



April 30, 1999

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BUREAU OF
AIR REGULATION

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
Room 638
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000

Re: Florida Power Corporation, Suwannee River Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air
Operation Permit*
Draft Permit No. 1210003-001-AV

Dear Ms. Carter:

On October 26, 1998, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues need to be resolved. Accordingly, FPC requests an enlargement of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including June 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial.

If you should have any questions, please contact Scott Osbourn at (727) 826-4258, or Robert Manning at Hopping Green Sams & Smith, P.A. at (850) 222-7500.

Sincerely,

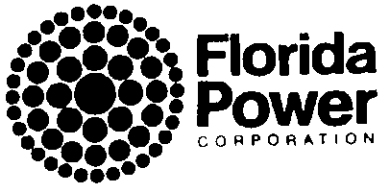
A handwritten signature in cursive script that reads "Robert Manning".

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Jeff Brown, DEP OGC

5/3/99 cc: Scott Sheplak
Bruce Mitchell

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BUREAU OF
AIR REGULATION

March 30, 1999

Ms. Kathy Carter, Clerk
Office of General Counsel
Florida Department of Environmental Protection
Room 638
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

Dear Ms. Carter:

RE: Florida Power Corporation, Suwannee River Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Revised Draft Permit No. 1210003-001-AV

On October 26, 1998, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. Accordingly, FPC requests an extension of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including May 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties' mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (727) 826-4258.

Sincerely,

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

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

A handwritten signature in black ink, appearing to read "Robert A. Manning".

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC



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February 23, 1999

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BUREAU OF
AIR REGULATION

Ms. Kathy Carter, Clerk
Office of General Counsel
Florida Department of Environmental Protection
Room 638
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

Dear Ms. Carter:

RE: Florida Power Corporation, Suwannee River Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Revised Draft Permit No. 1210003-001-AV

On October 26, 1998, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. Accordingly, FPC requests an extension of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including April 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties' mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (727) 826-4258.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue", written over a circular scribble.

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

A handwritten signature in black ink, appearing to read "Robert A. Manning", written in a cursive style.

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC



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FEB 15 1999

BUREAU OF
AIR REGULATION

February 12, 1999

Mr. Scott M. Sheplak, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Florida Power Corporation, Suwannee River Facility
REVISED DRAFT Title V Permit No. 1210003-001-AV

Dear Mr. Sheplak:

On behalf of Florida Power Corporation (FPC), attached are comments regarding the Revised Draft Title V permit for the Suwannee River Facility as identified above. FPC appreciates the Department's efforts in processing this permit and understands the need to resolve these issues in as timely a manner as possible. In this regard, FPC has requested an extension of time in which to file a Petition, if necessary, until April 1, 1999. If we are unable to reach a resolution of these comments within this time period, we intend to file an additional Request for Extension of Time. Accordingly, please contact me at (727) 826-4258 as soon as you have had a chance to review these comments. Thank you again for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott H. Osbourn", written in a cursive style.

Scott H. Osbourn
Senior Environmental Engineer

cc: Clair Fancy, P.E., DEP
Ken Kosky, P.E., Golder Associates
Robert Manning, HGSS

2/17/99 cc: *Scott Sheplak*
Bruce Mitchell

**FLORIDA POWER CORPORATION
COMMENTS ON REVISED DRAFT TITLE V PERMIT
SUWANNEE RIVER FACILITY**

General Comments

1. FPC requests a copy of the Statement of Basis as soon as possible to review.
2. FPC requests that the BACT determination be deleted from the **“Referenced Attachments made a part of this permit”** section of the placard page. There is no basis for making a BACT determination a part of the Title V permit, because it only provides the basis for the conditions in the PSD permit. If necessary, the BACT could be listed as a **“document on file with the permitting authority.”**

Section II., Facility-Wide Conditions.

3. Condition 3. For clarity and to make this Condition specific to FPC's Suwannee Plant, FPC requests that Condition 3. be edited as follows:

~~Except as otherwise provided in this permit for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause . . .~~

Section III. Subsection A.

4. Condition A.9. To make this Condition specific to this permit, FPC requests the following revision: “When burning liquid fuel, sulfur dioxide emissions shall not exceed 2.75 pounds per million Btu heat input, as measured by applicable compliance methods in accordance with Condition A. 20.”
5. Condition A.27. To make this Condition specific to this permit, FPC requests that subparagraph (a)(4), be revised as follows: “B. Each of the following pollutants, if there is an applicable standard, and SO₂ and PM, if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of these pollutants any other regulated pollutant; and c. Each NESHAP pollutant, if there is an applicable standard.”
6. Conditions A. 30. This condition should be deleted because there is no direct authority for its inclusion, although it is contained in the AO. It contains several ambiguous phrases that, if the condition remains, need to be clarified (e.g., “when required,” “for a period of time,” and “agreed upon between DEP and FPC”).
7. Condition A. 35. This condition should be deleted because there is no direct authority for its inclusion.

8. Conditions A.36. and A. 37. These Conditions should be revised to reflect the record keeping and reporting requirements associated with burning used oil identical to FPC's other facilities, in accordance with the discussions between FPC and DEP on September 24, 1997.

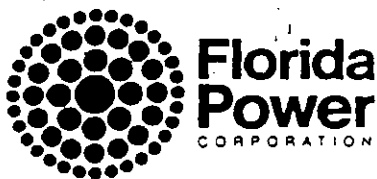
Section III. Subsection B.

9. Condition B.6. In accordance with the basis for the Construction Permit, FPC requests that this Condition clarify that the 1,500 hour/year/CT limitation reflects full load operation. In other words, the limitation should reflect the maximum annual fuel consumption at full load for 1,500 hr/yr. Then, if the units operated at less than full load, they could operate for more hours per year, as long as the maximum fuel consumption figure was not exceeded. Moreover, each of the CT units is comprised of two separate engines that power a single turbine. Much of the operation time has been at reduced load while one of the two engines on each unit has been operating (see attached letter, dated October 30, 1998).
10. Condition B.7. The NO_x emission limit should be expressed as 210.2 lb/hr/CT and 157.7 TPY/CT while burning fuel oil. The basis for the limit is 75 ppmvd; 1,255500 acfm; 726°F (AO61-189579, Specific Condition 4).
11. Condition B. 12. The tons per year limit in this Condition should be deleted because it is not necessary for compliance requirements, and is not contained in the existing construction permit.
12. Conditions B. 14. and B. 15. These two Conditions should be deleted because the excess emissions provisions under the NSPS govern these units; the state excess emissions provisions are not applicable. Accordingly, the language from Condition B. 34. should be moved to this section of the permit, and the language from 40 CFR §60.11(c) should be added.
13. Condition B. 18. This Condition is identical to Condition B. 16. and should therefore be deleted.
14. Condition B. 21. In accordance with FPC's letter to DEP dated September 10, 1997, FPC has requested a custom fuel monitoring schedule for these units, identical to the schedule suggested by EPA guidance. Accordingly, Condition B. 21. should be deleted and FPC requests that the following language be inserted: "The permittee shall comply with the custom fuel monitoring schedule attached as Appendix M. Monitoring of the natural gas sulfur content is not required." Prior representations by EPA indicate that if the EPA guidance is used verbatim (which FPC is), then the EPA approval is automatic. EPA has also stated that they would process these approvals prior to these permits going "final." In this regard, FPC assumes that DEP forwarded the September 10 letter to EPA to initiate the approval process. If this is not the case, please let us know as soon as possible what we can do to facilitate this process.

15. Condition B. 27. In accordance with DARM-EM-O5, dated November 22, 1995, this Condition should be revised to indicate that compliance testing (beyond the initial test) need not be corrected to ISO conditions, and need not be conducted at four load points.
16. Condition B. 28. For clarification, FPC requests that this Condition be revised as follows: "The owner or operator shall determine compliance with the nitrogen oxides and sulfur dioxide standards in 40 CFR 60.332 and 60.333(a) ~~as follows: (3) using~~ EPA Method 20 (40 CFR 60, Appendix A) ~~shall be used to determine the nitrogen oxides, sulfur dioxide, and oxygen concentrations.~~
17. Condition B. 35. and B. 36. These two Conditions include redundant requirements. The provisions under Appendix SS-1 should be sufficient to meet the federal requirements listed in Condition B. 35., and therefore Condition B. 35, should be deleted.
18. Condition B. 38. The language used to define the operating rate during testing should reflect recent DEP guidance incorporating the use of heat input curves.
19. Condition B. 40. For clarity, the first clause in paragraph 2 of this condition ("When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method") should be deleted because the permit specifies the applicable compliance method.
20. Condition B. 41. Subparagraph (a)(2) should be deleted from the Condition because these units are subject to the NSPS excess emissions limitations, and therefore this provisions does not apply. Also, for clarification, FPC requests the following revision to subparagraph (a)4.; a. Visible emissions, if there is an applicable standard; b. Nitrogen oxide; c. Sulfur dioxide; and d. Particulate matter. C. Each NESHAP pollutant, if there is an applicable standard.
21. Condition B. 44. This Condition should be revised as follows: "To determine compliance with the oil and natural gas firing heat input limitation in Condition B.3. . . ."
22. Condition B. 53. This condition only appears in the AO. It has no basis and should be deleted.
23. Condition B. 55. FPC requests that this Condition clarify that the water-to-fuel ratios listed apply only to fuel oil.
24. Condition B. 56. This Condition should be deleted because permit conditions related to water discharges are not appropriate for inclusion in a Title V Air Operation Permit.

Section IV. Acid Rain Part

- 25 Condition A.4. This Condition should be moved to the facility-wide section of this permit because it applies to every unit and every applicable requirement, not just to the Acid Rain requirements.



bcc: M. W. Lentz
J. L. Tillman

File: Suw/Air/Corresp.

October 30, 1998

Mr. Christopher L. Kirts, P.E.
Air Program Administrator
Florida Department of Environmental Protection
Northeast District
7825 Bay Meadows Way, Suite B200
Jacksonville, Florida 32256

Dear Mr. Kirts:

Re: FPC Suwannee Plant, Peaking Units
Hours of Operation Limitation

As we discussed by telephone, Florida Power Corporation (FPC) requests an interpretation of the operation permit condition regarding annual unit operating hour limits for the three peaking units at FPC's Suwannee River Plant. Due to the increased electricity demand from the unusually hot and dry summer, these peaking units have been operated more extensively than in prior years.

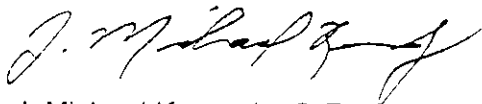
The current operation permit, number AO61-189579, for Suwannee Peaking Units 1, 2, and 3 limits the annual hours of operation of each unit. Specific Condition 4 states that the basis for the tons/year limits for NO_x and SO₂ as "Hours of operation shall be limited to 1500 hrs per calendar year and shall be recorded." Each of these peaking units is comprised of two separate engines that power a single turbine. During 1998, Unit 3 has run over 1,300 hours thus far, and Unit 1 has operated approximately 1,200 hours. Most of this run time has been while operating on natural gas (the hours of operation limits were based on oil-fired operation). Unit 2 has operated approximately 800 hours only on oil so far in 1998.

FPC is concerned that, given the unit operating time accumulated thus far in 1998, there may not be sufficient permitted operating hours remaining to adequately meet electricity demand should a period of cold weather increase needs later this year. Much of the operation time has been at reduced load while one of the two engines on each unit is operating. The annual hours of operation limit for each unit is based on the tons/year of pollutant emitted while both engines are operating at full load during oil-fired operation. FPC requests DEP's concurrence that the hours of operation limit applies to full load operation while both engines are running. Since FPC has often operated these units using one engine firing natural gas, particularly Units 1 and 3, total emissions will remain below the permitted tons/year limits.

Mr. Kirts
October 30, 1998
Page Two

Thank you for your consideration of this issue. Please contact me at (727) 826-4334 if you have any questions or need additional information.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. Michael Kennedy".

J. Michael Kennedy, Q.E.P.
Manager, Air Programs



January 27, 1999

RECEIVED

JAN 29 1999

BUREAU OF
AIR REGULATION

Ms. Kathy Carter, Clerk
Office of General Counsel
Florida Department of Environmental Protection
Room 638
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

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