

INTEROFFICE MEMORANDUM

Date: 18-Aug-2000 01:21pm
From: Kennedy, J-Michael
J-Michael.Kennedy@fpc.com
Dept:
Tel No:

To: Scott Sheplak (E-mail) (Scott.Sheplak@dep.state.fl.us)
CC: Stenger, Jennifer A (Jennifer.A.Stenger@fpc.com)

Subject: FPC Suwannee Peaker Testing

Scott,

As we discussed, this is to confirm our telephone conversation earlier today. The Title V permit for the Florida Power Corporation Suwannee River plant (number 1210003-001-AV) contains a new annual testing requirement for NOx emissions for each peaking unit that operates more than 400 hours in the federal fiscal year. This condition became effective with the permit in January of this year; therefore, if a peaking unit operates for a total of more than 400 hours in the fiscal year between 10/1/99 and 9/30/00, a NOx compliance test will be required during the fiscal year between 10/1/00 and 9/30/01. The condition will then apply in the same manner to subsequent years.

Thank you.

Mike Kennedy
Florida Power Corporation
Environmental Services
(727) 826-4334

*Jonathan,
Please look into
this. Sitt
8/21*

*PM + VE waivers for < 400 hr/yr from Annual testing, however,
Frequency waived annual if potential is < 100 TPY
NOx will need annual test.*

Table 2-1, Summary of Compliance Requirements

Florida Power Corporation
Suwannee River Facility

FINAL Permit No.: 1210003-001-AV
Facility ID No.: 1210003

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E. U. ID No.	Brief Description	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date ²	Min. Compliance Test Duration	CMS ¹	See Permit Condition(s)
-001	Boiler #1	VE	No. 6 F.O.	DEP method 9	Annually ³	7/1 - 9/1	60 Minutes	Yes	A.17., 18., 23., 25., 27. & 28.
002	Boiler #2		Natural Gas	DEP method 9	N/A	7/1 - 9/1	60 Minutes	No	
-003	Boiler #3 (conditions are for each boiler)	PM	No. 6 F.O.	17, 5, 5B or 5F	Annually ³	7/1 - 9/1	1 Hour	No	A.19., 22.-27., & 29.
			Natural Gas	17, 5, 5B or 5F	Annually ³	7/1 - 9/1	1 Hour	No	
	Acid Rain Phase II Units	SO ₂	No. 6 F.O.	Fuel Sampling & Analysis As-Fired				No	A.15., 20., & 21.
-004	CT (P-1) ⁴	VE	No. 2 F.O.	EPA method 9	Annually ³	11/20 - 1/20	60 Minutes	No	B.31. & 32.
-005	CT (P-2) ⁴	PM	No. 2 F.O.	EPA Method 5	Renewal or Annually ³		1 Hour	No	B.30.
-006	CT (P-3) ⁴	% S, by wt.	No. 2 F.O.	Fuel Sampling & Analysis: As-Fired or Provided By Vendor				No	B.11., 20., 28. & 29.
		SO ₂	No. 2 F.O.	EPA method 20 ⁵	Annually ⁵	8/30 - 10/30	1 Hour	No	B.27.
		NO _x	No. 2 F.O.	EPA method 20	Annually	8/30 - 10/30	1 Hour	Yes	B. 22.-27. & 29.

Notes:

¹ CMS [=] continuous monitoring system.

² Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.

³ Test not required in years that fuel oil is fired less than 400 hours.

⁴ If a combustion turbine is operated less than 400 hours per year, test is only required once every 5 years, during the year prior to permit renewal.

⁵ Fuel oil sulfur content analysis satisfies compliance with 40 CFR 60.333(a).

Revise!

[electronic file name: 12100032.xls]

B.39. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. For EPA Method 9, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1 (attached).

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.
[Rule 62-297.310(4), F.A.C.]

B.40. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate; or

b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
 - a. Visible emissions, if there is an applicable standard;
 - b. Each of the following pollutants, if there is an applicable standard, and 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; or, 100 tons per year or more of any other regulated air pollutant; and,
 - c. Each NESHAP pollutant, if there is an applicable standard.
5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.
8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.
9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; and, SIP approved]

B.41. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rule 62-297.310(7)(a)4., F.A.C.]

B.42. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

Recordkeeping and Reporting Requirements

B.43. The owner or operator subject to the provisions of 40 CFR 60 shall furnish the Administrator written notification as follows:

(4) A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.

[40 CFR 60.7(a)(4)]

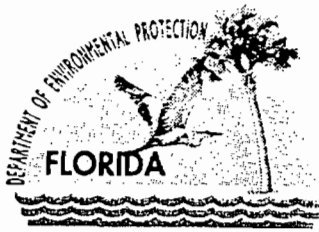
B.44. The owner or operator subject to the provisions of 40 CFR 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or, any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 CFR 60.7(b)]

B.45. The owner or operator required to install a continuous monitoring system (CMS) or monitoring device shall submit an excess emissions and monitoring systems performance report and/or a summary report form [see 40 CFR 60.7(d)] to the Administrator semiannually, except when: more frequent reporting is specifically required by an applicable subpart; or, the CMS data are to be used directly for compliance determination, in which case quarterly reports shall be submitted; or, the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each calendar half (or quarter, as appropriate). Written reports of excess emissions shall include the following information:

- (1) The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period.
- (2) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.
- (3) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.
- (4) When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.

[40 CFR 60.7(c)(1), (2), (3), and (4)]



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

November 18, 1999

Mr. Winston A. Smith, Director
Air, Pesticides and Toxics Management Division
United States Environmental Protection Agency
Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303-8909

Re: Proposed Changes to the PROPOSED Title V Permit for the Florida Power Corporation Suwannee River Plant to Satisfy EPA Objections
Title V Permit No.: 1210003-001-AV

Dear Mr. Smith:

This letter is to document changes that the Department proposes to satisfy EPA Region 4's objections to Florida's PROPOSED Title V Permit for the Florida Power Corporation Suwannee River Plant. The objections were detailed in a letter from EPA Region 4 dated July 12, 1999. All of the objections were resolved within the allotted timeframe except for one issue, which is the "the averaging time for the particulate matter standard". A letter received from Mr. W. Jeffrey Pardue on November 12, 1999, to Mr. Scott Sheplak, allows us to resolve the final issue.

Please review the following proposed changes to the referenced permit. If you concur with our changes, we will issue the FINAL Permit with these changes. The following items and changes are presented in the same order as listed in the June 12, 1999 EPA letter referenced above.

I. EPA Objection Issues

1. In order to remove any ambiguity in the interpretations between Specific Condition A.5. and Specific Conditions A.27. and A.29., the conditions will be linked, as follows:

A.5. Visible Emissions. Visible emissions shall not exceed 20 percent opacity, except for one two-minute period per hour during which opacity shall not exceed 40 percent. Emissions units governed by this visible emissions limit shall compliance test for particulate matter emissions annually and as otherwise required by Chapter 62-297, F.A.C. (See Specific Conditions A.27.(a)5. And A.29.b. & c.)

A.27.(a)5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours. (See Specific Conditions A.5. and A.29.b. & c.)

A.29. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:

- c. only gaseous fuel(s); or
- c. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year (See Specific Conditions A.5. and A.27(a)5.); or
- c. only liquid fuel(s) for less than 400 hours per year. (See Specific Conditions A.5. and A.27(a)5.)

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Mr. Winston A. Smith
Response Letter to EPA Region 4 Objection Letter on a PROPOSED Title V Permit
Florida Power Corporation: Suwannee River Plant
Title V Permit No.: 1210003-001-AV
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2. In Specific Conditions A.7. and A.8., we will include the following permitting note for "the averaging time for the particulate matter standard":

{Permitting note. The averaging time for the particulate matter standard corresponds to the cumulative sampling time of the specified test method.}

3. Since the basis for the requirements in Specific Condition A.34. are based on federal regulations and for reasonable assurance purposes, the qualifier "**Not Federally Enforceable.**" will be deleted.

4. Due to the requirement in Specific Condition B.6., the recording of the hours of operation for each CT needs to be done in order to satisfy the requirements of Specific Condition B.52.a. Therefore, the following will be added to Specific Condition B.52.a. and the two conditions will be linked:

B.6. Hours of Operation. The emissions units may operate 1500 hours/year/CT. See Specific Condition B.52.a.

and,

FROM:

B.52. Submit a quarterly report for each emissions unit for the following within 30 days at the end of each quarter:
a. Total hours of operation.

TO:

B.52. Submit a quarterly report for each emissions unit for the following within 30 days at the end of each quarter:
a. Total hours of operation, as reflected in an electronic data base. See Specific Condition B.6.

5. Equivalent Emissions. The equivalent emissions statements contained in Specific Conditions B.7., B.8., B10. and B.12. are deleted.

6. Acid Rain Part. The EPA has requested that the following condition be added to the Acid Rain Part of the permit (one of the requested conditions was already established in condition A.3.1. of the Acid Rain Part):

new:

Subsection IV.

A.7. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be incorporated into the permit and shall be enforceable by the Administrator.

[40 CFR 70.6(a)(4)(i); and, Rule 62-210.200, Definitions - Applicable Requirements, F.A.C.]

II. General Comments


1. Appendix TV-3 will be the reference when referring to the Facility-wide Conditions, except for what is established in Section II., Facility-wide Conditions.

2. Section II. Facility-wide Condition No. 10. We will make any appropriate changes to EPA's address, phone number and facsimile number.

Mr. Winston A. Smith
Response Letter to EPA Region 4 Objection Letter on a PROPOSED Title V Permit
Florida Power Corporation: Suwannee River Plant
Title V Permit No.: 1210003-001-AV
Page 3 of 3

All parties involved have been expeditiously seeking resolution of these issues. We feel that EPA's concerns have been adequately addressed and we look forward to issuing the FINAL Title V permit. Please advise as soon as possible if you concur with the specific changes detailed above. Please call me at 850/921-9503 if you have any questions. You may also contact Mr. Scott M. Sheplak, P.E., at 850/921-9532, if you need any additional information.

Sincerely,


C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

Attachment

CF/bm

cc: Howard L. Rhodes
Scott M. Sheplak
Bruce Mitchell
Pat Comer, Esq.
Gregg Worley, EPA
Scott Osbourn, FPC
Robert Manning, Esq., HGSS

FLORIDA PUBLISHING COMPANY
 Publisher
 JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
 COUNTY OF DUVAL }

Before the undersigned authority personally appeared _____

Kimberly Crisp who on oath says that he is

Legal Advertising Representative of The Florida Times-Union,

a daily newspaper published at Jacksonville in Duval County, Florida; that the attached copy of advertisement, being a Legal Notice

in the matter of Department of Environmental Protection

Notice Of Intent To Issue Permit, Title V DRAFT

Permit No. 1210003-001-AV

in the _____ Court,

was published in THE FLORIDA TIMES-UNION in the issues of _____

September 24, 1997

Affiant further says that the said The Florida Times-Union is a newspaper published at Jacksonville, in said Duval County, Florida, and that the said newspaper has heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me this 29th day of

September, A.D. 19 97.

[Signature]
 Notary Public,
 State of Florida

My Commission # CC 547806
 EXPIRES JUN 01, 2000
 BONDED THRU
 DA 444 ATLANTIC BONDING CO

[Signature]

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT
 STATE OF FLORIDA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 Title V DRAFT Permit No.: 1210003-001-AV
 Florida Power Corporation Suwannee River Facility
 Suwannee County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Florida Power Corporation Suwannee River Facility located South of U.S. Route 90 - Northwest of Live Oak, Suwannee County. The applicant's name and address are: Florida Power Corporation, 3201 34th Street South, St. Petersburg, Florida 33711.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station # 5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, Florida Statutes (F.S.). Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station # 35 Tallahassee, Florida 32399-3000 (Telephone: 850/488-9735 Fax: 850/487-4938). Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only of the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

- A petition must contain the following information:
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
 - (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
 - (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
 - (d) A statement of the material facts disputed by the petitioner, if any;
 - (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;
 - (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,
 - (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 410 M. Street, SW, Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority: Department of Environmental Protection Bureau of Air Regulation 111 South Magnolia Drive, Suite 4 Tallahassee, Florida 32301 Telephone: 850/488-1344 Fax: 850/922-6979	Affected District: Department of Environmental Protection Northwest District 7825 Baymeadows Way, Suite 2008 Jacksonville, Florida 32256-7577 Telephone: 904/448-4300 Fax: 904/448-4366
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The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/488-1344, for additional information.



RECEIVED

NOV 12 1999

BUREAU OF AIR POLLUTION

November 8, 1999

Mr. Scott Sheplak, P.E.
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Re: Florida Power Corporation's Anclote and Suwannee Facilities
EPA Objection to Proposed Title V Permit Nos. 1210003-001-AV and 1010017-003-AV

Dear Mr. Sheplak:

FPC appreciates DEP's and EPA's cooperation thus far in resolving the majority of the issues contained in EPA's objection letters to the above-referenced permits, dated July 12, 1999 and July 16, 1999.

FPC understands that the only remaining issue is EPA's position that the particulate matter emission limits contained in the above-referenced proposed permits are not "practicably enforceable" unless "some form of averaging time" is added. FPC disagrees. These conditions are completely enforceable in their current form; adding an averaging time is simply unnecessary.

However, in an effort to move the Title V permitting process to conclusion, FPC is willing to accept the inclusion of a "permitting note" following Conditions A.7 and A.8, as follows:

The averaging time for the particulate matter standard corresponds to the cumulative sampling time of the specified test method.

FPC's suggested resolution of this matter does not constitute or imply concurrence with EPA's position. The Title V process is intended to consolidate existing applicable requirements for each Title V permit on a case-by-case basis, and FPC's suggested resolution applies only to the Anclote and Suwannee Title V facilities/permits. Moreover, the language suggested above is applicable only to the existing particulate matter limit and only for the existing compliance determination method for this limit.

Mr. Sheplak, P.E.
November 8, 1999
Page 2

Thank you for your attention to this important matter. If you have any questions regarding FPC's response or wish to discuss this matter further, please contact Scott Osbourn at (727) 826-4258 or me at (727) 826-4301.

Sincerely,



W. Jeffrey Pardue, C.E.P.
Director, FPC Environmental Services Department
Responsible Official for Anclote and Suwannee Title V permits

cc: Howard Rhodes, DEP
Clair Fancy, DEP
Winston A. Smith, EPA
Greg Worley, EPA
Elizabeth Bartlett, EPA
Robert Manning, HGSS



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AUG 31 1999

BUREAU OF AIR REGULATION

August 27, 1999

Mr. Scott Sheplak, P.E.
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Dear Mr. Sheplak:

Re: Florida Power Corporation's Suwannee Facility
EPA Objection to Proposed Title V Permit No. 1210003-001-AV

Florida Power Corporation (FPC) is in receipt of a letter from the U.S. EPA, Region IV, dated July 12, 1999, objecting to the issuance of the above-referenced permit. The EPA has objected based on their belief that the Proposed permit does not fully meet periodic monitoring requirements, contains conditions which are unclear as to what the source must demonstrate compliance with, and is missing some Acid Rain requirements. This letter serves to provide responses to the EPA's objections in the order they were listed.

EPA Objection Issues

1. Periodic Monitoring- *The permit is not clear about the frequency of testing that the facility must follow to ensure compliance with the particulate matter limit. Condition A.5 of the permit requires the facility to conduct annual particulate matter testing. However, Conditions A.27 and A.29 establish that the facility will conduct testing once a year if fuel oil is burned for more than 400 hours, and that no testing is required otherwise. The permit must be clear about which one of these conditions the facility must follow to demonstrate compliance with the particulate matter limit.*

Response- It's been FPC's understanding that annual testing is not required if the emission unit does not burn fuel oil for more than 400 hours in a year. Therefore, Conditions A.27 and A.29 represent the applicable requirements.

2. Appropriate Averaging Times- *In order for the emission standard for particulate matter to be practicably enforceable, the appropriate averaging time must be specified in the permit. An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission limits are tied to or based on the run time of the test method(s) used for determining compliance.*

Response- The "applicable requirement" which provides the basis for Condition A.7 (particulate matter limit) is Florida's Rule 62-296.405(1)(b), F.A.C., which does not specify an averaging time directly. Moreover, neither the existing periodic monitoring rule, the Credible Evidence Rule, nor EPA's policy on practical enforceability, provide the authority to impose an averaging time in a Title V permit where none exists in the underlying requirement. Therefore, an averaging time has appropriately not been included in Condition A.7 in the Draft or Proposed Title V permits for FPC's Suwannee facility.

FPC had previously discussed this objection issue with the DEP and the EPA, and was willing to accept language regarding the use of appropriate reference test methods that are intended to make this permit condition practically enforceable. EPA was reluctant to accept any permit language short of including the following: "the averaging times for all specified emission limits are tied to or based on the run time of the test method(s) used for determining compliance." FPC is unwilling to accept this language in general and, particularly in the case of a particulate matter standard. The reference test methods used for particulate compliance (i.e., Methods 5 or 17) do not have a set run time; the sampling time may vary from one to four hours per run. The run times of the test methods are dependent on other relevant criteria, including the sampling of a minimum of 30 dry standard cubic feet (dscf) and the collection of a filter sample adequate for a representative analysis. Accordingly, EPA's suggested language is not appropriate or acceptable for a particulate limit that is compliance-tested using Methods 5 or 17. Further, the language suggested by the EPA is overly broad in that it applies to all emission limits, whereas the comment is limited solely to the particulate limit imposed by Condition A.7.

If EPA is unclear about the enforceability of Condition A.7, FPC suggests referencing the following conditions in Condition A.7: Condition A.19 (which specifies the test method), A.22 (which specifies the number of sampling runs), A.24 (which specifies how to calculate the actual emission rate), and A.25 (which specifies the sampling time, volume and flow rate). These conditions clearly provide how FPC's compliance with the particulate limit is completely enforceable.

- 3. Federal Enforceability- Condition A.34 has been identified as "Not Federally Enforceable". However, the condition contains documentation, record keeping, and notification requirements for used oil which originate from 40 CFR 279 and 761. Since those conditions are federal requirements, they are automatically federally enforceable. Additionally, Conditions A.11, A.30, and A.35 contain operational limitations for using used oil and reporting requirements that are identified as federally enforceable. Since the permit contains a federally enforceable limit and reporting requirements for the use of used oil, the method of establishing compliance with the limit and reporting requirement must also be federally enforceable. Therefore, the record keeping required by Condition A.34 is federally enforceable.*

Response- - FPC is in agreement that the individual permit requirements pertaining to used oil need to be broken down into federally enforceable and not federally enforceable conditions. FPC has reviewed the applicable rules in an effort to determine which of the requirements in

Conditions A.11, A.30, A.34, and A.35 are federally enforceable and which are not. FPC has determined that all of the requirements are federally enforceable, except for the following:

Not Federally Enforceable:

- A.11(a)- the maximum amount of on-spec used oil that can be burned;
 - A.11(a)- total halogens shall not exceed 1,000 ppm;
 - A.34(1) and (2)- the record keeping regarding the amounts of on-spec used oil burned per month and per year, respectively; and
 - A.35- the AOR reporting requirements.
4. Periodic Monitoring- *Condition B.6 limits the operation of the units to 1,500 hours per year per unit. The permit must specify that the facility is required to maintain records of the hours of operation of the units.*

Response- Each of these units is equipped with operating hour meters. The data is logged and records are kept on site.

5. Emission Limits- *Conditions B.7, B.8, B.10, and B.12 contain equivalent emissions for the NO_x, SO₂, and PM limits. It is not clear whether the facility is required to demonstrate compliance with these equivalent emissions and what the basis for these limits are. For example, we were only able to locate PSD permit modification FL-014(A), which modified the limit for SO₂ and it does not include the equivalent emissions for SO₂ that are listed in the permit. Please clarify these conditions of the permit.*

Response- FPC has discussed this issue with the Department, and it has been agreed these "equivalent emissions" will be deleted.

6. Acid Rain- *The following language regarding Acid Rain Program requirements in Title V is not addressed in the Acid Rain Part of the permit and does not appear to be included elsewhere in the body of the Proposed permit: Sections 70.6(a)(1)(ii) and 70.6(a)(4)(I). These conditions must be added to the Proposed Title V permit for this source.*

Response- FPC has no objection to the inclusion of the proposed language.

7. General Comment- Section II, Condition 1- *Please make sure that Appendix TV-2 reflects the updated version of Condition 51, as it is contained in Appendix TV-3.*

Response- No comment.


8. General Comment- Section II, Condition 10- *Please correct the telephone and fax number for the Air Enforcement Section. The correct telephone and fax numbers are (404) 562-9155 and (404) 562-9163, respectively.*

Response- No comment.

Mr. Sheplak
August 27, 1999
Page 4

If you should have any questions concerning the above, please do not hesitate to contact me at (727) 826-4258.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott H. Osbourn". The signature is stylized with a large initial "S" and a long horizontal flourish extending to the right.

Scott H. Osbourn
Senior Environmental Engineer

cc: Clair Fancy, DEP Tallahassee
Doug Neeley, EPA Region IV
Robert Manning, HGS&S



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUL 12 1999

Claim from: HCR 7/12

OPTIONAL FORM 88 (7-90)

FAX TRANSMITTAL

To Howard Rhodes DEP	From Gracy Davis
Dept/Agency DEP	Phone # 404 562-9119
Fax # 850 922-6979	Fax # 404 562-9095
NSN 7540-01-317-7388 6098-101 GENERAL SERVICES ADMINISTRATION	

of pages 4

4APT-ARB

Howard L. Rhodes, Director
Air Resources Management Division
Florida Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

JUL 13 1999

BUREAU OF AIR REGULATION

SUBJ: EPA's Review of Proposed Title V Permit
Florida Power Corporation
Suwannee River Facility
Permit No. 1210003-001-AV

Dear Mr. Rhodes:

The purpose of this letter is to provide comments to the Florida Department of Environmental Protection (DEP) on the proposed title V operating permit for Florida Power Corporation, Suwannee River Facility, which was posted on DEP's web site on May 26, 1999. Based on the Environmental Protection Agency's (EPA's) review of the proposed permit and the supporting information for this facility, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. § 70.8(c) (see also Florida Regulation 62-213.450), to the issuance of the title V permit for this facility. The basis of EPA's objection is that the permit does not fully meet the periodic monitoring requirements of 40 C.F.R. § 70.6(a)(3)(i), contains conditions which are unclear as to what the source must demonstrate compliance with, and is missing some requirements related to the Acid Rain conditions contained in the permit.

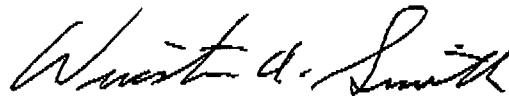
Section 70.8(c) requires EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information) if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 C.F.R. Part 70. Section 70.8(c)(4) and Section 505(c) of the Act further provide that if the State fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA and EPA will act accordingly. Because the objection issues must be fully addressed within the 90 days, we suggest that the revised permit be submitted in advance in order that any outstanding issues may be addressed prior to the expiration of the 90-day period.

2

Pursuant to 40 C.F.R. § 70.8(c), this letter and its enclosure contain a detailed explanation of the objection issues and the changes necessary to make the permit consistent with the requirements of 40 C.F.R. Part 70. The enclosure also contains general comments applicable to the permit.

If you have any questions or wish to discuss this further, please contact Mr. Gregg Worley, Chief, Operating Source Section at (404) 562-9141. Should your staff need additional information they may contact Ms. Gracy R. Danois, Florida Title V Contact, at (404) 562-9119, or Ms. Angelia Souder-Blackwell, Associate Regional Counsel, at (404) 562-9527.

Sincerely,



Winston A. Smith

Director

Air, Pesticides & Toxics
Management Division

Enclosure

cc: Mr. W. Jeffrey Pardue, Director
Environmental Services Dept.
Florida Power Corporation

Mr. Scott Osbourn Sr.
Environmental Engineer
Florida Power Corporation

Enclosure

**U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Florida Power Corporation
Suwannee River Facility
Permit no. 1210003-001-AV**

I. EPA Objection Issues

1. Periodic Monitoring: The permit is not clear about the frequency of testing that the facility must follow to assure compliance with the particulate matter limit. Condition A.5 of the permit requires the facility to conduct annual particulate matter testing. However, conditions A.27 and A.29 establish that the facility will conduct testing once a year if fuel oil is burned for more than 400 hours, and that no testing is required otherwise. The permit must be clear about which one of these conditions the facility must follow to demonstrate compliance with the particulate matter limit.
2. Appropriate Averaging Times: In order for the emissions standard for particulate matter to be practicably enforceable, the appropriate averaging time must be specified in the permit. An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission standards are tied to or based on the run time of the test method(s) used for determining compliance.
3. Periodic Monitoring: Condition A.34 has been identified as "not-Federally enforceable." However, the condition contains documentation, record keeping, and notification requirements for used oil which originate from 40 C.F.R. Parts 279 and 761. Since those conditions are federal requirements, they are automatically federally enforceable. Additionally, conditions A.11, A.30, and A.35 contain operational limitations for using used oil and reporting requirements that are identified as federally enforceable. Since the permit contains a federally enforceable limit and reporting requirement for the use of used oil, the method of establishing compliance with the limit and reporting requirement must also be federally enforceable. Therefore, the recordkeeping required by condition A.34 is federally enforceable.
4. Periodic Monitoring: Condition B.6 limits the operation of the units to 1500 hours per year per unit. The permit must specify that the facility is required to maintain records of the hours of operation of the units.
5. Emission Limits: Conditions B.7, B.8, B.10, and B.12 contain equivalent emissions for the NO_x, SO₂, and PM limits. It is not clear whether the facility is

required to demonstrate compliance with these equivalent emissions and what the basis for these limits are. For example, we were only able to locate PSD permit modification FL-014(A), which modified the limit for SO₂ and it does not include the equivalent emissions for SO₂ that are listed in the permit. Please clarify these conditions of the permit.

6. Acid Rain: The following language regarding Acid Rain Program requirements in title V is not addressed in the Acid Rain Part of the permit and does not appear to be included elsewhere in the body of the proposed permit: sections 70.6(a)(1)(ii) and 70.6(a)(4)(i). These conditions must be added to the proposed title V permit for this source.

II. General Comments

7. Section II, condition 1: Please make sure that Appendix TV-2 reflects the updated version of condition 51, as it is contained in Appendix TV-3.
8. Section II, condition 10: Please correct the telephone and fax number for the Air Enforcement Section. The correct telephone and fax numbers are 404/562-9155 and 404/562-9163, respectively.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUL 12 1999

-614-
Clair
Scott

4APT-ARB

Howard L. Rhodes, Director
Air Resources Management Division
Florida Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED
JUL 16 1999
DIVISION OF AIR
RESOURCES MANAGEMENT

SUBJ: EPA's Review of Proposed Title V Permit
Florida Power Corporation
Suwannee River Facility
Permit No. 1210003-001-AV

Dear Mr. Rhodes:

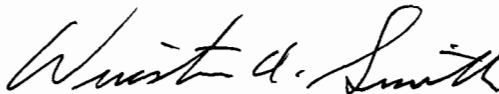
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Section 70.8(c) requires EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information) if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 C.F.R. Part 70. Section 70.8(c)(4) and Section 505(c) of the Act further provide that if the State fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA and EPA will act accordingly. Because the objection issues must be fully addressed within the 90 days, we suggest that the revised permit be submitted in advance in order that any outstanding issues may be addressed prior to the expiration of the 90-day period.

Pursuant to 40 C.F.R. § 70.8(c), this letter and its enclosure contain a detailed explanation of the objection issues and the changes necessary to make the permit consistent with the requirements of 40 C.F.R. Part 70. The enclosure also contains general comments applicable to the permit.

If you have any questions or wish to discuss this further, please contact Mr. Gregg Worley, Chief, Operating Source Section at (404) 562-9141. Should your staff need additional information they may contact Ms. Gracy R. Danois, Florida Title V Contact, at (404) 562-9119, or Ms. Angelia Souder-Blackwell, Associate Regional Counsel, at (404) 562-9527.

Sincerely,



Winston A. Smith

Director

Air, Pesticides & Toxics

Management Division

Enclosure

cc: Mr. W. Jeffrey Pardue, Director
Environmental Services Dept.
Florida Power Corporation

Mr. Scott Osbourn Sr.
Environmental Engineer
Florida Power Corporation

Enclosure

**U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Florida Power Corporation
Suwannee River Facility
Permit no. 1210003-001-AV**

I. EPA Objection Issues

1. Periodic Monitoring: The permit is not clear about the frequency of testing that the facility must follow to assure compliance with the particulate matter limit. Condition A.5 of the permit requires the facility to conduct annual particulate matter testing. However, conditions A.27 and A.29 establish that the facility will conduct testing once a year if fuel oil is burned for more than 400 hours, and that no testing is required otherwise. The permit must be clear about which one of these conditions the facility must follow to demonstrate compliance with the particulate matter limit.
2. Appropriate Averaging Times: In order for the emissions standard for particulate matter to be practicably enforceable, the appropriate averaging time must be specified in the permit. An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission standards are tied to or based on the run time of the test method(s) used for determining compliance.
3. Periodic Monitoring: Condition A.34 has been identified as “not-Federally enforceable.” However, the condition contains documentation, record keeping, and notification requirements for used oil which originate from 40 C.F.R. Parts 279 and 761. Since those conditions are federal requirements, they are automatically federally enforceable. Additionally, conditions A.11, A.30, and A.35 contain operational limitations for using used oil and reporting requirements that are identified as federally enforceable. Since the permit contains a federally enforceable limit and reporting requirement for the use of used oil, the method of establishing compliance with the limit and reporting requirement must also be federally enforceable. Therefore, the recordkeeping required by condition A.34 is federally enforceable.
4. Periodic Monitoring: Condition B.6 limits the operation of the units to 1500 hours per year per unit. The permit must specify that the facility is required to maintain records of the hours of operation of the units.
5. Emission Limits: Conditions B.7, B.8, B.10, and B.12 contain equivalent emissions for the NO_x, SO₂, and PM limits. It is not clear whether the facility is

required to demonstrate compliance with these equivalent emissions and what the basis for these limits are. For example, we were only able to locate PSD permit modification FL-014(A), which modified the limit for SO₂ and it does not include the equivalent emissions for SO₂ that are listed in the permit. Please clarify these conditions of the permit.

6. Acid Rain: The following language regarding Acid Rain Program requirements in title V is not addressed in the Acid Rain Part of the permit and does not appear to be included elsewhere in the body of the proposed permit: sections 70.6(a)(1)(ii) and 70.6(a)(4)(i). These conditions must be added to the proposed title V permit for this source.

II. General Comments

7. Section II, condition 1: Please make sure that Appendix TV-2 reflects the updated version of condition 51, as it is contained in Appendix TV-3.
8. Section II, condition 10: Please correct the telephone and fax number for the Air Enforcement Section. The correct telephone and fax numbers are 404/562-9155 and 404/562-9163, respectively.

Barbara / File



Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

July 14, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. W. Jeffrey Pardue, Director
Environmental Services Department
Florida Power Corporation
Post Office Box 14042
Saint Petersburg, Florida 33711

Re: EPA Objection to PROPOSED Title V Permit No. 1210003-001-AV
Facility Name: Suwannee River Facility

Dear Mr. Pardue:

On July 12, 1999, the Department received a timely written objection from the United States Environmental Protection Agency to the referenced proposed permit. A copy of EPA's objection is attached.

In accordance with Section 403.0872(8), Florida Statutes (F.S.), the Department must not issue a final permit until the objection is resolved or withdrawn. Pursuant to Section 403.0872(8), F.S., the applicant may file a written reply to the objection within 45 days after the date on which the Department serves the applicant with a copy of the objection. The written reply must include any supporting materials that the applicant desires to include in the record relevant to the issues raised by the objection. The written reply must be considered by the Department in issuing a final permit to resolve the objection of EPA. Please submit any written comments you wish to have considered concerning the objection to Mr. Scott M. Sheplak, P.E., at the above letterhead address.

Pursuant to 40 CFR 70.8(c)(4) the Department will have to resolve the objection by issuing a permit that satisfies EPA within 90 days of the objection, or EPA will assume authority for the permit.

If you should have any other questions, please contact Mr. Scott M. Sheplak, P.E., at 850/921-9532.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/sms/k

Enclosure

cc: Pat Comer, Esquire, OGC w/enclosure
Douglas Neeley, USEPA w/o enclosure
Gregg Worley, USEPA w/o enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUL 12 1999

Claim
From: HCF
7/12

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages 4

To: <i>Howard Rhodes</i>	From: <i>Gracy Davis</i>
Dept/Agency: <i>DEP</i>	Project #: <i>404 562-9119</i>
Fax #: <i>850 922-6999</i>	Fax #: <i>404 562-9095</i>
NSN 7540-01-317-7388	GENERAL SERVICES ADMINISTRATION
6039-101	

RECEIVED

JUL 13 1999

BUREAU OF AIR REGULATION

4APT-ARB

Howard L. Rhodes, Director
Air Resources Management Division
Florida Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: EPA's Review of Proposed Title V Permit
Florida Power Corporation
Suwannee River Facility
Permit No. 1210003-001-AV

Dear Mr. Rhodes:

The purpose of this letter is to provide comments to the Florida Department of Environmental Protection (DEP) on the proposed title V operating permit for Florida Power Corporation, Suwannee River Facility, which was posted on DEP's web site on May 26, 1999. Based on the Environmental Protection Agency's (EPA's) review of the proposed permit and the supporting information for this facility, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. § 70.8(c) (see also Florida Regulation 62-213.450), to the issuance of the title V permit for this facility. The basis of EPA's objection is that the permit does not fully meet the periodic monitoring requirements of 40 C.F.R. § 70.6(a)(3)(i), contains conditions which are unclear as to what the source must demonstrate compliance with, and is missing some requirements related to the Acid Rain conditions contained in the permit.

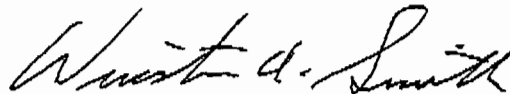
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2

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Sincerely,



Winston A. Smith

Director

Air, Pesticides & Toxics
Management Division

Enclosure

cc: Mr. W. Jeffrey Pardue, Director
Environmental Services Dept.
Florida Power Corporation

Mr. Scott Osbourn Sr.
Environmental Engineer
Florida Power Corporation

Enclosure

**U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Florida Power Corporation
Suwannee River Facility
Permit no. 1210003-001-AV**

I. EPA Objection Issues

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II. General Comments

7. Section II, condition 1: Please make sure that Appendix TV-2 reflects the updated version of condition 51, as it is contained in Appendix TV-3.
8. Section II, condition 10: Please correct the telephone and fax number for the Air Enforcement Section. The correct telephone and fax numbers are 404/562-9155 and 404/562-9163, respectively.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

**Mr. W. Jeffrey Pardue, Director
Environmental Services Dept.
Florida Power Corp.
P. O. Box 14042
Saint Petersburg, FL 33711**

4a. Article Number

P 174 053 162

4b. Service Type

- Registered Certified
- Express Mail Insured
- Return Receipt for Merchandise COD

7. Date of Delivery

JUL 16 1999

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Addressee or Agent)

X [Signature]

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

P 174 053 162

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

**Mr. W. Jeffrey Pardue, Director
Environmental Services Dept.
Florida Power Corp.
P. O. Box 14042
Saint Petersburg, FL 33711**

Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>July 14, 1999 50k</i>

PS Form 3800, April 1995



RECEIVED

JAN 27 1998

**BUREAU OF
AIR REGULATION**

January 26, 1998

Mr. Bruce Mitchell
Bureau of Air Regulation
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Mitchell:

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

This letter serves to provide additional information relating to a comment in a letter from Florida Power Corporation (FPC) to the Department, dated November 5, 1997. Specifically, in the Draft Title V permit (Section III, Subsection A, Conditions A.1 and A.11), FPC had requested that the fuel sulfur limit for Unit 3 be returned to 2.5 percent, the limit currently imposed on Units 1 and 2. Recall that FPC voluntarily accepted the 1.0 percent limit by letter, dated July 5, 1978 (attached) in order to meet the opacity standard. FPC reserved the right to return to using higher sulfur fuel oil if modifications were made that would cause the unit to meet the opacity standard. This letter is in response to your request for information on the changes made to Unit 3 that now enable it to meet applicable opacity standards without the use of low sulfur fuel oil.

The current permit language allows for the use of 2.5 percent sulfur fuel oil up to approximately 50 percent of full load and natural gas to supplement the demand for firing levels above 50 percent. Alternatively, the unit may burn 1.0 percent sulfur fuel oil up to full load. As evidenced by the attached interoffice memorandum, dated March 13, 1978, FPC was never convinced that the use of low sulfur fuel oil was the remedy for high opacity levels, especially at low loads; however, even though results were inconclusive, the Department's Jacksonville office was insistent on such a course of action. FPC has been burning the higher sulfur fuel oil in Unit 3 at lower loads with no opacity problems. This is significant because opacity problems are just as likely to be experienced at low loads as at high loads. This has been further confirmed consistently by the use of the continuous opacity monitor (COM).

The following is a list of actions taken to insure both lower opacity and best operating practices:

B. Mitchell
January 26, 1998
Page 2

1. Plant management maintains all fuel oil firing devices in good working order.
2. The combustion air diffusers and dampers were inspected and repaired.
3. Fuel and combustion training were conducted for operators (40 hour course).
4. Chief operators were sent to smoke school to insure complete emissions understanding.
5. Testing conducted to insure optimum excess air and oil viscosity resulted in the oil temperature range being increased from 215-220°F to 235-240°F.

FPC is now confident that all applicable standards can be met on the higher sulfur fuel oil and requests that the associated permit change be made. If you should have any questions or require additional information, please do not hesitate to contact me at (813) 866-5158.

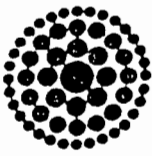
Sincerely,



Scott H. Osbourn
Senior Environmental Engineer

Attachments

cc: Clair Fancy, P.E., DEP
Ken Kosky, P.E., Golder Associates
Robert Manning, HGS&S



**Florida
Power**
CORPORATION

INTEROFFICE CORRESPONDENCE

Production
(OFFICE)

C-4
(MAIL CODE)

SUBJECT: Low Sulfur Oil Test
Suwannee No. 3

TO: W. P. Stewart

DATE: March 13, 1978

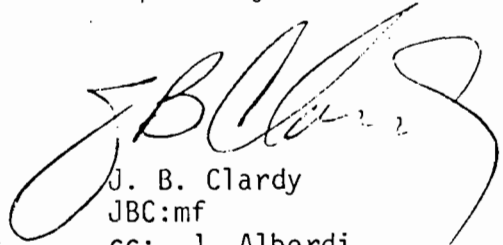
The subject test was conducted on Friday, March 10. The DER was represented by Dr. S. K. Nayak and three people from the Jacksonville office. W. A. Swyers, D. A. Shantz and myself were also present.

A solid cloud cover prevented any determination of opacity. There was no apparent change in the appearance of the plume during the time the 1% sulfur oil was being burned. Evidently only the particulate component of the plume was visible due to the cloud cover.

Dr. Nayak was insistent that low sulfur oil would solve the opacity problem and that if we could see the color of the plume it would be improved. He was asked to provide us with a letter to that effect, but he said that according to his internal departmental regulations he could not provide such assurance in writing, but he again asserted that low sulfur oil was "one possible solution for the problem." He also suggested that we might want to change the burners or the furnace configuration to solve the problem. He dismissed the possibility that the excess opacity of the plume was due to water vapor from steam atomization of the fuel oil. He said that a water vapor plume would dissipate in a much shorter distance than what he has seen at Suwannee.

Dr. Nayak told us that he had heard from EPA just prior to leaving his office the previous day that a letter was being prepared on Suwannee No. 3. It was not clear to me when this letter would be mailed, but it was my impression that it would be within the next few days.

After having observed the Anclote plume at lower loads with higher than normal excess air, I do not believe that low sulfur oil will reduce the plume from Suwannee No. 3 to less than 20% opacity, especially at lower loads.



J. B. Clardy
JBC:mf

cc: J. Alberdi

D. A. Shantz

E. M. Haywood

File: ENVIRON 5-1

THIS COPY FOR

**Florida
Power**

July 5, 1978

Mr. Frank Watkins, Jr., P.E.
Florida Department of Environmental Regulation
3426 Bills Road
Jacksonville, Florida 32207

Subject: Suwannee County - AP No. A061-10282
Florida Power Corporation
Power Unit No. 3

Dear Mr. Watkins:

The following corrections are requested in the subject permit:

1. On the permit, change the wording Maximum Heat Input Rate of "750 MMBTU/Hr." to 880 MMBTU/Hr.
2. Operating Permit Condition #9.B., delete the words "Four guns on" and "five guns on".

Concerning the maximum heat input rate please be advised that the maximum unit load is 83 MW with a fuel input of 141 barrels of oil per hour. During 1977 the average heat content per barrel was 6,236,675 BTU. Multiplying the barrels per hour by the heat content gives 879.37 MMBTU/Hr.

Concerning permit condition #9.B. the request to delete the number of guns is made because at reduced loads the normal practice is to reduce the number of guns used to inject fuel. The percentage of fuel oil and gas would remain constant but the number of guns used will vary. The changes in heat input is noted to correspond to the corrected maximum heat input rate.

Also, please be advised that Florida Power Corporation accepts the low sulfur fuel oil and oil/gas combination fuel requirements of this permit as an expedient method of meeting the opacity standard of CH 17-2.04(6)(e)2.(b).

Page 2
July 5, 1978
Mr. Frank Watkins, Jr., P.E.

Florida Power Corporation reserves the right to use a higher sulfur fuel oil if modifications are made which will cause Unit #3 to meet the opacity standard and other emission standards are also met.

The Department of Environmental Regulation will be informed of any effort to meet the opacity standard by modifications to Unit #3.

Should there be any questions concerning these requests please contact me by telephone at 813/866-4544.

Very truly yours,



R. E. Parnelle, P.E.
Manager
Environmental Operations

REP/bz

Attachments

bc: Mr. W. P. Stewart
Mr. W. S. O'Brien
Mr. J. Alberdi
Mr. D. A. Shantz
Ms. P. Y. Baynard
Mr. Ed. Haywood
Mr. J. B. Clardy



November 5, 1997

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
DRAFT Title V Permit No. 1210003-001-AV

Dear Mr. Sheplak:

On behalf of Florida Power Corporation (FPC), attached are comments regarding the 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, DEP agreed to grant FPC's Request for Extension of Time until December 8, 1997. If we are unable to reach a resolution of these comments within this time period, we would appreciate the opportunity to file an additional Request for Extension of Time. Accordingly, please contact me at (813) 866-5158 as soon as you have had a chance to review these comments to set up either a telephone or in-person conference. Thank you again for your consideration of our comments.

Sincerely,

Scott H. Osbourn,
Senior Environmental Engineer

cc: Clair Fancy, P.E., DEP
Charles Logan, DEP
Ken Kosky, P.E., Golder Associates
Robert Manning, HGS&S

11/12/97 cc: Scott Sheplak
Bruce Mitchell

RECEIVED

NOV 12 1997

BUREAU OF
AIR REGULATION

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

General Comments

1. FPC understands that Appendix TV-1, Title V Conditions, is expected to be revised within the next few weeks. FPC requests that its Title V permit reflect the most up-to-date version of this Appendix.

2. FPC understands that DEP will publish the Intent to Issue Title V Air Operation Permit. Because the applicant is ultimately responsible for the publication of the Intent to Issue, FPC requests that DEP provide a copy of the Notice intended to be published, as well as proof of publication.

Section I., Facility Information, Subsection A.

1. FPC requests the following revisions to the description to reference FPC's authorization at Suwannee River to burn used-oil: "Boilers Nos. 1, 2, and 3 fire natural gas, No. 6 fuel oil, and/or on-specification used oil, with No. 2 fuel oil used as an ignitor pilot-fuel-for-startup, shutdown, and malfunctions."

Section II., Facility-wide Conditions.

1. Condition 2. The word "not" was apparently inadvertently added, and should be deleted from, the second line of this Condition.

2. Condition 3. For clarity and to make this Condition specific to FPC's Suwannee Plant, FPC requests that Condition 2. 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

Also, because the reference to Chapter 62-297 in the last sentence of Condition 2. appears to be misplaced, FPC requests Condition 2. be edited as follows: "**EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.**"

3. Condition 6. In the context of this permit, how does DEP intend to respond to EPA's comments regarding the need to change the phrase "exempt" to "insignificant"?

4. Condition 7. For clarity, FPC requests that the first sentence of this Condition be edited as follows: "**The permittee shall not allow no person to store, pump,**" Also, because this condition is not included in Florida's SIP (based on our research), and to be consistent with other permits issued by DEP, this condition should be marked as "Not Federally Enforceable."

Section III. Subsection A.

1. The correct MW ratings for units 2 and 3 are 34 MW and 84 MW, respectively.
2. Conditions A.1 and A.11. For unit 3, it is not clear why there are two separate sets of maximum heat input numbers, or how they were derived. FPC requests that the fuel sulfur limit for Unit 3 be returned to 2.5 percent, the limit currently imposed on Units 1 and 2. Recall that FPC voluntarily accepted the 1.0 percent limit by letter, dated July 5, 1978 (attached) in order to meet the opacity standard. FPC reserved the right to return to using higher sulfur fuel oil if modifications were made that would cause the unit to meet the opacity standard. FPC is now confident that all applicable standards can be met on the higher sulfur fuel oil.
3. Condition A.5. FPC requests that this Condition be deleted because there is no regulatory basis for its inclusion. The heat input limits contained in Condition A.1. are sufficient to limit the quantity of fuel being fired in these units.
4. Condition A.10. 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.21.~~"
5. Condition A.28. 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.31. and A.32. do not appear warranted, although they are in the AO. They contain several ambiguous phrases that, if the condition remains, should probably be clarified (e.g., "when required," "for a period of time," and "agreed upon between DEP and FPC").]
7. Condition A.37. only appears in the AO. It has no basis and should be deleted.
8. Conditions A.38. and A.39. 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.

1. 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; 1,255,500 acfm; 726°F (AO61-189579, Specific Condition 4).
2. 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.

3. 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.

4. Condition B.18. This Condition is identical to Condition B.16. and should therefore be deleted.

5. 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.

6. Condition B.27. In accordance with DARM-EM-05, 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.

7. 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.~~

8. Condition B.31. A statement should be included indicating that particulate testing is not required if compliance with the opacity limit is demonstrated.

9. 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.

10. 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.

11. 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.

12. Condition B.41. Subparagraph (a)2. should be deleted from this Condition because these units are subject to the NSPS excess emissions limitations, and therefore this provision 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. e. Each NESAHHP pollutant, if there is an applicable standard.

13. 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. . . ."

14. Condition B.53. This condition only appears in the AO. It has no basis and should be deleted.

15. Condition B.55. Indicate that the water-to-fuel ratios listed are for fuel oil.

16. 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

1. Condition A.1.a. should reference the actual application that FPC submitted rather than DEP's form number.

2. 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.

Appendix E-1, List of Exempt Emissions Units and/or Activities

1. The following activities should be included in this Appendix: (1) degreasers and non-halogenated solvent use, (2) Brazing, soldering, and welding activities, and (3) Fire protection systems.

Appendix H-1, Permit History/ID Number Changes

Florida Power Corporation
Suwannee River

[DRAFT/PROPOSED/FINAL]Permit No.: 1210003-001-AV
Facility ID No.: 1210003

Permit History (for tracking purposes):

E.U.

<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u>	<u>Revised Date(s)</u>
-001	#1 Power Unit	AO61-189582	2/14/91	2/18/96	8/14/96	10/12/93, 7/12/94
-002	#2 Power Unit	AO61-189582	2/14/91	2/18/96	8/14/96	10/12/93, 7/12/94
-003	#3 Unit	AO61-189581	2/14/91	2/18/96	8/14/96	10/12/93
-004	#1 Peaking Unit	AO61-189579	2/14/91	3/3/96	8/14/96	
-005	#2 Peaking Unit	AO61-189579	2/14/91	3/3/96	8/14/96	
-006	#3 Peaking Unit	AO61-189579	2/14/91	3/3/96	8/14/96	

(if applicable) ID Number Changes (for tracking purposes):

From: Facility ID No.: 31JAX61000301

To: Facility ID No.: 1210003

Memorandum

TO: Chris Kirts, NED

FROM: Bruce Mitchell *BM*

DATE: January 29, 1997

SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit
Florida Power Corporation, Suwannee River: 1210003-001-AV

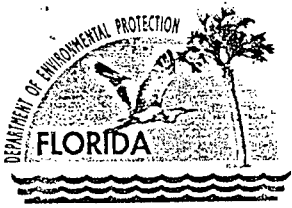
The Title V operating permit application package for the referenced facility is being processed in Tallahassee. The application was previously forwarded to your office for your files and future reference. Please have someone review the package for completeness and respond in writing by March 1, 1997, if you have any comments. Otherwise, no response is required. If there are any questions, please call the project engineer, Steve Welsh, at 904/488-1344 or SC:278-1344. It is very important to verify the compliance statement regarding the facility. Since we do not have a readily effective means of determining compliance at the time the application was submitted, please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. Also, do not write on the documents.

If there are any questions regarding this request, please call me or Scott Sheplak at the above number(s).

RBM/bm

cc: Bob Leech

1/27/97 Reading File
Steve Welsh
File



Department of Environmental Protection

Rita

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Virginia B. Wetherell
Secretary

CERTIFIED - RETURN RECEIPT

July 12, 1994

Dr. P.Y. Baynard
Director - Environmental & License Affairs
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

Dear Dr. Baynard:

Suwannee County - AP
Florida Power Corporation
ID #31JAX61000301
AO61-189582
Permit Revision

The Department on October 12, 1993, revised Specific Condition No. 1 of the above referenced permit to reflect the use of No. 2 fuel oil as an igniter fuel. In doing so, however, an error was made in the maximum allowable emission rates for Particulate Matter, Particulate Matter while soot blowing, and Sulfur Dioxide. This letter serves to correct that error.

This letter and attached revised Page 5 of 7 shall replace the October 12, 1993 revision and shall become a part of the referenced permit.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by filing a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

If you have any questions concerning this matter, please contact Rita C. Felton at (904) 448-4310, extension 237.

Sincerely,

Ernest E. Frey, P.E.
1992 Director of District Management

RCF
EEF:RCF:rcf

Attachment

PERMITEE:
 Florida Power Corporation
 Post Office Box 14042 (H2G)
 St. Petersburg, Florida 33733

I.D. Number: 31JAX61000301
 Permit/Cert: AO61-189582
 Date of Issue: February 14, 1991
 Expiration Date: February 18, 1996
 REVISED: July 12, 1994

1. The maximum input/rate (operating rate) is SEE BELOW and shall not be exceeded without prior Department approval:

<u>RATE</u>	<u>FUEL</u>
450 MMBTU/hr ¹	No. 6 fuel oil ²
460 MMBTU/hr	Natural Gas
--- ³	No. 2 fuel oil ⁴

¹ From 72 barrels/hr

² Fuel oil sulfur content shall not exceed 2.5% by wt.

³ Include the actual quantity fired in the Annual Operating Report (AOR)

⁴ Used as pilot fuel during startup, shutdown, malfunctions

2. Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition No. 1, or Specific Condition No. 3 will become effective.
3. The operating rate shall not exceed 110% of the most recently accepted test, except for additional testing purposes, and shall not exceed the rate in Specific Condition No. 1. After testing at a higher rate, the operating rate shall continue to not exceed the aforementioned rate until the test report at the higher rate is reviewed and accepted by the Department.
4. The permitted maximum allowable emission rate for each pollutant is as follows:

<u>POLLUTANT</u>	<u>FAC RULE</u>	<u>lbs/hr</u>	<u>TPY</u>
PM ₁ ¹	17-2.600(5)(a)2	45.0 ²	197.10 ³
PM ₂ ⁴	17-2.250(3)	135.0 ⁵	-----
SO ₂ ⁶	17-2.600(5)(a)3.a.(xi)	1237.5 ⁷	5420.25 ³
VE ₁ ⁸	17-2.600(5)(a)1	20% opacity, except 40% for 2 min/hr	
VE ₂ ⁹	17-2.250(3)	60% opacity up to 3 hrs in 24 hrs	
VE ₃ ¹⁰	17-2.250(3)	60% opacity up to 3 hrs in 24 hrs	

¹ PM - Particulate Matter

² Basis: 450 MMBTU/hr; 0.1 lb/MMBTU

³ Basis: Hours of operation shall be limited to 8760 H/Y (24 H/D; 7 D/W; 52 W/Y)

⁴ PM₂ - particulate matter while soot blowing

⁵ Basis: 450 MMBTU/hr; 0.3 lb/MMBTU

⁶ SO₂ - sulfur dioxide

⁷ Basis: 450 MMBTU/hr; 2.75 lbs/MMBTU

⁸ VE₁ - visible emissions as Steady State

⁹ VE₂ - visible emissions while soot blowing

¹⁰ VE₃ - visible emissions while load changing




Lawton Chiles
Governor

Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

TO: Chris Kirts, PE Administrator
Air Program

FROM: Ernest E. Frey, P.E. 
District Director

DATE: June 24, 1994

SUBJECT: Delegation of Authority

Under the provision of Rule 17-101.040 (4)(g), you are hereby delegated the authority to execute all documents in my absence. This delegation includes permits, COs, NOVs, Final Orders, and orders for corrective actions which may include stipulated court settlements.

A copy of this memo will be filed with each document that you sign.

hd

Administration 448-4300
Air 448-4310
Waste Management 448-4320

Recycled Paper
Printed with Soy Based Inks

Water Facilities 448-4330
Water Management 448-4340
FAX 448-4366



Florida Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

CERTIFIED - RETURN RECEIPT

October 12, 1993

Dr. P.Y. Baynard
Director - Environmental & License Affairs
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

Dear Dr. Baynard:

Suwannee County - AP
Florida Power Corporation
No. 1 Unit
ID#31JAX61000301
AO61-189582
Permit Revision

The Department has revised Specific Condition No. 1 of the above referenced permit to reflect the use of No. 2 fuel oil as an igniter.

This letter and attached revised page 5 of 7 shall become a part of the referenced permit.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by filing a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

If you have any questions concerning this matter, please contact Rita Felton at (904) 448-4310, Extension 370.

Sincerely,

Ernest E. Frey, P.E.
Director of District Management

RF
EEF:RF:bt

Attachment

PERMITTEE:
 Florida Power Corporation
 Post Office Box 14042 (H2G)
 St. Petersburg, Florida 33733

I.D. Number: / 31JAX61000301
 Permit/Cert: AO61-189582
 Date of Issue: February 14, 1991
 Expiration Date: February 18, 1996
 REVISED:

SPECIFIC CONDITIONS:

1. The maximum input/rate (operating rate) is SEE BELOW and shall not be exceeded without prior approval.

<u>Rate</u>	<u>Fuel</u>
450 MMBTU/hr ¹	No. 6 fuel oil ²
460 MMBTU/hr	Natural gas
---- ³	No. 2 fuel oil ⁴

¹From 72 barrels/hr

²Fuel oil sulfur content shall not exceed 2.5% by wt.

³Include the actual quantity fired in the Annual Operating Report (AOR)

⁴Used as a pilot fuel during startups, shutdowns, malfunctions

2. Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition (SC) No. 1, or SC No. 3 will become effective.
3. The operating rate shall not exceed 110% of the operating rate during the most recent test except for testing purposes, but shall not exceed the rate in SC No. 1. After testing at an operating rate greater than 110% of the last test operating rate, the operating rate shall not exceed 110% of the last (submitted) test operating rate until the test report at the higher rate has been reviewed and accepted by the Department.
4. The maximum allowable emission rate for each pollutant is as follows:

<u>Pollutant</u>	<u>FAC Rule</u>	<u>lbs/hr</u>	<u>TPY</u>
PM ₁ ¹	17-2.600(5)(a)2.	88.1 ²	385.88 ³
PM ₂ ⁴	17-2.250(3)	264.3 ⁵	----
SO ₂ ⁶	17-2.600(5)(a)3.a.(xi)	2422.75 ⁷	10611.64 ³
VE ₁ ⁸	17-2.600(5)(a)1.	20% opacity, except 40% for 2 mins/hr	
VE ₂ ⁹	17-2.250(3)	60% opacity up to 3 hrs in 24 hrs	
VE ₃ ¹⁰	17-2.250(3)	60% opacity up to 3 hrs in 24 hrs	

¹PM - particulate matter

²Basis: 881 MMBTU/hr; 0.1 lb/MMBTU

³Basis: Hours of operation shall be limited to 8760 H/Y (24 H/D; 7 D/W; 52 W/Y) and shall be recorded.

⁴PM₂ - particulate matter while sootblowing

⁵Basis: 881 MMBTU/hr; 0.3 lb/MMBTU

⁶SO₂ - sulfur dioxide

⁷Basis: 881 MMBTU/hr; 2.75 lbs/MMBTU

⁸VE₁ - visible emissions at Steady State

⁹VE₂ - visible emissions while sootblowing

¹⁰VE₃ - visible emissions while load changing



Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

I.D. Number: 31JAX61000301
Permit/Cert Number: A061-189582
Date of Issue: 02-14-91
Expiration Date: February 18, 1996
County: Suwannee
Latitude/Longitude: 30°22'35"N; 83°10'50"W
Project: No. 1 Unit
UTM: E-(17)290.5; N-3362.2

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of No. 1 Unit, Fossil Fuel Steam Generator.

Located south of U.S. 90, on east bank of Suwannee River, Northwest of Live Oak, Suwannee County, Florida.

In accordance with:

Application dated 11-07-80
Additional information received 02-19-81
Renewal application dated 12-02-85
Additional information received 12-26-85, 01-15 and 01-20-86
Renewal application received 11-26-90

PERMITTEE:
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

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GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants, or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.
6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

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- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

- 8. If, for any reason, the permittee does not comply with, or will be unable to comply with, any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

- 9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.
- 10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.
- 11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the department.
- 12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

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GENERAL CONDITIONS

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Certification of Compliance with State Water Quality Standards
- () (Section 401, PL 92-500)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.
- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the department, the permittee shall, within a reasonable period of time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

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SPECIFIC CONDITIONS:

1. The maximum input/rate (operating rate) is SEE BELOW and shall not be exceeded without prior approval.

<u>Rate</u>	<u>Fuel</u>
450 MMBTU/hr ¹	No. 6 fuel oil ²
460 MMBTU/hr	Natural gas

¹From 72 barrels/hr

²Fuel oil sulfur content shall not exceed 2.5% by wt.

2. Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition (SC) No. 1, or SC No. 3 will become effective.
3. The operating rate shall not exceed 110% of the operating rate during the most recent test except for testing purposes, but shall not exceed the rate in SC No. 1. After testing at an operating rate greater than 110% of the last test operating rate, the operating rate shall not exceed 110% of the last (submitted) test operating rate until the test report at the higher rate has been reviewed and accepted by the Department.
4. The maximum allowable emission rate for each pollutant is as follows:

<u>Pollutant</u>	<u>FAC Rule</u>	<u>lbs/hr</u>	<u>TPY</u>
PM ₁ ¹	17-2.600(5)(a)2.	45.0 ²	197.10 ³
PM _{2.5} ⁴	17-2.250(3)	135.0 ⁵	----
SO ₂ ⁶	17-2.600(5)(a)3.a.(xi)	1237.5 ⁷	5420.25 ³
VE ₁ ⁸	17-2.600(5)(a)1.	20% opacity, except 40% for 2 mins/hr	
VE ₂ ⁹	17-2.250(3)	60% opacity up to 3 hrs in 24 hrs	
VE ₃ ¹⁰	17-2.250(3)	60% opacity up to 3 hrs in 24 hrs	

¹PM - particulate matter

²Basis: 450 MMBTU/hr; 0.1 lb/MMBTU

³Basis: Hours of operation shall be limited to 8760 H/Y (24 H/D; 7 D/W; 52 W/Y) and shall be recorded.

⁴PM_{2.5} - particulate matter while sootblowing

⁵Basis: 450 MMBTU/hr; 0.3 lb/MMBTU

⁶SO₂ - sulfur dioxide

⁷Basis: 450 MMBTU/hr; 2.75 lbs/MMBTU

⁸VE₁ - visible emissions at Steady State

⁹VE₂ - visible emissions while sootblowing

¹⁰VE₃ - visible emissions while load changing

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SPECIFIC CONDITIONS:

5. Test the emission for the following pollutant(s) at the interval(s) indicated, notify the Department 14 days prior to testing, and submit the test report documentation to the Department within 45 days after completion of the testing:

<u>Pollutant</u>	<u>Interval</u>	<u>Test Method</u> ¹
PM ₁	12 months from 09-01-90 ²	EPA 5 or 17
PM ₂	12 months from 09-01-90 ²	EPA 5 or 17
SO ₂	12 months from 03-01-90 ²	----- ³
VE ₁ ⁴	12 months from 09-01-90 ²	DER 9
VE ₂ ⁴	12 months from 09-01-90 ²	DER 9

¹From 17-2.700(1), FAC in Table 700-1

²Per FAC Rule 17-2.700(2)(a)3.b., testing is not required if liquid fuel is used no more than 400 hrs/yr.

³See FAC Rule 17-2.700(6)(c)1.b.

⁴VE test shall be conducted during one of the test runs.

Tests and test reports shall comply with the requirements of Florida Administrative Code Rule 17-2.700(6) and (7), respectively.

6. If steady state emissions testing is required as noted above and if it is necessary to conduct soot blowing operations during the period that the unit is on oil, then a soot blowing emissions test shall be conducted in addition to the steady state emissions test. In order to produce stack emissions representative of soot blowing conditions, oil must be burned in the unit for a period of time immediately prior to conducting the soot blowing emissions test such that, in the unit operator's judgment, conditions for maintaining optimum boiler operations requires that soot blowing be conducted. The specific conditions under which the soot blowing emission test will be conducted shall be discussed and agreed upon between the Department and the permittee.
7. If any unit exceeds the maximum allowable emissions as indicated by the results of the testing, then the unit shall be retested on oil within one month of the date of the failed test. If it is not possible to retest within one month, a written request for a delay and an explanation of the cause of the failure and of the delay will be required within one month of the date of the failed test.
8. In conjunction with operation of this unit on oil, the permittee shall obtain and maintain (for Department review when requested) documentation that includes, but is not limited to, the following information: hourly rate of oil consumption, heat content of the oil consumed, and sulfur content of the oil consumed.
9. In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.

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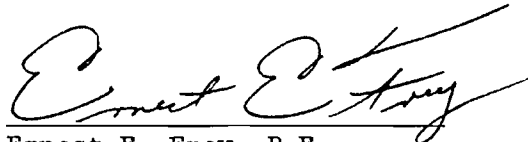
I.D. Number: 31JAX61000301
Permit/Cert: A061-189582
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Expiration Date: February 18, 1996

SPECIFIC CONDITIONS:

10. Submit an annual operation report for this source on the form supplied by the Department for each calendar year on or before March 1.
11. Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.
12. The ID No. for this source is to be used on all correspondence.
13. Forms for the renewal will be sent 5 months prior to 02-18-96 and the completed forms with test results are due 90 days prior to 02-18-96.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



Ernest E. Frey, P.E.
Deputy Assistant Secretary

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to S120.52, Florida
Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged.

Polly Olsen Clerk 2-14-91 Date

CERTIFICATION

PROJECT NAME: Florida Power Corporation
No. 1 Unit

Application No. A061-189582

I HEREBY CERTIFY that the engineering features described in application No. A061-189582 provide reasonable assurance of compliance with the applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Title 17. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, and geological features).

Andrew G. Kutyna, P.E.
Name, P.E.

Andrew G. Kutyna
Signature and Seal

2-12-91
Date



Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Carol M. Browner, Secretary

NOTICE OF PERMIT ISSUANCE

CERTIFIED - RETURN RECEIPT

Dr. P.Y. Baynard, Director - Environ. & Licen. Affrs.
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

Dear Dr. Baynard:

Suwannee County - AP
Florida Power Corporation
No. 2 Unit

Enclosed is Permit Number A061-189582 to operate the subject air pollution source, pursuant to Section 403.087, Florida Statutes (FS).

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of receipt of this Permit. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



Ernest E. Frey, P.E.
Deputy Assistant Secretary

EEF:dhk

Copies furnished to: Richard O. Frazee, P.E.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to § 120.62, Florida
Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged

Betty J. [Signature] 2-14-91
Clerk Date

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on 2/14/91 to the listed persons.



Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

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Latitude/Longitude: 30°22'35"N; 83°10'50"W
Project: No. 2 Unit
UTM: E-(17)290.5; N-3362.2

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of No. 2 Unit, Fossil Fuel Steam Generator.

Located south of U.S. 90, on east bank of Suwannee River, Northwest of Live Oak, Suwannee County, Florida.

In accordance with:

Application dated 11-07-80
Additional information received 02-19-81
Renewal application dated 12-02-85
Additional information received 12-26-85, 01-15 and 01-20-86
Renewal application received 11-26-90

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2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.
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7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

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- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with, or will be unable to comply with, any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.
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11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the department.
12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

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GENERAL CONDITIONS

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Certification of Compliance with State Water Quality Standards
- () (Section 401, PL 92-500)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.
- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the department, the permittee shall, within a reasonable period of time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

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SPECIFIC CONDITIONS:

1. The maximum input/rate (operating rate) is SEE BELOW and shall not be exceeded without prior approval.

<u>Rate</u>	<u>Fuel</u>
450 444 MMBTU/hr ¹ 450 MMBTU/hr A60	No. 6 fuel oil ² Natural gas

¹From 71 barrels/hr

²Fuel oil sulfur content shall not exceed 2.5% by wt.

2. Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition (SC) No. 1, or SC No. 3 will become effective.
3. The operating rate shall not exceed 110% of the operating rate during the most recent test except for testing purposes, but shall not exceed the rate in SC No. 1. After testing at an operating rate greater than 110% of the last test operating rate, the operating rate shall not exceed 110% of the last (submitted) test operating rate until the test report at the higher rate has been reviewed and accepted by the Department.
4. The maximum allowable emission rate for each pollutant is as follows:

<u>Pollutant</u>	<u>FAC Rule</u>	<i>src 1</i>	<u>lbs/hr</u>	<u>TPY</u>
PM ₁ ¹	17-2.600(5)(a)2.		45.0	197.1
PM ₂ ⁴	17-2.250(3)		44.42	194.473
SO ₂ ⁶	17-2.600(5)(a)3.a.(xi)	735.0	133.25	---
VE ₁ ⁸	17-2.600(5)(a)1.	1237.5	1221.07	5347.983
VE ₂ ⁹	17-2.250(3)		20% opacity, except	5420.25
VE ₃ ¹⁰	17-2.250(3)		40% for 2 mins/hr 60% opacity up to 3 hrs in 24 hrs 60% opacity up to 3 hrs in 24 hrs	

- ¹PM - particulate matter
- ²Basis: 444 MMBTU/hr; 0.1 lb/MMBTU
- ³Basis: Hours of operation shall be limited to 8760 H/Y (24 H/D; 7 D/W; 52 W/Y) and shall be recorded.
- ⁴PM₂ - particulate matter while sootblowing
- ⁵Basis: 444 MMBTU/hr; 0.3 lb/MMBTU
- ⁶SO₂ - sulfur dioxide
- ⁷Basis: 444 MMBTU/hr; 2.75 lbs/MMBTU
- ⁸VE₁ - visible emissions at Steady State
- ⁹VE₂ - visible emissions while sootblowing
- ¹⁰VE₃ - visible emissions while load changing

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SPECIFIC CONDITIONS:

5. Test the emission for the following pollutant(s) at the interval(s) indicated, notify the Department 14 days prior to testing, and submit the test report documentation to the Department within 45 days after completion of the testing:

<u>Pollutant</u>	<u>Interval</u>	<u>Test Method</u> ¹
PM ₁	12 months from 09-01-90 ²	EPA 5 or 17
PM ₂	12 months from 09-01-90 ²	EPA 5 or 17
SO ₂	12 months from 03-01-90 ²	----- ³
VE ₁ ⁴	12 months from 09-01-90 ²	DER 9
VE ₂ ⁴	12 months from 09-01-90 ²	DER 9

¹From 17-2.700(1), FAC in Table 700-1

²Per FAC Rule 17-2.700(2)(a)3.b., testing is not required if liquid fuel is used no more than 400 hrs/yr.

³See FAC Rule 17-2.700(6)(c)1.b.

⁴VE test shall be conducted during one of the test runs.

Tests and test reports shall comply with the requirements of Florida Administrative Code Rule 17-2.700(6) and (7), respectively.

6. If steady state emissions testing is required as noted above and if it is necessary to conduct soot blowing operations during the period that the unit is on oil, then a soot blowing emissions test shall be conducted in addition to the steady state emissions test. In order to produce stack emissions representative of soot blowing conditions, oil must be burned in the unit for a period of time immediately prior to conducting the soot blowing emissions test such that, in the unit operator's judgment, conditions for maintaining optimum boiler operations requires that soot blowing be conducted. The specific conditions under which the soot blowing emission test will be conducted shall be discussed and agreed upon between the Department and the permittee.
7. If any unit exceeds the maximum allowable emissions as indicated by the results of the testing, then the unit shall be retested on oil within one month of the date of the failed test. If it is not possible to retest within one month, a written request for a delay and an explanation of the cause of the failure and of the delay will be required within one month of the date of the failed test.
8. In conjunction with operation of this unit on oil, the permittee shall obtain and maintain (for Department review when requested) documentation that includes, but is not limited to, the following information: hourly rate of oil consumption, heat content of the oil consumed, and sulfur content of the oil consumed.
9. In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.

PERMITTEE:
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

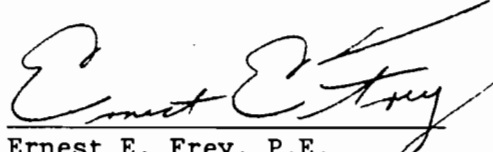
I.D. Number: 31JAX61000302
Permit/Cert: A061-189582
Date of Issue:
Expiration Date: February 18, 1996

SPECIFIC CONDITIONS:

10. Submit an annual operation report for this source on the form supplied by the Department for each calendar year on or before March 1.
11. Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.
12. The ID No. for this source is to be used on all correspondence.
13. Forms for the renewal will be sent 5 months prior to 02-18-96 and the completed forms with test results are due 90 days prior to 02-18-96.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



Ernest E. Frey, P.E.
Deputy Assistant Secretary

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to S120.52, Florida
Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged. 2-14-91
Betty Miller Clerk Date



Florida Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

CERTIFIED - RETURN RECEIPT

October 12, 1993

Dr. P.Y. Baynard
Director - Environmental & License Affairs
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

Dear Dr. Baynard:

Suwannee County - AP
Florida Power Corporation
No. 3 Unit
ID#31JAX61000303
A061-189581
Permit Revision

The Department has revised Specific Condition No. 1 of the above referenced permit to reflect the use of No. 2 fuel oil as an igniter.

This letter and attached revised page 5 of 7 shall become a part of the referenced permit.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by filing a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

If you have any questions concerning this matter, please contact Rita Felton at (904) 448-4310, Extension 370.

Sincerely,

Ernest E. Frey, P.E.

Director of District Management

^{RF}
EEF:RF:bt

Attachment

Administration 448-4300
Air 448-4310
Waste Management 448-4320

Recycled Paper
Printed with Soy Based Ink

Water Facilities 448-4330
Water Management 448-4340
FAX 448-4366

PERMITTEE:
 Florida Power Corporation
 Post Office Box 14042 (H2G)
 St. Petersburg, Florida 33733

I.D. Number: 31JAX61000303
 Permit/Cert: AO61-189581
 Date of Issue: February 14, 1991
 Expiration Date: February 18, 1996
 REVISED:

SPECIFIC CONDITIONS:

1. The maximum input/rate (operating rate) is SEE BELOW and shall not be exceeded without prior approval.

<u>Rate</u>	<u>Fuel</u>
881 MMBTU/hr ¹	No. 6 fuel oil ²
880 MMBTU/hr	Natural gas
493 MMBTU/hr ³	No. 6 fuel oil ⁴
388 MMBTU/hr ⁵	Natural gas
--- ⁶	No. 2 fuel oil ⁷

¹From 141 barrels/hr

²Fuel oil sulfur content shall not exceed 1.0% by wt.

³Basis: 56% of 881 MMBTU/hr

⁴Fuel oil sulfur content shall not exceed 2.5% by wt.

⁵Basis: 44% of 881 MMBTU/hr

⁶Include the actual quantity fired in the Annual Operating Report (AOR)

⁷Used as a pilot fuel during startups, shutdowns, malfunctions

2. Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition (SC) No. 1, or SC No. 3 will become effective.
3. The operating rate shall not exceed 110% of the operating rate during the most recent test except for testing purposes, but shall not exceed the rate in SC No. 1. After testing at an operating rate greater than 110% of the last test operating rate, the operating rate shall not exceed 110% of the last (submitted) test operating rate until the test report at the higher rate has been reviewed and accepted by the Department.
4. The maximum allowable emission rate for each pollutant is as follows:

<u>Pollutant</u>	<u>FAC Rule</u>	<u>lbs/hr</u>	<u>TPY</u>
PM ₁ ¹	17-2.600(5)(a)2.	88.1 ²	385.88 ³
PM ₂ ⁴	17-2.250(3)	264.3 ⁵	----
SO ₂ ⁶	17-2.600(5)(a)3.a.(xi)	2422.75 ⁷	10611.64 ³
VE ₁ ⁸	17-2.600(5)(a)1.	20% opacity, except 40% for 2 mins/hr	
VE ₂ ⁹	17-2.250(3)	60% opacity up to 3 hrs in 24 hrs	
VE ₃ ¹⁰	17-2.250(3)	60% opacity up to 3 hrs in 24 hrs	

¹PM - particulate matter

²Basis: 881 MMBTU/hr; 0.1 lb/MMBTU

³Basis: Hours of operation shall be limited to 8760 H/Y (24 H/D; 7 D/W; 52 W/Y) and shall be recorded.

⁴PM₂ - particulate matter while sootblowing

⁵Basis: 881 MMBTU/hr; 0.3 lb/MMBTU

⁶SO₂ - sulfur dioxide

⁷Basis: 881 MMBTU/hr; 2.75 lbs/MMBTU

⁸VE₁ - visible emissions at Steady State

⁹VE₂ - visible emissions while sootblowing

¹⁰VE₃ - visible emissions while load changing



Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Carol M. Browner, Secretary

NOTICE OF PERMIT ISSUANCE

CERTIFIED - RETURN RECEIPT

Dr. P.Y. Baynard, Director - Environ.& Licen. Affrs.
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

Dear Dr. Baynard:

Suwannee County - AP
Florida Power Corporation
No. 3 Unit

Enclosed is Permit Number A061-189581 to operate the subject air pollution source, pursuant to Section 403.087, Florida Statutes (FS).

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of receipt of this Permit. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

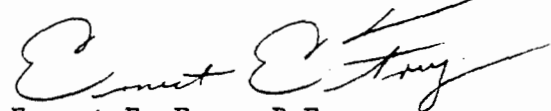
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



Ernest E. Frey, P.E.
Deputy Assistant Secretary

EEF:dhk

Copies furnished to: Richard O. Frazee, P.E.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to §120.52, Florida
Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged.

Patty Shrin 2-14-91
Clerk Date

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on 2/14/91 to the listed persons.



Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

I.D. Number: 31JAX61000303
Permit/Cert Number: A061-189581
Date of Issue: 02-14-91
Expiration Date: February 18, 1996
County: Suwannee
Latitude/Longitude: 30°22'35"N; 83°10'50"W
Project: No. 3 Unit
UTM: E-(17)290.5; N-3362.2

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of No. 3 Unit, Fossil Fuel Steam Generator.

Located south of U.S. 90, on east bank of Suwannee River, Northwest of Live Oak, Suwannee County, Florida.

In accordance with:

Application dated 11-07-80
Additional information received 02-19-81
Renewal application dated 12-02-85
Additional information received 12-26-85, 01-15 and 01-20-86
Renewal application received 11-25-90

PERMITTEE:
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

I.D. Number: 31JAX61000303
Permit/Cert: A061-189581
Date of Issue:
Expiration Date: February 18, 1996

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants, or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.
6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

PERMITTEE:
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

I.D. Number: 31JAX61000303
Permit/Cert: A061-189581
Date of Issue:
Expiration Date: February 18, 1996

GENERAL CONDITIONS

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with, or will be unable to comply with, any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.
10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.
11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the department.
12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

PERMITTEE:
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

I.D. Number: 31JAX61000303
Permit/Cert: A061-189581
Date of Issue:
Expiration Date: February 18, 1996

GENERAL CONDITIONS

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Certification of Compliance with State Water Quality Standards
- () (Section 401, PL 92-500)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.
- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the department, the permittee shall, within a reasonable period of time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

PERMITTEE:
 Florida Power Corporation
 Post Office Box 14042 (H2G)
 St. Petersburg, Florida 33733

I.D. Number: 31JAX61000303
 Permit/Cert: A061-189581
 Date of Issue:
 Expiration Date: February 18, 1996

SPECIFIC CONDITIONS:

1. The maximum input/rate (operating rate) is SEE BELOW and shall not be exceeded without prior approval.

<u>Rate</u>	<u>Fuel</u>
881 MMBTU/hr ¹	No. 6 fuel oil ²
880 MMBTU/hr	Natural gas
493 MMBTU/hr ³	No. 6 fuel oil ⁴
388 MMBTU/hr ⁵	Natural gas

¹From 141 barrels/hr

²Fuel oil sulfur content shall not exceed 1.0% by wt.

³Basis: 56% of 881 MMBTU/hr

⁴Fuel oil sulfur content shall not exceed 2.5% by wt.

⁵Basis: 44% of 881 MMBTU/hr

2. Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition (SC) No. 1, or SC No. 3 will become effective.
3. The operating rate shall not exceed 110% of the operating rate during the most recent test except for testing purposes, but shall not exceed the rate in SC No. 1. After testing at an operating rate greater than 110% of the last test operating rate, the operating rate shall not exceed 110% of the last (submitted) test operating rate until the test report at the higher rate has been reviewed and accepted by the Department.
4. The maximum allowable emission rate for each pollutant is as follows:

<u>Pollutant</u>	<u>FAC Rule</u>	<u>lbs/hr</u>	<u>TPY</u>
PM ₁ ¹	17-2.600(5)(a)2.	88.1 ²	385.88 ³
PM ₂ ⁴	17-2.250(3)	264.3 ⁵	-----
SO ₂ ⁶	17-2.600(5)(a)3.a.(xi).	2422.75 ⁵⁷	10611.64 ³
VE ₁ ⁸	17-2.600(5)(a)1.	20% opacity, except 40% for 2 mins/hr	
VE ₂ ⁹	17-2.250(3)	60% opacity up to 3 hrs in 24 hrs	
VE ₃ ¹⁰	17-2.250(3)	60% opacity up to 3 hrs in 24 hrs	

¹PM - particulate matter

²Basis: 881 MMBTU/hr; 0.1 lb/MMBTU

³Basis: Hours of operation shall be limited to 8760 H/Y (24 H/D; 7 D/W; 52 W/Y) and shall be recorded.

⁴PM₂ - particulate matter while sootblowing

⁵Basis: 881 MMBTU/hr; 0.3 lb/MMBTU

⁶SO₂ - sulfur dioxide

⁷Basis: 881 MMBTU/hr; 2.75 lbs/MMBTU

⁸VE₁ - visible emissions at Steady State

⁹VE₂ - visible emissions while sootblowing

¹⁰VE₃ - visible emissions while load changing

PERMITTEE:
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

I.D. Number: 31JAX61000303
Permit/Cert: AO61-189581
Date of Issue:
Expiration Date: February 18, 1996

SPECIFIC CONDITIONS:

5. Test the emission for the following pollutant(s) at the interval(s) indicated, notify the Department 14 days prior to testing, and submit the test report documentation to the Department within 45 days after completion of the testing:

<u>Pollutant</u>	<u>Interval</u>	<u>Test Method</u> ¹
PM ₁	12 months from 09-01-90 ²	EPA 5 or 17
PM ₂	12 months from 09-01-90 ²	EPA 5 or 17
SO ₂	12 months from 03-01-90 ²	---- ³
VE ₁ ⁴	12 months from 09-01-90 ²	DER 9
VE ₂ ⁴	12 months from 09-01-90 ²	DER 9

¹From 17-2.700(1), FAC in Table 700-1

²Per FAC Rule 17-2.700(2)(a)3.b., testing is not required if liquid fuel is used no more than 400 hrs/yr.

³See FAC Rule 17-2.700(6)(c)1.b.

⁴VE test shall be conducted during one of the test runs.

Tests and test reports shall comply with the requirements of Florida Administrative Code Rule 17-2.700(6) and (7), respectively.

6. If steady state emissions testing is required as noted above and if it is necessary to conduct soot blowing operations during the period that the unit is on oil, then a soot blowing emissions test shall be conducted in addition to the steady state emissions test. In order to produce stack emissions representative of soot blowing conditions, oil must be burned in the unit for a period of time immediately prior to conducting the soot blowing emissions test such that, in the unit operator's judgment, conditions for maintaining optimum boiler operations requires that soot blowing be conducted. The specific conditions under which the soot blowing emission test will be conducted shall be discussed and agreed upon between the Department and the permittee.
7. If any unit exceeds the maximum allowable emissions as indicated by the results of the testing, then the unit shall be retested on oil within one month of the date of the failed test. If it is not possible to retest within one month, a written request for a delay and an explanation of the cause of the failure and of the delay will be required within one month of the date of the failed test.
8. In conjunction with operation of this unit on oil, the permittee shall obtain and maintain (for Department review when requested) documentation that includes, but is not limited to, the following information: hourly rate of oil consumption, heat content of the oil consumed, and sulfur content of the oil consumed.
9. In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.

PERMITTEE:
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

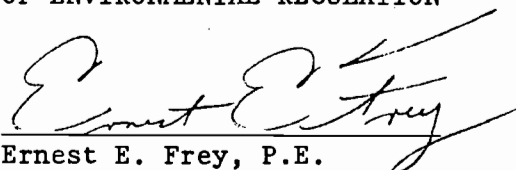
I.D. Number: 31JAX61000303
Permit/Cert: A061-189581
Date of Issue:
Expiration Date: February 18, 1996

SPECIFIC CONDITIONS:

10. Submit an annual operation report for this source on the form supplied by the Department for each calendar year on or before March 1.
11. Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.
12. The ID No. for this source is to be used on all correspondence.
13. Forms for the renewal will be sent 5 months prior to 02-18-96 and the completed forms with test results are due 90 days prior to 02-18-96.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



Ernest E. Frey, P.E.
Deputy Assistant Secretary

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to §120.52, Florida
Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged.

Devy Shen Clerk 2-14-91 Date

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT MODIFICATION

In the Matter of an
Application for Permit Modification

Mr. W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Dept.
Florida Power Corp.
3201 34th Street South
St. Petersburg, FL 33711

DEP File No. 1210003
PSD-FL-014(A)

Enclosed is Permit Modification Number PSD-FL-014(A) to add natural gas firing capability to three existing oil-fired peaking units at the Suwannee Power Plant. This permit modification is issued pursuant to Section 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

C.H. Fancy, P.E., Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT MODIFICATION (including the FINAL permit Modification) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 5-6-97 to the person(s) listed:

Mr. W. Jeffrey Pardue, FPC *
Mr. Ken Kosky, P.E., Golder Associates
Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. Chris Kirts, NED

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date,
pursuant to §120.52(7), Florida Statutes, with the designated
Department Clerk, receipt of which is hereby acknowledged.

Kerni Jaber 5-6-97
(Clerk) (Date)

FINAL DETERMINATION

Florida Power Corporation

Permit No. PSD-FL-014(A), File No. 1210003-002-AC

Suwannee Facility, Peaking Units P1, P2, P3

An Intent to Issue a permit modification for Florida Power Corporation (FPC), Suwannee Facility, Peaking Units P1, P2, and P3 was distributed on February 14, 1997. The facility is located South of U.S. Route 90, Northwest of Live Oak, Suwannee County. The Public Notice of Intent to Issue was published in the Suwannee Democrat on February 28, 1997. No comments were received in response to the public notice.

Comments were received from Department staff pointing out that the application forms describe the units as presently fired with No. 2 fuel oil and on-spec used oil. No construction (or PSD) permit modifications have been made in the past to incorporate used oil firing. During discussions with FPC it was clarified that the present permit action allows only the addition of natural gas firing capability.

A reconciliation was performed of conditions in the original construction permits issued by the Department in 1978 with the PSD permit issued by EPA in 1979. This primarily affects the sulfur dioxide emissions limit in the PSD permit and is consistent with FPC's application.

The final action of the Department will be to issue the permit as proposed but with the changes indicated above.



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

May 5, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Dept.
Florida Power Corp.
3201 34th Street South
St. Petersburg, FL 33711

Re: Suwannee Power Plant, Peaking Units P1, P2, and P3
Modification of Final Determination - PSD-FL-014(A)
Addition of Natural Gas Capability

Dear Mr. Pardue:

The Department hereby amends the Conditions of Approval related to emissions and fuel use in the subject Final Determination (dated July 9, 1979 as amended on May 22, 1980 by EPA) pursuant to 40CFR52.21 - Prevention of Significant Deterioration (PSD Permit). The PSD permit is amended as follows:

Introduction

References to the number of turbines are reduced to three from four.

Condition 1. Standards for Nitrogen Oxides

Add the following section addressing natural gas combustion:

- (3) From any gas turbine, while firing natural gas, any exhaust gases which contain nitrogen oxides in excess of 0.0068 percent by volume at 15 percent oxygen and on a dry basis.

Condition 2. Standard for Sulfur Dioxide

Incorporate construction permit provisions from AC61-11862, 63, and 64 (issued November 28, 1978 as amended on February 5, 1979 by the Department) as follows:

FROM:

- (a) On and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, the applicant shall not cause to be discharged into the atmosphere from any stationary gas

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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Mr. W. Jeffrey Pardue

May 5, 1997

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turbine any gases which contain sulfur dioxide in excess of a 0.015 percent by volume at 15 percent oxygen and on a dry basis.

- (b) The sulfur content of the fuel fired by the gas turbine may be used to determine compliance with paragraph (a) of this section. Under such circumstances, on and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, the applicant shall not burn in any stationary gas turbine any fuel which contains sulfur in excess of 0.8 percent by weight.

TO:

- (a) On and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, the applicant shall not cause to be discharged into the atmosphere from any stationary gas turbine any gases which contain sulfur dioxide in excess of 0.0095 percent by volume at 15 percent oxygen and on a dry basis. The maximum allowed emission rate shall not to exceed 379 pounds per hour.
- (b) The sulfur content of the fuel fired by the gas turbine may be used to determine compliance with paragraph (a) of this section. Under such circumstances, on and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, the applicant shall not burn in any stationary gas turbine any fuel which contains sulfur in excess of 0.5 percent by weight.

Condition 7 (new)

These stationary gas turbines shall burn natural gas and distillate (No. 2) fuel oil only. Burning of other fuels requires review, public notice, and approval through the preconstruction review process (Rules 62-210 and 62-212, F.A.C).

A copy of this modification letter and the General Permit Conditions pursuant to Rule 62-4.160, F.A.C. shall be attached to and shall become a part of Permit PSD-FL-014.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/aal/l

Enclosures

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit modification also constitutes:
- (a) Determination of Best Available Control Technology ()
 - (b) Determination of Prevention of Significant Deterioration (); and
 - (c) Compliance with New Source Performance Standards (X).
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Memorandum

Florida Department of Environmental Protection

TO: Howard Rhodes

THRU: Clair Fancy *CHF by Am*

FROM: Al Linero *Al Linero s/s*

DATE: May 5, 1997

SUBJECT: FPC Suwannee Natural Gas Use for Peaking Units P1, P2, and P3

Attached is a modification to the EPA-issued PSD construction permit for the three oil-fired peaking units at Suwannee which are slated for addition of natural gas capability.

The revision deletes from the permit one authorized unit which was never constructed, while allowing firing of natural gas which is available to FPC on an interruptible basis.

The key issue is that these units have not operated close to their permitted hours of operation in recent years, yet they are slated for greatly increased service this year whether or not gas capability is added. This additional demand is not related to addition of natural gas capability. Since it is likely that the units will operate near their operating limits at some point, it is reasonable to use past allowable emissions to compare with future potential emissions. This results in no significant emissions increases and therefore the project is not subject to PSD or BACT.

Some discussion of peaking units was included in the WEPCO decision which alluded to the unreasonableness of doing a past actual to future potential emissions comparison when replacing a peaking unit. We consulted with EPA who agreed that our action was proper and they pointed us to a memo sent to GE in the early 1980's for adding natural gas capability to an oil-fired turbine.

FPC agreed to accept a lower NOx limit of 56 ppm while firing gas versus the present limit of 98 ppm. Because control of NOx to 56 ppm can cause a PSD-significant increase in CO, we have agreed to a NOx limit of 68 ppm. This is still a significant reduction in NOx emissions compared to fuel oil use.

We have updated the PSD permit to state that the only fuels which can be fired are natural gas and distillate fuel oil. We also took the opportunity to consolidate conditions (e.g. 0.5% sulfur in fuel oil) from the original Florida AC's which had not been included in the EPA-issued PSD permit. FPC is aware of these conditions and had included them in the application. We received no comments as a result of the public notice. I recommend your approval and signature.

AAL/aal/l

Attachments

BEST AVAILABLE COPY

Mr. Joseph W. Landers
August 11, 1978
Page Two

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For And/O
To: _____
To: _____
To: _____
From: _____

INTEROFFICE MEMORANDUM

Study Group Member

- Steve S
- Albert
- Robert Depart
- Frank E
- Victori

Study Group Recomm

RECEIVED
JAN 29
BUREAU OF
AIR REGULATION

TO : Joseph W. Landers, Jr.

FROM: J. P. Subramani *J. P. Subramani*

DATE: August 11, 1978

SUBJ: BACT Application for Four Florida Power Gas Turbines, Suwannee River Plant Site Suwannee County

Facility: Four 63,000 KW gas turbine electrical units to be located at Florida Power Suwannee River Plant. The units, in commercial operation in October 1978, are known as Suwannee River Peaking Units.

At a peak power level of 63,000 KW, the units burn approximately 37,910 pounds of fuel per minute which constitutes a rate of 739 million BTU/hr.

BACT Determination Requested by the Applicant

- Nitrogen Dioxide: 75 ppm by volume
- Sulfur Dioxide: 95 ppm by volume
- Opacity: Less than 20%

Date Receipt of a Complete BACT Application:

May 12, 1978

Date of Publication in the Florida Administrative Register:

June 23, 1978

Date of Publication in a Newspaper of General Circulation:

June 30, 1978 - Florida Times Union

- *Albert Townsend
- Ash Content of Fuel
- Particulates
- NO₂ Wet
- SO₂ Low Oil
- Opacity
- HC
- CO
- Noise

*Albert Townsend f

**Steve Smallwood c

Mr. Joseph W. Landers, Jr.
 August 11, 1978
 Page Three

Other State and Local Emission Standard Applicable to Gas Turbines*:

<u>Pollutant</u>	<u>Fuel</u>	<u>Typical</u>	<u>Most Stringent</u>
NO _x	Gas	(75 ppm @ 15% O ₂) 0.3 lb NO _x /MMBTU	(42 ppm @ 15% O ₂) 125 ppm @ 3% O ₂)
	Oil	(75 ppm @ 15% O ₂) 0.3 lb NO _x /MMBTU	(75 ppm @ 15% O ₂) 0.3 lb NO _x /MMBTU
SO ₂	Oil	187 ppm 1% Sulfur by Weight (1 lb SO ₂ /MMBTU)	56 ppm 0.3% Sulfur by Weight (0.3 lb SO ₂ /MMBTU)
CO	All	None	None
Visible Emissions	All	20%	0%

*From the EPA's SSEIS document, EPA/450/2-77-017a

EPA's Proposed New Source Performance Standards for Gas Turbines:

The proposed standards were published in the Federal Register October 3, 1977 and are expected to be promulgated January, 1979, as follows:

Nitrogen Dioxide: 75 ppm by volume at 15 percent oxygen on a dry basis.

The standard would include an adjustment factor (see attachment) for gas turbine with thermal efficiencies greater than 25 percent, and also an adjustment factor (see attachment) for turbines burning fuels with fuel bound nitrogen content greater than 0.15 percent by weight. Each factor would result in a larger number. Measured NO_x levels would be adjusted to the International Standards Organization (ISO) reference conditions of 15°C and 60% R.H., 101.3 kilopascals pressure.

Sulfur Dioxide: 150 ppm by volume corrected to 15 percent oxygen, or
 0.8% Sulfur by weight in fuel.

Mr. Joseph W. Landers, Jr.
August 11, 1978
Page Four

BACT Determination by Florida Department of Environmental Regulation:

Nitrogen Dioxide: 75 ppm by volume at 15 percent oxygen on a dry basis, adjusted to ISO.

The proposed standard would be EPA's proposed New Source Performance Standard. NO_x emissions from gas turbines, therefore, would be limited according to the following equation:

$$\text{STD} = (.0075 E) + F$$

Where:

STD = allowable NO_x emission (percent by volume at 15 percent oxygen)

E = efficiency adjustment factor: $\frac{14.4 \text{ kilojoules/watt}\cdot\text{hr}}{\text{Actual ISO heat rate}}$

F = fuel-bound nitrogen allowance:

<u>Fuel-Bound Nitrogen</u> <u>percent by weight (N)</u>	<u>F</u> <u>(NO_x - percent by volume)</u>
(N) less than 0.015 percent	0
(N) between 0.015 and 0.1 percent	0.04 (N)
(N) between 0.1 and 0.25 percent	0.004 + 0.0067 (N-0.1)
(N) greater than 0.25 percent	0.005

During performance tests to determine compliance with the proposed standard, measured NO_x emission at 15 percent oxygen would be adjusted to ISO ambient atmospheric conditions by the following correction factor:

$$\text{NO}_x = (\text{NO}_{x_{\text{obs}}}) \left(\frac{P_{\text{ref}}}{P_{\text{obs}}} \right)^{0.5} e^{19 (H_{\text{obs}} - 0.00633)}$$

Where:

NO_x = Emissions of NO_x at 15 percent oxygen and ISO standard ambient conditions.

Mr. Joseph W. Landers, Jr.
August 11, 1978
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$NO_{x_{obs}}$ = Measured NO_x emission at 15 percent oxygen, ppmv.
 P_{ref} = Reference combustor inlet absolute pressure at 101.3 kilopascals (1 atmosphere) ambient pressure.
 P_{obs} = Measured combustor inlet absolute pressure.
 H_{obs} = Specific humidity of ambient air.
 e = Transcendental constant (2.718)

Sulfur Dioxide: 95 ppm by volume corrected to 15 percent oxygen in a dry basis, or 0.5% Sulfur by weight in fuel

Hydrocarbons: None

Carbon Monoxide: None

Particulates: None

Opacity: Less than 20%

Justification of DER Determination:

Nitrogen Dioxide

The proposed standard was selected after carefully examining the recommendations of the study group and the SSIES document for EPA's proposed standard. The SSIES document showed test data on 8 simple cycle peaking gas turbines. Of these, only 6 were fired with distillate fuel. Tests for controlled emissions were available for 4 of these 6 turbines. Test results showed a range in emission of 55 to 80 ppmv (after EPA's proposed upward correction for turbine efficiencies above 25%). Although three of these four turbines had emissions below or at the 60 ppmv level, the EPA's 75 ppmv standard was preferred because it allowed for the uncertain validity of the limited test data available.

SO₂

The only available and economically feasible technique for sulfur dioxide emission control is low sulfur oil. Other techniques for tail gas cleanup cost two to three times as much as the turbine itself.

In selecting the 0.5% S fuel by weight as the standard, the availability of this fuel and the relative economic advantage of its use were considered.

Mr. Joseph W. Landers, Jr.
August 11, 1978
Page Six

The lower 0.3% S by weight proposed by two members of the study group would result in an increase in fuel cost of 1.8% or about \$53,500/unit per year - a conservative estimate. Increases in ambient air concentrations expected to result from the operation of the turbines do not justify the need for the more stringent standard and increased cost of production.

HC, CO, Particulates:

The SSEIS document shows insignificant impact on ambient air from the limited gas turbines emissions of these pollutants.

Opacity:

The proposed standard is consistent with the SSEIS document and agrees with the recommendation of two of the three members of the group proposing an opacity standard.

Details of Analysis May be Obtained by Contacting:

Victoria Martinez
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, Florida 32301

Recommendation from: Bureau of Air Quality Management

by: J. P. Subramani
J. P. Subramani

DATE: AUGUST 11, 1978

Approved by:

Victoria Landers, Jr.
J. W. Landers, Jr.
Secretary

DATE: August 16, 1978

PSD-FL-0014
FPC SUWANNEE
LIVE OAK

Final Determination

Review of a Proposed Air Pollution Source Pursuant to Environmental
Protection Agency Rules for the Prevention of Significant Deterioration (PSD)

40 CFR 52.21

Suwannee River Power Plant

Four Gas Turbine Peaking Units

Florida Power Corporation, St. Petersburg, Florida

U.S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30308

I. Introduction

The Florida Power Corporation has applied to the U.S. Environmental Protection Agency to construct four 63 megawatt oil-fired gas turbine peaking units at its Suwannee River Power Plant located in Suwannee County midway between the towns of Live Oak and Madison and on U.S. 90. The proposed construction is subject to review under 40 CFR 52.21, Regulations for the Prevention of Significant Deterioration (PSD). Under these regulations, a modification to a source of air pollution in any one of 28 specified categories which will increase the emission potential of that source by more than 100 tons per year of any pollutant, is subject to review for each of those pollutants. One of these categories is fossil fuel-fired steam electric plants of more than 250 million BTU per hour heat input, of which the Suwannee Plant is one.

Paragraph (r) of the PSD regulations requires, in part, that EPA issue a Preliminary Determination whether the source should be approved, approved with conditions, or disapproved. On April 27, 1979, EPA made a Preliminary Determination that the proposed source could be approved with conditions. The Preliminary Determination was advertized for public comment in three local newspapers and placed on display at the Suwannee County Courthouse. The only comment received was from the applicant, regarding the restriction on yearly hours of operations.

After verbal discussion with Mr. W. W. Vierday, EPA determined that the applicant had further reviewed this condition and no longer objected to it. However, Mr. Vierday requested that the log required by Condition 6 be a monthly log (rather than hourly or daily) since the new units would be equipped with integrating meters measuring both hours of operation and fuel usage. This request has been granted, and Condition 6 is modified accordingly. All other conditions remain the same as those in the Preliminary Determination. It is the decision of EPA that the source should be approved with conditions. The conditions are included to insure that the applicant complies with emission control techniques and emission limits which are a part of the application. The conditions of approval follow on the next page.

Conditions for Florida Power Corporation's Proposed Suwannee
Park Peaking Units (Gas Turbines)

As required pursuant to 40 CFR 52.21(d)(2)(ii), a review was conducted to determine if the proposed peaking units would apply the best available control technology. Based on this review, it was determined that the applicant (Florida Power Corporation) must meet emission limits and other requirements as specified by the U.S. Environmental Protection Agency's Standard of Performance for Stationary Gas Turbines proposed on October 3, 1977 (40 CFR 60, Subpart GG).

Condition I. Standards for Nitrogen Oxides

On and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, the applicant shall not cause to be discharged into the atmosphere

(1) From any gas turbine with a heat rate at peak load of less than or equal to 14.4 kilojoules per watt hour, based on the lower heating value of the fuel fired, any gases which contain nitrogen oxides in excess of:

$$STD = 0.0075 \frac{14.4}{Y} + F$$

where:

STD = allowable NO_x emission (percent by volume at 15 percent oxygen and on a dry basis).

Y = manufacturer's rated heat rate at peak load (kilojoules per watt hour).

F = NO_x emission allowance for fuel-bound nitrogen as defined in part (3) of this paragraph.

(2) F shall be defined according to the nitrogen content of the fuel as follows:

Fuel-bound nitrogen (percent by weight)	F (NO _x by volume)
N < 0.015	0
0.015 < N < 0.1	0.04(N)
0.1 < N < 0.25	0.004 + 0.0067(N - 0.1)
N > 0.25	0.005

where:

N = the nitrogen content of the fuel (percent by weight).

Condition 2. Standard for Sulfur Dioxide

(a) On and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, the applicant shall not cause to be discharged into the atmosphere from any stationary gas turbine any gases which contain sulfur dioxide in excess of a 0.015 percent by volume at 15 percent oxygen and on a dry basis.

Best Available Copy

(b) The sulfur content of the fuel fired by the gas turbine may be used to determine compliance with paragraph (a) of this section. Under such circumstances, on and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, the applicant shall not burn in any stationary gas turbine any fuel which contains sulfur in excess of 0.8 percent by weight.

Condition 3. Monitoring of Operations

(a) If water injection is used to control NO_x emissions, the applicant shall install and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. This system shall be accurate to within ⁺5.0 percent and shall be approved by the Administrator.

(b) The applicant shall record daily the sulfur content, nitrogen content, and lower heating value of the fuel being fired in the gas turbine.

(c) For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions that shall be reported are defined as follows:

(1) Nitrogen oxides. Any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with 40 CFR 60.332 by the performance test required in 40 CFR 60.8. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions and nitrogen content of the fuel during the period of excess emissions, and the graphs or figures developed under 40 CFR 60.335(a).

(2) Sulfur dioxide. Any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8 percent.

Condition 4. Stack Testing

(a) Within sixty (60) days after achieving the maximum production rate at which the source will be operated, but no later than 180 days after initial startup, the applicant shall conduct or cause to be conducted, performance test(s) and furnish the Administrator with a written report of the results of such performance test(s). The results of the performance test(s) shall be submitted to the Administrator within thirty (30) days of the completion of said testing.

(b) Nitrogen oxide and sulfur dioxide performance tests shall be conducted and data reduced in accordance with methods and procedures approved by the Administrator.

(c) The applicant shall provide the Administrator thirty (30) days prior notice of the date of the performance test(s) to afford the opportunity to have an observer present.

(d) All required continuous monitoring systems shall be installed, calibrated, and operating when the performance test(s) are conducted.

(e) The applicant shall provide performance test reports which comply with criteria more fully described in 40 CFR 60, Appendix A.

Condition 5. NO_x Emission Control System

The applicant must submit technical data to the Administrator within ten (10) working days after it becomes available pertaining to the selected NO_x emissions control system. These data would include, but not be limited to, a copy of the formal bid from the successful bidder, guaranteed efficiency or emission rate, and major design parameters such as water/fuel ratio. If "dry" control techniques are to be used, to control NO_x emissions, the applicant must submit test data and other appropriate information for existing similarly sized gas turbines (i.e., approximately 63 MW) to show that dry control techniques are capable of achieving emission limits given in Condition 1 above. The Administrator, upon review of these data, may revoke or modify this application if evaluation of these data is different from data in the application in such a way that it would cause the control system to be inadequate to meet the emission limits specified above.

Condition 6. The turbines shall not operate more than 1500 hours per year. A log shall be kept at the plant, showing hours of operation and the amount of fuel used. This log will be available for inspection at the plant at any time.

II. Background

On March 21, 1978, Florida Power Corporation submitted a letter and attachments to EPA to apply under the PSD regulations to construct four combustion turbines at the Suwannee Power Plant. On August 5, 1978, further information was submitted which completed the application. The proposed construction is subject to EPA Regulations for the Prevention of Significant Air Quality Deterioration promulgated on June 19, 1978.

III. Review Requirements

The pollutants for which potential emissions are greater than 100 tons per year, and therefore subject to review, are sulfur dioxide, nitrogen oxides and carbon monoxide. Review of control technology and ambient impacts is required.

Certain portions of the PSD review may not be required if the proposed modification is subject to EPA's interpretative ruling, or if the source is a nonprofit health or education institution, or if the source has previously received approval under PSD and is only relocating. None of these exemptions applies in this case.

Other exemptions can apply to control technology review and ambient impact review. For control technology review, if allowable emissions of any pollutant are less than 50 tons per year, 1000 pounds per day and 100 pounds per hour, or if a modification is made to an existing facility and the emissions are offset by reductions elsewhere, review may not be required. None of these exemptions applies.

For ambient impact review and monitoring requirements, other exemptions are provided for. In addition to the allowable emission threshold, there are exemptions for temporary sources and for sources whose net emissions, after considering decreases, do not increase. None of these exemptions apply to the proposed turbines.

The one exemption which does apply is for air quality monitoring. Since a complete application was submitted before August 7, 1978, no preconstruction monitoring is required.

A. Control Technology Review

The applicant is required to install best available control technology (BACT) for each pollutant, taking into account energy, environmental and economic impacts and other costs. EPA concludes that the systems proposed by the applicant represents BACT for SO₂ and nitrogen oxides. There is currently no applicable technology for reduction of carbon monoxide beyond what is accomplished in the combustion chamber.

L. Sulfur Dioxide

The applicant has proposed to burn 0.5% sulfur distillate fuel oil. At the time the application was submitted, EPA had proposed a revision to the New Source Performance Standards (40 CFR 60) for stationary gas turbines. Part of this revision includes a requirement for burning no fuel which contains sulfur in excess of 0.8 percent by weight. This requirement is considered BACT, and is included as a condition of approval.

2. Nitrogen Oxides

The applicant has proposed to limit nitrogen oxide emissions to 75 ppm (adjusted for heat rate and fuel-bound nitrogen) by water injection. At the time the application was submitted, EPA had proposed a revision to the New Source Performance Standards (40 CFR 60) for stationary gas turbines. Part of this revision includes a requirement to limit nitrogen oxide emissions to 75 ppm. This requirement represents BACT and is included as a condition of approval.

B. Applicability of NSPS

As of this date, EPA has proposed revisions to the New Source Performance Standards for stationary gas turbines. Any future promulgation which applies to stationary gas turbines and is more stringent than any condition of approval, will supercede the conditions of approval.

C. Impact Review

The PSD regulations require the following air quality impacts to be assessed by the applicant:

- 1) National Ambient Air Quality Standards (NAAQS)
- 2) PSD increments
- 3) Visibility, soils and vegetation
- 4) Impacts due to growth caused by proposed source

All of these impacts were assessed by the applicant. Air quality modelling showed no violations of the NAAQS with all sources in the area of the Suwannee in operation. Likewise, the PSD increment analysis showed no violations with the four turbines operating at maximum load.

The maximum predicted ambient concentrations with the proposed turbines in operation are presented in the following table:

Scenario	Concentrations (ug/m ³)		
	Sulfur Dioxide		
	Annual Average	24-Hour Maximum	3-Hour Maximum
Maximum Predicted 1981 Concentration in vicinity of Suwannee River Plant	10	184	851
State of Florida Standards	60	260	1300
Federal Secondary Standards	--	--	1300
Federal Primary Standards	80	365	--

The maximum consumption of the Class II PSD increments caused by proposed turbines are presented in the following table:

<u>Increment</u>	<u>Pollutant</u>
Annual	10%
24-Hour	11%
3-Hour	10%

Impacts on visibility, soils and vegetation and on air quality due to growth were judged to be minimal.

The closest Class I area is Okefenokee National Wildlife Refuge in Georgia, about 75 KM to the east-northeast from the plant site.

The maximum consumption of the Class I PSD increments caused by the proposed turbines are presented in the following table:

<u>Increment</u>	<u>Pollutant</u>
Annual	10%
24-Hour	40%
3-Hour	56%

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

CONSTRUCTION PERMIT PROVISOS

AIR POLLUTION SOURCES

Permit No. AC61-11864

Date: Nov. 28, 1978
Revised: Feb. 5, 1979

- (X) 1. Construction of this installation shall be completed by November 1, 1980. Application for Permit to Operate to be submitted by February 1, 1981.
- (X) 2. This construction permit expires on May 1, 1981 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Department of Environmental Regulation Commission.
- (X) 3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction.
- (X) 4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Environmental Regulation for consideration toward the issuance of an operation permit.
- (X) 5. This peaking unit shall be tested* for SO₂ and NO_x (via continued on reverse side) within 60 days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted in duplicate to the Florida Department of Environmental Regulation, Gainesville Branch Office, 825 N.W. 23rd Ave., Suite G, Gainesville, FL 32601
-
- * Fuel Analysis May be Submitted for Required Sulfur Dioxide Emission Test.
- (X) 6. The operation of this installation shall be observed for visible emissions in accordance with Method 9-Visible Determination of the Opacity of Emissions from Stationary Sources (36FR24895; Federal Register, December 23, 1971). The observation results are required prior to our issuance of an operation permit, and shall be submitted in duplicate to the Department of Environmental Regulation ~~District Office~~, Branch Office, 825 N.W. 23rd Ave., Suite G, Gainesville, FL 32601
- (X) 7. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.
- (X) 8. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.
- (X) 9. All fugitive dust generated at this site shall be adequately controlled.

() 10. This permit is associated with a Development of Regional Impact (D.R.I.). It does not waive any other permits that may be required from this or any other State, Federal, or local agency.

(X) 11. The emission limiting standards required by the FDER "BACT" determination are as follows:

Nitrogen Dioxide - 75 ppm by volume at 15 percent oxygen on a dry basis

and corrected in accordance with the Federal Register Vol. 42, No. 191 - Monday, October 3, 1977, paragraph 60.332.

Sulfur Dioxide - 95 ppm by volume corrected to 15 percent oxygen on a dry basis; or, 0.5 percent sulfur by weight in fuel, but the maximum allowed emission rate is not to exceed 379 lbs/hr SO₂ under any condition.

Opacity - less than 20 percent

(X) 12. Particulate Matter - maximum allowed emission rate is 38 lbs/hr.

(X) 5. (cont'd) in accordance with Reference Method 20 specified in the Federal Register Vol. 42, No. 191 - Monday, October 3, 1977, paragraph 60.335.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

CONSTRUCTION PERMIT PROVISOS

AIR POLLUTION SOURCES

Permit No. AC67-11864

Date: 11/28/78

- (X) 1. Construction of this installation shall be completed by November 1, 1980. Application for Permit to Operate to be submitted by February 1, 1981.
- (X) 2. This construction permit expires on May 1, 1981 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Department of Environmental Regulation Commission.
- (X) 3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction.
- (X) 4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Environmental Regulation for consideration toward the issuance of an operation permit.
- (X) 5. This unit shall be tested* for SO₂ and NO_x (con't. on reverse within sixty days side) after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted in duplicate to the Florida Department of Environmental Regulation Gainesville Branch Office, 825 N.W. 23rd Ave., Suite G, Gainesville, FL 32601
-
- * Fuel Analysis May be Submitted for Required Sulfur Dioxide Emission Test.
- (X) 6. The operation of this installation shall be observed for visible emissions in accordance with Method 9-Visible Determination of the Opacity of Emissions from Stationary Sources (36FR24895; Federal Register, December 23, 1971). The observation results are required prior to our issuance of an operation permit, and shall be submitted in duplicate to the Department of Environmental Regulation District Office, Gainesville Branch Office, 825 N.W. 23rd Ave, Suite G, Gainesville, FL 32601
- (X) 7. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.
- (X) 8. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.
- (X) 9. All fugitive dust generated at this site shall be adequately controlled.

(X) 10. The emission limiting standards (based on a maximum total process input rate of 37,910 lb/hr of distillate fuel oil) required by the FDER BACT determination are as follows:

Nitrogen Dioxide - 75 ppm by volume at 15 percent oxygen on a dry basis

Sulfur Dioxide - 95 ppm by volume corrected to 15 percent oxygen on a dry basis or, 0.5 percent sulfur by weight in fuel.

Opacity - less than 20 percent

(X) 11. Maximum allowed emission rate for sulfur dioxide is 379 lbs/hr and for particulate matter is 38 lbs/hr.

(X) 5. (con't.) in accordance with Reference Method 20 specified in the Federal Register Vol. 42, No. 191 - Monday, October 3, 1977, paragraph 60.335.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

CONSTRUCTION PERMIT PROVISOS

AIR POLLUTION SOURCES

Permit No. AC61-11863

Date: 11/28/78

- (X) 1. Construction of this installation shall be completed by November 1, 1980. Application for Permit to Operate to be submitted by February 1, 1981.
- (X) 2. This construction permit expires on May 1, 1981 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Department of Environmental Regulation Commission.
- (X) 3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction.
- (X) 4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Environmental Regulation for consideration toward the issuance of an operation permit.
- (X) 5. This unit shall be tested* for SO₂ and NO_x (con't. on reverse within sixty days side) after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted in duplicate to the Florida Department of Environmental Regulation Gainesville Branch Office, 825 N.W. 23rd Ave., Suite G, Gainesville, FL 32601
-
- * Fuel Analysis May be Submitted for Required Sulfur Dioxide Emission Test.
- (X) 6. The operation of this installation shall be observed for visible emissions in accordance with Method 9-Visible Determination of the Opacity of Emissions from Stationary Sources (36FR24895; Federal Register, December 23, 1971). The observation results are required prior to our issuance of an operation permit, and shall be submitted in duplicate to the Department of Environmental Regulation ~~District Office~~ Gainesville Branch Office, 825 N.W. 23rd Ave., Suite G, Gainesville, FL 32601
- (X) 7. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.
- (X) 8. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.
- (X) 9. All fugitive dust generated at this site shall be adequately controlled.

- (X) 10. The emission limiting standards (based on a maximum total process input rate of 37,910 lb/hr of distillate fuel oil) required by the FDER BACT determination are as follows:

Nitrogen Dioxide - 75 ppm by volume at 15 percent oxygen on a dry basis

Sulfur Dioxide - 95 ppm by volume corrected to 15 percent oxygen on a dry basis or, 0.5 percent sulfur by weight in fuel

Opacity - less than 20 percent

- (X) 11. Maximum allowed emission rate for sulfur dioxide is 379 lbs/hr and for particulate matter is 38 lbs/hr.

- (X) 5. (con't.) in accordance with Reference Method 20 specified in the Federal Register Vol. 42, No. 191 - Monday, October 3, 1977, paragraph 60.335.



Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Carol M. Browner, Secretary

NOTICE OF PERMIT ISSUANCE

CERTIFIED - RETURN RECEIPT

Dr. P.Y. Baynard, Director Environ. & Licens. Affrs.
Florida Power Corporation
Post Office Box 14042
St. Petersburg, Florida 33733

Dear Mr. Baynard:

Suwannee County - AP
Florida Power Corporation
Nos. 1,2 & 3 Peaking Units

Enclosed is Permit Number A061-189579* (Revised) to operate the subject air pollution source, pursuant to Section 403.087, Florida Statutes (FS).

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of receipt of this Permit. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

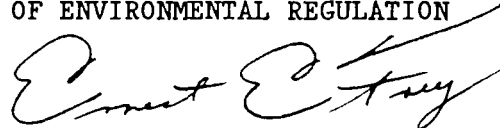
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Ernest E. Frey, P.E.
Deputy Assistant Secretary

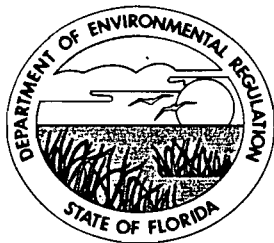
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Copies furnished to: Richard O. Frazee, P.E.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged. 3-21-91
Dorothy Adams Clerk Date

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on 3/21/91 to the listed persons.



Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

I.D. Number: 31JAX61000304,05,06
Permit/Cert Number: A061-189579*
Date of Issue: February 14, 1991
Revised: 03-21-91
Expiration Date: March 3, 1996
County: Suwannee
Latitude/Longitude: 30°22'35"N; 83°10'50"W
Project: Nos. 1,2,&3 Peaking
Units
UTM: E-(17)290.5; N-3362.2

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of Nos. 1,2,&3 Peaking Units (Combustion Turbines Model Turbo Power and Marine Systems FT4C-3 LF water injected twin pac).

*Similar sources with same permit no. and all of the conditions in this permit shall apply to each unit.

Located south of U.S. 90, on east bank of Suwannee River, Northwest of Live Oak, Suwannee County, Florida.

In accordance with:

Construction application dated 03-09-78
Certificate of Completion of Construction application dated 01-30-81
Renewal application dated 01-23-86
Renewal application received 11-20-90
Revision request dated 03-01-91

PERMITTEE:
Florida Power Corporation
Post Office Box 14042
Gainesville, Florida 32601

I.D. Number: 31JAX61000304,05,06
Permit/Cert: A061-189579*
Date of Issue:
Revised:
Expiration Date: August 07, 1996

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants, or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.
6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

PERMITTEE:
Florida Power Corporation
Post Office Box 14042
Gainesville, Florida 32601

I.D. Number: 31JAX61000304,05,06
Permit/Cert: A061-189579*
Date of Issue:
Revised:
Expiration Date: August 07, 1996

GENERAL CONDITIONS

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with, or will be unable to comply with, any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.
10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.
11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the department.
12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

PERMITTEE:
Florida Power Corporation
Post Office Box 14042
Gainesville, Florida 32601

I.D. Number: 31JAX61000304,05,06
Permit/Cert: A061-189579*
Date of Issue:
Revised:
Expiration Date: August 07, 1996

GENERAL CONDITIONS

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Certification of Compliance with State Water Quality Standards
- () (Section 401, PL 92-500)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.
- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the department, the permittee shall, within a reasonable period of time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

PERMITTEE:
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

I.D. Number: 31JAX61000304,05,06
Permit/Cert: A061-189579*
Date of Issue: February 14, 1991
Revised:
Expiration Date: March 3, 1996

SPECIFIC CONDITIONS:

1. The maximum input/rate (operating rate) is SEE BELOW and shall not be exceeded without prior approval.

<u>Rate</u>	<u>Material</u>
739 MMBTU/hr ¹	No. 2 fuel oil ^{2,3}

¹Rate at 59°F (per ACP dated 03-09-78)

²Sulfur content shall not exceed 0.5% by weight (per BACT dated 08-16-78).

³Fired No. 2 fuel oil shall not exceed 127 bbls/hr at 59°F

2. Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition (SC) No. 1, or SC No. 3 will become effective.
3. The operating rate shall not exceed 110% of the operating rate during the most recent test except for testing purposes, but shall not exceed the rate in SC No. 1. After testing at an operating rate greater than 110% of the last test operating rate, the operating rate shall not exceed 110% of the last (submitted) test operating rate until the test report at the higher rate has been reviewed and accepted by the Department.
4. The maximum allowable emission rate for each pollutant is as follows:

<u>Pollutant</u>	<u>FAC Rule</u>	<u>lbs/hr</u>	<u>TPY</u>
NO _x ¹	17-2.630 ^{2,3}	210.22 ⁴	157.66 ⁵
SO ₂ ⁶	17-2.630 ^{7,8}	370.48 ⁹	277.86 ⁵
VE ¹⁰	17-2.630 ¹¹	< 20% opacity	

¹NO_x - nitrogen oxides

²BACT (as nitrogen dioxide) dated 08-16-78

³Also, FAC Rule 17-2.660 (NSPS adopted by ref: 40 CFR 60.332)

⁴Basis: 75 ppm by vol, dry; 1,255,500 ACFM; 726°; at 15% O₂; 30% moisture

⁵Basis: Hours of operation shall be limited to 1500 hrs per calendar year and shall be recorded.

⁶SO₂ - sulfur dioxide

⁷BACT dated 08-16-78

⁸Also, FAC Rule 17-2.660 (NSPS adopted by ref: 40 CFR 60.333)

⁹Basis: 95 ppm by vol, dry; 1,255,500 ACFM; 726°F; corrected to 15% O₂; 30% moisture

¹⁰VE - visible emissions

¹¹BACT dated 08-16-78

PERMITTEE:
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

I.D. Number: 31JAX61000304,05,06
Permit/Cert: A061-189579*
Date of Issue: February 14, 1991
Revised:
Expiration Date: March 3, 1996

SPECIFIC CONDITIONS:

5. Test the emission for the following pollutant(s) at the interval(s) indicated, notify the Department 14 days prior to testing, and submit the test report documentation to the Department within 45 days after completion of the testing:

<u>Pollutant</u>	<u>Interval</u>	<u>Test Method</u>
VE	12 months from 01-20-90	EPA 9 ¹
NO ₂	3 months from 10-30-90	(See SC #6)
SO ₂	3 months from 10-30-90	(See SC #6)

¹From Table 700-1, used EPA 9 since limit is same as General VE.

Tests and test reports shall comply with the requirements of Florida Administrative Code Rule 17-2.700(6) and (7), respectively.

6. Submit quarterly report for each source for the following within 30 days at the end of each quarter:
- Any one hour period during which water to fuel ratio falls below 0.526 for #1 unit, 0.486 for #2 unit, and 0.505 for #3 unit per 40 CFR 60.334(c)(1) for nitrogen oxides.
 - Any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.5 percent by weight per FAC Rule 1702.700(6)(c)1.b.
 - For each period, the type, reasons and duration of the firing of the emergency fuel.
 - For each quarter, total hours of operation.
7. In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.
8. Submit an annual operation report for this source on the form supplied by the Department for each calendar year on or before March 1.
9. Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.
10. The ID No. for this source is to be used on all correspondence.

PERMITTEE:
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

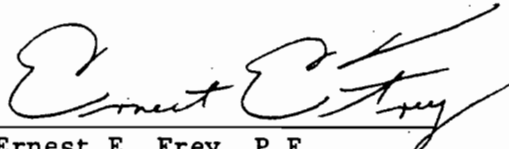
I.D. Number: 31JAX61000304,05,06
Permit/Cert: A061-189579*
Date of Issue: February 14, 1991
Revised:
Expiration Date: March 3, 1996

SPECIFIC CONDITIONS:

11. Forms for the renewal will be sent 5 months prior to 03-03-96 and the completed forms with test results are due 90 days prior to 03-03-96.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



Ernest E. Frey, P.E.
Deputy Assistant Secretary

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to S120.52, Florida
Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged.

Betty Lamm 3-21-91
Clerk Date

file



Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Carol M. Browner, Secretary

NOTICE OF PERMIT ISSUANCE

CERTIFIED - RETURN RECEIPT

Dr. P.Y. Baynard, Director Environ. & Licens Affrs
Florida Power Corporation
Post Office Box 14042
St. Petersburg, Florida 33733

Dear Dr. Baynard:

Suwannee County - AP
Florida Power Corporation
Nos. 1,2 & 3 Peaking Units

Enclosed is Permit Number A061-189579* to operate the subject air pollution source, pursuant to Section 403.087, Florida Statutes (FS).

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of receipt of this Permit. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

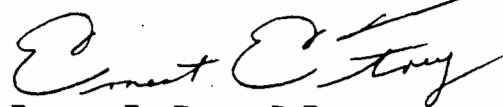
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



Ernest E. Frey, P.E.
Deputy Assistant Secretary

EEF:dhk

Copies furnished to: Richard O. Frazee, P.E.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to S120.52, Florida
Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged.

Debra L. Adams 2/14/91
Clerk Date

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed, before the close of business on 2/14/91 to the listed persons.



Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

I.D. Number: 31JAX61000304,05,06
Permit/Cert Number: A061-189579*
Date of Issue: 02-14-91
Expiration Date: March 3, 1996
County: Suwannee
Latitude/Longitude: 30°22'35"N; 83°10'50"W
Project: Nos. 1,2,&3 Peaking
Units
UTM: E-(17)290.5; N-3362.2

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of Nos. 1,2,&3 Peaking Units (Combustion Turbines Model Turbo Power and Marine Systems FT4C-3 LF water injected twin pac).

*Similar sources with same permit no. and all of the conditions in this permit shall apply to each unit.

Located south of U.S. 90, on east bank of Suwannee River, Northwest of Live Oak, Suwannee County, Florida.

In accordance with:

Construction application dated 03-09-78
Certificate of Completion of Construction application dated 01-30-81
Renewal application dated 01-23-86
Renewal application received 11-20-90

PERMITTEE:
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

I.D. Number: 31JAX61000303
Permit/Cert: A061-189581
Date of Issue:
Expiration Date: February 18, 1996

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants, or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.
6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

PERMITTEE:
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

I.D. Number: 31JAX61000303
Permit/Cert: A061-189581
Date of Issue:
Expiration Date: February 18, 1996

GENERAL CONDITIONS

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with, or will be unable to comply with, any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.
10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.
11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the department.
12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

PERMITTEE:
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

I.D. Number: 31JAX61000303
Permit/Cert: A061-189581
Date of Issue:
Expiration Date: February 18, 1996

GENERAL CONDITIONS

13. This permit also constitutes:

- Determination of Best Available Control Technology (BACT)
- Determination of Prevention of Significant Deterioration (PSD)
- Certification of Compliance with State Water Quality Standards
- (Section 401, PL 92-500)
- Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.
- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the department, the permittee shall, within a reasonable period of time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

PERMITTEE:
 Florida Power Corporation
 Post Office Box 14042 (H2G)
 St. Petersburg, Florida 33733

I.D. Number: 31JAX61000304
 Permit/Cert: A061-189579*
 Date of Issue:
 Expiration Date: March 3, 1996

SPECIFIC CONDITIONS:

1. The maximum input/rate (operating rate) is SEE BELOW and shall not be exceeded without prior approval.

<u>Rate</u>	<u>Material</u>
739 MMBTU/hr	No. 2 fuel oil ^{1,2}

¹Sulfur content shall not exceed 0.5% by weight (per BACT dated 08-16-78).

²Fired No. 2 fuel oil shall not exceed 127 bbls/hr

2. Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition (SC) No. 1, or SC No. 3 will become effective.
3. The operating rate shall not exceed 110% of the operating rate during the most recent test except for testing purposes, but shall not exceed the rate in SC No. 1. After testing at an operating rate greater than 110% of the last test operating rate, the operating rate shall not exceed 110% of the last (submitted) test operating rate until the test report at the higher rate has been reviewed and accepted by the Department.
4. The maximum allowable emission rate for each pollutant is as follows:

<u>Pollutant</u>	<u>FAC Rule</u>	<u>lbs/hr</u>	<u>TPY</u>
NO _x ¹	17-2.630 ^{2,3}	210.22 ⁴	157.66 ⁵
SO ₂ ⁶	17-2.630 ^{7,8}	370.48 ⁹	277.86 ⁵
VE ¹⁰	17-2.630 ¹¹	< 20% opacity	

¹NO_x - nitrogen oxides

²BACT (as nitrogen dioxide) dated 08-16-78

³Also, FAC Rule 17-2.660 (NSPS adopted by ref: 40 CFR 60.332)

⁴Basis: 75 ppm by vol, dry; 1,255,500 ACFM; 726°; at 15% O₂; 30% moisture

⁵Basis: Hours of operation shall be limited to 1500 hrs per calendar year and shall be recorded.

⁶SO₂ - sulfur dioxide

⁷BACT dated 08-16-78

⁸Also, FAC Rule 17-2.660 (NSPS adopted by ref: 40 CFR 60.333)

⁹Basis: 95 ppm by vol, dry; 1,255,500 ACFM; 726°F; corrected to 15% O₂; 30% moisture

¹⁰VE - visible emissions

¹¹BACT dated 08-16-78

PERMITTEE:
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

I.D. Number: 31JAX61000304
Permit/Cert: A061-189579*
Date of Issue:
Expiration Date: March 3, 1996

SPECIFIC CONDITIONS:

5. Test the emission for the following pollutant(s) at the interval(s) indicated, notify the Department 14 days prior to testing, and submit the test report documentation to the Department within 45 days after completion of the testing:

<u>Pollutant</u>	<u>Interval</u>	<u>Test Method</u>
VE	12 months from 01-20-90	EPA 9 ¹
NO ₂	3 months from 10-30-90	(See SC #6)
SO ₂	3 months from 10-30-90	(See SC #6)

¹From Table 700-1, used EPA 9 since limit is same as General VE.

Tests and test reports shall comply with the requirements of Florida Administrative Code Rule 17-2.700(6) and (7), respectively.

6. Submit quarterly report for each source for the following within 30 days at the end of each quarter:
- Any one hour period during which water to fuel ratio falls below 0.526 for #1 unit, 0.486 for #2 unit, and 0.505 for #3 unit per 40 CFR 60.334(c)(1) for nitrogen oxides.
 - Any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.5 percent by weight per FAC Rule 1702.700(6)(c)1.b.
 - For each period, the type, reasons and duration of the firing of the emergency fuel.
 - For each quarter, total hours of operation.
7. In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.
8. Submit an annual operation report for this source on the form supplied by the Department for each calendar year on or before March 1.
9. Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.
10. The ID No. for this source is to be used on all correspondence.
12. Forms for the renewal will be sent 5 months prior to 03-03-96 and the completed forms with test results are due 90 days prior to 03-03-96.

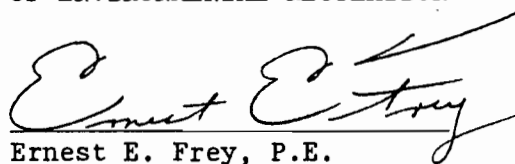
PERMITTEE:
Florida Power Corporation
Post Office Box 14042 (H2G)
St. Petersburg, Florida 33733

I.D. Number: 31JAX61000304
Permit/Cert: A061-189579*
Date of Issue:
Expiration Date: March 3, 1996

SPECIFIC CONDITIONS:

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



Ernest E. Frey, P.E.
Deputy Assistant Secretary

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to §120.52, Florida
Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged. 2/14/91
[Signature] Clerk Date

Memorandum

Florida Department of *File*
Environmental Protection

TO: Chris Kirts, NED

FROM: Scott Sheplak, P.E. *msb*

DATE: July 28, 1997

SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit
Florida Power Corporation, Suwannee River: 1210003-001-AV

Enclosed is an application package for a Title V operation permit that is being processed in Tallahassee. Please review the package for completeness and respond in writing by August 15, 1997, if you have any comments. Otherwise, no response is required.

It is very important to verify the compliance statement regarding the facility, since we do not have a readily effective means of determining compliance at the time the application was submitted. Please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. You should have a copy on file of the original initial Title V permit application submittal. Also, please do not write on these documents.

If there are any questions, please call the project engineer, Cleve Holladay, at 904/488-1344 or SC: 278-1344.

RBM/bjb

Enclosure

cc: Bob Leech


*7/28 Reading File
Cleve Holladay*

Florida Department of
Environmental Protection

Memorandum

1210003-002-AC
Pats# 6111862

TO : Howard Rhodes

FROM : Clair Fancy 

DATE : February 15, 1998

SUBJECT: Amendment to AC 61-11862, 61-11863, & 61-11864/PSD-FL-014(A) Permits
NSPS Custom Fuel Monitoring Schedule
Florida Power Corporation
Suwannee River Plant

Attached for your approval and signature is an amendment to construction permits prepared by the Bureau of Air Regulation for the FPC Suwannee River Plant. The purpose of this amendment is to specify a custom fuel monitoring schedule for sulfur dioxide and nitrogen oxides in natural gas used as fuel at this facility. As per 40 CFR 60.334(b)(2), the request for a custom fuel monitoring schedule, with data which demonstrated consistent compliance with all the conditions of this permit and 40 CFR 60, Subpart GG, was approved by the Administrator of the U.S. EPA. This amendment will not cause an increase in annual allowable emission limits or result in any equipment change.

This amendment is recommended for your approval and signature.

CF/CSL

Attachment

Scanned in 1210003-001-AV
*Also scanned as "Amendments"
under PSD-FL-014(A)



Barbara

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

February 15, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. W. Jeffrey Pardue, C.E.P.
Director of Environmental Services
Florida Power Corporation
3201 34th Street South
St. Petersburg, Florida 33711

RE: Amendment to AC 61-11862, 61-11863, & 61-11864/PSD-FL-014(A) Permits
NSPS Custom Fuel Monitoring Schedule
Florida Power Corporation
Suwannee River Plant

Dear Mr. Pardue:

The Department has reviewed your September 10, 1997 letter requesting an NSPS Custom Fuel Monitoring Schedule, which was submitted to EPA, and natural gas analysis data received by the Department on January 20, 1998. The schedule would only apply to a monitoring schedule for sulfur dioxide (SO₂) and nitrogen oxide (NO_x) when natural gas is being fired at the subject facility (Refer to Attachments Nos. 1 & 4). The facility is required by the permit to comply with Subpart GG of the New Source Performance Standards (NSPS) 40 CFR 60. For sources utilizing pipeline quality natural gas, 40 CFR 60.334(b) and 60.334(b)(2) state that a custom fuel monitoring schedule, if supported by data which demonstrates compliance with NSPS emission limits, may be approved by the Administrator of EPA. This authority has been delegated to EPA's regional offices and, the EPA Region IV will provide their determination of this request to the Department. The Department received a letter, dated October 25, 1997, from EPA on November 3, 1997, stating that a custom fuel monitoring schedule for this facility was acceptable, since it complied with all items of the attachment to the custom fuel monitoring guidance memo issued by EPA Headquarters on August 14, 1987 (Refer to Attachments Nos. 2 & 3). The results from a minimum of one sampling event each month for six months were provided by the permittee, which demonstrated consistent compliance with the allowable SO₂ emissions limits specified under 40 CFR 60.333 and this permit. Therefore, upon issuance of the amended permit, the permittee shall begin monitoring the sulfur content of natural gas once per quarter for six quarters as specified in 2.b. of the Custom Fuel Monitoring Schedule for Natural Gas. In accordance with the EPA and Department determination, the permit specific condition will be amended as follows:

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Mr. W. Jeffrey Pardue
AC 61-11862, 61-11863, & 61-11864/PSD-FL-014(A)
Suwannee River Permit Amendment
February 15, 1998
Page 2 of 5

I. Specific Condition Number;

From

Condition 3(b). The applicant shall record weekly the sulfur content, nitrogen content, and lower heating value of fuel being fired in the gas turbine.

To

Condition 3(b). The permittee shall monitor sulfur content and nitrogen content of the new No. 2 distillate fuel oil and sulfur content of natural gas. These values may be provided by the vendor and the frequency of determinations of these values shall be as follows:

A. New No. 2 Distillate Fuel Oil

The values, sulfur and nitrogen content, shall be determined on each occasion that fuel is transferred to the storage tanks from any other source. Records of these values shall be kept by the facility for a five year period for regulatory agency inspection purposes.

B. Natural Gas

Pursuant to 40 CFR 60.334(b)(2), a custom fuel monitoring schedule for the determination of these values shall be followed for the natural gas fired at this facility and shall be as follows:

Custom Fuel Monitoring Schedule for Natural Gas (NG)

1. Monitoring of fuel nitrogen content shall not be required if NG is the only fuel being fired in the gas turbines.
2. Sulfur Monitoring
 - a. Analysis for fuel sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternative method. The reference methods are ASTM D1072-80, ASTM D3031-81, ASTM D3246-81, and ASTM D4084-82 as referenced in 40 CFR 60.335(b)(2), or the latest edition(s).

Mr. W. Jeffrey Pardue
AC 61-11862, 61-11863, & 61-11864/PSD-FL-014(A)
Suwannee River Permit Amendment
February 15, 1998
Page 3 of 5

- b. This custom fuel monitoring schedule shall become effective on the date this permit amendment becomes valid. Effective the date of this custom schedule, sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content, and indicates consistent compliance with 40 CFR 60.333 and the conditions of this permit, then sulfur monitoring shall be conducted once per quarter for six quarters. If monitoring data is provided by the applicant which demonstrates consistent compliance with the requirements herein the applicant may begin monitoring as per the requirements of 2.c.
 - c. If after the monitoring required in item 2.b. above, or herein, the sulfur content of the fuel shows little variability and, calculated as sulfur dioxide, represents consistent compliance with the sulfur dioxide emission limits specified under 40 CFR 60.333 and the conditions of this permit, sample analysis shall be conducted twice per annum. This monitoring shall be conducted during the first and third quarters of each calendar year.
 - d. Should any sulfur analysis as required in items 2.b. or 2.c. above indicate noncompliance with 40 CFR 60.333 and the conditions of this permit, the owner or operator shall notify the Department of such excess emissions and the custom schedule shall be re-examined by the Environmental Protection Agency. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
3. If there is a change in fuel supply, the owner or operator must notify the Department of such change for re-examination of this custom schedule. A substantial change in fuel quality shall be considered as a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
 4. Records of sample analysis and fuel supply pertinent to this custom schedule shall be retained for a period of five years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.

II. Attachments to be Incorporated;

- FPC letter dated September 26, 1997
- EPA letter dated August 14, 1987
- EPA letter dated October 25, 1997
- Natural Gas Analysis Data received January 20, 1998

Mr. W. Jeffrey Pardue
AC 61-11862, 61-11863, & 61-11864/PSD-FL-014(A)
Suwannee River Permit Amendment
February 15, 1998
Page 4 of 5

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

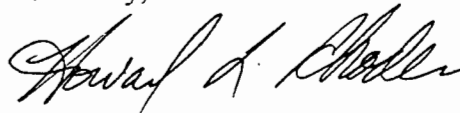
- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action;
- (g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

Mr. W. Jeffrey Pardue
AC 61-11862, 61-11863, & 61-11864/PSD-FL-014(A)
Suwannee River Permit Amendment
February 15, 1998
Page 5 of 5

This letter amendment must be attached to AC 61-11862, AC 61-11863, & AC 61-11864/
PSD-FL-014(A), and shall become part of the permits.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/CSL

Attachments

cc: C. Kirts, NED K. Kosky, P.E., Golder Associates, Inc.
 A. Linero, DEP G. Kamaras, LEAF
 S. Osbourn, FPC

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this
AMENDMENT was sent by certified mail to the person(s) listed below and all copies were sent
by U.S. mail to the person(s) listed above before close of business on 02-16-98 :

Mr. W. Jeffrey Pardue, C.E.P., FPC

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to Section 120.52(7),
Florida Statutes, with the designated agency
Clerk, receipt of which is hereby acknowledged.

Sandra Knight 02-16-98
(Clerk) (Date)

Attachment No. 1 - Applicants Request

Amendment to AC 61-11862, 61-11863, & 61-11864/PSD-FL-014(A) Permits
NSPS Custom Fuel Monitoring Schedule
Florida Power Corporation
Suwannee River Plant



bcc: J. M. Kennedy
J. L. Tillman
D. W. Sorrick
W. B. Hicks
M. V. Westbrook

File: DeBary/Air/Corresp.
Int. City/Air/Corresp.
Suwannee/Air/Corresp.

September 10, 1997

Mr. Clair Fancy, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Magnolia Park Courtyard
Tallahassee, Florida 32301

Dear Mr. Fancy:

Re: Florida Power Corporation's Intercession City, DeBary and Suwannee Facilities
Customized Fuel Monitoring Schedules

Florida Power Corporation (FPC) has been permitted for the use of natural gas at the above-referenced three sites. Specifically, natural gas conversions have been permitted for DeBary combustion turbines (CTs) 7, 8, 9 and 10; Intercession City CTs 7, 8, 9, 10 and 11; and Suwannee CTs 1, 2 and 3. These CTs are subject to New Source Performance Standards (NSPS 40 CFR 60, Subpart GG). 40 CFR 60.334(b) requires the owner/operator of any CT to monitor the sulfur and nitrogen content of the fuel as follows: 1) If the turbine fuel is supplied by a bulk storage tank, then the sulfur and nitrogen content are to be determined whenever new fuel is transferred into the bulk storage tank, and 2) If the turbine fuel is supplied without an intermediate bulk storage tank, then daily monitoring of the sulfur and nitrogen content of the fuel is required.

Since the natural gas used by the CTs does not pass through an intermediate bulk storage tank, FPC is hereby requesting a customized fuel monitoring schedule as allowed by 40 CFR 60.334(b)(2). While firing natural gas, FPC requests the following customized fuel monitoring schedule which was developed based on an EPA guidance memorandum (Attachment A):

1. Monitoring of natural gas nitrogen content shall not be required in accordance with page 2 of the EPA guidance memorandum attached.
2. Sulfur Monitoring
 - a. Analysis for sulfur content of the natural gas shall be conducted using one of the EPA-approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternate method. The reference methods are: ASTM D1072-80; ASTM D3031-81; ASTM D3245-81; and ASTM D4048-82 as referenced in 40 CFR 60.335(b)(2).

Mr. Fancy
September 10, 1997
Page 2

- b. Effective on the approval date of the customized fuel monitoring schedule, sulfur monitoring shall be conducted twice a month for six months. If this monitoring shows little variability in the sulfur content and indicates consistent compliance with 40 CFR 60.333, then sulfur monitoring shall be conducted once per quarter for six quarters.
- c. If the monitoring required by 2(b) above, of the sulfur content of the natural gas shows little variability and the calculated sulfur dioxide emissions represent consistent compliance with the sulfur dioxide emission limits specified under 40 CFR 60.333, sample analysis shall be conducted twice per year. This monitoring shall be conducted during the first and third quarters of each calendar year.
- d. Should any sulfur analysis, as required by items 2(b) or 2(c) above, indicate noncompliance with 40 CFR 60.333, FPC will notify the Department of Environmental Protection (DEP) of such excess emission and the customized fuel monitoring schedule shall be reexamined. The sulfur content of the natural gas shall be monitored weekly during the interim period while this schedule is being reexamined.
3. FPC will notify the DEP of any change in natural gas supply for reexamination of this monitoring schedule. A substantial change in natural gas quality (i.e., sulfur content varying by more than 10 grains/1000 of gas) shall be considered as a change in natural gas supply. Sulfur content of the natural gas will be monitored weekly during the interim period when this monitoring schedule is being reexamined.
4. Records of sample analysis and natural gas supply pertinent to this monitoring schedule shall be retained by FPC for a period of three years, and be available for inspection by appropriate regulatory personnel.
5. FPC will obtain the sulfur content of the natural gas from Florida Gas Transmission Company at its Brooker Lab.

Data from natural gas at the Brooker Lab site is considered representative of the sulfur content of the natural gas at these three FPC sites (DeBary, Intercession City and Suwannee), since there is no additional entry point for sulfur or other elements/compounds which may affect the quality of the natural gas.

If you or your staff have any questions about this request, please do not hesitate to contact me at (813) 866-5159.

Sincerely,



Scott H. Osbourn
Senior Environmental Engineer

Attachments

cc/attach: Mike Harley, DEP
David McNeal, EPA Region IV
Ken Kosky, P.E., Golder Associates

Attachment No. 2 - EPA Guidance Memorandum

Amendment to AC 61-11862, 61-11863, & 61-11864/PSD-FL-014(A) Permits
NSPS Custom Fuel Monitoring Schedule
Florida Power Corporation
Suwannee River Plant

05 07-92 11:45AM FROM EPA FPS/SSCD

Best Available Copy



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 14 1992

OFFICE OF
AIR AND CLIMATE

MEMORANDUM

SUBJECT: Authority for Approval of Custom Fuel Monitoring Schedules Under NSPS Subpart GG

FROM: John B. Rasnic, Chief *John B. Rasnic*
Compliance Monitoring Branch

TO: Air Compliance Branch Chiefs
Regions II, III, IV, V, VI and IX

Air Programs Branch Chiefs
Regions I-X

The NSPS for Stationary Gas Turbines (Subpart GG) at 40 CFR 60.334(b)(2) allows for the development of custom fuel monitoring schedules as an alternative to daily monitoring of the sulfur and nitrogen content of fuel fired in the turbines. Regional Offices have been forwarding custom fuel monitoring schedules to the Stationary Source Compliance Division (SSCD) for consideration since it was understood that authority for approval of these schedules was not delegated to the Regions. However, in consultation with the Emission Standards and Engineering Division, it has been determined that the Regional Offices do have the authority to approve Subpart GG custom fuel monitoring schedules. Therefore it is no longer necessary to forward these requests to Headquarters for approval.

Over the past few years, SSCD has issued over twenty custom schedules for sources using pipeline quality natural gas. In order to maintain national consistency, we recommend that any schedules Regional Offices issue for natural gas be no less stringent than the following: sulfur monitoring should

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TO 29195413470

PG06/007

Best Available Copy

2

be bimonthly, followed by quarterly, then semiannual, given at least six months of data demonstrating little variability in sulfur content and compliance with 60.333 at each monitoring frequency; nitrogen monitoring can be waived for pipeline quality natural gas, since there is no fuel-bound nitrogen and since the free nitrogen does not contribute appreciably to NO_x emissions. Please see the attached sample custom schedule for details. Given the increasing trend in the use of pipeline quality natural gas, we are investigating the possibility of amending Subpart GG to allow for less frequent sulfur monitoring and a waiver of nitrogen monitoring requirements where natural gas is used.

Where sources using oil request custom fuel monitoring schedules, Regional Offices are encouraged to contact SSCD for consultation on the appropriate fuel monitoring schedule. However, Regions are not required to send the request itself to SSCD for approval.

If you have any questions, please contact Sally M. Farrell at PFS 382-2675.

Attachment

cc: John Cranshaw
George Walsh
Robert Ajax
Earl Szlo

05-07-92 11:45AM FROM EPA FPS/SSCD

TO 89195413470

P007/007

Best Available Copy

Enclosure

Conditions for Custom Fuel Sampling Schedule for Stationary Gas Turbines

1. Monitoring of fuel nitrogen content shall not be required while natural gas is the only fuel fired in the gas turbine.
2. Sulfur Monitoring
 - a. Analysis for fuel sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternative method. The reference methods are: ASTM D1072-80; ASTM D3031-81; ASTM D3246-81; and ASTM D4084-82 as referenced in 40 CFR 60.333(b)(2).
 - b. Effective the date of this custom schedule, sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content, and indicates consistent compliance with 40 CFR 60.333, then sulfur monitoring shall be conducted once per quarter for six quarters.
 - c. If after the monitoring required in item 2(b) above, or herein, the sulfur content of the fuel shows little variability and, calculated as sulfur dioxide, represents consistent compliance with the sulfur dioxide emission limits specified under 40 CFR 60.333, sample analysis shall be conducted twice per annum. This monitoring shall be conducted during the first and third quarters of each calendar year.
 - d. Should any sulfur analysis as required in items 2(b) or 2(c) above indicate noncompliance with 40 CFR 60.333, the owner or operator shall notify the State Air Control Board of such excess emissions and the custom schedule shall be re-examined by the Environmental Protection Agency. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
3. If there is a change in fuel supply, the owner or operator must notify the State of such change for re-examination of this custom schedule. A substantial change in fuel quality shall be considered as a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
4. Records of sample analysis and fuel supply pertinent to this custom schedule shall be retained for a period of three years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.

Attachment No. 3 - EPA Determination

Amendment to AC 61-11862, 61-11863, & 61-11864/PSD-FL-014(A) Permits
NSPS Custom Fuel Monitoring Schedule
Florida Power Corporation
Suwannee River Plant



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
100 ALABAMA STREET, S.W.
ATLANTA, GEORGIA 30303-3104

OCT 23 1997

4APT-ARB

RECEIVED

NOV 03 1997

BUREAU OF
AIR REGULATION

Mr. Michael M. Harley, P.E., DEE
P.E. Administrator
Emissions Monitoring Section
Bureau of Air Monitoring and Mobile Sources
Air Resources Management Division
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJECT: Custom Fuel Monitoring Schedule Proposed for
Stationary Gas Turbines at the Florida Power
Corporation Intercession City, DeBary, and Suwannee
Power Plants

Dear Mr. Harley:

This letter is in response to your September 26, 1997,
request for a determination regarding a custom fuel monitoring
schedule proposed for the following combustion turbines (CTs) at
the referenced power plants:

Intercession City: CTs 7, 8, 9, and 10

DeBary: CTs 7, 8, 9, and 10

Suwannee: CTs 1, 2, and 3

The natural gas fired turbines listed above are subject to
40 C.F.R. Part 60, Subpart GG (Standards of Performance for
Stationary Gas Turbines), and Region 4 has concluded that the
proposed custom fuel monitoring schedule is acceptable because it
is consistent with guidance that the U.S. Environmental
Protection Agency (EPA) previously issued regarding such
schedules. In addition, the Florida Power Corporation proposal
to use fuel analysis results from sampling conducted at the
Florida Gas Transmission Company Brooker Lab for all three plants
is acceptable since there are no additional entry points for
natural gas or other sulfur containing streams between the
proposed sampling site and the three plants in question.

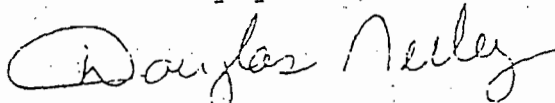
According to 40 C.F.R. §60.334(b)(2), owners and operators
of stationary gas turbines subject to Subpart GG are required to
monitor fuel nitrogen and sulfur content on a daily basis if a
company does not have intermediate bulk storage for its fuel.
40 C.F.R. §60.334(b)(2) also contains provisions allowing owners
and operators of turbines that do not have intermediate bulk
storage for their fuel to request approval of custom fuel

monitoring schedules that allow for less frequent monitoring of fuel nitrogen and sulfur content. In a memorandum dated August 14, 1987, the EPA Compliance Monitoring Branch provided guidance regarding acceptable custom fuel monitoring provisions for natural gas fired turbines, and this memorandum also gave EPA regional offices the authority to approve custom fuel monitoring schedules for Subpart GG turbines.

Under the EPA guidance issued in 1987, the requirement to monitor the nitrogen content of pipeline quality natural gas was waived entirely since the Agency determined that this type of fuel does not contain any fuel-bound nitrogen that can cause NO_x emissions. As an alternative to daily sulfur monitoring, the 1987 policy describes a three stage process under which owners and operators of natural gas fired turbines can obtain approval to conduct sampling on a semiannual basis. In the first step of this process the sulfur content of the fuel must be monitored on a bimonthly basis for at least six months. If the results of this bimonthly monitoring verify compliance with the applicable sulfur limit and indicate little variability in the sulfur content of the fuel, the fuel sampling and analysis frequency can be reduced from a bimonthly to a quarterly basis. If six quarters of fuel monitoring data verify compliance with the applicable sulfur standard and indicate little variability in the sulfur content of the fuel, the sampling and analysis frequency can be reduced to a semiannual basis. Since the custom fuel monitoring approach proposed by the Florida Power Corporation for the natural gas fired turbines at the Intercession City, DeBary, and Suwannee Plants is identical to that outlined in the policy issued by EPA in 1987, it is acceptable to Region 4.

If you have any questions about the determination provided in this letter, please contact Mr. David McNeal of my staff at 404/562-9102.

Sincerely yours,



R. Douglas Neeley
Chief
Air and Radiation Technology
Branch
Air, Pesticides and Toxics
Management Division

cc: Charles Logan, FL DEP

Attachment No. 4 - Natural Gas Sulfur Analysis

Amendment to AC 61-11862, 61-11863, & 61-11864/PSD-FL-014(A) Permits
NSPS Custom Fuel Monitoring Schedule
Florida Power Corporation
Suwannee River Plant

Southern Natural Gas Company
Post Office Box 147
Chalmette LA 70044
504 682 6200

SOUTHERN NATURAL GAS

To: Scott Osbourn
Subject: Sulfur and BTU data for Florida Power
Date: January 14, 1998

Dear Mr. Osbourn:

Captioned are the results that you requested concerning sulfur and BTU content sampled from Southern Natural Gas' pipeline. These results were based on "spot" samples and were taken with cylinders that comply to sulfur and BTU measurement standards.

Date Sampled	Sulfur Grains/100 cu ft	BTU @ 14.73 dry
7-1-97	0.00416	1024
7-14-97	0.00198	1025
8-14-97	0.0030	1025
8-28-97	0.0198	1025
9-23-97	0.00396	1026
10-9-97	0.00297	1024
10-21-97	0.00396	1019
10-24-97	0.00554	1026
11-14-97	0.00812	1029
12-19-97	0.00396	1028

Please feel free to call the lab with any further questions or concerns.

Respectfully,



Dwight J. Romig
Chemist

RECEIVED

JAN 20 1998

BUREAU OF
AIR REGULATION

SOUTHERN NATURAL GAS

To: Scott Osbourn
Subject: Sulfur and BTU data for Florida Power
Date: January 14, 1998

Dear Mr. Osbourn:

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9-23-97	0.00396	1026
10-9-97	0.00297	1024
10-21-97	0.00396	1019
10-24-97	0.00554	1026
11-14-97	0.00812	1029
12-19-97	0.00396	1028

Please feel free to call the lab with any further questions or concerns.

Respectfully,



Dwight J. Romig
Chemist

RECEIVED

JAN 20 1998

BUREAU OF
AIR REGULATION

Florida Department of
Environmental Protection

Memorandum


RECEIVED

BAR

MAR 19 1999

BUREAU OF
AIR REGULATION

1210003-NA-AC
Pats# 6111862

TO : Howard Rhodes
FROM : Clair Fancy 
DATE : March 19, 1999

SUBJECT: Amendment to AC 61-11862, 61-11863, & 61-11864/PSD-FL-014(A) Permits
NSPS Custom Fuel Monitoring Schedule
Florida Power Corporation
Suwannee River Plant

Attached for your approval and signature is an amendment to construction permits prepared by the Bureau of Air Regulation for the FPC Suwannee River Plant. The purpose of this amendment is to specify a custom fuel monitoring schedule for sulfur dioxide and nitrogen oxides in natural gas used as fuel at this facility. As per 40 CFR 60.334(b)(2), the request for a custom fuel monitoring schedule, with data which demonstrated consistent compliance with all the conditions of this permit and 40 CFR 60, Subpart GG, was approved by the Administrator of the U.S. EPA. This amendment will not cause an increase in annual allowable emission limits or result in any equipment change.

This amendment is recommended for your approval and signature.

CF/RBM

Attachment

* Scanned in 1210003-001-Av
- Also scanned as "amendment"
under PSD-014(A)



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

March 19, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. W. Jeffrey Pardue, C.E.P.
Director of Environmental Services
Florida Power Corporation
3201 34th Street South
St. Petersburg, Florida 33711

RE: Amendment to AC 61-11862, 61-11863, & 61-11864/PSD-FL-014(A) Permits
NSPS Custom Fuel Monitoring Schedule
Florida Power Corporation
Suwannee River Plant

Dear Mr. Pardue:

The Department has reviewed your September 10, 1997 letter requesting an NSPS Custom Fuel Monitoring Schedule, which was submitted to EPA, and natural gas analysis data received by the Department on January 20, 1998. The schedule would only apply to a monitoring schedule for sulfur dioxide (SO₂) and nitrogen oxide (NO_x) when natural gas is being fired at the subject facility (Refer to Attachments Nos. 1 & 4). The facility is required by the permit to comply with Subpart GG of the New Source Performance Standards (NSPS) 40 CFR 60. For sources utilizing pipeline quality natural gas, 40 CFR 60.334(b) and 60.334(b)(2) state that a custom fuel monitoring schedule, if supported by data which demonstrates compliance with NSPS emission limits, may be approved by the Administrator of EPA. This authority has been delegated to EPA's regional offices and, the EPA Region IV will provide their determination of this request to the Department. The Department received a letter, dated October 25, 1997, from EPA on November 3, 1997, stating that a custom fuel monitoring schedule for this facility was acceptable, since it complied with all items of the attachment to the custom fuel monitoring guidance memo issued by EPA Headquarters on August 14, 1987 (Refer to Attachments Nos. 2 & 3). The results from a minimum of one sampling event each month for six months were provided by the permittee, which demonstrated consistent compliance with the allowable SO₂ emissions limits specified under 40 CFR 60.333 and this permit. Therefore, upon issuance of the amended permit, the permittee shall begin monitoring the sulfur content of natural gas once per quarter for six quarters as specified in 2.b. of the Custom Fuel Monitoring Schedule for Natural Gas. In accordance with the EPA and Department determination, the permit specific condition will be amended as follows:

Is your RETURN ADDRESS completed on the reverse side?

SENDER: ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
3. Article Addressed to: Mr. W. Jeffrey Pardue, C.E.P. Director of Environmental Services Florida Power Corporation 3201 Thirty-fourth Street South St. Petersburg, Florida 33733	4a. Article Number P 263 585 292	
5. Received By: (Print Name)		4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD
6. Signature (Addressee or Agent) X <i>[Signature]</i>		7. Date of Delivery MAR 24 1999
8. Addressee's Address (Only if requested and fee is paid)		

Thank you for using Return Receipt Service.

PS Form 3811, December 1994

102595-97-B-0179

Domestic Return Receipt

P 263 585 292

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to	<i>Mr. W. Jeffrey Pardue</i>
Street & Number	<i>3201 34th Street South</i>
Post Office, State, & ZIP Code	<i>St. Petersburg, FL 33733</i>
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>3/22/99</i>
<i>FPC - Suwannee River Plant NSPS Amendment to ac Permit Custom Fuel Monitoring Schedule</i>	

PS Form 3800, April 1995

Mr. W. Jeffrey Pardue
AC 61-11862, 61-11863, & 61-11864/PSD-FL-014(A)
Suwannee River Permit Amendment
March 19, 1999
Page 2 of 5

I. Specific Condition Number;

From

Condition 3(b). The applicant shall record weekly the sulfur content, nitrogen content, and lower heating value of fuel being fired in the gas turbine.

To

Condition 3(b). The permittee shall monitor sulfur content and nitrogen content of the new No. 2 distillate fuel oil and sulfur content of natural gas. These values may be provided by the vendor and the frequency of determinations of these values shall be as follows:

A. New No. 2 Distillate Fuel Oil

The values, sulfur and nitrogen content, shall be determined on each occasion that fuel is transferred to the storage tanks from any other source. Records of these values shall be kept by the facility for a five year period for regulatory agency inspection purposes.

B. Natural Gas

Pursuant to 40 CFR 60.334(b)(2), a custom fuel monitoring schedule for the determination of these values shall be followed for the natural gas fired at this facility and shall be as follows:

Custom Fuel Monitoring Schedule for Natural Gas (NG)

1. Monitoring of fuel nitrogen content shall not be required if NG is the only fuel being fired in the gas turbines.
2. Sulfur Monitoring
 - a. Analysis for fuel sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternative method. The reference methods are ASTM D1072-80, ASTM D3031-81, ASTM D3246-81, and ASTM D4084-82 as referenced in 40 CFR 60.335(b)(2), or the latest edition(s).

Mr. W. Jeffrey Pardue
AC 61-11862, 61-11863, & 61-11864/PSD-FL-014(A)
Suwannee River Permit Amendment
March 19, 1999
Page 4 of 5

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action;
- (g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

Mr. W. Jeffrey Pardue
AC 61-11862, 61-11863, & 61-11864/PSD-FL-014(A)
Suwannee River Permit Amendment
March 19, 1999
Page 5 of 5

This letter amendment must be attached to AC 61-11862, AC 61-11863, & AC 61-11864/
PSD-FL-014(A), and shall become part of the permits.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/RBM

Attachments

cc: C. Kirts, NED
A. Linero, DEP
S. Osbourn, FPC
K. Kosky, P.E., Golder Associates, Inc.
G. Kamaras, LEAF

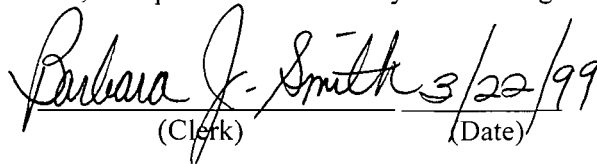
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this AMENDMENT was sent by certified mail to the person(s) listed below and all copies were sent by U.S. mail to the person(s) listed above before close of business on 3/22/99 :

Mr. W. Jeffrey Pardue, C.E.P., FPC

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to Section 120.52(7),
Florida Statutes, with the designated agency
Clerk, receipt of which is hereby acknowledged.


(Clerk) 3/22/99 (Date)



RECEIVED

February 24, 1999

MAR 02 1999

Mr. Clair Fancy, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

BUREAU OF AIR REGULATION

BAR conference room

Dear Mr. Fancy:

March 17 (10-12 noon, 1-3 p.m.)

Re: Status of Title V Permits

As you know, several of Florida Power Corporation's (FPC) Title V permits remain in the Initial Draft or Revised Draft stages and progress is being made very slowly. This is no one's fault in particular; it's difficult to establish any momentum when the involved parties are processing so many permits and some of the issues (e.g., periodic monitoring) are moving targets. As you and Mr. Scott Osbourn recently discussed, it may be helpful if all involved parties at FPC and the Department were to meet at one time to discuss any remaining unresolved issues.

FPC proposes, with your concurrence, to arrange for a one- or two-day meeting between FPC and the Department to resolve issues associated with the following Title V permits that remain in either the Initial Draft or Revised Draft stage: Anclote, Bartow, Crystal River, Suwannee, Tiger Bay, Bayboro and the University of Florida. It would be desirable to have you, Scott Sheplak and the permit engineers responsible for these facilities in attendance. Mr. Scott Osbourn and I will represent FPC.

It is FPC's desire to advance these Title V permits to the Final Permit stage as expeditiously as possible. FPC has recently requested additional extensions of time on the above-mentioned permits until April 1, 1999 and would like to resolve these permits prior to that date. We will contact you in the next day or two to coordinate a meeting date. If you should have any questions in the meantime, please contact either Scott Osbourn at (727) 826-4258 or me at (727) 826-4334.

Sincerely,

J. Michael Kennedy

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

cc: Scott Sheplak
Doug Beason, OGC
Jeffrey Brown, OGC
Robert Manning, HGS&S

processor

Andote Mike
Bartow Ed
Crystal Ed
SUWANNEE Bruce
Tiger Bay Jonathan
Bayboro Ed
UofF Bruce

{ See responses to
KPC comments for
Bartow or Crystal
River for
consistency }