



Via Electronic Mail
November 14, 2006

Mr. Jeffrey F. Koerner, PE
Professional Engineer Administrator
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road, M.S. 5500
Tallahassee, Florida 32399-2400

RE: Comments on Draft Air Construction Permit Project No.: 1050234-015-AC/PSD-FL-195(D)/PSD-FL-296(C)/PSD-FL-330(B) and Draft/Proposed Title V Air Operation Permit Renewal Project No. 1050234-014-AV
Florida Power Corporation d/b/a Progress Energy Florida, Inc.
Hines Energy Complex
Facility ID 1050234

Dear Mr. Koerner:

Please find below comments on the draft Air Construction Permit modification and Title V Air Operation Permit renewal/revision for the Florida Power Corporation d/b/a Progress Energy Florida, Inc. ("PEF") Hines Energy Complex. Any suggested changes will be shown in red with strikethrough for deletion and underline for insertion.

Draft Air Construction Permit Modification PSD-FL-195(D)

1. In Condition C.1 the first and last sentences from the PSD-FL-195(B) are indicated in the opening paragraph. However, the remaining language in the opening paragraph (see below) was not listed. Are those sentences removed?

"...Testing of emissions shall be conducted with the source operating at capacity (maximum heat input rate for the tested operating temperature). Capacity is defined as 90-100 percent of permitted capacity. If it is impracticable to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen consecutive days for purposes of additional compliance testing to regarding the rated capacity in the permit, with prior notification to the Department..."

Comments on Draft Air Construction Permit Project No.: 1050234-015-AC/PSD-FI-195(D)/PSD-FI-296(C)/PSD-FI-330(B) and Draft/Proposed Title V Air Operation Permit Renewal Project No. 1050234-014-AV

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Hines Energy Complex

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Draft/Proposed Title V Permit Project No. 1050234-014-AV

1. Statement of Basis. The maximum heat input rating in the first paragraph under Power Block 2 is based on the HHV and not LHV:

Power Block 2: Emission Units -014 (CT2A) and -015 (CT2B).

Emission units 014 and 015 each consist of a combined cycle Westinghouse 5011D Combustion Turbine, each with a nominal generator rating of 170 MW and each with a maximum heat input rating of 2,048 MMBtu/hr (HHV), while firing natural gas, and 2,155 MMBtu/hr (HHV), while firing fuel oil, based on a compressor inlet air temperature of 59 °F, the ~~HHV~~ HHV of each fuel, and 100% load.....

2. Placard Page. The permittee mailing address on the placard page should be as follows:

Permittee:

FPC dba Progress Energy Florida, Inc.

100 Central Avenue, ~~444~~-HF44

St. Petersburg, Florida 33701-5511

3. Section I. Facility Information, Subsection B., Summary of Emissions Unit ID No(s). and Brief Description(s). To make the Power Block 1 (EU ID Nos. -001 and -002) descriptions consistent through out the permit, change "501F" to "501FC" under the brief description on Page 2.
4. Section II. Facility-wide Conditions. In Facility-wide Condition 14. and through out the permit, please change the abbreviation for Progress Energy Florida, Inc. from "PEFI" to "PEF".

14. FPC vs. PEFI. Where previous text referenced "FPC", for Florida Power Corporation, they have been changed to "PEFI" to represent Progress Energy Florida, Inc. FPC is doing business as PEFI.

5. Section III. Emissions Unit(s) and Conditions, Subsection A, EU ID Nos. -001 and -002. In Specific Condition A.5.c, please add a reference to Specific Condition A.6.
6. Section III. Emissions Unit(s) and Conditions, Subsection E, EU ID Nos. -014 and -015. As in item 2. above, please change the reference to LHV to HHV in the EU description:

Emission units 014 and 015 each consist of a combined cycle Westinghouse 5011D Combustion Turbine, each with a nominal generator rating of 170 MW and each with a maximum heat input rating of 2,048 MMBtu/hr (HHV), while firing natural gas, and 2,155 MMBtu/hr (HHV), while firing fuel oil, based on a compressor inlet air temperature of 59 °F, the ~~HHV~~ HHV of each fuel, and 100% load.....

7. Section III. Emissions Unit(s) and Conditions, Subsection F, EU ID Nos. -016 and -017. The construction permit PSD-FL-330 is referenced in Specific Condition F.3. Consider including the permit modification projects (i.e. PSD-FL-330(A)) in this reference.
8. Section III. Emissions Unit(s) and Conditions, Subsection F, EU ID Nos. -016 and -017. In Specific Condition F.6, references are made to installing the gas turbines, water injection, SCR system, and HRSG as well as design and construction of the SCR System and HRSG. This language appears to be a carry over from the construction permit. Consider removing the verbs "install", "designed", and "constructed."
9. Section III. Emissions Unit(s) and Conditions, Subsection F, EU ID Nos. -016 and -017. To make the language similar to Power Block 2, please add oil-to-gas or gas-to-oil to the opening paragraph of Specific Condition F.11:

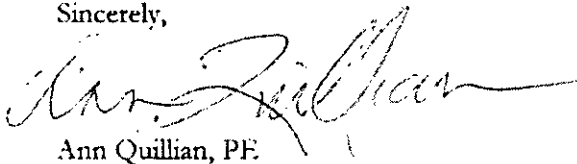
F.11. CEMS Data Exclusion. As provided in this paragraph, NO_x and CO emissions data recorded during periods of startup, shutdown, fuel switches (~~oil-to-gas or gas-to-oil~~), and documented malfunctions may be excluded from the block average calculated to demonstrate compliance with the emission limits of specific condition F.8.
10. Section III. Emissions Unit(s) and Conditions, Subsection F, EU ID Nos. -016 and -017. Similar to item 8. above, Specific Condition F.20 states "...the permittee shall install, calibrate, operate and maintain..." As the ammonia flow meter is already in place on Power Block 3, please remove "install."
11. Section III. Emissions Unit(s) and Conditions, Subsection H, Common Conditions. As discussed in item 4. above, change the abbreviation for Progress Energy Florida, Inc. from "PEFI" to "PEF" in Specific Conditions H.11, H.13, and H.16.
12. Appendix I-1, List of Insignificant Emissions Units and/or Activities and Appendix U-1, List of Unregulated Emissions Units and Activities. As discussed in item 4. above, change the abbreviation for Progress Energy Florida, Inc. from "PEFI" to "PEF".
13. Appendix I-1, List of Insignificant Emission Units and Activities. PEF reviewed the emissions units and/or activities listed in Appendix I-1. Please add the following two insignificant emissions units to the list:
 7. Vehicle fueling station with storage - gasoline and diesel
 8. Hydraulic oil storage (300, 200, and 166 gallons)
14. Appendix U-1, List of Unregulated Emission Units and Activities. PEF reviewed the unregulated emissions units and/or activities listed in Appendix U-1 and found that an update was required. The following presents these changes to the list in strikethrough/underline format:

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<u>EU. ID No.</u>	<u>Brief Description of Emissions Units and/or Activities</u>
-xxx	Three <u>Two</u> Lube Oil Storage Tanks (two with 7,000 gallon capacity, one with 555+10,000 gallon and 6,200 gallon capacity) Two Waste Oil Storage Tanks (500 gallon capacity) One No. 2 Fuel Oil Storage Tank (3.80 million gallon capacity) One Diesel Fuel Storage Tank (300 gallon capacity) One <u>Three</u> Ammonium Storage Tanks (30,000 gallon capacity each) One Sodium Hypochlorite Storage Tank (4800 <u>10,000</u> gallon capacity) Fuel loading and unloading activities Lube oil vents with demisters Non-halogenated solvents

Thank you for your assistance. Please let me know at (727) 820-5962, if you have any questions.

Sincerely,



Ann Quillian, PE
Ann.Quillian@pgnmail.com
Senior Environmental Specialist

cc: Cindy Zhang-Torres - FDEP Southwest District
Martin J. Drango, PE - PEF Hines Energy Complex



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 6th, 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

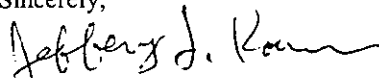
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Mr. Martin J. Drango
Title V Air Operation Permit Revision/Renewal
Project No.: 1050234-014-AV
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authorized representative or responsible official. You are reminded that Rule 62-4.055(1), F.A.C. requires 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

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- 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

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

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Agent

Addressee

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Milton Moberg

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6/12/06

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Mr. Martin J. Drango, (Plant Manager) SE

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 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