



Progress Energy

August 25, 2009

UPS Tracking No: 1Z 363 196 22 1039 8665

Mr. Scott Sheplak, P.E.
Permitting Engineer – Title V Section
Bureau of Air Regulation
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

RECEIVED
AUG 26 2009
BUREAU OF AIR REGULATION

Re: Response to Request for Additional Information (RAI)
Title V Air Operation Permit Renewal Application
File No: 1210003-007-AV
Suwannee River Power Plant
Facility ID No: 1210003

Dear Mr. Sheplak:

Thank you for your letter to Mr. Hamilton dated June 25, 2009 regarding the submission of additional information for the Title V Air Operation Renewal Permit application for the Florida Power Corporation d/b/a Progress Energy Florida, Inc. ("PEF") Suwannee River Power Plant. The following is PEF's response to this request:

- Item No. 1 - The combustion turbine (CT) peaking units (E.U. ID Nos. -004 through -006) do not have NO_x Continuous Emission Monitoring System (CEMS) installed and there are no plans to do so in the future. However, the CTs do have a Continuous Monitoring System (CMS) installed as noted in Section H of the permit renewal application. Please note the description contained in Title 40 Code of Federal Regulations (40 CFR) Part 60.334(a), titled "Monitoring of Operations" included below:

"Except as provided in paragraph (b) of this section, the owner or operator of any stationary gas turbine subject to the provisions of this subpart and using water or steam injection to control NO_x emissions shall install, calibrate, maintain and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water or steam to fuel being fired in the turbine.

The term "Continuous Monitoring System" clearly describes a system that monitors water delivered to and fuel consumed by the CT in order to document the control of NO_x emissions. Therefore, PEF does not wish to demonstrate continuous compliance by utilizing NO_x CEMS and believes the current CAM plan addressing monitoring the water-to-fuel ratio

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is sufficient. As a result PEF does not believe further information is necessary at this time. If you do not concur with this conclusion, please contact me.

- Item No. 2 - Several large engines are permanently located at the Suwannee River Facility. These engines and associated information are identified in the enclosed table and include two (2) Cummins compression ignition (i.e., diesel-fired) engines. A 210 HP Cummins Model No. V8 210 IF, manufactured in October 1971, is utilized as an emergency fire pump, and a 190 HP Cummins Model No. HRF 6 IP, manufactured in April 1967, is utilized as an emergency generator. Based on the date of manufacture, these engines are not subject to either 40 CFR Part 60, Subpart IIII or Subpart JJJJ. In addition, based on the exemptions listed in Part 63.6590(b)(3) neither of these engines are subject to 40 CFR Part 63 Subpart ZZZZ.
- Item No. 3 - This is a request to complete and submit the current Acid Rain Part Application Form (Effective date: 03-16-2008). The appropriate Acid Rain Forms have been completed, signed by the Alternate Designated Representative (DR) and enclosed for submission to the Department.

Also included with this response to the RAI is the Responsible Official (RO) Certification. However, the Professional Engineer Certification has been excluded because PEF believes the submitted information is not of an engineering nature.

If you require further information or clarification, or if you have any questions, please contact me at (727) 820-5962 or by e-mail at Chris.Bradley@pgnmail.com. Thank you for your attention to this matter.

Best Regards,



Chris Bradley
Senior Environmental Specialist
Progress Energy Florida, Inc.

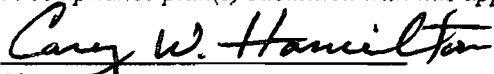

Enclosures:

cc: Mr. Cary Hamilton, Plant Manager, SW 39
Mr. Jonathon Holtom, P.E., DEP TV Program Admin.

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Cary W. Hamilton, Plant Manager
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.
3. Application Responsible Official Mailing Address... Organization/Firm: Florida Power Corporation dba Progress Energy Florida, Inc. Street Address: 4037 River Road City: Live Oak State: Florida Zip Code: 32060-8746
4. Application Responsible Official Telephone Numbers... Telephone: (386) 330-5402 ext. Fax: (386) 330-5407
5. Application Responsible Official E-mail Address: Cary.Hamilton@pgnmail.com
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature  Date

SUWANNEE RIVER POWER PLANT
List of On-Site Engines
Compression Ignition and Spark Ignition

Facility ID for Engine	Year of Manufacture	Engine Model No.	Engine Horsepower	Engine Type CI (Compression Ignition) or SI (Spark Ignition)	Fuel Type (gasoline, natural gas, propane, diesel, etc)	Purpose of the engine (e.g., emergency generator, water pump, etc.)
Emergency Generator	April 1967	HRF 6 IP Cummins	190 HP	CI (Compression Ignition)	Diesel	Emergency Generator
Fire Pump	October 1971	V8 210 IF Cummins	210 HP	CI (Compression Ignition)	Diesel	Emergency Fire Pump
Welder	October 2004	CH 20 S Kohler	20 HP	SI (Spark Ignition)	Gasoline	Portable Welder

Acid Rain Part Application

For more information, see instructions and refer to 40 CFR 72.30, 72.31, and 74; and Chapter 62-214, F.A.C.

This submission is: New Revised Renewal

STEP 1

Identify the source by plant name, state, and ORIS or plant code.

Plant name <p style="text-align: center; margin: 0;">Suwannee River Plant</p>	State <p style="text-align: center; margin: 0;">FL</p>	ORIS/Plant Code <p style="text-align: center; margin: 0;">638</p>
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STEP 2

Enter the unit ID# for every Acid Rain unit at the Acid Rain source in column "a."

If unit a SO₂ Opt-in unit, enter "yes" in column "b".

For new units or SO₂ Opt-in units, enter the requested information in columns "d" and "e."

a	b	c	d	e
Unit ID#	SO ₂ Opt-in Unit? (Yes or No)	Unit will hold allowances in accordance with 40 CFR 72.9(c)(1)	New or SO ₂ Opt-in Units Commence Operation Date	New or SO ₂ Opt-in Units Monitor Certification Deadline
1		Yes		
2		Yes		
3		Yes		

Suwannee River Plant
Plant Name (from STEP 1)

STEP 3

Read the standard requirements.

Acid Rain Part Requirements.

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Submit a complete Acid Rain Part application (including a compliance plan) under 40 CFR Part 72 and Rules 62-214.320 and 330, F.A.C., in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
 - (ii) Submit in a timely manner any supplemental information that the DEP determines is necessary in order to review an Acid Rain Part application and issue or deny an Acid Rain Part;
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain Part application or a superseding Acid Rain Part issued by the DEP; and
 - (ii) Have an Acid Rain Part.

Monitoring Requirements.

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR Part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR Part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.
- (4) For applications including a SO₂ Opt-in unit, a monitoring plan for each SO₂ Opt-in unit must be submitted with this application pursuant to 40 CFR 74.14(a). For renewal applications for SO₂ Opt-in units include an updated monitoring plan if applicable under 40 CFR 75.53(b).

Sulfur Dioxide Requirements.

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another Acid Rain unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000, or the deadline for monitor certification under 40 CFR Part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain Part application, the Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR Part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR Part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR Part 77.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the EPA or the DEP:
 - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR Part 75, provided that to the extent that 40 CFR Part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and

Suwannee River Plant
Plant Name (from STEP 1)

**STEP 3,
Continued.**

Recordkeeping and Reporting Requirements (cont)

(iv) Copies of all documents used to complete an Acid Rain Part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR Part 72, Subpart I, and 40 CFR Part 75.

Liability.

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain Part application, an Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.

(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.

(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.

(4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.

(5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.

(6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR Part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.

(7) Each violation of a provision of 40 CFR Parts 72, 73, 74, 75, 76, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities.

No provision of the Acid Rain Program, an Acid Rain Part application, an Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;

(3) Requiring a change of any kind in any state law regulating electric utility rates and charges, affecting any state law regarding such state regulation, or limiting such state regulation, including any prudence review requirements under such state law;

(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,

(5) Interfering with or impairing any program for competitive bidding for power supply in a state in which such program is established.

STEP 4

For SO₂ Opt-in units only.

In column "f" enter the unit ID# for every SO₂ Opt-in unit identified in column "a" of STEP 2.

For column "g" describe the combustion unit and attach information and diagrams on the combustion unit's configuration.

In column "h" enter the hours.

f	g	h (not required for renewal application)
Unit ID#	Description of the combustion unit	Number of hours unit operated in the six months preceding initial application

DEP Form No. 62-210.900(1)(a) – Form
Effective: 3/16/08

3

Suwannee River Plant

Plant Name (from STEP 1)

STEP 5

For SO₂ Opt-in units only. (Not required for SO₂ Opt-in renewal applications.)

In column "i" enter the unit ID# for every SO₂ Opt-in unit identified in column "a" (and in column "f").

For columns "j" through "n," enter the information required under 40 CFR 74.20-74.25 and attach all supporting documentation required by 40 CFR 74.20-74.25.

i	j	k	l	m	n
Unit ID#	Baseline or Alternative Baseline under 40 CFR 74.20 (mmBtu)	Actual SO ₂ Emissions Rate under 40 CFR 74.22 (lbs/mmBtu)	Allowable 1985 SO ₂ Emissions Rate under 40 CFR 74.23 (lbs/mmBtu)	Current Allowable SO ₂ Emissions Rate under 40 CFR 74.24 (lbs/mmBtu)	Current Promulgated SO ₂ Emissions Rate under 40 CFR 74.25 (lbs/mmBtu)

STEP 6

For SO₂ Opt-in units only. Attach additional requirements, certify and sign.

- A. If the combustion source seeks to qualify for a transfer of allowances from the replacement of thermal energy, a thermal energy plan as provided in 40 CFR 74.47 for combustion sources must be attached.
- B. A statement whether the combustion unit was previously an affected unit under 40 CFR 74.
- C. A statement that the combustion unit is not an affected unit under 40 CFR 72.6 and does not have an exemption under 40 CFR 72.7, 72.8, or 72.14.
- D. Attach a complete compliance plan for SO₂ under 40 CFR 72.40.
- E. The designated representative of the combustion unit shall submit a monitoring plan in accordance with 40 CFR 74.61. For renewal application, submit an updated monitoring plan if applicable under 40 CFR 75.53(b).
- F. The following statement must be signed by the designated representative or alternate designated representative of the combustion source: "I certify that the data submitted under 40 CFR Part 74, Subpart C, reflects actual operations of the combustion source and has not been adjusted in any way."

Signature	Date
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STEP 7

Read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign, and date.

Certification (for designated representative or alternate designated representative only)

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Brenda E. Brickhouse	Title Director, Environmental, Health & Safety Section, Progress Energy, Inc.
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Owner Company Name **Florida Power Corporation dba Progress Energy Florida, Inc.**

Phone (727) 820-5153	E-mail address Brenda.Brickhouse@pgnmail.com
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Signature 	Date 8/21/09
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Acid Rain Program

Instructions for Acid Rain Part Application

(40 CFR 72.30 - 72.31, and 74; and Rule 62-214.320, F.A.C.)

The Acid Rain Program requires the designated representative to submit an Acid Rain Part application for each source with an Acid Rain unit. A complete Certificate of Representation must be received by EPA before the Acid Rain Part application is submitted to the DEP Bureau of Air Regulation. A complete Acid Rain Part application, once submitted, is binding on the owners and operators of the Acid Rain source and is enforceable in the absence of an Acid Rain Part until the DEP Bureau of Air Regulation either issues an Acid Rain Part to the source or disapproves the application.

DEFINITIONS

"Act" – The federal Clean Air Act:

"CFR" - Code of Federal Regulations

"DOE" – U.S. Department of Energy

"EIA" – U.S. Energy Information Agency

"F.A.C." - Florida Administrative Code

"DEP" - Florida Department of Environmental Protection

"lbs" - pounds

"mmBtu" – million British thermal units

"NO_x" – Nitrogen oxides

"SO₂ Opt-in unit" - A combustion unit that has elected to become an affected unit under the Acid Rain Program.

For the purposes of applying 40 CFR Parts 72, 73, 75, 77, and 78, and

Chapter 62-214, F.A.C., each SO₂ Opt-in unit shall be treated as an Acid Rain unit.

"ORIS" - Office of Regulatory Information Systems

Please type or print. The alternate designated representative may sign in lieu of the designated representative. If assistance is needed, contact the DEP Bureau of Air Regulation at (850) 488-0114.

- STEP 1** Use the plant name and ORIS Code listed on the Certificate of Representation for the plant. An ORIS code is a 4-digit number assigned by the EIA at the DOE to power plants owned by utilities. If the plant is not owned by a utility but has a 5-digit plant code (also assigned by EIA), use the plant code. If no code has been assigned or if there is uncertainty regarding what the code number is, contact EIA at (202) 586-2402.
- STEP 2** For column "a," identify each Acid Rain unit at the Acid Rain source by providing the appropriate unit identification numbers, consistent with the unit identification numbers entered on the Certificate of Representation and with unit identification numbers used in reporting to the DOE and/or EIA. For new units without identification numbers, owners and operators may assign such numbers consistent with EIA and DOE requirements. If the unit is a SO₂ Opt-in unit, or electing to become one, enter "yes" in column "b." For columns "d" and "e," enter the commence operation date(s) and monitor certification deadline(s) for new units in accordance with 40 CFR 72.2 and 75.4, respectively.
- STEP 3** Read the standard requirements.
- STEP 4** **For SO₂ Opt-in units only.** In column "f" enter the unit ID# for every SO₂ Opt-in unit identified in column "a" of STEP 2. For column "g" describe the combustion unit and attach information and diagrams on the combustion unit's configuration. If not a renewal application, in column "h" enter the number of hours each unit operated in the six months preceding initial application and attach supporting documentation.
- STEP 5** **For SO₂ Opt-in units only. (Not required for renewal applications.)** In column "i" enter the unit ID# for every SO₂ Opt-in unit identified in column "a" (and in column "f"). For columns "j" through "n," enter the information required under 40 CFR 74.20-74.25 and attach all supporting documentation required by 40 CFR 74.20-74.25.

- STEP 6 For SO₂ Opt-in units only.** Complete the additional requirements A - F. The designated representative or alternate designated representative must read the certification statement, sign and date.
The Administrator shall be responsible for the following activities under the opt-in provisions of the Acid Rain Program:
- (1) *Calculating* the baseline or alternative baseline and allowance allocation, and allocating allowances for combustion or process sources that become affected units under 40 CFR Part 74;
 - (2) Certifying or recertifying monitoring systems for combustion or process sources as provided under 40 CFR 74.20;
 - (3) Establishing allowance accounts, tracking allowances, assessing end-of-year compliance, determining reduced utilization, approving thermal energy transfer and accounting for the replacement of thermal energy, closing accounts for opt-in sources that shut down, are reconstructed, become affected under 40 CFR 72.6, or fail to renew their opt-in permit, and deducting allowances as provided under 40 CFR Part 74, Subpart E; and
 - (4) Ensuring that the opt-in source meets all withdrawal conditions prior to withdrawal from the Acid Rain Program as provided under 40 CFR 74.18; and
 - (5) Approving and disapproving the request to withdraw from the Acid Rain Program.
- The DEP shall be responsible for the following activities:**
- (1) Issuing the draft and final opt-in permit;
 - (2) Revising and renewing the opt-in permit; and
 - (3) Terminating the opt-in permit for an opt-in source as provided in 40 CFR 74.18 (withdrawal), 40 CFR 74.46 (shutdown, reconstruction or change in affected status) and 40 CFR 74.50 (deducting allowances).

STEP 7 The designated representative or alternate designated representative must read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign and date.

Submission Deadlines

For new units, an initial Acid Rain Part application must be submitted to the DEP Bureau of Air Regulation 24 months before the date the unit commences operation.

Acid Rain Part renewal applications must meet the same submission deadline as the Title V permit renewal application for the source.

The designated representative of any operating combustion unit that wishes the unit to become a SO₂ Opt-in unit may submit an Acid Rain Part application and a monitoring plan to the Administrator and DEP Bureau of Air Regulation at any time. Within 21 calendar days from the date the DEP Bureau of Air Regulation issues or denies a draft Title V permit revision incorporating the unit as an acid rain unit, the designated representative of the unit must submit to the Administrator and DEP Bureau of Air Regulation, in writing, a confirmation or rescission of the unit's intention to become a SO₂ Opt-in unit. The Administrator shall treat the failure to make a timely submission as a rescission of the unit's intention to become a SO₂ Opt-in unit and as a withdrawal of the application.

Submit this form and a copy to:

DEP Bureau of Air Regulation
 MS 5505
 2600 Blair Stone Rd
 Tallahassee, FL 32399-2400

For SO₂ Opt-In units, also send this form or its equivalent to the Administrator at:

U.S. Environmental Protection Agency
 Clean Air Markets Division (6204J)
 1200 Pennsylvania Ave NW
 Washington, DC 20460



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 (Also see Specific Conditions A.15, A.24 & A.25)	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 SO ₂ Emissions.
Appendix D, 40 CFR 75 (See Specific Condition B.21)	Optional SO ₂ Emissions Data Protocol for Gas-Fired and Oil-Fired Units.
EPA Method 7, 7A, 7C, 7D or 7E	Determination of NO _x Emissions
EPA Method 9	Visual Determination of the Opacity of Emissions (VE)
EPA Method 20	Determination of NO _x , SO ₂ 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@pqnmail.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)

Sheplak, Scott

From: Garner, Patricia A [Patricia.Garner@pgnmail.com]
Sent: Tuesday, November 24, 2009 2:10 PM
To: Sheplak, Scott
Cc: Bradley, Chris; Hamilton, Cary W; Meyer, Dave
Subject: Suwannee Power Plant - Submittal of Comments on Draft Permit
Attachments: SUW Plt Comments on Draft Permit Holtom .pdf

Attached is a copy of the letter above-referenced letter submitted to Mr. Jonathan Holtom. Should you have any questions, please contact Mr. Chris Bradley.

Patricia A. Garner

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11/24/2009