



# Department of Environmental Protection

Jeb Bush  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

June 8, 2006

CERTIFIED MAIL – Return Receipt Requested

Mr. Martin J. Drango  
Plant Manager  
Florida Power Corporation dba Progress Energy Florida, Inc.  
Hines Energy Complex  
100 Central Avenue, CX1B  
St. Petersburg, Florida 33701

RE: Title V Air Operation Permit Revision/Renewal  
Project No.: 1050234-014-AV

Dear Mr. Drango:

On April 21, 2006, the Department received your application for a Title V Air Operation Permit Revision/Renewal for the Hines Energy Complex. Based on a meeting on June 6, 2006, and a review of the application, the application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the items below require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. For all of the responses, please identify the affected Power Block(s) (1, 2, and/or 3) and the proposed changes. Since it appears that previously issued air construction permits will be affected by the proposed changes, please request (check the box in the application) under the "Purpose of Application" that the permitting action will include the issuance of an air construction permit and possibly "concurrent processing".
2. For Power Blocks 1, 2 and 3, please list and describe/define the various "methods of operation" that affect each CT and their operation, i.e., startup (cold, warm and hot), shutdown and fuel switch (gas to oil and oil to gas). For the previous two years, submit actual operational CEMS data (Excel worksheet) and a summary of emissions test data in ppm, lbs/hr, lbs/yr and lbs/episode, for each affected pollutant from these various methods of operation. Please provide the actual frequency for each method of operation that has occurred and been experienced at the plant for each emissions unit for the last five years of operation or for which data is available. For each method of operation, please describe the various stages/steps within each method of operation and appropriate duration. Discuss the potential for actual emissions increases as a result of the proposed changes.
3. From our meeting on June 6<sup>th</sup>, you plan to revise your original request regarding excess emissions for these various operating methods. Please consider proposing an alternate emissions standard for these periods.
4. For all of the proposed "Excess Emissions" changes, please justify each method of operation and the proposed timeframe associated with each method of operation.
5. For any changes/edits made to the initial submittal, please make appropriate changes/edits and resubmit, i.e., ATTACHMENT PEF-FI-CV6.
6. Under Specific Condition E.9., please define and describe what "process control adjustments" are (including examples), their frequency of occurrence, and any effect on emissions. Please include a response on the process that is involved with handling these types of episodes. Also, provide the same emissions related data as requested in Item #2, above.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C., requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the

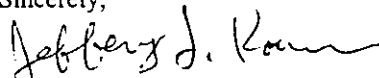
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Mr. Martin J. Drango  
Title V Air Operation Permit Revision/Renewal  
Project No.: 1050234-014-AV  
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authorized representative or responsible official. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information. If you have any questions regarding this matter, please call Bruce Mitchell at (850)413-9198.

Sincerely,



Jeffrey F. Koerner, P.E.  
Permitting North Administrator  
Bureau of Air Regulation

JFK/bm

cc: Jason Waters, SWD  
Gregg Worley, U.S. EPA, Region 4  
Buck Oven, PPS  
Ann Quillian, Application Contact, PEFI-HEC  
Scott Osbourn, P.E., GAI

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MR. Martin J. Drango  
 Plant Manager  
 Florida Power Corporation dba  
 Progress Energy Florida, Inc.  
 Hines Energy Complex  
 100 Central Avenue, CX1B  
 St. Petersburg, Florida 33701

2. Article Number

(Transfer from service label)

7005 1160 0004 3034 4523

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

*Milton Morze*

Agent

Addressee

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Milton Morze

C. Date of Delivery

6/12/06

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PS Form 3811, February 2004

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Mr. Martin J. Drango, Plant Manager

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Mr. Martin J. Drango, Plant Manager

Street, Apt. No.,  
or PO Box No.

100 Central Avenue, CX1B

City, State, ZIP+4

St. Petersburg, Florida 33701

PS Form 3800, June 2002

See Reverse for Instructions