

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

RECEIVED

JUN 29 1999

BUREAU OF
AIR REGULATION

In the Matter of an
Application for Permit by:

OGC CASE NO.

Florida Power Corporation,
Bayboro Facility

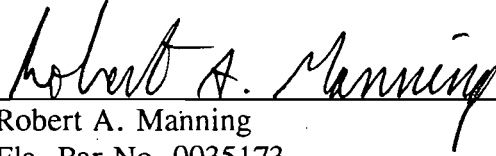
DRAFT Permit No.: 1030013-001-AV
Pinellas County, Florida

**NOTICE OF WITHDRAWAL OF REQUEST
FOR EXTENSION OF TIME**

The Florida Power Corporation (FPC), by and through undersigned counsel, hereby withdraws its Request for Extension of Time to file a petition for formal administrative proceedings in accordance with Chapter 120, Florida Statutes, in the above-styled matter. FPC filed its last Request for Extension of Time on May 28, 1999, in response to the "Intent to Issue Title V Air Operation Permit" (Permit No. 1030013-001-AV) for the Bayboro Facility located in Pinellas County, Florida, to negotiate certain changes in the draft Title V air operation permit with the Department of Environmental Protection (Department). Based on the FPC comment letter dated October 20, 1998, and subsequent discussions with Department representatives, FPC and the Department have come to an agreement on the issues involving the above-referenced draft Title V permit. The agreement between FPC and the Department is contained in the preliminary proposed Title V permit, e-mailed to FPC on June 25, 1999, a copy which is attached to this Notice. Therefore, FPC hereby withdraws its Request for Extension, conditioned upon the Department's issuance of the Proposed Permit in accordance with the Department's agreement with FPC.

Respectfully submitted this 28 day of June, 1999.

HOPPING GREEN SAMS & SMITH, P.A.



Robert A. Manning
Fla. Bar No. 0035173
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(904) 222-7500

Attorneys for Florida Power Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by U.S.

Mail on this 28 day of June, 1999:

Scott Sheplak
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Doug Beason
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

7/2/99 cc: Ed Svec
Scott Sheplak 
Attorney

Forward Header

Subject: Re: Bayboro Title V Permit
Author: Ed.Svec (Ed.Svec@dep.state.fl.us) at internet
Date: 6/25/99 8:31 AM

Here are the corrected copies of the "sob" and PROPOSED permit. Your final comment on the PROPOSED asked about unregulated EUs, they are addressed in Appendix U-1. Let me know if you are going to withdraw the extension or let it laspe (July 1)?

Thanks

Ed Svec

[Date]

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

Re: PROPOSED Title V Permit No.: 1030013-001-AV
Bayboro Facility

Dear Mr. Pardue:

One copy of the "PROPOSED PERMIT DETERMINATION" for the Bayboro Facility located at 13th Avenue and 2nd Street South, St. Petersburg, Pinellas County, is enclosed. This letter is only a courtesy to inform you that the DRAFT permit has become a PROPOSED permit.

An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is <http://www2.dep.state.fl.us/air>.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED permit is made by the USEPA within 45 days, the PROPOSED permit will become a FINAL permit no later than 55 days after the date on which the PROPOSED permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED permit, the FINAL permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Edward J. Svec at 850/488-1344.

Sincerely,

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

CHF/s

Enclosures

copy furnished to:
Mr. Kennard Kosky, PE, Golder Associates, Inc.
Mr. Scott Osbourn, FPC
Mr. Peter Hessling, PCDEM
Ms. Gracy Danois, USEPA, Region 4 (INTERNET E-mail Memorandum)
Ms. Carla E. Pierce, USEPA, Region 4 (INTERNET E-mail Memorandum)

PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 1030013-001-AV

Page 1 of 14

I. Public Notice.

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" to Florida Power Corporation for the Bayboro Facility located at 13th Avenue and 2nd Street South, St. Petersburg, Pinellas County was clerked on September 8, 1998. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in the St. Petersburg Times on October 4, 1998. The DRAFT Title V Air Operation Permit was available for public inspection at the Pinellas County Department of Environmental Management, Air Quality Division office 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 October 21, 1998.

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 one respondent 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. Scott Osbourn dated October 20, 1998, and received on October 21, 1998.

General Comments

1.R: The Department acknowledges the comment.

2.R: The effective date of the permit will be determined by any action the EPA may take upon review of the PROPOSED permit. It will either be 55 days after the PROPOSED permit is forwarded to EPA if there are no objections to the permit or the date when all objections are satisfied.

Section I., Facility Information, Subsection A.

3.R: The Department agrees with the comment and will change the facility description, as follows:

From: These facility's emissions units are No. 2 fuel oil fired combustion turbines manufactured by Pratt & Whitney (model number FT4C-1LF) and are designated as Bayboro Peaking Units #1, #2, #3 and #4. Each combustion turbine has two (2) turbine engines with each engine having its own stack. The manufacturers fuel flow and heat input ratings at 30°F for each turbine is 5,609 gallons per hour of No. 2 fuel oil (corresponds to approximately 774 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 56.7 MW generator (each). Emissions from the combustion turbines are uncontrolled. In addition, the facility may have relocatable diesel generator(s). The generator(s) will have a maximum (combined) heat input of 25.74 MMBtu/hour while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum (combined) rating of 2460 kilowatts. Emissions from the generator(s) are uncontrolled.

To: These facility's emissions units are No. 2 fuel oil fired combustion turbines manufactured by Pratt & Whitney (model number FT4C-1LF) and are designated as Bayboro Peaking Units #1, #2, #3 and #4. Each combustion turbine has two (2) turbine engines with each engine having its own stack. The manufacturers fuel flow and heat input ratings at 30°F for each turbine is 5,609 gallons per hour of No. 2 fuel oil (corresponds to approximately 774 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 to run a nominal 56.7 MW generator (each). Emissions from the combustion turbines are uncontrolled. In addition, the facility may have relocatable diesel generator(s). The generator(s) will have a maximum (combined) heat input of 25.74 MMBtu/hour while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum (combined) rating of 2460 kilowatts. Emissions from the generator(s) are uncontrolled.

Section II., Facility-wide Conditions.

4.R: The Department disagrees with the comment. Rule quotes are used for consistency in all Title V permits issued state-wide. The Department will not customize language for an individual permit.

5.R: See response 4.R., above.

6.R: The Department agrees with the comment and will delete condition 10. Aand renumber the remaining conditions. However, Facility-wide Condition 1 incorporates APPENDIX TV-3, TITLE V CONDITIONS, which contains condition 51., the requirement for annual statements of compliance in accordance with Rule 62-213.440(3), F.A.C.

Delete: 10. 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 52., APPENDIX TV-3, TITLE V CONDITIONS}
[Rule 62-214.420(11), F.A.C.]

Section III., Subsection A.

7.R: The Department agrees with the comment and the description of the emissions units will be changed, as follows:

From: These emissions units are No. 2 fuel oil fired combustion turbines manufactured by Pratt & Whitney (model number FT4C-1LF) and are designated as Bayboro Peaking Units #1, #2, #3 and #4. Each combustion turbine has two (2) turbine engines with each engine having its own stack. The manufacturers fuel flow and heat input ratings at 30°F for each turbine is 5,609 gallons per hour of No. 2 fuel oil (corresponds to approximately 774 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 56.7 MW generator (each). Emissions from the combustion turbines are uncontrolled.

To: These emissions units are No. 2 fuel oil fired combustion turbines manufactured by Pratt & Whitney (model number FT4C-1LF) and are designated as Bayboro Peaking Units #1, #2, #3 and #4. Each combustion turbine has two (2) turbine engines with each engine having its own stack. The manufacturers fuel flow and heat input ratings at 30°F for each turbine is 5,609 gallons per hour of No. 2 fuel oil (corresponds to approximately 774 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 to run a nominal 56.7 MW generator (each). Emissions from the combustion turbines are uncontrolled.

8.R: The Department agrees with the comments and the following changes are made:

From: A.1. Permitted Capacity. The maximum capacity for each gas turbine is as follows:
(a) 5,609 gallons per hour of No. 2 fuel oil (approximately 774.0 million Btu per hour) at 30° F.
(b) The peak capacity shall be determined from the graph of Fuel Heat Input verses Ambient Temperature shown on "Appendix - Bayboro Combustion Turbine", using the daily average temperature.
[Rules 62-4.160(2), 62-210.200(PTE), and 62-297.310(2)(a), F.A.C.]

To: A.1. Permitted Capacity. The maximum capacity for each gas turbine is as follows:
(a) 774.0 million Btu per hour at 30° F.
(b) The peak capacity shall be determined from the graph of Fuel Heat Input verses Ambient Temperature shown on "Appendix - Bayboro Combustion Turbine".
[Rules 62-4.160(2), and 62-210.200(PTE), F.A.C.]

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. Regular record keeping is not required

for heat input. Instead the owner or operator is expected to determine

heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test. }

9.R: The Department disagrees with the comment. PCDEM is responsible for compliance under the State Operating Agreement and as such is the authorizing authority. The condition will remain as noticed.

10.R: The Department agrees with the comment and the following change is made:

From: A.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 **A.12.**
[Rule 62-213.440, F.A.C.]

To: A.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, or the permittee, upon each fuel delivery. See specific condition **A.13.**
[Rule 62-213.440, F.A.C.]

11.R: The Department agrees with the comment and the following change is made:

From: A.10. In order to provide reasonable assurance that the fuel oil supplier's fuel oil analysis is accurate, the permittee shall perform at least one audit sample analysis from a fuel oil delivery during each calendar year period. The fuel oil shall be analyzed for the following:

- Btu content
- API gravity
- Density
- Sulfur content, percent by weight

An audit sample analysis is not required in any calendar year for which the fuel supplier certifications were not used to demonstrate compliance with the fuel oil sulfur limitation. See specific condition **A.12.**

[Rules 62-4.070(3) and 62-213.440, F.A.C.]

To: A.10. Not federally enforceable. In order to provide reasonable assurance that the fuel oil supplier's fuel oil analysis is accurate, the permittee shall perform at least one audit sample analysis from a fuel oil delivery during each calendar year period. The fuel oil shall be analyzed for the following:

- Btu content
- API gravity
- Density
- Sulfur content, percent by weight

An audit sample analysis is not required in any calendar year for which the fuel supplier certifications were not used to demonstrate compliance with the fuel oil sulfur limitation. See specific condition A.9. [Rules 62-4.070(3) and 62-213.440, F.A.C.]

12.R: In recent discussions with representatives of FPC, this comment is withdrawn.

13.R: The Department agrees with the comment and the following change is made:

From: A.16. 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.
- 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 PCDEM in writing, 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

To: A.16. 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;
- 9. The owner or operator shall notify the PCDEM in writing, 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

14.R: Condition A.18. refers to condition A.17. The following change is made:

From: A.17. 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 liquid fuels for less than 400 hours per year.

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

To: A.17. 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 liquid fuels for less than 400 hours per year.

See specific condition A.18.

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

15.R: The Department disagrees with the comment. However, after reviewing the condition, the Department feels that the condition should be identified as “Not federally enforceable.” and will be changed as follows:

From: A.22. Operating Reports. Submit to the Southwest District office, Air Compliance Section of the Department of Environmental Protection, and the PCDEM, Air Quality Division, each calendar year, on or before March 1, completed DEP Form 62-210.900(5), “*Annual Operating Report for Air Pollutant Emitting Facility*”, including the Emissions Report, for the preceding calendar year. The annual operating report shall be based on the following:

To: A.22. Not federally enforceable. Operating Reports. Submit to the Southwest District office, Air Compliance Section of the Department of Environmental Protection, and the PCDEM, Air Quality Division, each calendar year, on or before March 1, completed DEP Form 62-210.900(5), “*Annual Operating Report for Air Pollutant Emitting Facility*”, including the Emissions Report, for the preceding calendar year. The annual operating report shall be based on the following:

Section III., Subsection B.

16.R: The Department will address this comment in response **17.R:**, below.

17.R: The Department agrees with the comment and for consistency with other FPC permits, the original **Section III. Subsection B.** is deleted and replaced with the following:

New Section III, Subsection B:

Section III. Emissions Unit(s) and Conditions.

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

| Facility ID No. | E. U. ID No. | Brief Description |
|------------------------|---------------------|--|
| 7775047 | -001 | Relocatable diesel generator(s) will have a maximum (combined) heat input of 25.74 MMBtu/hour while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum (combined) rating of 2460 kilowatts. Emissions from the generator(s) are uncontrolled. |

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. Hines Energy Complex, County Road 555, 1 mi. southwest of Homeland, Polk County.
7. Anclote Power Plant, 1729 Baileys Road, Holiday, Pasco 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 Bayboro Facility.}

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

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum (combined) heat input rate shall not exceed 25.74 million Btu per hour.

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

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition B.12.

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

B.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.]

B.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, AC 09-202080.]

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.}

B.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, AC 09-202080.]

Excess Emissions

B.6. 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.]

B.7. 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.8. 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 condition **B.3.** and **B.11.**

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

B.9. 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. }

B.10. 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.]

B.11. 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.]

B.12. 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 for each generator. 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, AC 09-202080.]

B.13. 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.]

B.14. 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.]

B.15. 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.]

B.16. 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.3.**, **B.5.**, and **B.8.**

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

Recordkeeping and Reporting Requirements

B.17. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, the owner or operator shall notify 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.]

B.18. 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.]

B.19. To demonstrate compliance with specific condition **B.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.]

B.20. To demonstrate compliance with specific condition **B.3.**, 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, AC 09-202080.]

Source Obligation

B.21. 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.]

B.22. 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]

Appendix I-1, List of Insignificant Emissions Units and/or Activities.

18.R: The Department agrees with the request and will make the following change to the above referenced appendix:

From: 11. Six underground waste oil tanks - 168 gallons/each

To: 11. Eight underground waste oil tanks - 168 gallons/each

PROPOSED Permit No.: 1030013-001-AV
Page 14 of 14

The enclosed PROPOSED Title V Air Operation Permit includes the aforementioned changes to the DRAFT Title V Air Operation Permit.

B. Document(s) on file with the permitting authority:
-Letter received October 21, 1998, from Mr. Scott Osbourn.

III. Conclusion.

The permitting authority hereby issues the PROPOSED Permit No.: 1030013-001-AV, with any changes noted above.

Because of the number of changes to the DRAFT, a copy of the PROPOSED permit has been printed for the applicant.

Florida Power Corporation
Bayboro Facility
Facility ID No.: 1030013
Pinellas County

Initial Title V Air Operation Permit
PROPOSED Permit No.: 1030013-001-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: 850/488-1344
Fax: 850/922-6979

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
PROPOSED Permit No.: 1030013-001-AV

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

PROPOSED Permit No.: 1030013-001-AV
Facility ID No.: 1030013
SIC Nos.: 49, 4911
Project: Initial Title V Air Operation Permit

This permit is for the operation of the Bayboro Facility. This facility is located at 13th Avenue and 2nd Street South, St. Petersburg, Pinellas County; UTM Coordinates: Zone 17, 338.8 km East and 3071.3 km North; Latitude: 27° 45' 28" North and Longitude: 82° 38' 13" 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, and 62-213. 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 I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-3, TITLE V CONDITIONS (version dated 04/30/99)
Appendix- Bayboro Combustion Turbine Fuel Heat Input vs. Temperature

Effective Date:
Renewal Application Due Date:
Expiration Date:

Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/sms/ejs

Section I. Facility Information.

Subsection A. Facility Description.

These facility's emissions units are No. 2 fuel oil fired combustion turbines manufactured by Pratt & Whitney (model number FT4C-1LF) and are designated as Bayboro Peaking Units #1, #2, #3 and #4. Each combustion turbine has two (2) turbine engines with each engine having its own stack. The manufacturers fuel flow and heat input ratings at 30°F for each turbine is 5,609 gallons per hour of No. 2 fuel oil (corresponds to approximately 774 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 to run a nominal 56.7 MW generator (each). Emissions from the combustion turbines are uncontrolled. In addition, the facility may have relocatable diesel generator(s). The generator(s) will have a maximum (combined) heat input of 25.74 MMBtu/hour while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum (combined) rating of 2460 kilowatts. Emissions from the generator(s) are uncontrolled.

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

Based on the initial Title V permit application received June 14, 1996, this facility is not a major source of hazardous air pollutants (HAPs).

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

| <u>Facility ID No.</u> | <u>E. U. ID No.</u> | <u>Brief Description</u> |
|------------------------|---------------------|--|
| 1030013 | -001 | Bayboro Peaking Unit #1 Gas Turbine |
| | -002 | Bayboro Peaking Unit #2 Gas Turbine |
| | -003 | Bayboro Peaking Unit #3 Gas Turbine |
| | -004 | Bayboro Peaking Unit #4 Gas Turbine |
| 7775047 | -001 | Relocatable diesel generator(s) will have a maximum (combined) heat input of 25.74 MMBtu/hour while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum (combined) rating of 2460 kilowatts. Emissions from the generator(s) are uncontrolled. |

Unregulated Emissions Units and/or Activities

- xxx Internal floating roof fuel oil tank - 1,088,304 gallons
- xxx Internal floating roof fuel oil tank - 786,232 gallons
- xxx Waste oil tank - 12,000 gallons
- xxx Lube oil storage tank - 500 gallons
- xxx Fuel filter building vents
- xxx Overboard tanks for the peaking unit turbines
- xxx Lube oil vents with demisters for the peaking unit turbines

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

Letter received October 21, 1998, from Mr. Scott Osbourn.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-3, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-3, 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 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]
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. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant 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. 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 grass mowing 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.]

{Note: This condition implements the requirements of Rules 62-296.320(4)(c)1., 3., & 4. F.A.C. (condition 58. of APPENDIX TV-3, TITLE V CONDITIONS.}

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 unit(s).

E.U.

| <u>ID No.</u> | <u>Brief Description</u> |
|---------------|--------------------------|
| -001 | Bayboro Peaking Unit #1 |
| -002 | Bayboro Peaking Unit #2 |
| -003 | Bayboro Peaking Unit #3 |
| -004 | Bayboro Peaking Unit #4 |

These emissions units are No. 2 fuel oil fired combustion turbines manufactured by Pratt & Whitney (model number FT4C-1LF) and are designated as Bayboro Peaking Units #1, #2, #3 and #4. Each combustion turbine has two (2) turbine engines with each engine having its own stack. The manufacturers fuel flow and heat input ratings at 30°F for each turbine is 5,609 gallons per hour of No. 2 fuel oil (corresponds to approximately 774 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 to run a nominal 56.7 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 engine has its own stack. Each combustion turbine began commercial operation in 1973.}

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

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum capacity for each gas turbine is as follows:

- (a) 774.0 million Btu per hour at 30° F.
 - (b) The peak capacity shall be determined from the graph of Fuel Heat Input verses Ambient Temperature shown on "Appendix - Bayboro Combustion Turbine".
- [Rules 62-4.160(2), and 62-210.200(PTE), F.A.C.]

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. Regular record keeping is not required for heat input. Instead the owner or operator is expected to determine heat input whenever

emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test. }

A.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition A.14.
[Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation - Fuels. Only 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 52-253207A, AO 52-253209A, AO 52-253211A, and AO 52-253213A]

A.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 52-253207A, AO 52-253209A, AO 52-253211A, and AO 52-253213A]

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 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 52-253207A, AO 52-253209A, AO 52-253211A, and AO 52-253213A]

A.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 52-253207A, AO 52-253209A, AO 52-253211A, and AO 52-253213A]

Excess Emissions

A.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.]

A.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

A.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, or the permittee, upon each fuel delivery. See specific condition **A.13**.
[Rule 62-213.440, F.A.C.]

A.10. Not federally enforceable. In order to provide reasonable assurance that the fuel oil supplier's fuel oil analysis is accurate, the permittee shall perform at least one audit sample analysis from a fuel oil delivery during each calendar year period. The fuel oil shall be analyzed for the following:

- Btu content
- API gravity
- Density
- Sulfur content, percent by weight

An audit sample analysis is not required in any calendar year for which the permittee provided fuel analysis to demonstrate compliance with the fuel oil sulfur limitation. See specific condition **A.9**.
[Rules 62-4.070(3) and 62-213.440, F.A.C.]

A.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: 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.12. 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.]

A.13. 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.]

A.14. 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. 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.
[Rule 62-297.310(2), F.A.C.; and, AO 52-253207A, AO 52-253209A, AO 52-253211A, and AO 52-253213A]

A.15. 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.]

A.16. 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;

9. The owner or operator shall notify the PCDEM in writing, 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.

(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.17. 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 liquid fuels for less than 400 hours per year.

See specific condition A.18.

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

A.18. Visible Emissions Testing - Waiver. In order to request the annual visible emissions test waiver, a letter shall be sent each year, when the visible emissions test is due, to the Air Compliance Section, Southwest District Office of the Department of Environmental Protection, and to the PCDEM, Air Quality Division, stating the number of hours that fuel oil was utilized, and that the requirements for approval of the waiver have been satisfied. Regardless of fuel usage, a waiver will not be granted for the visible emissions test for the 12 month period prior to permit renewal. A visible emissions test is required and shall be conducted during the 12 month period prior to permit renewal.

[Rule 62-4.070(3), F.A.C.; and, AO 52-253207A, AO 52-253209A, AO 52-253211A, and AO 52-253213A]

Recordkeeping and Reporting Requirements

A.19. Monthly Recordkeeping. Florida Power Corporation shall maintain a monthly record of the hours of operation of the peaking units. This record shall be updated monthly and shall be completed by the end of the following month. The records shall be maintained at the facility for a minimum of the most recent five year period and shall be made available to the Department and PCDEM, Air Quality Division, upon request.

[Rules 62-4.070(3) and 62-213.440(1)(b)2.b., F.A.C.; and, AO 52-253207A, AO 52-253209A, AO 52-253211A, and AO 52-253213A]

A.20. 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.]

A.21. 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.
- (c) Each test report shall include:
 - (1) A statement of the maximum turbine performance based on the turbine performance criteria defined by specific condition A.1.
 - (2) A copy of the graph of Fuel Heat Input versus Ambient Temperature for each peaking unit noting the maximum heat input and the ambient temperature during the compliance test; and
 - (3) A copy of the fuel oil analysis.

[Rule 62-297.310(8), F.A.C.; and, AO 52-253207A, AO 52-253209A, AO 52-253211A, and AO 52-253213A]

A.22. Not federally enforceable. Operating Reports. Submit to the Southwest District office, Air Compliance Section of the Department of Environmental Protection, and the PCDEM, Air Quality Division, each calendar year, on or before March 1, completed DEP Form 62-210.900(5), "*Annual Operating Report for Air Pollutant Emitting Facility*", including the Emissions Report, for the preceding calendar year.

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 | 0.48 PM |
| 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.

[Rule 62-210.370(3), F.A.C.; and, AO 52-253207A, AO 52-253209A, AO 52-253211A, and AO 52-253213A]

Section III. Emissions Unit(s) and Conditions.

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

| Facility ID No. | E. U. ID No. | Brief Description |
|----------------------------|-------------------------|--|
| 7775047 | -001 | Relocatable diesel generator(s) will have a maximum (combined) heat input of 25.74 MMBtu/hour while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum (combined) rating of 2460 kilowatts. Emissions from the generator(s) are uncontrolled. |

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. Hines Energy Complex, County Road 555, 1 mi. southwest of Homeland, Polk County.
7. Anclote Power Plant, 1729 Baileys Road, Holiday, Pasco 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 Bayboro Facility.}

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

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum (combined) heat input rate shall not exceed 25.74 million Btu per hour.

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

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **B.12.**

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

B.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.]

B.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, AC 09-202080.]

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. }

B.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, AC 09-202080.]

Excess Emissions

B.6. 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.]

B.7. 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.8. 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 condition **B.3.** and **B.11.**
[Rule 62-213.440, F.A.C.]

B.9. 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. }

B.10. 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.]

B.11. 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.]

B.12. 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 for each generator. 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, AC 09-202080.]

B.13. 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.]

B.14. 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.]

B.15. 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.]

B.16. 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.3.**, **B.5.**, and **B.8.**

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

Recordkeeping and Reporting Requirements

B.17. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, the owner or operator shall notify 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.]

B.18. 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.]

B.19. To demonstrate compliance with specific condition **B.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.]

B.20. To demonstrate compliance with specific condition **B.3.**, 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, AC 09-202080.]

Source Obligation

B.21. 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.]

B.22. 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]

STATEMENT OF BASIS

Florida Power Corporation
Bayboro Facility
Facility ID No.: 1030013
Pinellas County

Initial Title V Air Operation Permit
PROPOSED Permit No.: 1030013-001-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, and 62-213. 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.

The facility's permitted emissions units are four No. 2 fuel oil fired combustion turbine peaking units. In addition, the facility may have relocatable diesel fired generator(s). There are no Acid Rain Emissions Units at this facility.

The No. 2 fuel oil fired combustion turbines are manufactured by Pratt & Whitney (model number FT4C-11F) and are designated as Bayboro Peaking Units #1, #2, #3 and #4. The turbines are not subject to 40 CFR 60, Subpart GG, the only standards these emissions units are subject to are opacity and percent sulfur content of the fuel oil. Each combustion turbine has two (2) turbine engines with each engine having its own stack. The manufacturer's fuel flow and heat input ratings at 30°F for each turbine is 5,609 gallons per hour of No. 2 fuel oil (corresponds to approximately 774 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 to run a nominal 56.7 MW generator (each). Emissions from the combustion turbines are uncontrolled. The Department has determined that the appropriate visible emissions (VE) testing frequency for the four combustion turbines is a VE test upon exceeding 400 hours of operation on fuel oil in any federal fiscal year (October 1 through September 30). This frequency is justified by the low historical use of fuel oil for these emissions units and the previous VE tests, which documented compliance while firing fuel oil. Moreover, no Method 9 test since 1994 on these emissions units have resulted in an opacity measurement greater than 5% opacity. Regarding hours of operation, these emissions units had not significantly exceeded 400 hours per year (going back to 1994), until the summer of 1998. The highest turbine hours of operation on oil for each year are: 1998 (#4) 681 hours; 1997 (#2) 399 hours; 1996 (#1) 611 hours; 1995 (#1) 539 hours; and, 1994 (#2) 270 hours. All electric generating units, not only within FPC's system, but state-wide, operated at record levels during the summer of 1998. The owner or operator will be conducting VE compliance tests while firing fuel oil for each combustion turbine upon that combustion turbine exceeding 400 hours of operation on fuel oil in any federal fiscal year (October 1 through September 30). Regardless of the number of hours of operation

on fuel oil, at least one VE compliance test will be conducted on all four combustion turbines every five (5) years, coinciding with the term of the operation permit for these combustion turbines.

The relocatable diesel generator(s) will have a maximum (combined) heat input of 25.74 MMBtu/hour while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum (combined) rating of 2460 kilowatts. Emissions from the generator(s) are uncontrolled.

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. Hines Energy Complex, County Road 555, 1 mi. southwest of Homeland, Polk County.
7. Anclote Power Plant, 1729 Baileys Road, Holiday, Pasco County

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

Based on the initial Title V permit application received June 14, 1996, this facility is not a major source of hazardous air pollutants (HAPs).

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

Florida Power Corporation
Bayboro Facility

PROPOSED Permit No.: 1030013-001-AV
Facility ID No.: 1030013

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 ‘insignificant emissions units’.

E.U. ID

No.

Brief Description of Emissions Units and/or Activity

| | |
|------|---|
| -xxx | Internal floating roof fuel oil tank - 1,088,304 gallons |
| -xxx | Internal floating roof fuel oil tank - 786,232 gallons |
| -xxx | Waste oil tank - 12,000 gallons |
| -xxx | Lube oil storage tank - 500 gallons |
| -xxx | Fuel filter building vents |
| -xxx | Overboard tanks for the peaking unit turbines |
| -xxx | Lube oil vents with demisters for the peaking unit turbines |

RECEIVED

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JUN 08 1999

BUREAU OF
AIR REGULATION

FLORIDA POWER CORPORATION
(BAYBORO FACILITY),

Petitioner,

vs.

OGC CASE NO. 98-2608

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 (Bayboro Facility), to grant an extension of time to file a petition for an administrative hearing on Application No. 1030013-001-AV. See Exhibit 1.

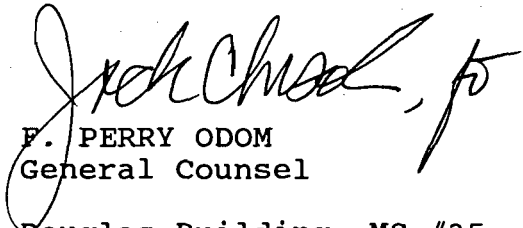
Respondent, State of Florida Department of Environmental Protection, has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until July 1, 1999, 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 8th day of June, 1999, 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: (850) 488-9314

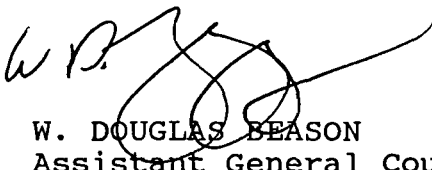
CERTIFICATE OF SERVICE

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

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Florida Power Corporation
Post Office Box 14042
St. Petersburg, FL 33733-4042

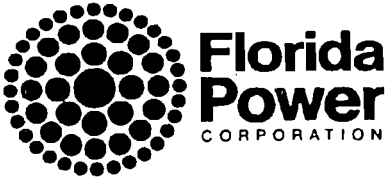
on this 8th day of June, 1999.

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: (850) 488-9314

6/9/99 cc: Scott Sheplak
Ed Svec



May 27, 1999

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, Bayboro Facility
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 1030013-001-AV

On September 10, 1998, 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. Accordingly, FPC requests an extension of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including July 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties' mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (727) 826-4258.

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
Doug Beason, DEP OGC

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

RECEIVED

MAY 13 1999

BUREAU OF
AIR REGULATION

FLORIDA POWER CORPORATION
(BAYBORO FACILITY),

Petitioner,

vs.

OGC CASE NO. 98-2608

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 (Bayboro Facility), to grant an extension of time to file a petition for an administrative hearing on Application No. 1030013-001-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 June 1, 1999, 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 May, 1999, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Jack Chase
F. PERRY ODOM
General Counsel

Douglas Building, MS #35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314

CERTIFICATE OF SERVICE

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

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Florida Power Corporation
Post Office Box 14042
St. Petersburg, FL 33733-4042

on this 12th day of May, 1999.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314

5/13/99 cc: Ed Svec



April 30, 1999

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

Re: Florida Power Corporation, Bayboro Facility
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air
Operation Permit*
Draft Permit No. 1030013-001-AV

Dear Ms. Carter:

On September 10, 1998, 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 need to be resolved. Accordingly, FPC requests an enlargement of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including June 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial.

If you should have any questions, please contact Scott Osbourn at (727) 826-4258, or Robert Manning at Hopping Green Sams & Smith, P.A. at (850) 222-7500.

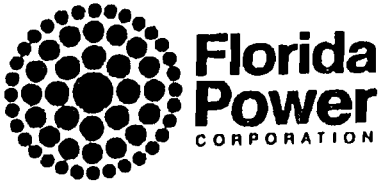
Sincerely,

A handwritten signature in black ink that reads "Robert Manning". The signature is written in a cursive style with a large, sweeping initial "R".

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

cc: Scott Sheplak, DEP
Doug Beason, DEP OGC

115215.1



April 30, 1999

RECEIVED

MAY 03 1999

BUREAU OF
AIR REGULATION

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

Re: Florida Power Corporation, Bayboro Facility
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air
Operation Permit*
Draft Permit No. 1030013-001-AV

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Sincerely,

A handwritten signature in black ink that reads "Robert Manning". The signature is written in a cursive, slightly slanted style.

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

cc: Scott Sheplak, DEP
Doug Beason, DEP OGC

5/3/99 cc: Scott Sheplak
Ed Ives

115215.1



March 18, 1999

RECEIVED

MAR 26 1999

**BUREAU OF
AIR REGULATION**

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, Bayboro Facility
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 1030013-001-AV

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If you should have any questions, please contact Mr. Scott Osbourn of FPC at (727) 826-4258.

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, appearing to read "Robert A. Manning", written in a cursive style.

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

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC

3/29/99 cc = Scott Sheplak
Ed Svec

RECEIVED

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

MAR 10 1999

BUREAU OF
AIR REGULATION

FLORIDA POWER CORPORATION
(BAYBORO FACILITY),

Petitioner,

vs.

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OF ENVIRONMENTAL PROTECTION,

Respondent.

ORDER GRANTING REQUEST FOR EXTENSION
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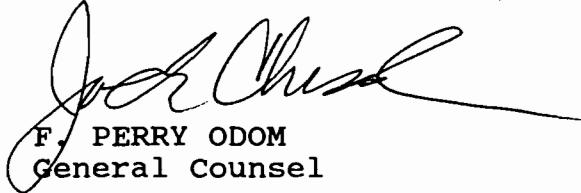
Respondent, State of Florida Department of Environmental Protection, has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until April 1, 1999, 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 5th day of March, 1999, 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: (850) 488-9314

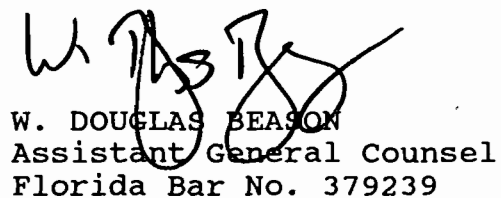
CERTIFICATE OF SERVICE

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

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Florida Power Corporation
Post Office Box 14042
St. Petersburg, FL 33733-4042

on this 9th day of March, 1999.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

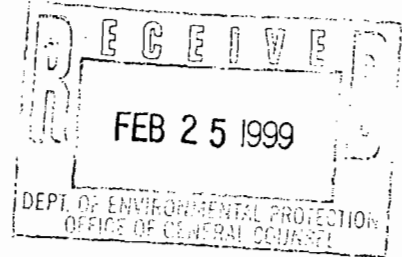


W. DOUGLAS BEASON
Assistant General Counsel
Florida Bar No. 379239

Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314



February 23, 1999



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, Bayboro Facility
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 1030013-001-AV

On September 10, 1998, 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. Accordingly, FPC requests an extension of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including April 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties' mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (727) 826-4258.

Sincerely,

Handwritten signature of W. Jeffrey Pardue in black ink.

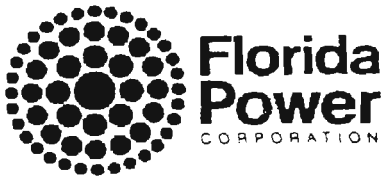
W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

Handwritten signature of Robert A. Manning in black ink.

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

cc: Scott Sheplak, DEP
Doug Beason, DEP OGC

LEG 51



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 KPC comments for Bartow or Crystal River for consistency }



February 23, 1999

RECEIVED

FEB 25 1999

BUREAU OF
AIR REGULATION

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, Bayboro Facility
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 1030013-001-AV

On September 10, 1998, 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. Accordingly, FPC requests an extension of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including April 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties' mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (727) 826-4258.

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 A. Manning", written in a cursive style.

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

cc: Scott Sheplak, DEP
Doug Beason, DEP OGC.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

RECEIVED

FEB 09 1999

FLORIDA POWER CORPORATION
(BAYBORO FACILITY),

BUREAU OF
AIR REGULATION

Petitioner,

vs.

OGC CASE NO. 98-2608

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 (Bayboro Facility), to grant an extension of time to file a petition for an administrative hearing on Application No. 1030013-001-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 1, 1999, 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 5th day of February, 1999, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Jack Chisholm, Jr.
F. PERRY ODOM
General Counsel

Douglas Building, MS #35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314

CERTIFICATE OF SERVICE

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

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Florida Power Corporation
Post Office Box 14042
St. Petersburg, FL 33733-4042

on this 8th day of January, 1999.

2/17/99 cc: Ed Svec

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314



January 27, 1999

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, Bayboro Facility
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title-V Air Operation Permit,*
Draft Permit No. 1030013-001-AV

On September 10, 1998, 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. Accordingly, FPC requests an extension of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including April 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties' mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (727) 826-4258.

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



RECEIVED

JAN 27 1999

January 27, 1999

BUREAU OF
AIR REGULATION

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, Bayboro Facility
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit, Draft Permit No. 1030013-001-AV*

On September 10, 1998, 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. Accordingly, FPC requests an extension of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including April 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties' mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (727) 826-4258.

Sincerely,

Handwritten signature of W. Jeffrey Pardue in black ink.

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

Handwritten signature of Robert A. Manning in black ink.

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

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC

2/1/99 cc: Scott Sheplak
Ed Svec

**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

FLORIDA POWER CORPORATION
(BAYBORO FACILITY),

Petitioner,

vs.

OGC CASE NO. 98-2608

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 (Bayboro Facility), to grant an extension of time to file a petition for an administrative hearing on Application No. 1030013-001-AV. See Exhibit 1.

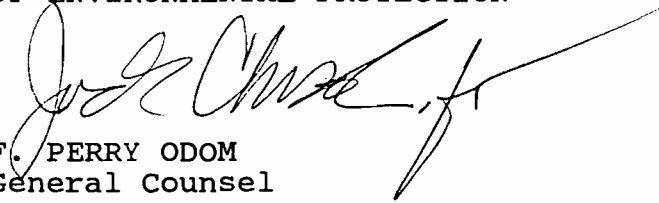
Respondent, State of Florida Department of Environmental Protection, has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until February 1, 1999, 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 3rd day of December, 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: (850) 488-9314

CERTIFICATE OF SERVICE

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

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Florida Power Corporation
Post Office Box 14042
St. Petersburg, FL 33733-4042

on this 4th day of December, 1998.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


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

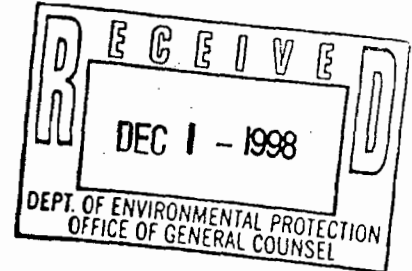
Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314

12/9/98

cc - Ed Svec
Scott Sheplek



November 25, 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, Bayboro Facility
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 1030013-001-AV

On September 10, 1998, 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. Accordingly, FPC requests an extension of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including February 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties' mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (727) 826-4258.

Sincerely,

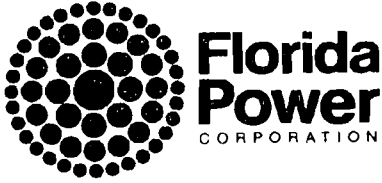
A handwritten signature in cursive script, appearing to read "W. Jeffrey Pardue".

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



RECEIVED

DEC 03 1998

BUREAU OF
AIR REGULATION

November 25, 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, Bayboro Facility
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 1030013-001-AV

On September 10, 1998, 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. Accordingly, FPC requests an extension of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including February 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties' mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (727) 826-4258.

Sincerely,

Handwritten signature of W. Jeffrey Pardue in cursive.

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

Handwritten signature of Robert A. Manning in cursive.

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

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC

12/9/98 cc: Ed Svec
Scott Sheplak

RECEIVED

NOV 19 1998

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

BUREAU OF
AIR REGULATION

FLORIDA POWER CORPORATION
(BAYBORO FACILITY),

Petitioner,

vs.

OGC CASE NO. 98-2608

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 (Bayboro Facility), to grant an extension of time to file a petition for an administrative hearing on Application No. 1030013-001-AV. See Exhibit 1.

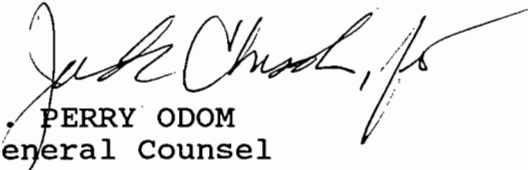
Respondent, State of Florida Department of Environmental Protection, has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until December 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 13 day of November, 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: (850) 488-9314

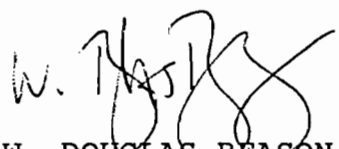
CERTIFICATE OF SERVICE

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

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Florida Power Corporation
Post Office Box 14042
St. Petersburg, FL 33733-4042

on this 19th day of November, 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: (850) 488-9314

11/20/98 cc: Ed Svec
Scott Sheplak



October 29, 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, Bayboro Facility
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 1030013-001-AV

On September 10, 1998, 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. Accordingly, FPC requests an extension of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including December 1, 1998, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties' mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (727) 826-4258.

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 in a cursive style.

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

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC



RECEIVED

NOV 02 1998

BUREAU OF
AIR REGULATION

October 29, 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, Bayboro Facility
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit, Draft Permit No. 1030013-001-AV*

On September 10, 1998, 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. Accordingly, FPC requests an extension of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including December 1, 1998, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties' mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (727) 826-4258.

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 A. Manning", written in a cursive style.

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

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC

11/4/98 Ed Svec

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

RECEIVED

FLORIDA POWER CORPORATION
(BAYBORO FACILITY),

Petitioner,

vs.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

OCT 27 1998

BUREAU OF
AIR REGULATION
OGC CASE NO. 98-2698

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 (Bayboro Facility), to grant an extension of time to file a petition for an administrative hearing on Application No. 1030013-001-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 November 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 22 day of October, 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: (850) 488-9314


CERTIFICATE OF SERVICE

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

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Florida Power Corporation
Post Office Box 14042
St. Petersburg, FL 33733-4042

on this 21st day of October, 1998.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


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

cc - Ed Svec

Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314



RECEIVED

SEP 24 1998

Dept. of Environmental Protection
Office of General Counsel

September 21, 1998

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

Dear Ms. Carter:

Re: Florida Power Corporation, Bayboro Facility
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*
Draft Permit No 1030013-001-AV

On September 10, 1998, 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 need to be resolved. Accordingly, FPC requests an enlargement of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including November 1, 1998, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial.

If you should have any questions, please contact Scott Osbourn at (727) 826-4258, or Robert Manning at Hopping Green Sams & Smith, P.A. at (850) 222-7500.

Sincerely,

Handwritten signature of W. Jeffrey Pardue in cursive.

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

Handwritten signature of Robert A. Manning in cursive.

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

cc: Scott Sheplak, DEP

RECEIVED

OCT 21 1998

BUREAU OF
AIR REGULATION



October 20, 1998

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, Bayboro Plant
DRAFT Title V Permit No. 1030013-001-AV

Dear Mr. Sheplak:

On September 10, 1998, 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 need to be resolved. Accordingly, FPC has requested an extension of time, up to November 1, 1998, in which to file a Petition for Administrative Proceedings. FPC offers the following comments regarding the DRAFT Title V permit for the Bayboro Plant.

General Comments

1. FPC published the Notice of Intent on October 5, 1998. Proof of publication was mailed to your office on October 19, 1998.

2. FPC expects that the Effective Date of this permit will be 55 days after the "Proposed" permit is forwarded to EPA. Does the Department expect the effective date to be January 1, 1999?

Section I., Facility Information, Subsection A.

1. FPC requests a revision to the following sentence from the description because FPC is not aware of any other Bayboro permitting documents in which it appears: "These combustion turbines are used as peaking units during peak demand times, during emergencies, and during control testing, to run a nominal 56.7 MW generator (each)."

Section II., Facility-wide Conditions.

1. Condition 3. FPC has previously requested revisions to this language in other FPC draft Title V permits and continues to believe that it is appropriate to strive for site-specific permit language. Accordingly, for clarity and to make this Condition specific to FPC's Bayboro Plant, 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 3. appears to be misplaced, FPC requests the following additional edits: **"EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C."**

2. 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,"** Also, FPC requests the addition of a permitting note for this Condition to clarify that the Department has not deemed necessary and ordered any specific vapor emission control devices for this facility.

3. Condition 10. should be deleted because the Bayboro facility is not an Acid Rain facility.

Section III. Subsection A.

1. FPC requests a revision to the following sentence from the description because FPC is not aware of any other Bayboro permitting documents in which it appears: **"These combustion turbines are used as peaking units ~~during peak demand times, during emergencies, and during controls testing,~~ to run a nominal 56.7 MW generator (each)."**

2. Condition A.1. FPC requests that the reference to fuel usage be deleted from paragraph (a). The heat input number should be sufficient. Also, FPC requests that a permitting note be included to clarify that this heat input number is only included for purposes of determining capacity at testing, etc., as well as specific language in the statement of basis regarding the lack of recordkeeping requirements, etc. FPC has made this exact request in its other Title V permits as well.

Regarding paragraph (b), FPC requests that the last clause -- "using daily average temperature" -- be deleted. The inclusion of the heat input/temperature curves is sufficient. Also, the citation to Rule 62-297.310(2)(a), F.A.C. should be deleted because this rule is marked "reserved"; there is no regulatory language.

3. Condition A.7. FPC requests the following revision to allow for further options if needed: **". . . but in no case exceed two hours in any twenty-four hour period unless specifically authorized by PCDEM or the Department for longer duration."**

4. Condition A.9. FPC requests the following revision because the current operating permit allows FPC, as well as the vendor, to determine compliance with the fuel sulfur limit: "The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor, or by the permittee, upon each fuel delivery." Also, the second paragraph in Condition A.10 would not make sense if FPC were not allowed to do the analysis as well. Finally, the reference to Condition A.12. should be changed to Condition A.13.

5. Condition A.10. This Condition should be marked "Not Federally Enforceable" because it only appears in the facility's operating permit. Further, a citation to the AOs should be provided, and the reference to Condition A.12. should be changed to Condition A.9.

6. Condition A.14. FPC requests that this Condition be re-written to reflect the language in the AOs as well as the established DARM guidance for testing of CTs.

7. Condition A.16. Because these CTs are only subject to an emission limit for visible emissions, paragraph (a)4.a. should be edited as follows: "~~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 pollutant; and c. Each NESHAP pollutant, if there is an applicable emission standard.~~" Also, paragraph (a)5. should be deleted because there is no particulate standard or testing requirement for these CTs.

8. Condition A.18. FPC requests that the title to this Condition be clarified to indicate whether it is referring to Condition A.16(c) or Condition A.17. Specifically, the term "waiver" is used in Condition A.16(c) in reference to the waiver of certain test requirements, while the language in Condition A.18. refers to the number of hours the unit burned oil, presumably in relation to condition A.17., which is written in terms of an "exemption."

9. Condition A.22. FPC requests that this Condition be deleted because Appendix TV-1 already requires the submission of an AOR, and the inclusion of emission factors is unnecessary and overly restrictive.

Section III. Subsection B.

1. In the listing of sites to which these relocatable generators can be located, Site 4. lists the Bayboro plant and should be changed to the Anclote Plant, and Site 6. should be updated to the "Hines Energy Complex near Fort Meade, Florida."

2. Because these emissions units can be located at other sites, and therefore are included in the other sites Title V permits, FPC requests that this section of the Bayboro Title V permit be essentially identical to the other sites -- see specifically FPC's Higgins Title V permit, which was effective January 1, 1998. Also note that Condition B.6. is redundant to Condition B.9., and that the reference in Condition B.21 to Condition B.6. should be changed to Condition B.9.

Mr. Sheplak
October 20, 1998
Page 4

Appendix I-1, List of Insignificant Emissions Units and /or Activities

The description to Insignificant Unit 11. should be changed from "Six underground waste oil tanks" to "Eight underground waste oil tanks."

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, on September 24, 1998 FPC filed a Request for Extension of Time to file a Petition (if necessary) until November 1, 1998. If we are unable to reach a resolution of these comments within this time period, FPC intends to file an additional extension. Accordingly, please contact me at (727) 826-4258 as soon as you have had a chance to review these comments.

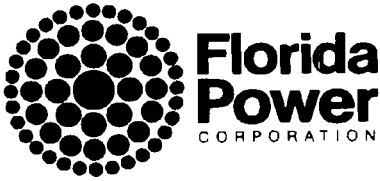
Sincerely,



Scott Osbourn,
Senior Environmental Engineer

cc: Clair Fancy, P.E., DEP
Robert Manning, Esq., HGS&S

10/21/98 cc: Ed Ivec
Scott Sheplak



RECEIVED

OCT 21 1998

BUREAU OF
AIR REGULATION

October 19, 1998

Mr. Scott Sheplak, P.E.
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Dear Mr. Sheplak:

Re: FPC-Bayboro Facility, Notice of Intent to Issue Title V Air Operation Permit
Draft Title V Permit No. 1030013-001-AV

Enclosed please find the notarized proof of publication received from the St. Petersburg Times for the Florida Department of Environmental Protection *Notice of Intent to Issue Title V Air Operation Permit* referenced to the above request. The notice was published on October 4, 1998.

If you should have any questions concerning this correspondence, please do not hesitate to contact me at (727) 826-4258.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott H. Osbourn".

Scott H. Osbourn
Senior Environmental Engineer

cc: Bill Thomas, DEP SW District (w/attach)

Attachment

10/21/98 cc: Ed Ivec



RECEIVED

SEP 25 1998

BUREAU OF
AIR REGULATION

September 21, 1998

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

Dear Ms. Carter:

Re: Florida Power Corporation, Bayboro Facility
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*
Draft Permit No 1030013-001-AV

On September 10, 1998, 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 need to be resolved. Accordingly, FPC requests an enlargement of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including November 1, 1998, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial.

If you should have any questions, please contact Scott Osbourn at (727) 826-4258, or Robert Manning at Hopping Green Sams & Smith, P.A. at (850) 222-7500.

Sincerely,

Handwritten signature of W. Jeffrey Pardue in black ink.

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

Handwritten signature of Robert A. Manning in black ink.

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

cc: Scott Sheplak, DEP

9/25/98 cc: Scott Sheplak
Ed Svec