

# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

August 16, 2007

*Electronic Mail - Received Receipt Requested*

[David.Fernandes@pgnmail.com](mailto:David.Fernandes@pgnmail.com)

Mr. David Fernandes  
Plant Manager  
Higgins Power Plant  
Florida Power Corporation d.b.a. Progress Energy Florida, Inc.  
299 First Avenue North, MAC PEF-903  
St. Petersburg, Florida 33701

Re: Request for Additional Information  
Project Number 1030012-005-AV, Title V Air Operation Permit Renewal  
Higgins Power Plant

Dear Mr. Fernandes:

The Department received your application for a Title V air operation permit renewal via hand delivery of a hard copy submission on June 21<sup>st</sup>. This existing facility is located in Pinellas County at 998 East Shore Drive, Oldsmar.

After review it has been determined that the application is incomplete. In order to continue the processing of the permit application, the Department needs the following additional information. Should a response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

## **Additional Information Items**

1. The fossil fuel fired steam generators previously known as SG 1, SG 2, & SG 3 (Emissions Unit ID Numbers -001, -002 and -003) which had been on long term reserve shutdown since January 24, 1994 were torn down (imploded) on October 20, 2006. Based on these dates, the fossil fuel fired steam generators had been in a long term reserve shutdown status for approximately 12 years. Please describe the operational status of the remaining combustion turbines.

a. Are the remaining peaking units (CTP1 - CTP4, Emission Unit ID Numbers -004 - 007) on "cold standby", "long term reserve shutdown" or "shutdown"?

b. Please provide the hours of operation for each remaining peaking unit during calendar years 2002 - 2006, as reported in the annual operating reports (AORs).

c. In the Certificate of Representation Report attached as part of the acid rain application the "Operating Status" is listed as "Operating" for the remaining combustion turbine peaking units. Please explain this status description from the Clean Air Interstate Rule (CAIR) Program.

d. The next questions are specific to peaking units CTP2 (EU ID No. - 005) and CTP4 (EU ID No. - 007).

- 1) What was the "operational problem" that prevented oil burning in units CTP2 (EU ID No. - 005) and CTP4 (EU ID No. - 007) as described in Attachment FAI-6 of the renewal application?
- 2) Are the CTP2 and CTP4 units able to operate or are they simply not able to operate on fuel oil?
- 3) A repair timeframe of late 2007 or early 2008 was provided in the compliance plan to correct the "operational problem". Please provide a more definitive repair schedule to include specific dates with milestones along with the specific required repairs.

e. Note Rule 62-210.300(2)(a)3., F.A.C. (copy enclosed) contains specific applicable requirements that apply to the duration (term) of an air operation permit for units that are on "cold standby", "long term reserve shutdown" and "shutdown". Therefore, the status of the remaining units affects the duration the air operation permit.

Also, specific applicable requirements apply to units that are in "cold standby" or "long term reserve shutdown" (see Rule 62-210.300(2)(a)3.d., F.A.C.). If the remaining units are in this operational status, have the requirements of Rule 62-210.300(2)(a)3.b.(I) - (III), F.A.C. been met?

2. Applicants for Title V permits are required to submit Procedures for Startup and Shutdown (see Emissions Unit Additional Information item 4. of the application form). A generic procedure was provided in Attachment CTP-3 of the application. The procedures submitted need to contain the best operational practices followed during periods of startup and shutdown to minimize excess emissions preferably as prescribed by the turbine manufacturer, Pratt & Whitney.

Submit additional responses, any additional updates to the application and supporting documentation in quadruplicate as required by Rule 62-4.050(2), F.A.C.

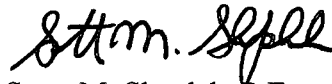
Request for Additional Information  
Project Number 1030012-005-AV, Title V Air Operation Permit Renewal  
Higgins Power Plant  
Page 3 of 3

The Department will resume processing your application after receipt of the requested information. For any material changes to the application, please include a new certification statement by the responsible official.

*The processing of this application is under time constraints due to acid rain requiring this permit to be effective January 1, 2007. To be effective January 1, the DRAFT permit needs to be issued by October 1, 2007. Please provide responses to these items no later than **September 28, 2007**.*

If you should have any questions, please contact me at 850/921-9532.

Sincerely,



Scott M. Sheplak, P.E.  
Air Permitting South Section  
Bureau of Air Regulation  
Mail Station #5505  
[Scott.Sheplak@dep.state.fl.us](mailto:Scott.Sheplak@dep.state.fl.us)

sms/

Enclosure

copy to: Gus Schaefer, PEF, [Gustave.Schaefer@pgnmail.com](mailto:Gustave.Schaefer@pgnmail.com)  
J. Michael Kennedy, PEF, [j-michael.kennedy@pgnmail.com](mailto:j-michael.kennedy@pgnmail.com)  
Ann M. Quillian, P.E., PEF, [Ann.Quillian@pgnmail.com](mailto:Ann.Quillian@pgnmail.com)  
Cindy Zhang-Torres, P.E., DEP SWD, [Zhang-Torres@dep.state.fl.us](mailto:Zhang-Torres@dep.state.fl.us)  
Peter Hessling, PCDEM AQD, [phesslin@co.pinellas.fl.us](mailto:phesslin@co.pinellas.fl.us)

## Excerpt of Rule 62-210.300(2)(a), F.A.C.

### CHAPTER 62-210 STATIONARY SOURCES - GENERAL REQUIREMENTS

...

62-210.300 Permits Required. (Effective 5/9/07)

...

#### **62-210.300 Permits Required.**

...

(2) Air Operation Permits. Upon expiration of the air operation permit for any existing facility or emissions unit; subsequent to any construction, reconstruction or modification of a facility or emissions unit authorized by an air construction permit, and demonstration of compliance with the conditions of such air construction permit; subsequent to the establishment of a PAL or air emissions bubble by air construction permit; or as otherwise provided in this chapter or Chapter 62-213, F.A.C.; the owner or operator of such facility or emissions unit shall obtain a renewal air operation permit, an initial air operation permit, or an administrative correction or revision of an existing air operation permit, whichever is appropriate, in accordance with all applicable provisions of this chapter, Chapter 62-213 (if the facility is a Title V source), and Chapter 62-4, F.A.C.

(a) Minimum Requirements for All Air Operation Permits. At a minimum, a permit issued pursuant to this subsection shall:

1. Specify the manner, nature, volume and frequency of the emissions permitted, and the applicable emission limiting standards or performance standards, if any;
2. Require proper operation and maintenance of any pollution control equipment by qualified personnel, where applicable in accordance with the provisions of any operation and maintenance plan required by the air pollution rules of the Department.
3. Contain an effective date stated in the permit which shall not be earlier than the date final action is taken on the application and be issued for a period, beginning on the effective date, as provided below.
  - a. The operation permit for an emissions unit which is in compliance with all applicable rules and in operational condition, and which the owner or operator intends to continue operating, shall be issued or renewed for a five-year period, except that, for Title V sources subject to subparagraph 62-213.420(1)(a)1., F.A.C., operation permits shall be extended until 60 days after the due date for submittal of the facility's Title V permit application as specified in subparagraph 62-213.420(1)(a)1., F.A.C.
  - b. Except as provided in sub-subparagraph 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit which has been shut down for six months or more prior to the expiration date of the current operation permit, shall be renewed for a period not to exceed five years from the date of shutdown, even if the emissions unit is not maintained in operational condition, provided:
    - (I) The owner or operator of the emissions unit demonstrates to the Department that the emissions unit may need to be reactivated and used, or that it is the owner's or operator's intent to apply to the Department for a permit to construct a new emissions unit at the facility before the end of the extension period; and
    - (II) The owner or operator of the emissions unit agrees to and is legally prohibited from providing the allowable emission permitted by the renewed permit as an emissions offset to any other person under Rule 62-212.500, F.A.C.; and
    - (III) The emissions unit was operating in compliance with all applicable rules as of the time the source was shut down.

## Excerpt of Rule 62-210.300(2)(a), F.A.C.

c. Except as provided in sub-subparagraph 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit which has been shut down for five years or more prior to the expiration date of the current operation permit shall be renewed for a maximum period not to exceed ten years from the date of shutdown, even if the emissions unit is not maintained in operational condition, provided the conditions given in sub-subparagraph 62-210.300(2)(a)3.b., F.A.C., are met and the owner or operator demonstrates to the Department that failure to renew the permit would constitute a hardship, which may include economic hardship.

d. The operation permit for an electric utility generating unit on cold standby or long-term reserve shutdown shall be renewed for a five-year period, and additional five-year periods, even if the unit is not maintained in operational condition, provided the conditions given in sub-sub-subparagraphs 62-210.300(2)(a)3.b.(I) through (III), F.A.C., are met.

4. In the case of an emissions unit permitted pursuant to sub-subparagraphs 62-210.300(2)(a)3.b., c., and d., F.A.C., include reasonable notification and compliance testing requirements for reactivation of such emissions unit and provide that the owner or operator demonstrate to the Department prior to reactivation that such reactivation would not constitute any modification or reconstruction pursuant to this chapter or any federal regulation adopted by reference at Rule 62-204.800, F.A.C.

...

*Specific Authority 403.061 FS. Law Implemented 403.031, 403.061, 403.087, 403.814 FS. History—New 10-16-95, Amended 1-2-96, 3-21-96, 5-13-96, 8-15-96, 11-13-97, 5-25-98, 2-11-99, 6-21-01, 1-10-07, 5-9-07.*

**Harvey, Mary**

**From:** Harvey, Mary  
**Sent:** Friday, August 17, 2007 3:06 PM  
**To:** 'phesslin@co.pinellas.fl.us'; Zhang-Torres; 'Ms. Ann Quillian, Progress Energy Florida, Inc.'; 'David.Fernandes@pgnmail.com'; 'Gustave.Schaefer@pgnmail.com'; 'j-michael.kennedy@pgnmail.com'  
**Cc:** Adams, Patty; Gibson, Victoria; Sheplak, Scott  
**Subject:** Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV  
**Attachments:** LETTER-HIGGINS POWER PLANT-PROJECT #1030012-005-AV.pdf

Tracking:	Recipient	Delivery	Read
	✓ 'phesslin@co.pinellas.fl.us'		
	✓ Zhang-Torres	Delivered: 8/17/2007 3:06 PM	Read: 8/17/2007 4:14 PM
	✓ 'Ms. Ann Quillian, Progress Energy Florida, Inc.'		
	✓ 'David.Fernandes@pgnmail.com'		
	✓ 'Gustave.Schaefer@pgnmail.com'		
	✓ 'j-michael.kennedy@pgnmail.com'		
	✓ Adams, Patty	Delivered: 8/17/2007 3:06 PM	Read: 8/17/2007 3:19 PM
	✓ Gibson, Victoria	Delivered: 8/17/2007 3:06 PM	Read: 8/17/2007 3:08 PM
	✓ Sheplak, Scott	Delivered: 8/17/2007 3:06 PM	Read: 8/17/2007 3:13 PM

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Thank you,

DEP, Bureau of Air Regulation

8/21/2007

**Harvey, Mary**

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**From:** Schaefer, Gustave [Gustave.Schaefer@pgnmail.com]  
**Sent:** Tuesday, August 21, 2007 7:47 AM  
**To:** Harvey, Mary  
**Subject:** RE: Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV

Received by Gus Schaefer.  
Thank you.

-----Original Message-----

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Friday, August 17, 2007 3:06 PM  
**To:** phesslin@co.pinellas.fl.us; Zhang-Torres; Quillian, Ann; Fernandes, David; Schaefer, Gustave; Kennedy, J-Michael  
**Cc:** Adams, Patty; Gibson, Victoria; Sheplak, Scott  
**Subject:** Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV

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Thank you,

DEP, Bureau of Air Regulation

Harvey, Mary

---

**From:** Hessling, Peter A [phesslin@co.pinellas.fl.us]  
**To:** Harvey, Mary  
**Sent:** Monday, August 20, 2007 11:16 AM  
**Subject:** Read: Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV

Your message

**To:** phesslin@co.pinellas.fl.us  
**Subject:**

was read on 8/20/2007 11:16 AM.



**Harvey, Mary**

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**From:** Hessling, Peter A [phesslin@co.pinellas.fl.us]  
**Sent:** Monday, August 20, 2007 3:55 PM  
**To:** Harvey, Mary  
**Subject:** RE: Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV

Documents received.

Peter Hessling  
Air Quality Division Director  
Pinellas Co. Dept. of Envir. Mgt.

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**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Friday, August 17, 2007 3:06 PM  
**To:** Hessling, Peter A; Zhang-Torres; Ms. Ann Quillian, Progress Energy Florida, Inc.;  
David.Fernandes@pgnmail.com; Gustave.Schaefer@pgnmail.com; j-michael.kennedy@pgnmail.com  
**Cc:** Adams, Patty; Gibson, Victoria; Sheplak, Scott  
**Subject:** Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV

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Thank you,

DEP, Bureau of Air Regulation

Harvey, Mary

---

**From:** Fernandes, David [David.Fernandes@pgnmail.com]  
**To:** Harvey, Mary  
**Sent:** Friday, August 17, 2007 3:08 PM  
**Subject:** Read: Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV

Your message

**To:** David.Fernandes@pgnmail.com  
**Subject:**

was read on 8/17/2007 3:08 PM.

**Harvey, Mary**

---

**From:** Fernandes, David [David.Fernandes@pgnmail.com]  
**Sent:** Friday, August 17, 2007 3:14 PM  
**To:** Harvey, Mary  
**Subject:** RE: Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV

received.

thank you Mary,

**David Fernandes**

*Progress Energy - CT Operations  
Plant Manager - SunCoast CTs  
Bartow, Bayboro, Higgins & Suwannee  
(727) 827-6235 - Office  
(727) 827-6237 - Fax  
(727) 409-3367 - Cell*

-----Original Message-----

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Friday, August 17, 2007 3:06 PM  
**To:** phesslin@co.pinellas.fl.us; Zhang-Torres; Quillian, Ann; Fernandes, David; Schaefer, Gustave; Kennedy, J-Michael  
**Cc:** Adams, Patty; Gibson, Victoria; Sheplak, Scott  
**Subject:** Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV

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Thank you,

## Harvey, Mary

---

**From:** Gibson, Victoria  
**To:** Harvey, Mary  
**Sent:** Friday, August 17, 2007 3:08 PM  
**Subject:** Read: Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV

Your message

**To:** 'phesslin@co.pinellas.fl.us'; Zhang-Torres; 'Ms. Ann Quillian, Progress Energy Florida, Inc.'; 'David.Fernandes@pgnmail.com'; 'Gustave.Schaefer@pgnmail.com'; 'j-michael.kennedy@pgnmail.com'  
**Cc:** Adams, Patty; Gibson, Victoria; Sheplak, Scott  
**Subject:** Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV  
**Sent:** 8/17/2007 3:06 PM

was read on 8/17/2007 3:08 PM.

## Harvey, Mary

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**From:** Quillian, Ann [Ann.Quillian@pgnmail.com]  
**To:** Harvey, Mary  
**Sent:** Friday, August 17, 2007 3:08 PM  
**Subject:** Read: Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV

Your message

To: Ann.Quillian@pgnmail.com  
Subject:

was read on 8/17/2007 3:08 PM.

## Harvey, Mary

---

**From:** Sheplak, Scott  
**To:** Harvey, Mary  
**Sent:** Friday, August 17, 2007 3:13 PM  
**Subject:** Read: Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV

### Your message

**To:** 'phesslin@co.pinellas.fl.us'; Zhang-Torres; 'Ms. Ann Quillian, Progress Energy Florida, Inc.'; 'David.Fernandes@pgnmail.com'; 'Gustave.Schaefer@pgnmail.com'; 'j-michael.kennedy@pgnmail.com'  
**Cc:** Adams, Patty; Gibson, Victoria; Sheplak, Scott  
**Subject:** Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV  
**Sent:** 8/17/2007 3:06 PM

was read on 8/17/2007 3:13 PM.

## Harvey, Mary

---

**From:** Adams, Patty  
**To:** Harvey, Mary  
**Sent:** Friday, August 17, 2007 3:19 PM  
**Subject:** Read: Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV

Your message

**To:** 'phesslin@co.pinellas.fl.us'; Zhang-Torres; 'Ms. Ann Quillian, Progress Energy Florida, Inc.'; 'David.Fernandes@pgnmail.com'; 'Gustave.Schaefer@pgnmail.com'; 'j-michael.kennedy@pgnmail.com'  
**Cc:** Adams, Patty; Gibson, Victoria; Sheplak, Scott  
**Subject:** Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV  
**Sent:** 8/17/2007 3:06 PM

was read on 8/17/2007 3:19 PM.

## Harvey, Mary

---

**From:** Zhang-Torres  
**To:** Harvey, Mary  
**Sent:** Friday, August 17, 2007 4:14 PM  
**Subject:** Read: Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV

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**To:** 'phesslin@co.pinellas.fl.us'; Zhang-Torres; 'Ms. Ann Quillian, Progress Energy Florida, Inc.'; 'David.Fernandes@pgnmail.com'; 'Gustave.Schaefer@pgnmail.com'; 'j-michael.kennedy@pgnmail.com'  
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**Subject:** Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV  
**Sent:** 8/17/2007 3:06 PM

was read on 8/17/2007 4:14 PM.



## Harvey, Mary

---

**From:** Kennedy, J-Michael [J-Michael.Kennedy@pgnmail.com]  
**Sent:** Sunday, August 19, 2007 7:36 PM  
**To:** Harvey, Mary  
**Subject:** RE: Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV

I received your email with one attachment. Thanks.

Mike Kennedy

---

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Fri 8/17/2007 3:06 PM  
**To:** phessler@co.pinellas.fl.us; Zhang-Torres; Quillian, Ann; Fernandes, David; Schaefer, Gustave; Kennedy, J-Michael  
**Cc:** Adams, Patty; Gibson, Victoria; Sheplak, Scott  
**Subject:** Letter-Mr. David Fernandes - Higgins Power Plant - Project #1030012-005-AV

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DEP, Bureau of Air Regulation