



June 25, 2009

Mr. Jonathan Holtom, P.E.  
Title V Administrator  
Bureau of Air Regulation  
Division of Air Resource Management  
2600 Blair Stone Road, MS 5500  
Tallahassee, Florida 32399-2400

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JUN 29 2009

BUREAU OF AIR REGULATION

Re: Appendix 1-1 - List of Insignificant Emission Units and/or Activities  
Higgins Power Plant  
Facility ID No. 1030012  
Pinellas County

Dear Mr. Holtom:

As requested Progress Energy Florida, Inc. (PEF) is submitting information regarding the temporary location of a soil vapor extraction (SVE) system at the Higgins Power Plant. This system is an integral component of the Remedial Action Plan (RAP) to remediate the release of No. 2 distillate fuel oil to the soil at the site. The RAP was prepared by Qore, Inc. for PEF and submitted to the Pinellas County Health Department.

Based on the design air flow and the highest Total Petroleum Hydrocarbon (TPH) concentration identified during pilot testing, Qore, Inc. has estimated emissions from the system at less than 0.8 lbs VOC/day and has very conservatively estimated the Potential to Emit (PTE) at no more that 2.8 lbs of VOC/day; i.e., less than 1050 lbs of VOC/year. Based on these emissions PEF believes the SVE system meets the criteria for an insignificant emission unit as defined in Rule 62-213.430(6) of the Florida Administrative Code (F.A.C.). Accordingly, PEF request that addition of the "Soil Vapor Extraction (SVE) System" to Appendix I-1 - List of Insignificant Emission Units and/or Activities per Item No. 22 of the Title V Permitting Action Tree, which authorizes waiting for Title V permit to be revised or renewed to incorporate this change to Appendix I.

Thank you very much for your assistance and consideration in this matter, and if you have any questions, please contact Chris Bradley at (727) 820-5962.

*I, the undersigned, am the responsible official as defined in Chapter 62-210.200, FAC. , of the Title V source for which this document is being submitted. I hereby certify, based on the information and belief formed after reasonable inquiry that the statements made and data contained in this document are true, accurate and complete.*

*Patricia Q. West*  
Acid Rain & CAIR Programs Designated Representative  
Florida Power Corp. d/b/a/ Progress Energy Florida, Inc.