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THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

MAY 06 1999

BUREAU OF
AIR REGULATION

5/5/99

In the Matter of an
Application for Permit by:

OGC CASE NO. 97-1641

Florida Power Corporation,
Suwannee River Plant

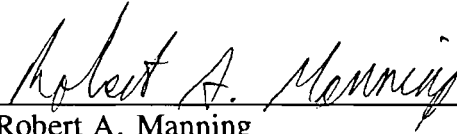
DRAFT Permit No.: 1210003-001-AV
Suwannee County, Florida

NOTICE OF WITHDRAWAL OF EXTENSION OF TIME

The Florida Power Corporation (FPC), by and through undersigned counsel, hereby withdraws its Request for Extension of Time to file a petition for formal administrative proceedings in accordance with Chapter 120, Florida Statutes. FPC filed its last Request for Extension of Time until June 1, 1999, in response to the "Intent to Issue Title V Air Operation Permit" (Revised Draft Permit No. 1210003-001-AVC) for the Suwannee River Plant located in Suwannee County, Florida, to negotiate certain changes in the Revised Draft Title V permit with the Department of Environmental Protection (Department). Based on discussions with Department representatives, FPC and the Department have come to an agreement on the issues involved in the above-referenced Revised Draft Title V permit. The agreement between FPC and the Department is contained in the preliminary Proposed Title V permit, a copy of which is attached to this Notice. Therefore, FPC hereby withdraws its Request for Extension, conditioned upon the Department's issuance of the Proposed Permit in accordance with the Department's agreement with FPC.

Respectfully submitted this 5th day of May, 1999.

HOPPING GREEN SAMS & SMITH, P.A.

A handwritten signature in cursive script, reading "Robert A. Manning", is written over a solid horizontal line.

Robert A. Manning
Fla. Bar No. 0035173
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Post Office Box 6526
Tallahassee, FL 32314
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Attorney for Florida Power Corporation

CERTIFICATE OF SERVICE

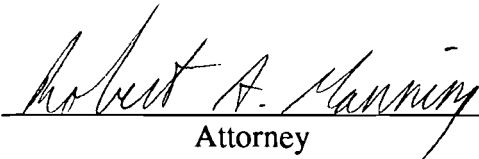
I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by

U.S. Mail on this 5th day of May, 1999.

Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Scott Sheplak
Bureau of Air Regulation
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Jeffrey Brown
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Attorney

Florida Power Corporation
Suwannee River Facility
Facility ID No.: 1210003
Suwannee County

Initial Title V Air Operation Permit
PROPOSED Permit No.: 1210003-001-AV

Permitting Authority:

State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-1344
Fax: 850/922-6979

Compliance Authority:

Department of Environmental Protection
Northeast District Office
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32256-7590
Telephone: 904/448-4300
Fax: 904/448-4363

Initial Title V Air Operation Permit
PROPOSED Permit No.: 1210003-001-AV

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Permittee:

Florida Power Corporation
3201 34th Street South
St. Petersburg, Florida 33711

PROPOSED Permit No.: 1210003-001-AV**Facility ID No.:** 1210003**SIC No.:** 49; 4911**Project:** Initial Title V Air Operation Permit

This permit is for the operation of the Florida Power Corporation's Suwannee River Facility. This facility is located South of Route 90 - Northwest of Live Oak, Suwannee County; UTM Coordinates: Zone 17, 290.5 km East and 3362.2 km North; Latitude: 30° 22' 35" North and Longitude: 83° 10' 50" West.

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. 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 permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix U-1, List of Unregulated Emissions Units and/or Activities

Appendix I-1, List of Insignificant Emissions Units and/or Activities

APPENDIX TV-2, TITLE V CONDITIONS (version dated 11/10/98)

APPENDIX SS-1, STACK SAMPLING FACILITIES (dated 10/07/96)

TABLE 297.310-1, CALIBRATION SCHEDULE (dated 10/07/96)

FIGURE 1 - SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS

AND MONITORING SYSTEMS PERFORMANCE REPORT (40 CFR 60, July 1996)

Phase II Acid Rain Application/Compliance Plan received 12/14/95

Alternate Sampling Procedure: ASP Number 97-B-01

ORDER CORRECTING SCRIVENER'S ERROR: ASP Number 97-B-01

Effective Date: January 1, 2000**Renewal Application Due Date:** July 5, 2004**Expiration Date:** December 31, 2004

Howard L. Rhodes, Director
Division of Air Resources Management

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of three boilers, Nos. 1, 2 and 3, and three combustion turbine peaking units, Nos. 1, 2 and 3. There are no air pollution controls associated with the boilers. 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 fuel. Combustion turbine peaking units Nos. 1, 2 and 3 fire natural gas or No. 2 fuel oil. There is a fuel oil storage tank farm associated with the boilers and combustion turbines. Also, included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

<u>E.U. ID Nos.</u>	<u>Brief Description</u>
-001	Boiler No. 1
-002	Boiler No. 2
-003	Boiler No. 3
-004	Combustion Turbine Peaking Unit No. 1 (P-1)
-005	Combustion Turbine Peaking Unit No. 2 (P-2)
-006	Combustion Turbine Peaking Unit No. 3 (P-3)

Unregulated Emissions Units and/or Activities

-xxx Petroleum Product Storage - Fugitive VOCs

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/ID Number Changes

These documents are on file with the permitting authority:

BACT Determination dated August 11, 1978.

Initial Title V Permit Application received June 14, 1996.

Mr. Scott H. Osbourn's letter received January 21, 1997.

DRAFT Title V Permit clerked September 7, 1997.

Mr. Scott H. Osbourn's letter received November 17, 1997.

Mr. Scott H. Osbourn's letter received February 15, 1999.

Mr. Scott H. Osbourn's Fax received March 31, 1999.

Mr. Scott H. Osbourn's Fax received April 13, 1999.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-2, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-2, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}
2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard.
Except as otherwise provided in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the test method of compliance for visible emissions, incorporated and adopted by reference in Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]
4. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:
 - a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and,
 - b. certification forms and/or RMPs according to the promulgated rule schedule.[40 CFR 68]
5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]
6. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

7. General Pollutant Emission Limiting Standards. Volatile Organic Compounds Emissions or Organic Solvents Emissions. No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

{Permitting note: There are no requirements deemed necessary and ordered by the Department at this time.}

[Rule 62-296.320(1)(a), F.A.C.]

8. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northeast District office:

Department of Environmental Protection
Northeast District Office
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32256-7590
Telephone: 904/448-4300
Fax: 904/448-4363

10. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air & EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 32303
Telephone: 404/562-9099
Fax: 404/562-9095

Section III. Emissions Units.

Subsection A. This section addresses the following emissions units.

<u>E.U. ID Nos.</u>	<u>Brief Description</u>
-001	Boiler No. 1
-002	Boiler No. 2
-003	Boiler No. 3

Fossil fuel fired steam generator No. 1 is a nominal 35.0 megawatt (electric) steam generator designated as Boiler No. 1. The emissions unit is allowed to fire No. 2 fuel oil, No. 6 fuel oil, “on specification” used oil, natural gas, and a blend of fuel oil and natural gas. The No. 2 fuel oil will be fired as an ignitor fuel. The “on-specification” used oil will be generally fired as a blended fuel oil with either the No. 2 fuel oil or the No. 6 fuel oil. Emissions are uncontrolled on Boiler No. 1. The combustion gases exhaust through a single stack of 110 feet. Fossil fuel fired steam generator No. 1 began commercial operation in 1953.

Fossil fuel fired steam generator No. 2 is a nominal 34.0 megawatt (electric) steam generator designated as Boiler No. 2. The emissions unit is allowed to fire No. 2 fuel oil, No. 6 fuel oil, “on specification” used oil, natural gas, and a blend of fuel oil and natural gas. The No. 2 fuel oil will be fired as an ignitor fuel. The “on-specification” used oil will be generally fired as a blended fuel oil with either the No. 2 fuel oil or the No. 6 fuel oil. Emissions are uncontrolled on Boiler No. 2. The combustion gases exhaust through a single stack of 110 feet. Fossil fuel fired steam generator No. 2 began commercial operation in 1954.

Fossil fuel fired steam generator No. 3 is a nominal 84.0 megawatt (electric) steam generator designated as Boiler No. 3. The emissions unit is allowed to fire No. 2 fuel oil, No. 6 fuel oil, “on specification” used oil, natural gas, and a blend of fuel oil and natural gas. The No. 2 fuel oil will be fired as an ignitor fuel. The “on-specification” used oil will be generally fired as a blended fuel oil with either the No. 2 fuel oil or the No. 6 fuel oil. Emissions are uncontrolled on Boiler No. 3. The combustion gases exhaust through a single stack of 135 feet. Fossil fuel fired steam generator No. 3 began commercial operation in 1956.

{Permitting note(s): These emissions units are regulated under Acid Rain, Phase II; Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input; and, Rule 62-296.702, F.A.C., Fossil Fuel Steam Generators.}

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum operation heat input rates are as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
1	460	Natural Gas
	450	Fuel Oil ²
	450 - 460 ¹	Fuel Oil ² and Natural Gas
	450	On-specification Used Oil ⁶
2	450	Natural Gas
	444	Fuel Oil ²
	444 - 450 ¹	Fuel Oil ² and Natural Gas
	444	On-specification Used Oil ⁶
3	880	Natural Gas
	881	Fuel Oil ³
	880 - 881 ¹	Natural Gas and Fuel Oil ³
	388 ⁴	Natural Gas
	493 ⁵	Fuel Oil ²
	388 - 493 ¹	Natural Gas and Fuel Oil ²
	493 - 881	On-specification Used Oil ⁶

Note:

- ¹ When a blend of fuel oil and natural gas is fired, the heat input is prorated based on the percent heat input of each fuel.
- ² Fuel oil sulfur content maximum of 2.5%, by weight.
- ³ Fuel oil sulfur content maximum of 1.0%, by weight.
- ⁴ Basis: 44% of 881 MMBtu/hr heat input.
- ⁵ Basis: 56% of 881 MMBtu/hr heat input.
- ⁶ Maximum sulfur content, percent by weight, shall be the same as that allowed for the fuel oil for each boiler.

{Permitting note: The heat input limitations have been placed in the permit to identify the capacity of each emissions unit for purposes of confirming that emissions testing is conducted within 90-100 percent of the emissions unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate limits and to aid in determining future rule applicability.}

[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.405, F.A.C.; AO61-189582 (#1 & #2) and AO61-189581 (#3); and, applicant request dated June 14, 1996.]

A.2. Emissions Unit Operating Rate Limitation After Testing. See Specific Condition A.23.
 [Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation - Fuels. The only fuels allowed to be burned are No. 2 fuel oil, No. 6 fuel oil, "on-specification" used oil, natural gas, and a blend of fuel oil and natural gas. The No. 2 fuel oil is fired as an ignitor fuel. The "on-specification" used oil is generally fired as a blended fuel oil with either the No. 2 fuel oil or the No. 6 fuel oil. Used oil containing PCBs above the detectable level of 2 ppm cannot be used for startup or shutdown.

[Rule 62-213.410, F.A.C.; AO61-189582 (#1 & #2) and AO61-189581 (#3); and, applicant request dated June 14, 1996.]

A.4. Hours of Operation. The emissions units may operate continuously, i.e., 8,760 hours/year. [Rule 62-210.200(PTE), F.A.C.; and, AO61-189582 (#1 & #2) and AO61-189581 (#3)]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

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. [Rules 62-296.405(1)(a) and 62-296.702(2)(b), F.A.C.; and, AO61-189582 (#1 & #2) and AO61-189581 (#3)]

A.6. Visible Emissions - Soot Blowing and Load Change. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

Visible emissions above 60 percent opacity shall be allowed for not more than four, 6-minute periods, during the 3-hour period of excess emissions allowed by Rule 62-210.700(3), F.A.C., for boiler cleaning and load changes, at emissions units which have installed and are operating, or have committed to install and operate, continuous opacity monitors.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

[Rule 62-210.700(3), F.A.C.]

A.7. Particulate Matter. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods.

[Rule 62-296.405(1)(b), F.A.C.]

A.8. Particulate Matter - Soot Blowing and Load Change. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

[Rule 62-210.700(3), F.A.C.]

A.9. Sulfur Dioxide. When burning liquid fuel, sulfur dioxide emissions shall not exceed 2.75 pounds per million Btu heat input, as measured by applicable compliance methods. Any calculations or methods used to demonstrate compliance shall be based on the total heat input from all fossil fuels, including natural gas, and the sulfur from all fuels fired. See Specific Conditions **A.20.** and **A.21.**

[Rules 62-213.440 and 62-296.405(1)(c)1.j., F.A.C.]

A.10. Sulfur Dioxide - Sulfur Content.

- a. Boilers Nos. 1 and 2: The sulfur content of the as fired fuel oil shall not exceed 2.5 percent, by weight. See Specific Conditions **A.1.** and **A.21.**
- b. Boiler No. 3:

- (1). When firing only fuel oil, the sulfur content of the as fired fuel oil shall not exceed 1.0 percent, by weight. However, this fuel oil can be fired in combination with natural gas; or,
- (2). When firing fuel oil having a maximum sulfur content of 2.5%, by weight, then only 493 MMBtu/hr heat input (56% of the permitted capacity) can be provided by the fuel oil and 388 MMBtu/hr heat input can be provided by natural gas (44% of the permitted capacity). However, if less heat input is provided by the fuel oil, then the difference in heat input from the permitted capacity can be provided by natural gas. See Specific Conditions **A.1.** and **A.21.**

[Rule 62-296.405(1)(e)3., F.A.C.; and, AO61-189582 (#1 & #2) and AO61-189581 (#3)]

A.11. “On-Specification” Used Oil: The burning of “on-specification” used oil is allowed at this facility in accordance with all other conditions of this permit and the following additional conditions:

- a. Only “on-specification” used oil is allowed be burned in these emissions units. The total quantity allowed to be burned in these emissions units shall not exceed 10% of the total allowable annual heat input for Boilers Nos. 1, 2 and 3. “On-specification” used oil is defined as each used oil delivery that meets the specifications of 40 CFR 279 (Standards for the Management of Used Oil) listed below. Used oil that does not meet all of the following specifications is considered “off-specification” oil and shall not be burned. See Specific Conditions **A.30.**, **A.34.** and **A.35.**

<u>CONSTITUENT / PROPERTY *</u>	<u>ALLOWABLE LEVEL</u>
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash Point	100 °F minimum
PCBs	less than 50 ppm

* As determined by approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

[40 CFR 279.11; and, Rule 62-212.400(2)(f)1., F.A.C.]

Excess Emissions

A.12. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

A.13. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.

[Rule 62-210.700(2), F.A.C.]

A.14. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

A.15. Sulfur Dioxide. **The permittee elected to demonstrate compliance using fuel sampling and analysis.** This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See Specific Conditions **A.20.** and **A.21.**

[Rule 62-296.405(1)(f)1.b., F.A.C.]

A.16. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.17. Visible emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. See Specific Condition **A.18.**

[Rule 62-296.405(1)(e)1., F.A.C.]

A.18. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.

2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

- a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
- b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.]

A.19. Particulate Matter. The test methods for particulate emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 (with Orsat analysis) or 3A shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17.

[Rules 62-213.440, 62-296.405(1)(e)2., and 62-297.401, F.A.C.]

A.20. Sulfur Dioxide. The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedences of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. **The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, as an alternate sampling procedure authorized by permit, the permittee elected to demonstrate compliance using fuel sampling and analysis.** See Specific Condition A.21.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.401, F.A.C.]

A.21. For each emissions unit, the following fuel sampling and analysis protocol shall be used as an alternate sampling procedure authorized by permit to demonstrate compliance and for periodic monitoring with the sulfur dioxide standard:

- a. Determine and record the as-fired fuel sulfur content, percent by weight, for liquid fuels using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition, to analyze a representative sample of the blended fuel following any fuel delivery that exceeds the fuel sulfur content limits, percent by weight, contained in Specific Conditions A.10.a. and A.10.b.; and, no as-fired sampling of the fuel oil is required for sulfur content, percent by weight, if any delivery of fuel oil is equal to or less than the compliant fuel oil sulfur content limits, percent by weight, specified in Specific Conditions A.10.a. and A.10.b. and pursuant to the vendor's bill of lading.
- b. Create and maintain for each emissions unit hourly records of the amount of each fuel fired, and the ratio of fuel oil to natural gas if co-fired.
- c. The analyses of any fuel oil, as received from the vendor or as-fired, shall include the following:
 - (1) Density (ASTM D 1298-80 or the latest edition).
 - (2) Calorific heat value in Btu per pound (ASTM D 240-76 or the latest edition).

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.; and, applicant requested]

A.22. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

A.23. Operating Rate During Testing. Testing of emissions shall be conducted with each emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

A.24. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

A.25. 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. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, 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.]

A.26. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

A.27. 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.

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid fuel for more than 400 hours other than during startup.

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.

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]

A.28. 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.]

A.29. 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.]

A.30. Compliance with the “on-specification” used oil requirements will be determined from a sample collected and analyzed from each batch delivered for firing. See Specific Conditions **A.11.**, **A.34.** and **A.35.**

[Rules 62-4.070 and 62-213.440; and, 40 CFR 279]

Record keeping and Reporting Requirements

A.31. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

A.32. Submit to the Department a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years.

[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

A.33. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.

7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

A.34. Not federally enforceable. Special Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil:

- (1) The gallons of on-specification used oil burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (2) The total gallons of on-specification used oil burned in the preceding calendar year.
- (3) The name and address of all marketers delivering used oil to the facility.
- (4) Copies of the marketer certifications, if obtained, and any supporting information.
- (5) Documentation that the used oil contains less than 2 ppm PCBs, if claimed, including the name and address of the person making the claim.
- (6) Results of the analyses required above.
- (7) A copy of the notice to EPA and a copy of the one-time written notice provided to each marketer.

The records shall be retained in a form suitable for inspection at the facility by the Department, and shall be retained for 5 years. See Specific Conditions **A.11.**, **A.30.** and **A.35.**

[Rule 62-213.440(1)(b)2.b., F.A.C.; and, 40 CFR 279.61 and 761.20(e)]

A.35. Reporting Required. The owner or operator shall submit, with the Annual Operation Report (AOR) form, the total amount of on-specification used oil burned in Boilers Nos. 1, 2 and 3 during the previous calendar year to the Northeast District Office. See Specific Conditions **A.11.**, **A.30.** and **A.34.** [Rules 62-4.070(3), 62-212.400(2)(f)1. and 62-213.440(1)(b)2.b., F.A.C.]

A.36: COMS for Periodic Monitoring. The owner or operator is required to install, calibrate, operate and maintain continuous opacity monitoring systems (COMS) pursuant to 40 CFR Part 75. The owner or operator shall maintain and operate the COMS and shall make and maintain records of opacity measured by the COMS, for purposes of periodic monitoring. [Rule 62-213.440, F.A.C.; and, applicant requested]

Subsection B. This section addresses the following emissions units.

<u>E.U. ID Nos.</u>	<u>Brief Description</u>
-004	Combustion Turbine Electric Generating Peaking Unit No. 1 (P-1)
-005	Combustion Turbine Electric Generating Peaking Unit No. 2 (P-2)
-006	Combustion Turbine Electric Generating Peaking Unit No. 3 (P-3)

All three combustion turbines are identical in configuration. They are Combustion Turbines Model Turbo Power and Marine Systems FT4C-3 LF water injected twin pacs. Nitrogen oxide emissions are controlled by using water injection for fuel oil firing. Natural gas and new No. 2 distillate fuel oil are allowed to be fired in these emissions units; and, the maximum allowable fuel oil sulfur content is 0.5%, by weight. Each emissions unit has a maximum generating output of 63,000 kW. Units Nos. 1 and 2 (P-1 and P-2, respectively) commenced commercial operation in October, 1980. Unit No. 3 (P-3) commenced commercial operation in November, 1980.

{Permitting notes: The emissions units are regulated under NSPS - 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines; adopted and incorporated by reference in Rule 62-204.800(7)(b)38., F.A.C.; PSD-FL-014 and PSD-FL-014(A), Prevention of Significant Deterioration (PSD), in Rule 62-212.400, F.A.C.; Best Available Control Technology (BACT), in Rule 62-212.410, F.A.C.}

The following conditions apply to the emissions units listed above:

General

B.1. Definitions. For the purposes of Rule 62-204.800(7), F.A.C., the definitions contained in the various provisions of 40 CFR 60, shall apply except that the term "Administrator" when used in 40 CFR 60, shall mean the Secretary or the Secretary's designee.
[40 CFR 60.2; Rule 62-204.800(7)(a), F.A.C.]

B.2. Circumvention. No owner or operator subject to the provisions of 40 CFR 60 shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.
[40 CFR 60.12]

Essential Potential to Emit (PTE) Parameters

B.3. Permitted Capacity. The maximum heat input to each Combustion Turbine (CT) shall not exceed 739 MMBtu/hr (LHV: lower heating value) at 59 degrees F while firing new No. 2 distillate fuel oil or natural gas.

{Permitting note: The heat input limitation has been placed in the permit to identify the capacity of the emissions unit for purposes of confirming that emissions testing is conducted within 95-100 percent of the emissions unit's rated capacity (or to limit future operation to 105 percent of the test load), to establish appropriate limits and to aid in determining future rule applicability.}

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; 40 CFR 60.332(b); PSD-FL-014 & PSD-FL-014(A); and, AO61-189579]

B.4. Emissions Unit Operating Rate Limitation After Testing. See Specific Condition B.37.
[Rule 62-297.310(2), F.A.C.]

B.5. Methods of Operation - Fuels.

a. Only natural gas or new No. 2 distillate fuel oil shall be fired in the CTs. The burning of other fuels requires review, public notice, and approval through the preconstruction process (Chapters 62-210 and 62-212, F.A.C.).

b. The maximum new No. 2 distillate fuel oil that can be fired is 37,910 lbs/hr (127 barrels at 59 degrees F).

[Rule 62-213.410, F.A.C.; AC61-11862, -11863 & -11864; PSD-FL-014 and BACT; PSD-FL-014(A); and, AO61-189579]

B.6. Hours of Operation. The emissions units may operate 1500 hours/year/CT.

[Rule 62-210.200(PTE), F.A.C.; AC61-11862, -11863 & -11864; and, PSD-FL-014]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.7. Nitrogen Oxides. Nitrogen oxides emissions, expressed as NO_x, shall not exceed 75 ppm by volume at 15 percent oxygen and on a dry basis, adjusted per 40 CFR 60.332(a) (equivalent emissions are: 210.2 lbs/hr/CT; and, 157.7 tons/yr/CT), while burning new No. 2 distillate fuel oil.

[40 CFR 60.332(a); PSD-FL-014 and BACT; and, AO61-189579]

B.8. Nitrogen Oxides. Nitrogen oxides emissions, expressed as NO_x, shall not exceed 68 ppm by volume at 15 percent oxygen and on a dry basis (equivalent emissions are: 143.6 lbs/hr/CT; and, 107.7 tons/yr/CT), while burning natural gas.

[PSD-FL-014(A); and, AO61-189579]

B.9. Nitrogen Oxides. Nitrogen oxides from the CTs shall be controlled by water injection for fuel oil firing.

[PSD-FL-014 and BACT]

B.10. Sulfur Dioxide. The owner or operator 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 on a dry basis. The maximum allowed sulfur dioxide emission rate shall not exceed 379 lbs/hr/CT (equivalent emissions: 284 tons/yr/CT). See Specific Condition **B.11**.

[PSD-FL-014(A)]

B.11. Sulfur Dioxide - Sulfur Content. The sulfur content of any fuel fired in any stationary gas turbine shall not exceed 0.5 percent, by weight, and may be used to determine compliance with Specific Condition B.10.

[PSD-FL-014(A)]

B.12. Particulate Matter. Particulate matter shall not exceed 38 lbs/hr/CT (equivalent emissions are: 28.5 tons/yr/CT).

[AC61-11862, -11863 & -11864; and, AO61-189579]

B.13. Visible Emissions. Visible emissions (VE) shall be less than 20 percent opacity.

{Permitting note: The owner shall conduct VE compliance tests while firing fuel oil for each combustion turbine upon that combustion turbine exceeding 400 hours of operation on fuel oil in any given federal fiscal year (October 1 through September 30). Regardless of the number of hours of operation on fuel oil, at least one VE compliance test will be conducted on all three combustion turbines every five (5) years, coinciding with the term of the operation permit for these combustion turbines.}

[PSD-FL-014 and BACT; AC61-11862, -11863 & -11864; and, applicant requested]

Excess Emissions

{Permitting note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of an NSPS, NESHAP, or Acid Rain program provision.}

B.14. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

B.15. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

B.16. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[40 CFR 60.11(d)]

B.17. 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 or any period during which the fuel-bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by the fuel-bound nitrogen allowance used during the performance test required in 40 CFR 60.8. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, gas turbine load, and nitrogen content of the fuel during the period of excess emissions, and the graphs or figures developed under 40 CFR 60.335(a).

[40 CFR 60.334(c)(1)]

Monitoring of Operations

B.18. The owner or operator of any stationary gas turbine subject to the provisions of 40 CFR 60, Subpart GG, and using water injection to control NO_x emissions 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.

[40 CFR 60.334(a); PSD-FL-014]

B.19. The owner or operator of any stationary gas turbine subject to the provisions of 40 CFR 60, Subpart GG, shall monitor and record on a weekly basis the sulfur content, nitrogen content, and lower heating value of the fuel being fired in the turbine.

[40 CFR 60.334(b); PSD-FL-014]

B.20. 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).
 - (b). This custom fuel monitoring schedule shall become effective on the date this permit 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 non-compliance 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.
[40 CFR 60.334(b); PSD-FL-014; and, Custom Fuel Monitoring Schedule clerked on 03/22/99.]

B.21. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. [Rule 62-297.310(5), F.A.C.]

Continuous Monitoring Requirements

B.22. For the purposes of 40 CFR 60.13, all continuous monitoring systems required under applicable subparts shall be subject to the provisions of 40 CFR 60.13 upon promulgation of performance specifications for continuous monitoring systems under Appendix B of 40 CFR 60 and, if the continuous monitoring system is used to demonstrate compliance with emission limits on a continuous basis, Appendix F of 40 CFR 60, unless otherwise specified in an applicable subpart or by the Administrator. Appendix F is applicable December 4, 1987. [40 CFR 60.13(a)]

B.23. All continuous monitoring systems (CMS) or monitoring devices shall be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. Additional procedures for location of continuous monitoring systems contained in the applicable Performance Specifications of Appendix B of 40 CFR 60 shall be used. [40 CFR 60.13(f)]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.24. Nitrogen Oxides. To compute the nitrogen oxides emissions, the owner or operator shall use analytical methods and procedures that are accurate to within 5 percent and are approved by the Department to determine the nitrogen content of the fuel being fired. [40 CFR 60.335(a)]

B.25. Nitrogen Oxides. The owner or operator shall determine compliance with the NSPS nitrogen oxides standard in 40 CFR 60.332 as follows:

(1). The nitrogen oxides emission rate (NO_x) shall be computed for each run using the following equation:

$$\text{NO}_x = (\text{NO}_{x0}) (P_r/P_o)^{0.5} e^{19(H_o-0.00633)} (288^\circ\text{K}/T_a)^{1.53}$$

where:

NO_x = emission rate of NO_x at 15 percent O_2 and ISO standard ambient conditions, volume percent.

NO_{x0} = observed NO_x concentration, ppm by volume.

P_r = reference combustor inlet absolute pressure at 101.3 kilopascals ambient pressure, mm Hg.

P_o = observed combustor inlet absolute pressure at test, mm Hg.

H_o = observed humidity of ambient air, g $\text{H}_2\text{O}/\text{g}$ air.

e = transcendental constant, 2.718.

T_a = ambient temperature, $^\circ\text{K}$.

[40 CFR 60.335(c)(1)]

B.26. The monitoring device of 40 CFR 60.334(a) shall be used to determine the fuel consumption and the water-to-fuel ratio necessary to comply with the permitted NO_x standard at 30, 50, 75, and 100 percent of peak load or at four points in the normal operating range of the gas turbine, including the minimum point in the range and peak load. All loads shall be corrected to ISO conditions using the appropriate equations supplied by the manufacturer. Testing at the four load points and correction to ISO is an initial compliance test requirement only and not an annual compliance test requirement; however, when testing shows that NO_x emissions exceed the standard when operating at capacity, the permittee shall recalibrate the NO_x emission control system using the emission testing at four loads as required in 40 CFR 60.335(c)(2).

[40 CFR 60.335(c)(2); and, applicant requested in a letter received 11/12/97]

B.27. Nitrogen Oxides and Sulfur Dioxide. 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). EPA Method 20 (40 CFR 60, Appendix A) shall be used to determine the nitrogen oxides, sulfur dioxide, and oxygen concentrations. The span values shall be 300 ppm of nitrogen oxide and 21 percent oxygen. The NO_x emissions shall be determined at each of the load conditions specified in 40 CFR

60.335(c)(2).

[40 CFR 60.335(c)(3)]

B.28. Sulfur Dioxide - Sulfur Content. The owner or operator shall determine compliance with the sulfur content standard of 0.5 percent, by weight, as follows: ASTM D 2880-96, or the latest edition, shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-90(94)E-1, D 3031-81(86), D 4084-94, D 3246-92, or the latest edition, shall be used for the sulfur content of gaseous fuels (incorporated by reference-see 40 CFR 60.17). The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Administrator.

[40 CFR 60.335(d)]

B.29. Nitrogen and Sulfur Contents. To meet the requirements of 40 CFR 60.334(b), the owner or operator shall use the methods specified in 40 CFR 60.335(a) and 40 CFR 60.335(d) of 40 CFR 60.335 to determine the nitrogen and sulfur contents of the fuel being burned. The analysis may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency.

[40 CFR 60.335(e)]

B.30. Particulate Matter. EPA Method 5 pursuant to Chapter 62-297, F.A.C., and 40 CFR 60, Appendix A, shall be used to determine compliance with the particulate matter emissions limitation in Specific Condition **B.12**.

[Rule 62-297.401, F.A.C.; and, 40 CFR 60, Appendix A]

B.31. Visible Emissions. EPA Method 9 pursuant to Chapter 62-297, F.A.C., and 40 CFR 60, Appendix A, shall be used to determine compliance with the visible emissions standard in Specific Condition **B.13**.

[Rule 62-297.401, F.A.C.; and, 40 CFR 60, Appendix A]

B.32. Opacity. Compliance with standards in 40 CFR 60, other than opacity standards, shall be determined only by performance tests established by 40 CFR 60.8, unless otherwise specified in the applicable standard.

[40 CFR 60.11(a)]

B.33. Performance tests shall be conducted under such conditions as the Administrator shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.

[40 CFR 60.8(c)]

B.34. The owner or operator shall provide, or cause to be provided, stack sampling and performance testing facilities as follows:

- (1) Sampling ports adequate for test methods applicable to such facilities.
 - (2) Safe sampling platform(s).
 - (3) Safe access to sampling platform(s).
 - (4) Utilities for sampling and testing equipment.
- [40 CFR 60.8(e)(1), (2), (3) & (4); and, PSD-FL-014]

B.35. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.; and, PSD-FL-014]

B.36. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

B.37. Operating Rate During Testing. Testing of emissions shall be conducted with each emissions unit operation at capacity. Capacity is defined as 95 to 100 percent of the manufacturer's rated heat input achievable for the average ambient (or conditioned) air temperature during the test. If it is impracticable to test at capacity, then an emissions unit may be tested at less than capacity. In such cases, the entire heat input vs. inlet temperature curve will be adjusted by the increment equal to the difference between the design heat input value and 105 percent of the value reached during the test. Data, curves, and calculations necessary to demonstrate the heat input rate correction at both design and test conditions shall be submitted to the Department with the compliance test report.

[Rule 62-297.310(2), F.A.C.; and, applicant requested in a letter received 11/12/97]

B.38. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

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)]

B.46. The summary report form shall contain the information and be in the format shown in Figure 1 (attached) unless otherwise specified by the Administrator. One summary report form shall be submitted for each pollutant monitored at each affected facility.

(1) If the total duration of excess emissions for the reporting period is less than 1 percent of the total operating time for the reporting period and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report form shall be submitted and the excess emission report described in 40 CFR 60.7(c) need not be submitted unless requested by the Administrator.

(2) If the total duration of excess emissions for the reporting period is 1 percent or greater of the total operating time for the reporting period or the total CMS downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, the summary report form and the excess emission report described in 40 CFR 60.7(c) shall both be submitted.

[40 CFR 60.7(d)(1) and (2)]

{See attached Figure 1: Summary Report-Gaseous and Opacity Excess Emission and Monitoring System Performance} (electronic file name: figure1.doc)

B.47. (1) Notwithstanding the frequency of reporting requirements specified in 40 CFR 60.7(c), an owner or operator who is required by an applicable subpart to submit excess emissions and monitoring systems performance reports (and summary reports) on a quarterly (or more frequent) basis may reduce the frequency of reporting for that standard to semiannual if the following conditions are met:

- (i) For 1 full year (e.g., 4 quarterly or 12 monthly reporting periods) the affected facility's excess emissions and monitoring systems reports submitted to comply with a standard under this part continually demonstrate that the facility is in compliance with the applicable standard;
- (ii) The owner or operator continues to comply with all recordkeeping and monitoring requirements specified in 40 CFR 60, Subpart A, and the applicable standard; and
- (iii) The Administrator does not object to a reduced frequency of reporting for the affected facility, as provided in 40 CFR 60.7(e)(2).

(2) The frequency of reporting of excess emissions and monitoring systems performance (and summary) reports may be reduced only after the owner or operator notifies the Administrator in writing of his or her intention to make such a change and the Administrator does not object to the intended change. In deciding whether to approve a reduced frequency of reporting, the Administrator may review information concerning the source's entire previous performance history during the required recordkeeping period prior to the intended change, including performance test results, monitoring data, and evaluations of an owner or operator's conformance with operation and maintenance requirements. Such information may be used by the Administrator to make a judgment about the source's potential for noncompliance in the future. If the Administrator disapproves the owner or operator's request to reduce the frequency of reporting, the Administrator will notify the owner or operator in writing within 45 days after receiving notice of the owner or operator's intention. The notification from the Administrator to the owner or operator will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted.

(3) As soon as monitoring data indicate that the affected facility is not in compliance with any emission limitation or operating parameter specified in the applicable standard, the frequency of reporting shall revert to the frequency specified in the applicable standard, and the owner or operator shall submit an excess emissions and monitoring systems performance report (and summary report, if required) at the next appropriate reporting period following the noncomplying event. After demonstrating compliance with the applicable standard for another full year, the owner or operator may again request approval from the Administrator to reduce the frequency of reporting for that standard as provided for in 40 CFR 60.7(e)(1) and (e)(2).

[40 CFR 60.7(e)(1)]

B.48. The owner or operator subject to the provisions of 40 CFR 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and, all other information required by 40 CFR 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least 5 (five) years following the date of such measurements, maintenance, reports, and records.

[40 CFR 60.7(f); Rule 62-213.440(1)(b)2.b., F.A.C.]

B.49. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

B.50. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.

9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

B.51. Reports under 40 CFR 60.7(c) are required for periods of NO_x excess emissions, which are defined in Specific Condition **B.17**.

[40 CFR 60.334(c)(1)]

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.
- b. Per 40 CFR 60.334(c)(1) for NO_x, any one hour period in which the water to fuel ratio for fuel oil falls below:
 - (1). 0.526 for CT Unit No. 1
 - (2). 0.486 for CT Unit No. 2
 - (3). 0.505 for CT Unit No. 3

[Rule 62-213.400, F.A.C.; and, AO61-189579]

Section IV. This section is the Acid Rain Part.

**Operated by: Florida Power Corporation - Suwannee River Power Plant
 ORIS code: 0638**

Subsection A. This subsection addresses Acid Rain, Phase II.

The emissions units listed below are regulated under Acid Rain, Phase II.

<u>E.U. ID Nos.</u>	<u>Brief Description</u>
-001	Boiler No. 1
-002	Boiler No. 2
-003	Boiler No. 3

A.1. The Phase II permit application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these Phase II acid rain unit(s) must comply with the standard requirements and special provisions set forth in the application(s) listed below:

- a. DEP Form No. 62-210.900(1)(a), dated 07/01/95.
 [Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

A.2. Sulfur dioxide (SO₂) allowance allocations requirements for each Acid Rain unit are as follows:

<u>E.U. ID Nos.</u>	<u>EPA ID</u>	<u>Year</u>	<u>2000</u>	<u>2001</u>	<u>2002</u>	<u>2003</u>	<u>2004</u>
-001	1	SO ₂ allowances, under Table 2 or 3 of 40 CFR Part 73	251*	251*	251*	251*	251*
-002	2	SO ₂ allowances, under Table 2 or 3 of 40 CFR Part 73	251*	251*	251*	251*	251*
-003	3	SO ₂ allowances, under Table 2 or 3 of 40 CFR Part 73	641*	641*	641*	641*	641*

*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2 or 3 of 40 CFR 73.]

A.3. Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

1. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.400(3), F.A.C.

2. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.

3. Allowances shall be accounted for under the Federal Acid Rain Program.

[Rule 62-213.440(1)(c), F.A.C.]

A.4. Fast-Track Revisions of Acid Rain Parts. Those Acid Rain sources making a change described at Rule 62-214.370(4), F.A.C., may request such change as provided in Rule 62-213.413, F.A.C., Fast-Track Revisions of Acid Rain Parts.

[Rules 62-213.413 and 62-214.370(4), F.A.C.]

A.5. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within 60 (sixty) days after the end of the calendar year. {See condition 52., APPENDIX TV-2, TITLE V CONDITIONS}.

[Rule 62-214.420(11), F.A.C.]

A.6. Comments, notes, and justifications: None.



April 30, 1999

RECEIVED

MAY 03 1999

BUREAU OF
AIR REGULATION

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

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

Dear Ms. Carter:

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

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

Sincerely,

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

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

cc: Scott Sheplak, DEP
Jeff Brown, DEP OGC

5/3/99 cc: Scott Sheplak
Bruce Mitchell

115215.1



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APR 01 1999

BUREAU OF
AIR REGULATION

March 30, 1999

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

Dear Ms. Carter:

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

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

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

Sincerely,

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

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

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

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

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC



RECEIVED

February 23, 1999

FEB 25 1999

BUREAU OF
AIR REGULATION

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

Dear Ms. Carter:

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

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

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

Sincerely,

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

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

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

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

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC



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FEB 15 1999

**BUREAU OF
AIR REGULATION**

February 12, 1999

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

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

Dear Mr. Sheplak:

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

Sincerely,

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

Scott H. Osbourn
Senior Environmental Engineer

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

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

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

General Comments

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

Section II., Facility-Wide Conditions.

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

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

Section III. Subsection A.

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

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

Section III. Subsection B.

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

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

Section IV. Acid Rain Part

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

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

File: Suw/Air/Corresp.



October 30, 1998

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

Dear Mr. Kirts:

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

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

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

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

Mr. Kirts
October 30, 1998
Page Two

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

Sincerely,

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

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



January 27, 1999

RECEIVED

JAN 29 1999

BUREAU OF
AIR REGULATION

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

Dear Ms. Carter:

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

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

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

Sincerely,

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

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

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

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

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC

2/1/99 cc: Scott Sheplak
Bruce Mitchell

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

FLORIDA POWER CORPORATION
(SUWANNEE RIVER FACILITY),

Petitioner,

vs.

OGC CASE NO. 97-1641

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, FLORIDA POWER CORPORATION, to grant an extension of time to file a petition for an administrative hearing on Permit Application No. 1210003-001-AV. See Exhibit 1.

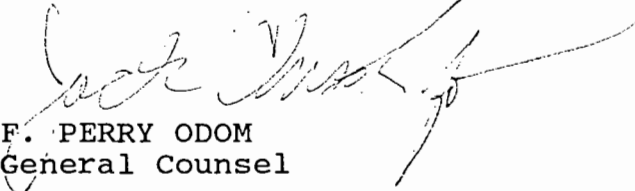
Respondent, State of Florida Department of Environmental Protection, the Department has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until December 31, 1998, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Mail Station 35, Department of Environmental Protection, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 9th day of December, 1998, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


F. PERRY ODOM
General Counsel

Douglas Building, MS #35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314

CERTIFICATE OF SERVICE

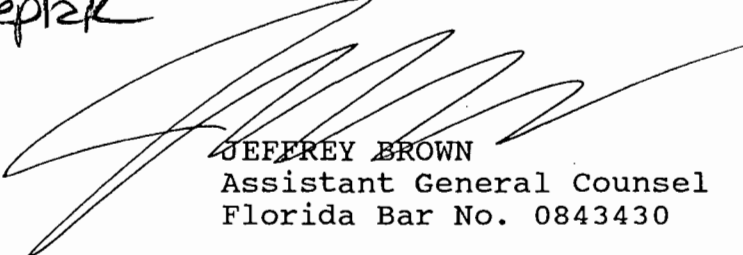
I CERTIFY that a true copy of the foregoing was mailed to:

Robert A. Manning
123 South Calhoun Street
Tallahassee, Florida 32314

on this 8 day of December, 1998.

12/9/98 cc: Bruce Mitchell,
Scott Stepiak

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


JEFFREY BROWN
Assistant General Counsel
Florida Bar No. 0843430

Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314

RECEIVED

NOV 9 1998

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Dept. of Environmental Protection,
Office of General Counsel

In the Matter of an
Application for Permit by:

OGC CASE NO.:
FDEP Revised Draft Permit No.: 1210003-001-AV

Florida Power Corporation
Suwannee River Facility, Suwannee County, Florida

REQUEST FOR EXTENSION OF TIME

By and through undersigned counsel, Florida Power Corporation (FPC) hereby requests, pursuant to Florida Administrative Code Rule 62-110.106(4), an enlargement of time, to and including December 11, 1998, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, FPC states the following:

1. On or about September 12, 1997, FPC received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Draft Permit No. 1210003-001-AV) for the FPC Suwannee River Facility located in Suwannee County, Florida. FPC subsequently filed several extensions of time, until December 1, 1998, to preserve its right to file a Petition for Administrative Proceeding on this permit.

2. On or about October 26, 1998, FPC received from the Department an "Intent to Issue Title V Air Operation Permit" (**REVISED** Draft Permit No. 1210003-001-AV) for the FPC Suwannee River Facility.

3. The Department's cover letter to the Revised permit states that the initial Draft Title V permit is withdrawn. In reliance on this representation, FPC hereby files this Request for Extension of Time on the Revised Draft permit, and understands that no further extensions of time are needed to preserve its rights in relation to the initial Title V permit because it has been effectively withdrawn.

Nonetheless, insofar as the initial Draft Title V permit may be determined to still be in effect, FPC respectfully requests that this Request for Extension of Time apply to both the initial and the Revised Draft Title V permits.

4. Based on FPC's review, the Revised Draft permit and associated documents contain several provisions that warrant clarification or correction.

5. This request is filed simply as a protective measure to avoid waiver of FPC's right to challenge certain conditions contained in the Revised Draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and hopefully avoid the need to file a petition and proceed to a formal administrative hearing.

WHEREFORE, FPC respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Revised Draft Permit No. 1020003-001-AV be formally extended to and including December 11, 1998.

Respectfully submitted this 9th day of November, 1998.

HOPPING GREEN SAMS & SMITH, P.A.

By: Robert A. Manning

Robert A. Manning
Fla. Bar No. 0035173
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(850) 222-7500

Attorneys for FLORIDA POWER
CORPORATION

CERTIFICATE OF SERVICE

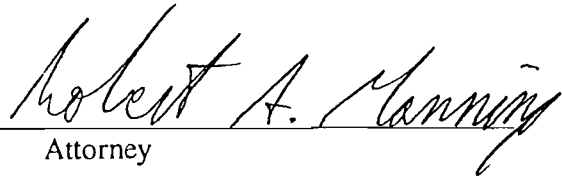
I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by U.S.

Mail on this 9th day of November, 1998:

Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Jeff Brown, Esq.
Department of Environmental Protection
Room 669
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Ed Svec
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400



Attorney

**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

**FLORIDA POWER CORPORATION
SUWANNEE RIVER PLANT,**

Petitioner,

vs.

OGC CASE NO. 12-1641

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,**

Respondent.

RECEIVED

JUN 22 1998

BUREAU OF
AIR REGULATION

6/9

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, Florida Power Corporation, to grant an extension of time to file a petition for an administrative hearing on Application No. 1210003-001-AV. See Exhibit 1.

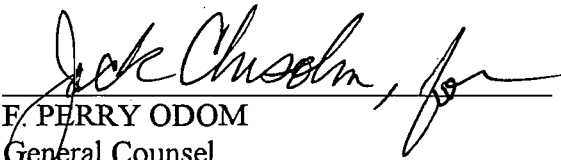
Counsel for Petitioner has discussed this request with staff for the Respondent, which has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until December 1, 1998 to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 9th day of June, 1998, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

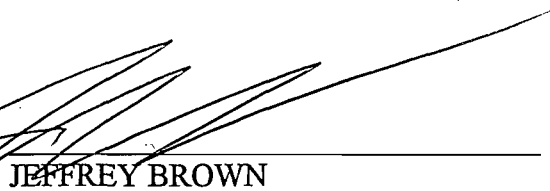


F. PERRY ODOM
General Counsel
Douglas Building
3900 Commonwealth Boulevard
Mail Station 35
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314

CERTIFICATE OF SERVICE

I CERTIFY that a true copy of the foregoing was mailed to Robert A. Manning, Hopping, Green, Sams, & Smith P.A., Post office Box 6526, Tallahassee, Florida 32314, on this 22 day of June 1998.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



JEFFREY BROWN
Assistant General Counsel
Florida Bar No.: 0843430
Douglas Building
3900 Commonwealth Boulevard
Mail Station 35
Tallahassee, FL 32399-3000
Telephone: (850) 488-9730



May 27, 1998

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

Dear Ms. Carter:

RE: Florida Power Corporation, Suwannee River Plant 97-1641
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 1210003-001-AV

On September 12, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until June 1, 1998. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including December 1, 1998.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (813) 866-5158.

Sincerely,

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

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

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

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

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

FLORIDA POWER CORPORATION,

Petitioner,

vs.

OGC CASE NO. 97-1641

4/15/98

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, Florida Power Corporation, Suwannee River Plant, to grant an extension of time to file a petition for an administrative hearing on Application No. 1210003-001-AV. See Exhibit 1.

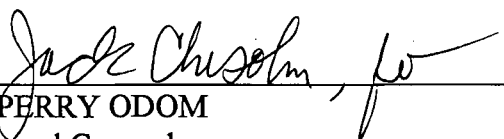
Counsel for Petitioner has discussed this request with counsel for the Respondent Department. The Department has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have up until and including June 1, 1998, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 15th day of April 1998, in Tallahassee,
Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



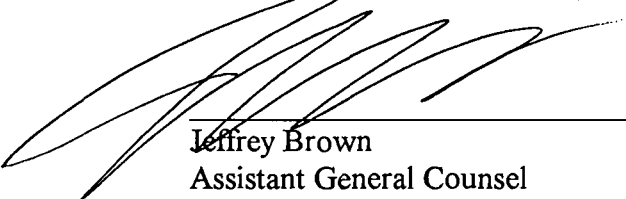
F. PERRY ODOM
General Counsel

3900 Commonwealth Boulevard
Mail Station 35
Tallahassee, FL 32399-3000
Telephone: (904) 488-9314

CERTIFICATE OF SERVICE

I CERTIFY that a true copy of the foregoing was mailed to Scott Osbourn, 3201 34th
Street South, P.O. Box 14042, St. Petersburg, Florida 33733 on this 15 day of
April 1998.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Jeffrey Brown
Assistant General Counsel
Florida Bar No.: 0843430

3900 Commonwealth Boulevard
Mail Station 35
Tallahassee, FL 32399-3000
Telephone: (904) 488-9730



RECEIVED

MAR 24 1998

Dept. of Environmental Protection
Office of General Counsel

March 24, 1998

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

Dear Ms. Carter:

RE: Florida Power Corporation, Suwannee River Plant 97-1641
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 1210003-001-AV

On September 12, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until March 31, 1998. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including June 1, 1998.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (813) 866-5158.

Sincerely,

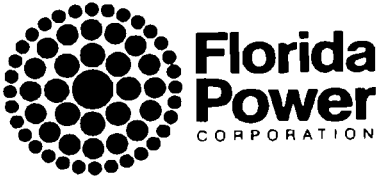
A handwritten signature in cursive script, appearing to read "W. Jeffrey Pardue".

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

A handwritten signature in cursive script, appearing to read "Robert Manning".

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

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC



March 24, 1998

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

Dear Ms. Carter:

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

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If you should have any questions, please contact Mr. Scott Osbourn of FPC at (813) 866-5158.

Sincerely,

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

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

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

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

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC

3/30/98 cc - Scott Sheplak
Bruce Mitchell



RECEIVED

MAR 02 1998

BUREAU OF
AIR REGULATION

February 26, 1998

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

Dear Ms. Carter:

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

On September 12, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until February 27, 1998. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including March 31, 1998.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (813) 866-5158.

Sincerely,

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

A handwritten signature in cursive script, appearing to read "Robert A. Manning".

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

cc: Scott Sheplak, DEP
 Jeffrey Brown, DEP OGC

RECEIVED

DEC 24 1997

BUREAU OF
AIR REGULATION

12/18/97

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

FLORIDA POWER CORPORATION,
(Suwannee River Facility),

Petitioner,

vs.

OGC CASE NO. 97-1641

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, FLORIDA POWER CORPORATION, to grant an extension of time to file a petition for an administrative hearing on Application No. 1210003-001-AV. See Exhibit 1.

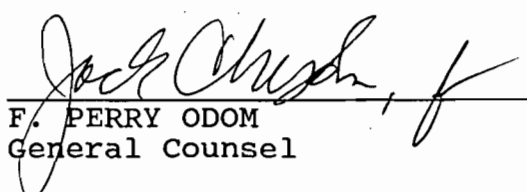
Although Counsel for Petitioner has not discussed this request with counsel for the Respondent State of Florida Department of Environmental Protection, the Department has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until January 30, 1998, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Mail Station 35, Department of Environmental Protection, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 19th day of December 1997 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


F. PERRY ODOM
General Counsel

Douglas Building, MS #35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314

CERTIFICATE OF SERVICE

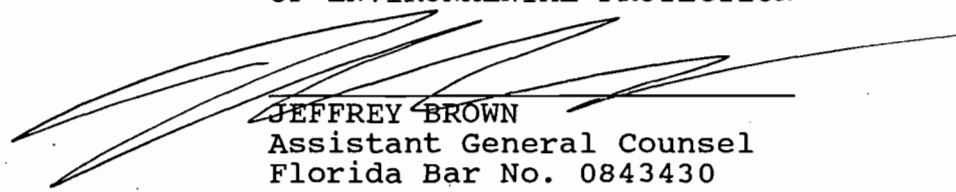
I CERTIFY that a true copy of the foregoing was mailed to:

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Florida Power Corporation
3201 Thirty-fourth Street South
Post Office Box 14042
St. Petersburg, Florida 33733

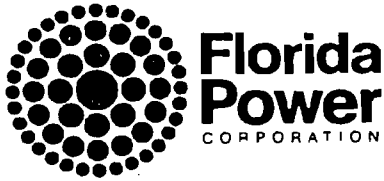
Robert A. Manning, Esquire
HOPPING GREEN SAMS & SMITH
123 South Calhoun Street
Post Office Box 6526
Tallahassee, Florida 32314-6526

on this 23 day of December 1997.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


JEFFREY BROWN
Assistant General Counsel
Florida Bar No. 0843430

Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9730



RECEIVED

DEC 5 1997

Dept. of Environmental Protection
Office of General Counsel

December 4, 1997

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

Dear Ms. Carter:

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

On September 12, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until December 8, 1997. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including January 30, 1998.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

Handwritten signature of W. Jeffrey Pardue in cursive.

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

Handwritten signature of Robert A. Manning in cursive.

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

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

10/14/97

FLORIDA POWER CORPORATION
(SUWANNEE RIVER FACILITY),

Petitioner,

vs.

OGC CASE NO. 97-1641

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

_____ /

ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner FLORIDA POWER CORPORATION, to grant an extension of time to file a petition for an administrative hearing on Permit Application No. 1210003-001-AV. See Exhibit 1.

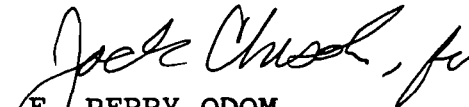
Although Counsel for Petitioner has not discussed this request with counsel for the Respondent State of Florida Department of Environmental Protection, the Department has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until October 24, 1997, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Mail Station 35, Department of Environmental Protection, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 14 day of October 1997 in
Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


F. PERRY ODOM
General Counsel

Douglas Building, MS #35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314


CERTIFICATE OF SERVICE

I CERTIFY that a true copy of the foregoing was mailed to:

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Florida Power Corporation
3201 Thirty-fourth Street South
St. Petersburg, Florida 33733

on this 14 day of October 1997.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


JEFFREY BROWN
Assistant General Counsel
Florida Bar No. 0843430

Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9730



Florida
Power
CORPORATION

September 24, 1997

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

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

On September 12, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department and they have agreed that an extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including October 24, 1997.

Sincerely,

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

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

cc: Scott Sheplak, DEP

**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

11/18/97

FLORIDA POWER CORPORATION
(SUWANNEE RIVER FACILITY),

Petitioner,

vs.

OGC CASE NO. 97-1641

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, FLORIDA POWER CORPORATION, to grant an extension of time to file a petition for an administrative hearing on Permit Application No. 1210003-001-AV. See Exhibit 1.

Although Counsel for Petitioner has not discussed this request with counsel for the Respondent State of Florida Department of Environmental Protection, the Department has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until December 8, 1997, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Mail Station 35, Department of Environmental Protection, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 18th day of November 1997 in
Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Jack Chusdm, for
F. PERRY ODOM
General Counsel

Douglas Building, MS #35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314

CERTIFICATE OF SERVICE

I CERTIFY that a true copy of the foregoing was mailed to:

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Florida Power Corporation
3201 Thirty-fourth Street South
St. Petersburg, Florida 33733

Robert A. Manning
123 South Calhoun Street
Tallahassee, Florida 32314

on this 19 day of November 1997.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

JA Spejmlowski for

JEFFREY BROWN
Assistant General Counsel
Florida Bar No. 0843430

Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9730



RECEIVED

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Dept. of Environmental Protection
Office of General Counsel

November 5, 1997

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

Dear Ms. Carter:

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

On September 12, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until November 7, 1997. Mr. Scott Osbourn of my staff has had discussions with Mr. Charles Logan of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including December 8, 1997.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

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

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

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC

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EXHIBIT 1



December 4, 1997

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

RECEIVED

DEC 08 1997

BUREAU OF
AIR REGULATION

Dear Ms. Carter:

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

On September 12, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until December 8, 1997. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including January 30, 1998.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

Handwritten signature of W. Jeffrey Pardue in cursive.

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

Handwritten signature of Robert A. Manning in cursive.

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

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC

12/8/97 cc: Scott Sheplak
Bruce Mitchell



October 23, 1997

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

Dear Ms. Carter:

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

On September 12, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until October 24, 1997. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including November 7, 1997.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

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

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

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

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

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC

10/27/97 cc: Bruce Mitchell

RECEIVED

OCT 27 1997

BUREAU OF
AIR REGULATION



Florida
Power
CORPORATION

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SEP 25 1997

Dept. of Environmental Protection
Office of General Counsel

RECEIVED

SEP 26 1997

BUREAU OF
AIR REGULATION

September 24, 1997

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

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

On September 12, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department and they have agreed that an extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including October 24, 1997.

Sincerely,

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

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

cc: Scott Sheplak, DEP