



March 8, 2012

UPS Tracking No: 1Z 363 196 23 1003 4797

Mr. Jonathan Holtom, P.E., CPM  
Office of Permitting and Compliance  
Division of Air Resource Management  
Department of Environmental Protection  
111 South Magnolia Drive, Suite 23  
Tallahassee, Florida 32301-2973

**RE:** Addendum to Response to Request for Additional Information (RAI)  
FDEP Project No: 1050234-018-AC  
Hines Energy Complex Title V Permit Renewal Application  
Florida Power Corporation d/b/a Progress Energy Florida, Inc.  
Facility ID No: 1050234  
Polk County

*This is an Addendum to project  
1050234-018-AC*

Dear Mr. Holtom:

Please find enclosed an addendum to the response dated February 24, 2012 to the Florida Department of Environmental Protection (FDEP) Division of Air Resource Management's (DARM) request for additional information (RAI) for the above referenced project. This addendum is in response to a teleconference conducted March 6, 2012 between Chris Bradley and Tommy Oneal of Progress Energy Florida, Inc. (PEF) and Kris Lanh and you of the Division of Air Resource management (DARM). Based on the referenced teleconference, this addendum withdraws specific permit condition changes requested by PEF and replaces them with changes recommended by DARM that are contained in recently issued Title V Air Operation Permits and address PEF's concerns. The following is the addendum to PEF's response to the Department's RAI:

**Reference RAI Item 4:**

PEF withdraws the request for inclusion of CEMS data exclusionary period for excess emissions associated with "balance-of-plant" (BOP) tuning. After the March 6, 2012 teleconference/discussion between PEF and DARM staff, it was agreed that CEMS exclusion data language included in recently issued Title V Air Operation Permits would cover such BOP tuning. The recommended language included the following and should be inserted for Power Blocks 1 through 4 (PB1, PB2, PB3 & PB4); specifically, Specific Conditions D.16, E.16 and F.17. The DARM recommended language is as follows:

CEMS Data Exclusion - DLN Tuning: CEMS data collected during initial or other major DLN tuning sessions shall be excluded from the CEMS compliance demonstration provided the tuning session is performed in accordance with the manufacturer's specifications. A "major tuning

session” would occur after completion of initial construction, a combustor change-out, a major repair or maintenance to a combustor, or circumstances as identified or requested by the equipment vendor. Prior to performing any major tuning session, the permittee shall provide the Department’s Southwest District Compliance Authority with an advance notice that details the activity and proposed tuning schedule. The notice may be by telephone, facsimile transmittal, or electronic mail.

**Reference RAI Item 7:**

PEF withdraws the request in the response to RAI Item 7 as presented; however, PEF requests changing Specific Condition A.16 – Fuel Monitoring for Power Block 1 (PB1) included in Title V Permit Number 1050234-019-AV. The requested change to Specific Condition A.16 is identical to the language for the remaining Power Blocks (PB2 through PB4). Recall the Hines Energy Complex (HEC) units currently employ 40 CFR Part 75 Appendix D to quantify and report SO<sub>2</sub> emissions for a variety of purposes including the Acid Rain Program. As a result, for purposes of documenting the sulfur content of the natural gas supplied complies with the permit limit of not exceeding 1 grain/100 SCF (i.e., 0.5 grains/100 SCF or less, the definition of pipeline natural gas (PNG)), HEC complies with 40 CFR Part 75, Appendix D, Section 2.3.1.4 – *Documentation that a Fuel is Pipeline Natural Gas*, which references 40 CFR Part 72.2. In addition, this language change was discussed and recommended during the March 6, 2012 teleconference/discussion between PEF and DARM staff. The recommended language included the following and should be inserted for PB1. The recommended language is similar or identical to Specific Condition D.33., E.33 and F.32, and is as follows:

**Fuel Sulfur Records**


- a. Compliance with the fuel sulfur limit for natural gas shall be demonstrated by keeping reports obtained from the vendor indicating the average sulfur content of the natural gas being supplied from the pipeline for each month of operation. Methods for determining the sulfur content of the natural gas shall be in accordance with 40 CFR 60, Subpart GG. (See Appendix NSPS, Subpart GG - Standards of Performance for Stationary Gas Turbines.). The permittee shall demonstrate compliance with the fuel sulfur limits specified in this permit by maintaining the following records of the sulfur contents.
- b. Sampling and analysis for the fuel oil sulfur content shall be conducted in accordance with the methods in 40 CFR 60, Subpart GG, or their latest editions. For each subsequent fuel delivery, the permittee shall either (1) maintain a permanent file of the certified fuel sulfur analysis from the fuel vendor, or (2) take and analyze a sample according to the above procedures and maintain a permanent file of the results of the analysis. At the request of a Compliance Authority, the permittee shall perform additional sampling and analysis for the fuel sulfur content. (See Appendix NSPS, Subpart GG - Standards of Performance for Stationary Gas Turbines.)
- c. The above methods shall be used to determine the fuel sulfur content in conjunction with the provisions of 40 CFR 75, Appendix D.


Mr. Jonathan Holtom, P.E., CPM  
Hines Energy Complex – Response Addendum  
FDEP Project No: 1050234-018-AC  
March 8, 2012  
Page 3 of 3

Due to the nature of the information requested and addressed in this addendum, which does not include additional information of an engineering nature; e.g. new calculations; a professional engineer's (P.E.) certification, pursuant to Rule 62-4.050(3), F.A.C. is not required.

If the Department requires additional information regarding the enclosed RAI response, please contact Mr. Chris Bradley by telephone via e-mail at [Chris.Bradley@pgnmail.com](mailto:Chris.Bradley@pgnmail.com) or at (727) 820-5962.

Sincerely,



 Anthony Salvarezza, Plant Manager  
Hines Energy Complex

cc: Tom Davis, P.E., Environmental Consulting & Technology  
Tommy Oneal, HE 44  
Chris Bradley, PEF 903 (ES&S Files)