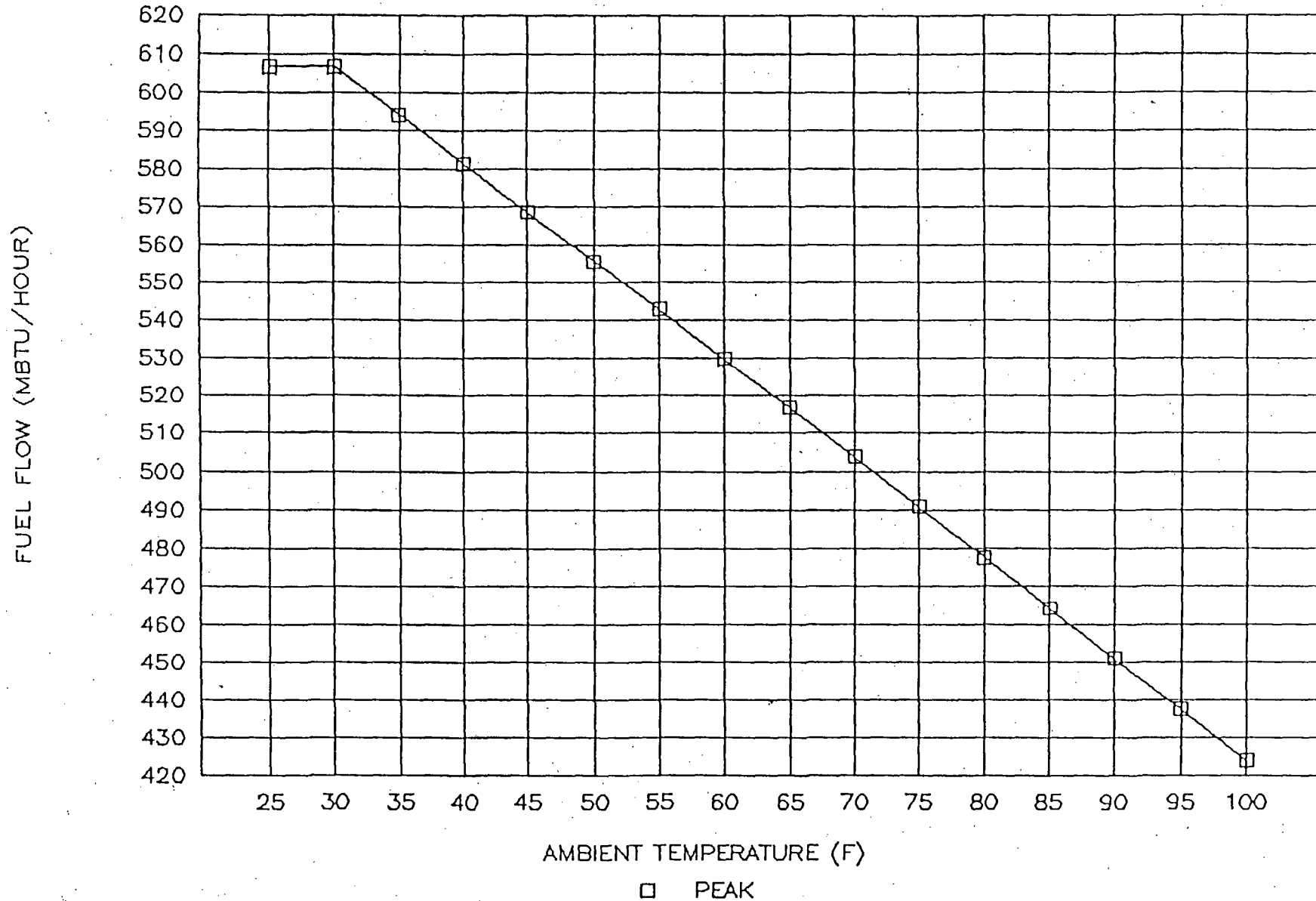
Sample Comment:

* Analysis performed by: TECO Labs

Jeff Smith
Chemist, Central Chem Lab

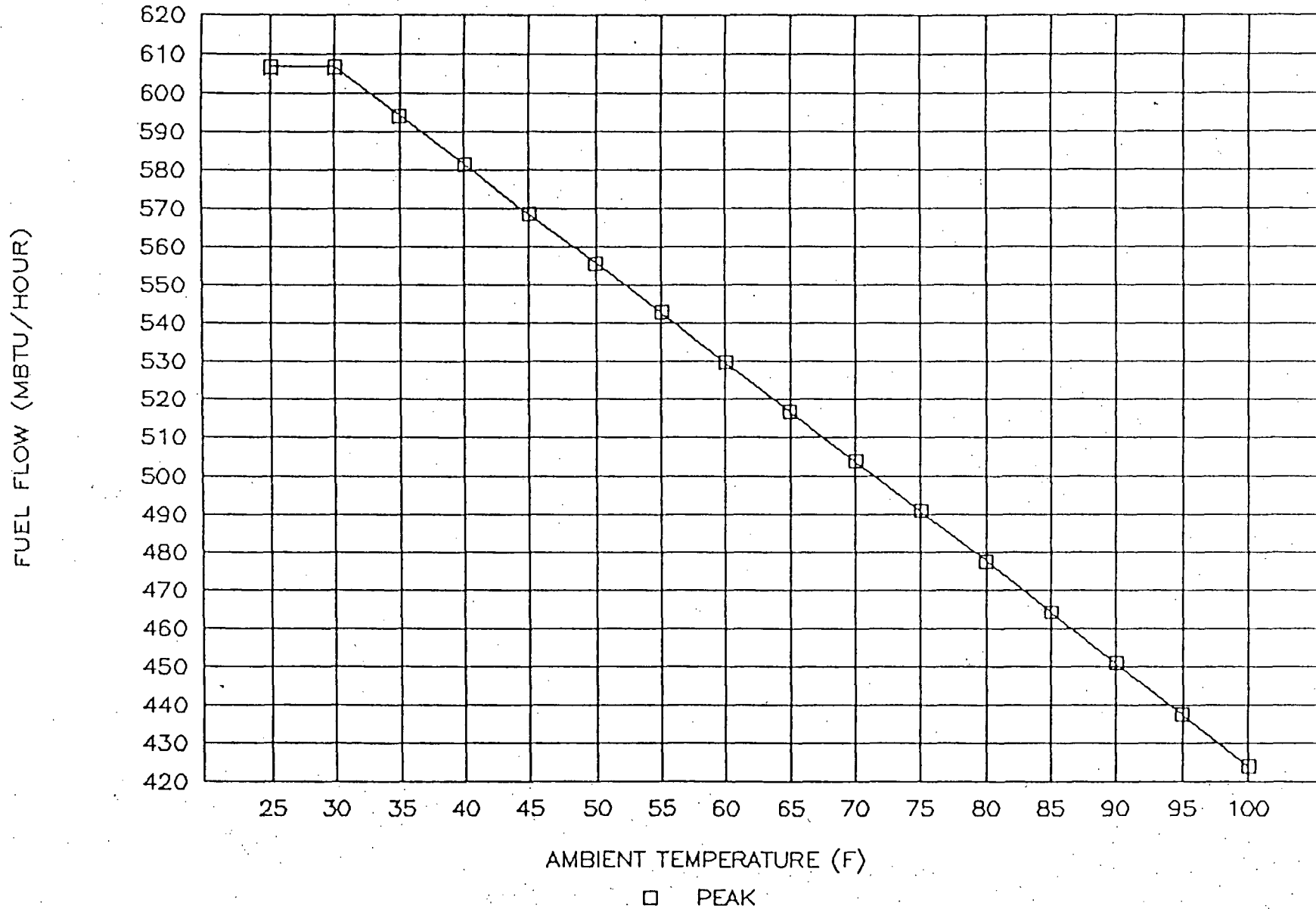
HIGGINS P1 COMBUSTION TURBINE

FUEL HEAT INPUT vs AMBIENT TEMPERATURE



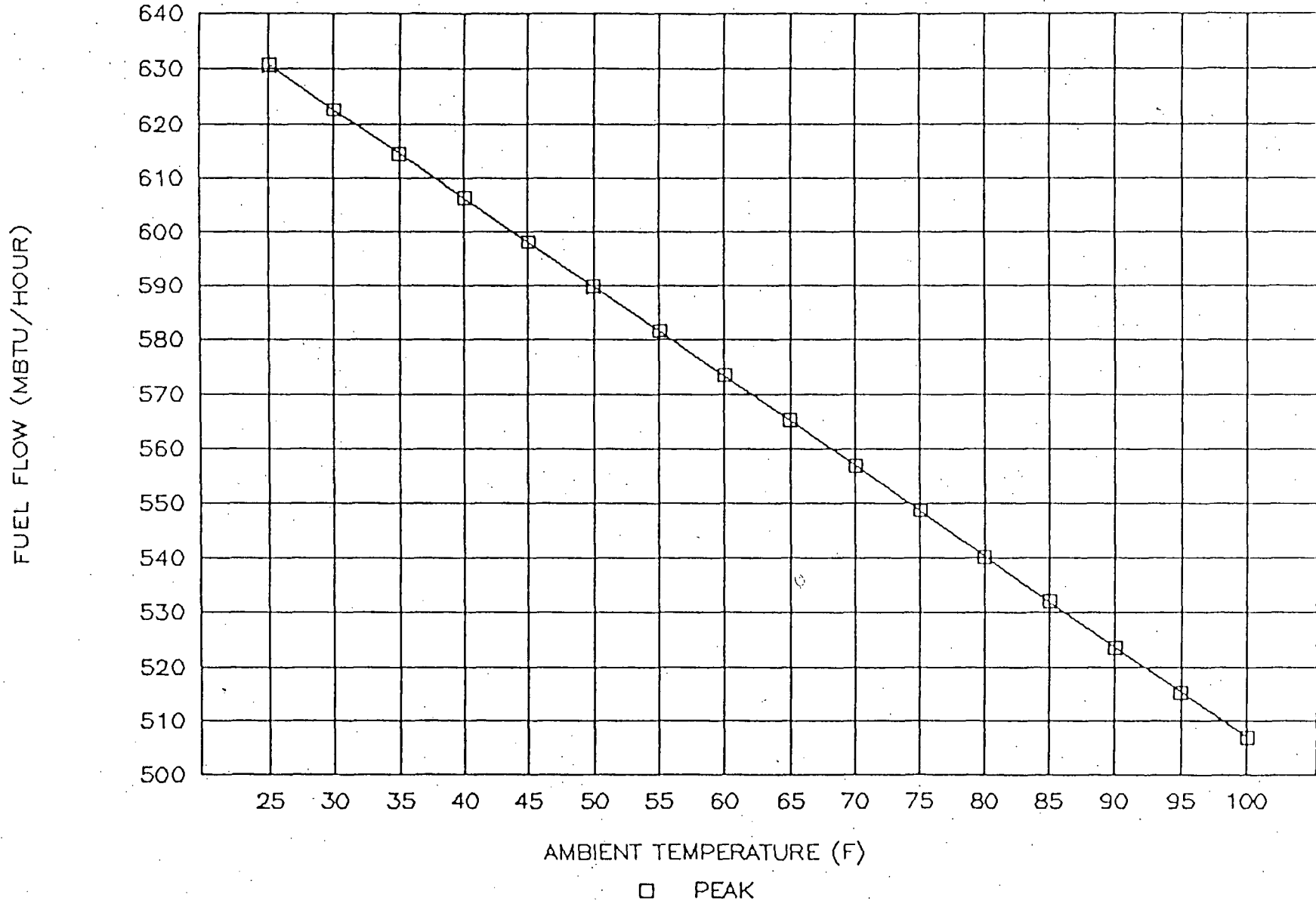
HIGGINS P2 COMBUSTION TURBINE

FUEL HEAT INPUT vs AMBIENT TEMPERATURE



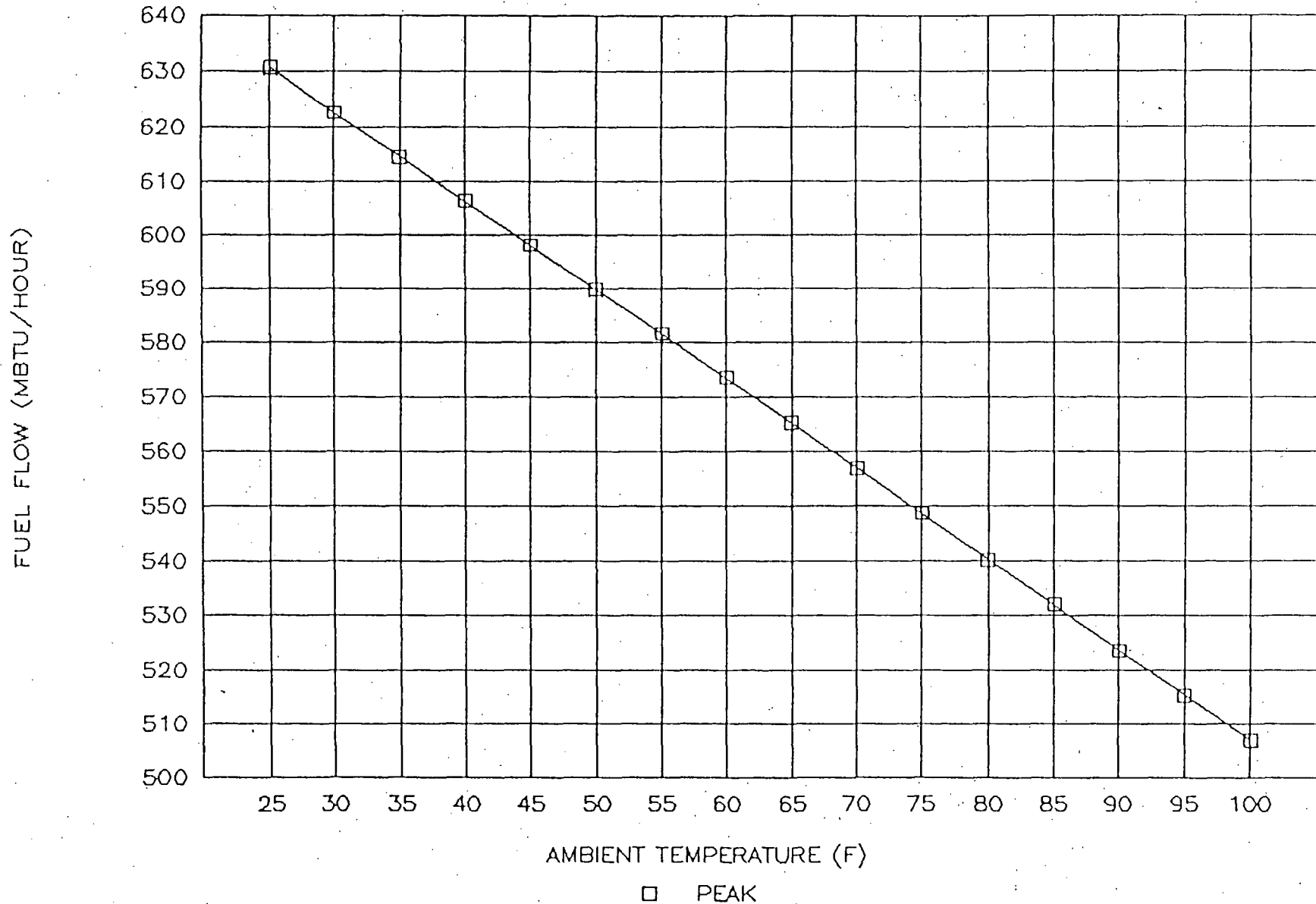
HIGGINS P3 COMBUSTION TURBINE

FUEL HEAT INPUT vs AMBIENT TEMPERATURE



HIGGINS P4 COMBUSTION TURBINE

FUEL HEAT INPUT vs AMBIENT TEMPERATURE



APPENDIX C

PROJECT PARTICIPANTS

Project Participants

Ms. Debbie Telemeco-Anders

VE Observer,
Environmental Technician
Progress Energy Corporation
Technical Services

Mr. Loyde Fry

VE Observer,
Environmental Technician
Progress Energy Corporation
Technical Services

VISIBLE EMISSIONS EVALUATOR

This is to certify that

Debbie Telemeco Anders

met the specifications of Federal Reference Method 9 and qualified as a visible emissions evaluator.

Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, North Carolina. This certificate is valid for six months from date of issue.

309490

Certificate Number

Tampa, Florida

Location

August 19, 2003

Date of Issue

Thomas Hore

President

Michael W. Junford

Director of Training

VISIBLE EMISSIONS EVALUATOR

This is to certify that

Loyde Fry

met the specifications of Federal Reference Method 9 and qualified as a visible emissions evaluator.

Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, North Carolina. This certificate is valid for six months from date of issue.

309489

Certificate Number

Tampa, Florida

Location

August 20, 2003

Date of Issue

Thomas Lore

President

Michael W. Junford

Director of Training