



December 02, 2009

**UPS OVERNIGHT TRACKING No: 1Z 363 196 22 1039 8307**

Mr. Jonathan Holtom, P.E.  
Title V Program Administrator  
Division of Air Resource Management  
Florida Department of Environmental Protection  
111 South Magnolia Drive, Suite 23  
Tallahassee, Florida 32301-2973

RECEIVED  
DEC 03 2009  
BUREAU OF AIR REGULATION

RE: Comments on Draft/Proposed Title V Air Construction & Operation Renewal Permit  
Project Nos: 1050223-015-AV/1050223-16-AC  
Florida Power Corporation d/b/a Progress Energy Florida, Inc.  
Tiger Bay Co- Generation Facility  
Facility ID: 1050223

Dear Mr. Holtom:

Please find below comments on the Draft/Proposed Title V Air Operation Renewal and Air Construction Revision Permit for the Florida Power Corporation d/b/a Progress Energy Florida, Inc. (PEF) Tiger Bay Co-Generation Facility. These comments are submitted in an effort to further clarify and remove any ambiguity in specific permit conditions. Any requested changes are shown in red with ~~strikethrough~~ for deletion and underline for insertion.

***DRAFT TITLE V AIR OPERATION PERMIT REVISION & RENEWAL: 1050223-016-AC***

No Comments.

***DRAFT TITLE V AIR OPERATION PERMIT REVISION & RENEWAL: 1050223-015-AV***

1. *Requested changes throughout the Draft Permit:* PEF requests correcting the facility identification number portion of the permit/project number reference wherever it appears as '10550223' throughout the permit; the correct facility identification number is '1050223'. Therefore, the requested correction throughout the permit is as follows - ~~10550223~~ 1050223.
2. *Statement of Basis – Primary Regulatory Requirements:* The requested changes are analogous to the language included under the NSPS section and the purpose is to clarify which NESHAP subpart(s) is/are applicable and to what unit(s) the NESHAP subpart(s) apply. Therefore the requested changes are as follows:

Progress Energy Florida, Inc.  
P.O. Box 14042  
St. Petersburg, FL 33733

NESHAP: This facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 Code of Federal Regulations (CFR) 63.

The engines listed in Appendix I are regulated under 40 CFR 63, Subpart ZZZZ also known as (a.k.a.) MACT “4-Z’s” or “RICE MACT,” however, since the engines meet the Subpart ZZZZ definition of “existing units,” there are no unit specific applicable requirements that must be met pursuant to this rule at this time.

3. *Table of Content - Section VI - Appendices:* The requested change includes Appendix CP-1 into the list of appendices attached to this permit.

VI. Appendices.....	VI.1
Appendix A, Glossary.	
Appendix BOP, Best Operational Practices for Start up and Shutdown.	
<u>Appendix CP-1, Compliance Plan</u>	
Appendix 40 CFR 60, Subpart A, General Provisions.	
Appendix 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.	
Appendix 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines.	
Appendix I, List of Insignificant Emissions Units and/or Activities.	
Appendix RR, Facility-wide Reporting Requirements.	
Appendix TR, Facility-wide Testing Requirements.	
Appendix TV, Title V General Conditions.	

4. *Section III, Subsection A, Specific Condition A.6- Nitrogen Oxides – while Burning Natural Gas:* Part b of this specific condition is confusing and ambiguous and there are several scenarios under which actions taken to comply with this condition as currently written are irrational and unnecessary. For example, if the unit is operated for five (5) hours and suddenly must be shut down due to a malfunction, the condition appears to require PEF restart the unit in an effort to reduce the average NO<sub>x</sub> emissions to less than 120 lbs/hr over the 24-hour period initiated by the start-up. Furthermore, PEF is uncertain how to average NO<sub>x</sub> emissions for a 24-hour period initiated by this shutdown. Nevertheless, the facility is required by Specific Conditions A.20, A.21 and A.22 to minimize excess emission, and if the average NO<sub>x</sub> emission rate is 120/lbs/hr for a 24-hour period initiated by a start-up, then 2,880 lbs of NO<sub>x</sub> is authorized to be emitted over that 24-hour period. Therefore, in conjunction with the requirements delineated in Specific Conditions A.20 through A.22, a 24-hour NO<sub>x</sub> mass emission limit of 2,880 lbs/24-hour period initiated by a start-up would clarify this permit condition, meet the intent of the current condition and allow for operational flexibility without relaxing the current NO<sub>x</sub> mass emissions limitation for start-up. Therefore, at a minimum PEF is requesting the addition of a Permitting Note to clarify the permit condition. As an alternative to the addition of explanatory Permitting Note, the following change is requested to the specific condition:

**A.6. Nitrogen Oxides - while Burning Natural Gas.**

b. The maximum allowable nitrogen oxide emissions resulting from a start up or shut down of the CT shall not exceed 2,880 lbs an average of 120 lbs/hour, based on a 24-hour period commencing with the beginning of a start up ~~or a shut down~~ of the unit. The 24-hour average shall be based on all available data excluding calibration data and periods of emissions due to malfunction during the start up period.

5. *Section III, Subsection A, Specific Condition A.27 – Test Methods*: The requested change is to clarify the alternatives for quantifying SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> emissions from the facility other than employing stack test methods. Therefore the requested changes are as follows:

**A.27. Test Methods.** Required tests shall be performed in accordance with the following reference methods:

<b>Method(s)</b>	<b>Description of Method(s) and Comment(s)</b>
EPA Methods 1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
EPA Methods 5, 17, 201A or 202	Methods for Determining PM/PM <sub>10</sub> Emissions
EPA Methods 6, 6A, 6B or 6C ( <u>Also see Specific Condition A.32</u> )	Methods for Determining SO <sub>2</sub> Emissions
EPA Method 8 ( <u>Also see Specific Condition A.33</u> )	Methods for Determining H <sub>2</sub> SO <sub>4</sub> Mist Emissions
Appendix D, 40 CFR 75	Optional SO <sub>2</sub> Emissions Data Protocol for Gas-Fired and Oil-Fired Units
EPA Method 7, 7A, 7C, 7D or 7E	Determination of NO <sub>x</sub> Emissions
EPA Method 9	Visual Determination of the Opacity of Emissions (VE)
EPA Method 10	Determination of CO Emissions
EPA Method 20	Determination of NO <sub>x</sub> , SO <sub>2</sub> and Diluent Emissions from Stationary Gas Turbines
EPA Method 25A	Measurement of Gaseous Organic Compound Emissions (VOC)

6. *Section III, Subsection A, Specific Condition A.27- Annual Compliance Test:* The requested change clarifies that the facility is not required to conduct an annual VE test if the facility combusts only gaseous fuel during the federal fiscal year. Therefore the requested changes are as follows:

**A.28.** Annual Compliance Test. Except as specified in Specific Conditions **A.32**, and **A.33** and **A.38** for SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> mist and visible emissions (VE), during each federal fiscal year (October 1st to September 30th), Emissions Unit ID No. -001 shall be tested to demonstrate compliance with the emission limitations and standards for NO<sub>x</sub>, SO<sub>2</sub>, CO, H<sub>2</sub>SO<sub>4</sub> mist and VE. PM testing is only required if the VE test indicates an exceedance of the standards. VOC testing is only required if the CO test indicates an exceedance of the standard. The NO<sub>x</sub> RATA test data may be used to demonstrate compliance with the annual test requirement, provided the testing requirements (notification, procedures and reporting) of Chapter 62-297, F.A.C. are met.

7. *Section III, Subsection A, Specific Condition A.29 – Compliance Test Prior to Renewal:* The requested change is to clarify that fuel sulfur analysis is sufficient to determine compliance with the SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> emissions limitations and that stack testing is not required to quantify the emissions for these two pollutants. Therefore, the requested changes are as follows:

**A.29.** Compliance Test Prior To Renewal. Except as specified in Specific Conditions A.32 and A.33, Pprior to permit renewal, Emissions Unit ID No. -001 shall be tested to demonstrate compliance with the emission limitations and standards for PM, VOC, CO, NO<sub>x</sub> and VE. PM testing is only required if the VE test indicates an exceedance of the standards. VOC testing is only required if the CO test indicates an exceedance of the standard. The NO<sub>x</sub> RATA test data may be used to demonstrate compliance with the renewal test requirement, provided the testing requirements (notification, procedures and reporting) of Chapter 62-297, F.A.C. are met.

8. *Section III, Subsection B, Specific Condition B.1 – Authorization to Operate:* PEF requests clarification on this permit condition regarding the type of permit application required to be submitted (e.g., minor revision, major revision, PSD, etc.). Therefore, please clarify within the specific condition or in a permitting note, specifically the type of application that would be required to be submitted.

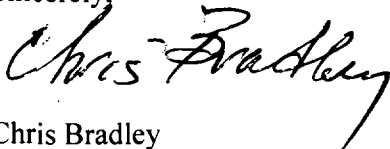
**B.1.** Authorization to Operate. Since this emissions unit has been shutdown since September 2007 {shutdown date}, in accordance with the requirements of Rule 62-210.300, F.A.C., this emissions unit is authorized to operate only up to September 30, 2012 {5 years from the shutdown date}. To request operation beyond September 30, 2012, an application must be submitted to the permitting authority at least 180 days prior to September 30, 2012.

9. *Section III, Subsection B, Specific Condition B.18 – Annual Compliance Test:* The requested change is to correct the reference to a related specific condition. Specific Condition B.20 is unrelated because it addresses “*Common Testing Requirements*”; the correct reference is to Specific Condition B.21 for “*VE Testing Not Required*”. Therefore, the requested change is as follows:

**B.18.** Annual Compliance Test. Except as specified in Specific Condition ~~B.20~~B.21, during each federal fiscal year (October 1st to September 30th), Emissions Unit ID No. -001 shall be tested to demonstrate compliance with the emission limitations and standards for VE.

Thank you for your assistance and if you have any questions, you may contact me by e-mail at [Chris.Bradley@pgnmail.com](mailto:Chris.Bradley@pgnmail.com) or via telephone at (727) 820-5962.

Sincerely,



Chris Bradley  
Sr. Environmental Specialist  
Progress Energy Florida, Inc.

cc: Mr. Scott Sheplak, P.E., Permitting Engineer – DEP/DARM (via e-mail)  
Mr. Martin Drango, P.E., Plant Manager (via e-mail) – HE44 (via e-mail)