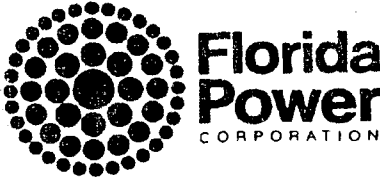


Jonathan Ross



RECEIVED

JAN 22 1999

BUREAU OF
AIR REGULATION

January 21, 1999

Scott Sheplak, P.E.
Bureau of Air Regulation
Division of Air Resources Management
Department of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

Dear Mr. Sheplak:

Re: Tiger Bay Cogeneration Facility
Draft Title V Permit No.: 1050023-002-AV
1050223

Florida Power Corporation (FPC) is providing comments related to the draft Title V permit dated October 27, 1998. Our comments are directed at specific conditions for the facility and emissions units. The comments are presented below in the same order as the conditions appear in the initial draft permit. FPC has filed a Request for Extension of Time until February 1, 1999. In this regard, if we are unable to resolve each of the issues described below before this time, FPC intends to file an additional Request for Extension. Accordingly, at your earliest convenience after reviewing this letter, please contact me at (727) 826-4258 to discuss.

1. Page 2. The Title V application (Facility Regulatory Classification) indicated that the facility was not a major source of HAPs. To the best of our knowledge, the facility classification has not changed.

No restrictions on fuels they have to be unregulated. Don't meet definition of insignificant
2. Page 3. Brief Description of Unregulated Units. FPC requests that the units described as unregulated (i.e., internal combustion engines, emergency generator, and fresh water cooling towers) be re-classified as insignificant.

Possibly put statement in facility description that duct burner has been removed, all operational
3. Page 7. Description. First Paragraph. The model number listed in line 2 for the combustion turbine should be MS7221 FA. The MS7001 FA is the general model classification made by General Electric. The HRSG was not manufactured by GE, as stated in line 4. Since the HRSG is not an emissions unit, it is not necessary to include a vendor designation. Also, all references to a duct burner, fuels for a duct burner, and emissions from the HRSG because of a duct burner, should be deleted as the duct burner has been physically removed.

One Power Plaza • 263 - 13th Avenue South • St. Petersburg • Florida 33701-5511
P.O. Box 14042 • St. Petersburg • Florida 33733-4042 • (727) 820-5151
A Florida Progress Company

Site certification check for removal of duct burner changes should have been made in the PSD permit.

4. Page 7. Second Paragraph. The flow rate listed in the paragraph (4th line) is for distillate oil; the flow rate listed in the application is 1,072,001 acfm. It should be noted the flow and other parameters change as a result of load and turbine inlet temperature. These data were included in the original construction permit application. It is suggested that these data be so qualified. Also, for your information, the statement that the emissions from the CT are controlled with DLN 2.6 will be accurate when the permit becomes effective; FPC has ordered this equipment and will have it installed in 1999.

5. Page 7. Condition A.3. This Condition should be deleted because it does not impose any existing requirement; it simply states that a "modification" to the unit will subject it to the NSPS requirements. *The Dept. believes that this condition is applicable, the condition will remain.*

6. Page 8. Condition A.4. This Condition should clarify that the heat input is dependent upon the ambient temperature in accordance with manufacturer's curves. Also, as stated above, the reference to the duct burner should be deleted.

7. Page 8. Condition A.6.a. The description of the distillate fuel should be changed from "New" to "distillate fuel oil." This would be consistent with the terminology in the PSD/BACT permit that did not characterize the distillate oil as either "new", "No. 2" or "low sulfur." The latter comment applies to Condition A.6.b. Also, the third and fourth sentences of Condition A.6.a should be deleted: as stated above, the HRSG does not contain a duct burner, and the pre-construction requirements are redundant with Appendix TV-1. *Add permit note to cover manufacturer's curves*

Drop "new" if they can't burn used oil

8. All citations to the BACT as authority for a permit condition should be deleted because the BACT is simply the basis for the PSD permit. The PSD permit is appropriately listed, and is sufficient authority. *Add manu. curves a referenced attachment on the first page*
Did BACT appear in PSD-190 if so BACT is redundant

9. Pages 9-11. Conditions A.12, A.15, A.19, A.22, A.25, and A.28 should be deleted because the HRSG does not contain a duct burner.

10. Page 10. Condition A.20. The phrase "at full load conditions" should be added to this condition as was done in Condition A.21. This terminology is consistent with the PSD permit conditions. *If consistent change*

11. Pages 10 and 11. In the Title V application, FPC requested that the Conditions for sulfuric acid mist, listed in Conditions A.26., A.27., and A.28, be deleted from the Title V Permit. These conditions were added to the original PSD Permit for the Tiger Bay Cogeneration Facility, as was common practice for other similar facilities at the time of permitting. These conditions are currently obsolete and no longer included in PSD permits for combustion turbines firing natural gas and distillate oil.

This is 11. Will remain an applicable requirement that was established by PSD

12. Page 11. In the Title V application, FPC requested that the conditions for mercury, arsenic, beryllium and lead, listed in Conditions A.31 through A.34, be deleted from the Title V Permit. These conditions were added to the original PSD Permit for the Tiger Bay Cogeneration Facility, as was common practice for other similar facilities at the

same as 11

New Auxillary Boiler will be included ^{exempt from permitting}
in TV permit as either Insig. or unregulated.
categorically exempt by rule

time of permitting. These conditions are currently obsolete and no longer included in PSD permits for combustion turbines firing natural gas and distillate oil. In addition, arsenic and beryllium have been deleted from the list of PSD Significant Emission Rates, by the Department. This request is consistent with Department guidance (DARM-PER/GEN-18).

~~Passage~~
13
This is a quote of the rule.

Generally in 27-30 ppm during startup. Provide Best Operational Practice from GE.
Page 11. Condition A.35. In accordance with the attached start-up curve, FPC requests that this unit be specifically authorized to have excess emissions for 3 hours (rather than 2 hours) in any 24-hour period, unless specifically authorized by the Department for longer duration. Also, the pertinent excess emission provisions of 40 CFR Part 60 should be included in this section of the permit, i.e., §§ 60.8(c), 60.11(c), and 60.43c(d). check w/ Bruce would this have to be proved by Mike Hurley's group

14. Page 12. Condition A.39. This Condition is identical with Condition A.37 and therefore should be deleted. Drop one ^{add these if not in permit}

15. Page 12. Condition A.41. This condition should be replaced with the Custom Fuel Monitoring Schedule issued by the Department and dated December 2, 1994 (attached). can use if they have a schedule and it has been approved ^{if not the condition will remain the same}

not attached
possible
Type-O

16. Page 13. Condition A.43. The reference to 40 CFR Part 75 on line 5 should be put into context with Part 60 and the word "or" should be added. The following is suggested: "(July 2, 1992) or 40 CFR Part 75, whichever is more stringent." Also, the last sentence of this Condition should be deleted because it does not appear in the PSD permit. make the last sentence a separate condition cite 40 CFR 60

make
cite AC if only initial tests are required

17. Page 14. Condition A.46. The references to annual testing for VOCs and H₂SO₄ should be deleted. A sentence should be added to this Condition stating that "VOC testing is only required if the CO test indicates an exceedance of the CO standard. See Condition A.55." In accordance with Comment No. 11, there should be no need for annual H₂SO₄ testing. Also, as stated above, the Permitting Note should be revised to reflect the deletion of the limits for mercury, arsenic, beryllium, and lead. Specify all tests

18. Page 14. Condition A.47. Section 60.335(a) applies only to fuel oil, since the nitrogen in gas is not fuel bound as provided in Section 60.332(a)(3). check NSPS to see if only applies to fuel only

19. Page 14. Condition A.48. This condition was deleted from the PSD permit by the Department letter dated April 23, 1996, which changed several permit conditions. Check letter again

20. Conditions A.44, A.45, A.49, A.50, A.51, A.52, A.57, A.58, A.59, and A.67 through A.72 should be deleted. Other Title V permits for similar facilities do not have these conditions and they are either misapplied to this unit or simply cause confusion. For example, Condition A.44 is not appropriate because the only CEM on this unit is for NOx and Method 20 (a stack test method) is the compliance determination method pursuant to Condition A.48. Also, the permit should not reference 40 CFR 60.335(c)(2) in Condition A.49 as clarified by DEP guidance (DARM-EM-05).

44, 45, 49, 50, 51, 52, 57, 58, 59, 67-72
Quote of the rule.

and the ~~rule~~ conditions are in the permit for permit consistency.

DEP guidance can only be used if they have accepted capacity as 95-100%

21. Page 15. Condition A.53. The references to the other permit conditions should be revised as follows: "A.13, A.14, and A.16; and A.26 - A.27."
22. Page 15. Condition A.54. The reference to the other permit conditions should be revised as follows: "A.20 and A.21."
23. Page 16. Condition A.55. The reference to the other permit conditions should be revised as follows: "A.23 and A.24 . . . A.20 and A.21."
24. Page 16. Condition A.59. The reference to PSD-FL-014 appears incorrect.
if wrong take out, still a cite from 40 CFR PSD-FL-190 should have been
25. Page 17. Condition A.62. This Condition should reference the manufacturer's curve ^{should check} for heat input vs. inlet temperature. ^{75D permit if they have accepted 95% rule cite can't be used for 95-100% ISO annual test requirements can}
26. Page 18. Condition A.65. Paragraph (a)4. is redundant to Condition A.46, and ^{be removed} therefore should be deleted.
27. Page 19. Condition A.66. There does not appear to be any basis for this Condition and therefore FPC requests that it be deleted.
Quote of the rule included for permit consistency
28. Page 23. Condition A.76. This Condition is obsolete and duplicative and therefore should be deleted. Compliance with 40 CFR Part 75 should be sufficient.
Check for NSPS reporting requirement was it w/in area of influence of downtown Tampa
After A.6. @ say see condition A.66. there is reason for it
29. Page 24. Description. Second Paragraph. FPC requests the following revision of the first sentence for clarification: "This unit is regulated under exempt from Rule 62-296.700, F.A.C., Reasonably Available Control Technology (RACT) Particulate Matter - Exemptions pursuant to Rule 62-296.700(2), F.A.C." Also, as listed in the application, the stack flow should be 5,000 acfm and not 5,050 acfm. ^{Acid Rain}
check cited AC
62-213.400 may not be good to use
too small a PM source to ever be RACT. regulated under
30. Page 25. Condition B.4. The second sentence of this condition should be deleted, since the air construction permit did not include such wording.
Continuous operation - why should log of operations be kept
31. Page 25. Condition B.5. For clarification, FPC requests that this Condition specify the compliance method to be used, assuming the provisions of Condition B.6 are met.
add method 5 if not already in permit
32. Page 25. Condition B.6. This Condition states that compliance determinations, if required, shall be "demonstrated by the test method specified in the applicable rule." FPC is uncertain what the "applicable rule" is, and therefore requests that a specific citation be included.
Break out condition about Dept. ability to require tests
make separate
33. Page 29. Condition B.15. FPC requests that paragraphs (a)4.b. and c. be deleted and replaced with a simple reference to particulate matter, because this unit is only subject to limits on visible emissions and particulate matter.
can be deleted, but they are a quote of the rule.
34. Page 33. Condition A.4. Consistent with other DEP Title V permits, FPC requests that

this Condition be moved to the facility-wide section of the permit. *No, this is an acid rain condition.*

35. Page 35. Item 17. The chemical tank listed is 550 lb., not 5,500 lb. indicated in the condition. There are several similar tanks associated with the Cooling Tower Area that were not listed. The tanks were pH guard (500 gal., 2,925 lb.) and Conquor 3583 (2 @ 500 lb.). Several chlorine tanks were also identified in this area, as well as gas cylinders (CO₂ and H₂). *Type - O* *Move would not be consistent w/ other permits.*
36. Page 35. Items 19 and 20. The natural gas knockout tank was not listed with these items. This insignificant emission unit had a vent. *List* *Format reviewed & approved by EPA*

FPC appreciates the opportunity to comment on the Initial Title V Permit. Thank you again for your prompt attention to this matter.

Sincerely,



Scott H. Osbourn
Senior Environmental Engineer

Attachments

cc: Ken Kosky, P.E., Golder Assoc.
Robert Manning, HGS&S



GE Energy Services

Todd R. Nass, Facility Manager
FPC Tiger Bay

Contractual Services
3219 County Road 630 West
Fort Meade, FL 33841
(941) 285-1200
(941) 285-1206 Fax
Cell 941-512-0204
Todd.Nass@ps.ge.com

November 19, 1998

TO: Mike Kennedy
Florida Power Corporation
MAC BB1A

Re: 7FA Gas Turbine Soft Start Sequence

Mike,

Per your request attached please find a graph showing the start up sequence for the 7FA at Florida Power's Tiger Bay Facility. As we discussed the attached sequence occurs automatically after any gas turbine shutdown of 50 hours or more duration. General Electric has added this revised start up sequence (titled "Soft Start") to the gas turbine controls as a protective measure to minimize potentially damaging thermal stresses in the turbine rotor during a cold startup.

Of note is the long period at which the gas turbine operates below the steady state pre-mix mode (just over 2 hours from initial start up command). At loads below steady state pre-mix the combustion system is not capable of achieving 25 ppmvd NOx levels. Shortening of the cycle to get the turbine into steady state pre-mix sooner would offset the benefit of allowing the slower warm-up of the turbine rotor and may result in pre-mature failure of turbine components.

I trust this information will assist you in revising the Tiger Bay Air permit. If I can provide any further information on this or any other matter please do not hesitate to call me.

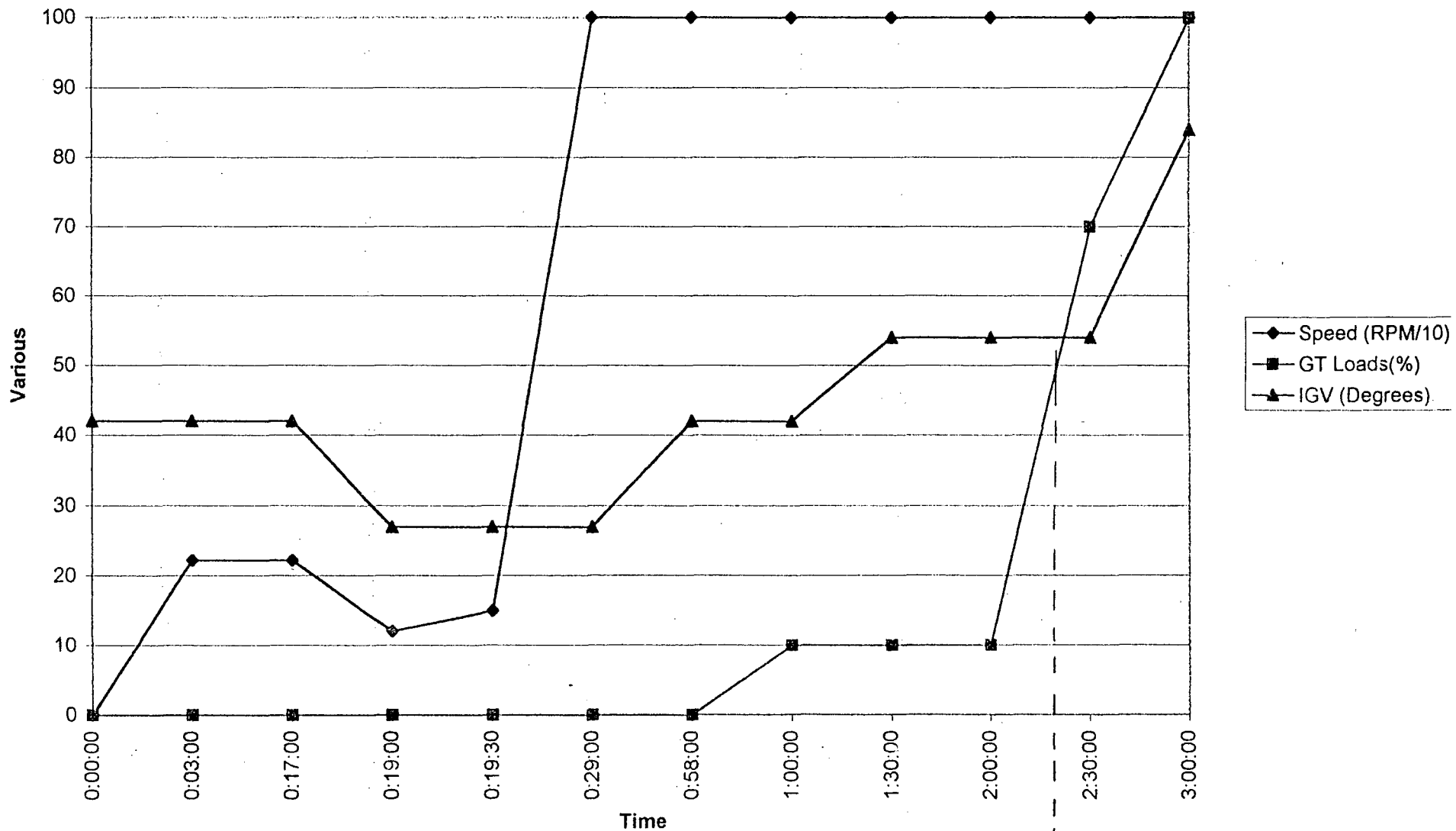
Regards,

Todd Nass

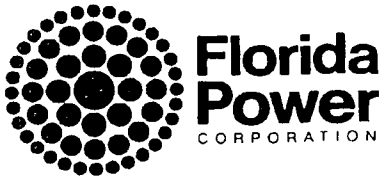
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publi\nassto\letters\TNTB 98-27

7F/FA MSCC W/IBH



Approx Transition
to Pre-Mix
Steady State
(Low NOx)



Jonathan

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FEB 18 1998

**BUREAU OF
AIR REGULATION**

1050223-002-AV

February 16, 1998

Mr. Scott Sheplak
Title V Permit Section
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

Dear Mr. Sheplak:

Re: Tiger Bay Cogen Facility

As you know, the Tiger Bay Cogeneration Facility was purchased by Florida Power Corporation (FPC) from DESTEC in 1997. FPC is in the process of obtaining a site certification for an additional 10.5 megawatts (MW) of steam electric capacity. This reflects the actual steam capacity of the unit, which is a nominal 85.5 MW.

This change necessitates a corresponding amendment to the Title V permit application in order to reflect the unit's actual capacity. A revised Title V application page describing the capacity of the steam turbine is enclosed as Attachment 1. Attachment 2 contains a P.E.-certified certification of the capacity of the steam turbine. In addition, Tiger Bay became an acid rain facility as a result of the FPC purchase. Attachment 3 contains copies of the acid rain permit application and certificate of representation for Tiger Bay.

Thank you for your processing of this request. Please contact Mr. Mike Kennedy at (813) 866-4344 if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue".

W. Jeffrey Pardue, C.E.P.
Director

Attachments

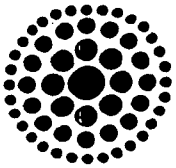
Attachment 1

B. GENERAL EMISSIONS UNIT INFORMATION
(Regulated and Unregulated Emissions Units)

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Combustion Turbine (CT) General Electric - MS70001FA		
2. Emissions Unit Identification Number: [] No Corresponding ID [] Unknown 001		
3. Emissions Unit Status Code: A	4. Acid Rain Unit? [X] Yes [] No	5. Emissions Unit Major Group SIC Code: 49
6. Emissions Unit Comment (limit to 500 characters): The CT exhausts through a HRSG. The nominal rating of the CT is 184MW. The steam turbine serves a separate generator with a nominal rating of 85.5MW. The unit was permitted (AC53-214903/PSD-FL-190; as amended) and is capable of accommodating fuel oil. Associated facilities (e.g., fuel oil tank) have not been installed and unit has not operated on distillate oil. This unit is an "Affected Unit" under EPA's Acid Rain Program, pursuant to 40CFR72.6(b)(5).		

Attachment 2



**Florida
Power**
CORPORATION

INTEROFFICE CORRESPONDENCE

Performance Services
OFFICE

MAC
MAC

231-5292
TELEPHONE

SUBJECT: **Tiger Bay Steam Turbine Capabilities**

TO: **Michael J. Kennedy**

DATE: **November 20, 1997**

Performance Services has reviewed the design specifications for the steam turbine at Tiger Bay and concluded that the steam turbine is capable of operating continuously at 105 percent of initial pressure (1537.5 psia) with control valves wide open. We expect to generate 87.4 gross megawatts at the following steam inlet conditions:

- steam flow of 549,675 lbs/hr
- Throttle steam pressure of 1537.5 psia
- Throttle steam temperature of 1000 deg F
- Exhausting to 1.62 psia

If you have any further questions concerning Tiger Bay, please call me at Ext. 231-5292.

Dario B. Zuloaga
Dario B. Zuloaga, P.E.
License # 0032729 (FL)
Lead Principal Engineer
Performance Services

cc: Bob Anderson

Attachment 3



Phase II Permit Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31

This submission is: New Revised

STEP 1
Identify the source by
plant name, State, and
ORIS code from NADB

Tiger Bay Facility	FL	7699
Plant Name	State	ORIS Code

STEP 2
Enter the boiler ID#
from NADB for each
affected unit, and
indicate whether a
repowering plan is
being submitted for the
unit by entering "yes" or
"no" at column c. For
new units, enter the
requested information
in columns d and e

a	Compliance Plan		d	e
	b	c		
Boiler ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)	Repowering Plan	New Units Commence Operation Date	New Units Monitor Certification Deadline

1	Yes	No		
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			

STEP 3
Check the box
if the
response in
column c
of Step 2 is "Yes"
for any unit

For each unit that will be repowered, the Repowering Extension Plan form is included and the Repowering Technology Petition form has been submitted or will be submitted by June 1, 1997.

Tiger Bay Facility

Plant Name (from Step 1)

Phase II Permit - Page 2

STEP 4
Read the standard requirements and certification, enter the name of the designated representative, and sign and date

Standard Requirements

Permit Requirements.

- (1) The designated representative of each affected source and each affected unit at the source shall:
 - (i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each affected source and each affected unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
 - (ii) Have an Acid Rain Permit.

Monitoring Requirements.

- (1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR parts 74, 75, and 76.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR parts 74 and 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements.

- (1) The owners and operators of each source and each affected unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1)(i) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

- (1) The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an affected unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
 - (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and

Tiger Bay Facility

Plant Name (from Step 1)

Recordkeeping and Reporting Requirements (cont.)

(iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability.

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or a written exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.

(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.

(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.

(4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.

(5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.

(6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one affected unit shall not be liable for any violation by any other affected unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.

(7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Exemption on Other Authorities. No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or a written exemption under 40 CFR 72.7 or 72.8 shall be construed as:

(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;


(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;

(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,

(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name W. Jeffrey Pardue, C.E.P.	
Signature 	Date 12/23/97

STEP 5 (optional)
Enter the source AIRS
and FINDS identification
numbers, if known

AIRS

FINDS



Certificate of Representation

For more information, see instructions and refer to 40 CFR 72.24

This submission is: New Revised

This submission includes combustion or process sources under 40 CFR part 74

STEP 1

Identify the source by plant name, State, and, if applicable, ORIS code from NADB.

Plant Name	State	ORIS Code
Tiger Bay Cogeneration Facility	FL	

STEP 2

Enter requested information for the designated representative.

Name	W. Jeffrey Pardue, CEP		
Address	Florida Power Corporation 3201 34th Street South, MAC - H2G St. Petersburg, FL 33711		
Phone Number	(813) 866-4387	Fax Number	(813)866-4926

STEP 3

Enter requested information for the alternate designated representative, if applicable.

Name			
Address			
Phone Number		Fax Number	

STEP 4

Complete Step 5, read the certifications, and sign and date. For a designated representative of a combustion or process source under 40 CFR part 74, the references in the certifications to "affected unit" or "affected units" also apply to the combustion or process source under 40 CFR part 74 and the references to "affected source" also apply to the source at which the combustion or process source is located.

I certify that I was selected as the designated representative or alternate designated representative, as applicable, by an agreement binding on the owners and operators of the affected source and each affected unit at the source.

I certify that I have given notice of the agreement, selecting me as the designated representative or alternate designated representative, as applicable, for the affected source and each affected unit at the source identified in this certificate of representation, daily for a period of one week in a newspaper of general circulation in the area where the source is located or in a State publication designed to give general public notice.

I certify that I have all necessary authority to carry out my duties and responsibilities under the Acid Rain Program on behalf of the owners and operators of the affected source and of each affected unit at the source and that each such owner and operator shall be fully bound by my actions, inactions, or submissions.

I certify that I shall abide by any fiduciary responsibilities imposed by the agreement by which I was selected as designated representative or alternate designated representative, as applicable.

I certify that the owners and operators of the affected source and of each affected unit at the source shall be bound by any order issued to me by the Administrator, the permitting authority, or a court regarding the source or unit.

Where there are multiple holders of a legal or equitable title to, or a leasehold interest in, an affected unit, or where a utility or industrial customer purchases power from an affected unit under life-of-the-unit, firm power contractual arrangements, I certify that:


I have given a written notice of my selection as the designated representative or alternate designated representative, as applicable, and of the agreement by which I was selected to each owner and operator of the affected source and of each affected unit at the source; and

Allowances and the proceeds of transactions involving allowances will be deemed to be held or distributed in proportion to each holder's legal, equitable, leasehold, or contractual reservation or entitlement or, if such multiple holders have expressly provided for a different distribution of allowances by contract, that allowances and the proceeds of transactions involving allowances will be deemed to be held or distributed in accordance with the contract.

Tiger Bay Cogeneration Facility

The agreement by which I was selected as the alternate designated representative, if applicable, includes a procedure for the owners and operators of the source and affected units at the source to authorize the alternate designated representative to act in lieu of the designated representative.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

 Signature (designated representative)	Date 7/14/97
Signature (alternate designated representative)	Date

STEP 5

Provide the name of every owner and operator of the source and each affected unit (or combustion or process source) at the source. Identify the units they own and/or operate by boiler ID# from NADB, if applicable. For owners only, identify each state or local utility regulatory authority with ratemaking jurisdiction over each owner, if applicable.

Name Florida Power Corporation					<input checked="" type="checkbox"/> Owner	<input checked="" type="checkbox"/> Operator
ID# 1	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#
Regulatory Authorities Florida Public Service Commission						

Name					<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#
Regulatory Authorities						

Name					<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#
Regulatory Authorities						