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BUREAU OF AIR REGULATION

November 24, 2009

Mr. Jonathan Holtom, P.E.
Title V Program Administrator
Division of Air Resource Management
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 23
Tallahassee, Florida 32301-2973

Re: Comments on Draft/Proposed Title V Air Operation Renewal Permit
Project No: 1210003-007-AV
Florida Power Corporation d/b/a Progress Energy Florida, Inc.
Suwannee River Power Plant
Facility ID: 1210007

Dear Mr. Holtom:

Listed below are comments on the draft/proposed Title V Air Operation Renewal/Revision Permit for the Florida Power Corporation d/b/a Progress Energy Florida, Inc. ("PEF") Suwannee River Power Plant. Requested changes are shown in red with underline for insertion.

Draft Title V Air Operation Permit Revision & Renewal: 1210003-007-AV

1. **Section I, Subsection A – Facility Description:** The requested change provides a description for the use of propane/Liquefied Petroleum (LP) gas as an igniter fuel. This fuel has been employed for this purpose at the facility since the facility initiated operation. Pipeline natural gas has almost entirely replaced the use of LG or propane gas as an igniter fuel; however, during the winter months natural gas supplies can be curtailed because of high natural gas demand for heating. In this situation the LP or propane gas is used for lighting off the Nos. 2 and/or 6 fuel oil. Therefore, the requested change to the facility description is the addition of propane or LP gas as an igniter fuel as follows:

SECTION I. Subsection A. Facility Description.

This existing facility is a nominal 345 megawatt (MW) electrical generation facility comprised of three fossil fuel fired steam generators, Boiler Nos. 1, 2 and 3, and three combustion turbine peaking (CTP) units, CTP Unit Nos. 1, 2 and 3. There are no air pollution control devices associated with the boilers. Boilers Nos. 1, 2 and 3 fire natural gas, No. 2 fuel oil, No. 6 fuel oil, and/or on-specification used oil. In addition, propane/liquefied petroleum (LP) gas is sometimes used as an igniter fuel. CTP Unit Nos. 1, 2 and 3 fire natural gas or No. 2 fuel oil. Nitrogen oxide emissions from each CTP are controlled by using water injection for both fuel oil and natural gas firing. Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Fossil fuel fired steam generator Unit No. 1 is a nominal 35.0 megawatt (MW) (electric) steam generator designated as Boiler No. 1. This emissions unit is allowed to fire No. 2 fuel oil, No. 6 fuel oil, "on specification" used oil, natural gas, and a blend of fuel oil and natural gas. The "on-specification" used oil is generally fired as a blended fuel oil with either the No. 2 fuel oil or the No. 6 fuel oil. In addition, propane/liquefied petroleum (LP) gas is sometimes used as an igniter fuel. The stack parameters are: height, 110 feet; diameter, 7.0 feet; exit temperature, 320 degrees F; and, actual stack gas flow rate, 143,700 acfm. Fossil fuel fired steam generator No. 1 began commercial operation in 1953.

Fossil fuel fired steam generator Unit No. 2 is a nominal 34.0 MW (electric) steam generator designated as Boiler No. 2. This emissions unit is allowed to fire No. 2 fuel oil, No. 6 fuel oil, "on specification" used oil, natural gas, and a blend of fuel oil and natural gas. The "on-specification" used oil is generally fired as a blended fuel oil with either the No. 2 fuel oil or the No. 6 fuel oil. In addition, propane/liquefied petroleum (LP) gas is sometimes used as an igniter fuel. The stack parameters are: height, 110 feet; diameter, 7.0 feet; exit temperature, 340 degrees F; and, actual stack gas flow rate, 197,000 acfm. Fossil fuel fired steam generator No. 2 began commercial operation in 1954.

Fossil fuel fired steam generator Unit No. 3 is a nominal 84.0 MW (electric) steam generator designated as Boiler No. 3. This emissions unit is allowed to fire No. 2 fuel oil, No. 6 fuel oil, "on specification" used oil, natural gas, and a blend of fuel oil and natural gas. The "on-specification" used oil is generally fired as a blended fuel oil with either the No. 2 fuel oil or the No. 6 fuel oil. In addition, propane/liquefied petroleum (LP) gas is sometimes used as an igniter fuel. The stack parameters are: height, 135 feet; diameter, 7.7 feet; exit temperature, 300 degrees F; and, actual stack gas flow rate, 305,100 acfm. Fossil fuel fired steam generator No. 3 began commercial operation in 1956.

2. *Section III, Subsection A, Specific Condition A.17- Test Methods:* The requested change clarifies that there are alternatives to determining sulfur dioxide emissions other than those identified in the table included under this permit condition. Therefore, the requested change is as follows:

A.17. Test Methods. Required tests shall be performed in accordance with the following reference method(s):

Method(s)	Description of Method(s) and Comment(s)
EPA Methods 1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
EPA Methods 5, 5B, 5F or 17	Methods for Determining Particulate Matter Emissions
EPA Methods 6, 6A, 6B or 6C <u>(Also see Specific Conditions A.15, A.24 & A.25)</u>	Methods for Determining Sulfur Dioxide Emissions
Appendix D, 40 CFR 75	Optional SO2 Emissions Data Protocol for Gas-Fired and Oil-Fired Units
DEP Method 9	Visual Determination of the Opacity of Emissions

3. *Section III, Subsection A, Specific Condition A.30 - Records:* The requested change clarifies that there are alternatives to determining fuel sulfur content for liquid fuels other than those specifically included in this permit condition. Therefore, the requested change is as follows:

A.30. Records. The owner or operator shall maintain records of the fuel oil heating value, density or specific gravity, and the percent sulfur content. Fuel sulfur content, percent by weight, for liquid fuels shall be determined by either ASTM D2622-94, ASTM D4294-90 (95), ASTM D1552-95, ASTM D1266-91, or both ASTM D4057-88, and ASTM D129-95 (or later editions) to analyze a representative sample of the fuel oil. Alternatively, fuel oil sulfur content may be evaluated using the methods specified in Section 2.2.5 of Appendix D to 40 CFR 75, "Optional SO2 Emissions Data Protocol for Gas-Fired and Oil-Fired Units," as amended. In addition, any ASTM method (or later editions) referenced in Rule 62-297.440(1) F.A.C. is acceptable.

4. *Section III, Subsection B, Specific Condition B.16- Test Methods:* The requested change clarifies that there are alternatives to determining sulfur dioxide emissions other than those identified in the table included under this permit condition. Therefore, the requested change is as follows:

B.16. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method(s)	Description of Method(s) and Comment(s)
EPA Methods 1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
EPA Methods 6, 6A, 6B or 6C (See Specific Condition B.21)	Methods for Determining SO2 Emissions
Appendix D, 40 CFR 75 (See Specific Condition B.21)	Optional SO2 Emissions Data Protocol for Gas-Fired and Oil-Fired Units
EPA Method 7, 7A, 7C, 7D or 7E	Determination of NOx Emissions
EPA Method 9	Visual Determination of the Opacity of Emissions (VE)
EPA Method 20	Determination of NOx, SO2 and Diluent Emissions from Stationary Gas Turbines

Thank you for your assistance and if you have any questions, you may contact me by e-mail at Chris.Bradley@pgnmail.com or via telephone at (727) 820-5962.

Sincerely,



for Chris Bradley
Sr. Environmental Specialist

CB/pag
UPS Overnight

cc: Mr. Scott Sheplak, P.E., Permitting Engineer – DEP/DARM (via e-mail)
Mr. Cary Hamilton, Suwannee Plant Manager (via e-mail)