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BUREAU OF AIR REGULATION

January 20, 2009

CERTIFIED MAIL No. 7008 1830 0000 2837 2876

Mr. Jonathan Holtom, P.E.  
Title V Administrator  
Bureau of Air Regulation  
Division of Air Resource Management  
2600 Blair Stone Road, MS 5500  
Tallahassee, Florida 32399-2400

Re: Appendix 1-1 - List of Insignificant Emission Units and/or Activities  
HRSG Boiler Tube Clean-Out Project  
Hines Energy Complex  
Facility ID No. 1050234  
Polk County

Dear Mr. Holtom:

As requested Progress Energy Florida, Inc. (PEF) is submitting information regarding the temporary relocation of an 1160 horsepower (hp) (approximately 47 mmBtu/hr) back-up boiler to the Hines Energy Complex site. This boiler will be employed to produce steam to heat a cleaning solution to be utilized in cleaning the tubes located in the heat recovery steam generator (HRSG) of Power Block 4 (PB4). The primary source of steam during this operation will be the Power Block 3 (PB3) HRSG, and the back-up boiler will only be used only if PB3 "trips off-line" and is unable to provide required steam. This cleaning is anticipated to be a one-time operation and the boiler will be onsite only for the duration of the cleaning operation, currently scheduled to occur in March and April of 2009.

During the cleaning operation, steam heat will only be required for approximately 55 hours per HRSG, or a total of 110 hours. PEF has estimated emissions from the unit based on 250 hours of operation, thereby providing a conservative multiplier of 2.25 for estimating emissions. Utilizing AP-42 factors and emission data from the supplier, PEF calculates that the emissions of regulated pollutants will be less than the quantities itemized in Rule 62-213.430(6)(b), F.A.C., and the unit can be categorized as insignificant emission unit. A summary of the potential emissions from this unit are presented in Table I.

PEF also believes this temporary 1160 hp boiler meets the criteria for categorical exemption identified in Rule 62-210.300(3)(a)34 of the Florida Administrative Code (F.A.C.). Specifically, this exemption is for fossil fuel steam generators, hot water generators, and other external combustion heating units with heat input capacity less than 100 million Btu per hour. The boiler will burn only No. 2 fuel oil and will combust less than one million gallons of No. 2 fuel oil with sulfur content of 0.05% or less and is therefore eligible for this exemption.

Mr. Jonathan Holtom, P.E.  
Hines – Addition to Insignificant Emission Units  
Hines HRSG Clean-out Boiler  
Page 2

PEF requests that this unit may be operated at the site without a change to the Title V permit in accordance with the language in Rule 62-213.430(6)(a) regarding insignificant activities.

*Emissions units or activities which are added to a Title V source after issuance of a permit under this chapter shall be incorporated into the permit at its next renewal, provided such emissions units or activities have been exempted from the requirement to obtain an air construction permit and also qualify as insignificant pursuant to this rule.*

As discussed above, PEF believes that the boiler meets both of the criteria required.

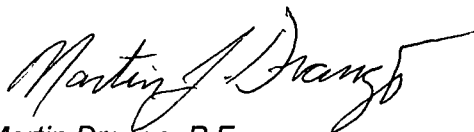
Accordingly, PEF requests the addition of "1160 hp Diesel-Fired HSRG Tube Clean-Out Steam Boiler" to Appendix I-1 - List of Insignificant Emission Units and/or Activities of the Hines Energy Complex Title V permit the next time the Title V permit is revised or renewed to incorporate this change to Appendix I per Item No. 13 of the Title V Permitting Action Tree. PEF anticipates placing and operating this steam boiler on the Hines site in March 2009 and expects that the boiler will cease operation by the end of April. However, the addition of this boiler to Appendix I-1 will allow PEF to perform this type of operation in the future without repeating this request.

At the conclusion of the operation, PEF will provide the agency with actual operating information to support the estimates above; specifically, the total number of hours of operation of the boiler and the number of gallons of fuel combusted will be submitted to the agency. PEF will also incorporate the emissions from this operation into the total emissions reported in the 2009 Annual Operating Report.

Thank you very much for your assistance and consideration in this matter. If you have any questions, please contact Chris Bradley by telephone at (727) 820-5962 or via email at Chris.Bradley@pgnmail.com.

*I, the undersigned, am the responsible official as defined in Chapter 62-210.200, FAC. , of the Title V source for which this document is being submitted. I hereby certify, based on the information and belief formed after reasonable inquiry that the statements made and data contained in this document are true, accurate and complete.*

Sincerely,



Martin Drango, P.E.  
Responsible Official/Plant Manager

Cc: Mara Grace Nasca, Air Program Administrator, SWD

**Table I - Summary of Pollutant Emissions**

<b>Emissions from 1160 hp Boiler</b>		
<b>Pollutant</b>	<b>Emission Rate for No. 2 Fuel Oil (lbs/mmBtu)</b>	<b>Mass Emissions (tons) combusting No. 2 Fuel Oil for 250 hours</b>
NOx	0.25	1.49
SOx	0.05	0.30
CO	0.15	0.90
PM	0.05	0.30

**Table II - Summary of Maximum Operation (in 250 hrs)**

<b>Duration</b>	<b>Total Fuel Oil Consumption (gals)</b>	<b>Total mmBtu Fired</b>
250 hrs	87,750	11,934

**Notes:**

1. Sulfur content of No. 2 fuel oil to be used will be 0.05% (wt/wt)
2. Fuel Consumption for temporary/emergency boiler is approximately 351 gal/hour
3. Energy content of No. 2 fuel oil is approximately 0.135 mmBtu/gal
4. Maximum hours of operation of the boiler are assumed to be 250 hrs.

Mr. Jonathan Holtom, P.E.  
Hines – Addition to Insignificant Emission Units  
Hines HRSG Clean-out Boiler  
Page 4

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