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Dept. of Environmental Protection
Office of General Counsel

September 25, 1997

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

RE: Florida Power Corporation, Turner Power Plant
DRAFT Title V Permit No. 1270020-001-AV

Dear Mr. Sheplak:

On behalf of Florida Power Corporation (FPC), attached are comments regarding the DRAFT Title V permit for the Turner Power Plant as identified above. FPC appreciates the Department's efforts in processing this permit and understands the need to resolve these issues in as timely a manner as possible. In this regard, DEP agreed to grant FPC's Request for Extension of Time to file a Petition for Administrative Hearing until October 10, 1997. If we are unable to reach a resolution of these comments by this time, we would appreciate the opportunity to file a second Request for Extension of Time. Accordingly, please contact me at (813) 866-5158 as soon as you have had a chance to review these comments to set up either a telephone or in-person conference. Thank you again for your consideration of our comments.

Sincerely,

J. Michael King for

Scott Osbourn,
Environmental Specialist

cc: W. Jeffrey Pardue, FPC
Clair Fancy, P.E., DEP
Charles Logan, DEP
Ken Kosky, P.E., Golder
Robert Manning, HGSS

cc: Bruce Mitchell

**FLORIDA POWER CORPORATION
COMMENTS ON DRAFT TITLE V PERMIT
TURNER POWER PLANT**

General Comments

1. FPC understands that Appendix TV-1, Title V Conditions, is being revised. FPC request that its Title V permit reflect the most up-to-date version of this Appendix.
2. FPC understands that DEP will publish the Intent to Issue Title V Air Operation Permit. Because the applicant is ultimately responsible for the publication of the Intent to Issue, FPC requests that DEP provide a copy of the Notice intended to be published, as well as proof of publication.

Intent to Issue Title V Air Operation Permit

1. The description states that the FPC's Title V application for the Turner Power Plant was received on "June 13, 1996." The correct submittal date is June 14, 1997.

Referenced attachments made part of this permit:

1. Following document ASP Number 97-B-01, a reference should also be made to the Order Correcting Scrivener's Error, dated July 2, 1997.
2. The reference to Figure 1 - Summary Report-Gaseous and Opacity Excess Emission and Monitoring System Performance Report should be deleted because there are no CEMs at this plant and the units are not subject to 40 CFR Part 60.

Section II., Facility-wide Conditions.

1. Condition 2. The word "not" was apparently inadvertently added, and should be deleted from, the second line of this Condition.
2. Condition 3. For clarity and to make this Condition specific to FPC's Turner Power Plant, FPC requests that Condition 2. be edited as follows:

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

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

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

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

Section III. Subsection A.

1. In the first line of the description, the reference to the Florida Administrative Code appears to be misplaced, and therefore FPC requests that this sentence be revised as follows: "~~Pursuant to Rule 62-210.300(2)(a)3.d., F.A.C.,~~ SG 2, SG 3, and SG 4 were placed on "Long Term"

2. Condition A.1. Under paragraph (a), FPC requests the correction of an apparent typographical error as follows: ". . . new No. 6 or lighter grades of fuel oils, and"

Also, the second sentence of paragraph (a), as well as all of paragraphs (b) and (c) of Condition A.1. apparently are intended to prevent annual lead emissions associated with used oil from exceeding the PSD applicability threshold for that pollutant. These new provisions should be deleted; because there is no regulatory authority for their inclusion. The rule citation and AO referenced by DEP as authority do not provide justification for placing conditions on the utilization of used oil. FPC's existing permit, and prior DEP interpretations, did not place such conditions on FPC's utilization of used oil. The co-firing of used oil does not trigger PSD applicability because the units were capable of accommodating used oil prior to January 6, 1975.

3. Condition A.8. For clarification, this Condition should be revised as follows: "Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured in accordance with Condition A.19, ~~by applicable compliance methods.~~

4. Condition A.11. The rule citation for this Condition is incorrect and should be deleted.

5. Condition A.21. The ASTM methods should be updated as follows to reflect the current methods: ". . . ASTM D4292-90 (1995), or both"

6. Condition A.25. For clarity, the first clause in paragraph (a)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 required compliance method.

7. Condition A.27. This Condition should be revised because there is no need for an annual testing requirement for units that are on stand-by. At a minimum, clarification should be provided that an annual test is not required for sulfur dioxide (which is based on fuel sampling analysis) if the unit operates less than a certain time period per year. Conditions A.28. and A.29 currently provide such an exemption for the testing requirements for visible emissions and particulate matter. The same clarification should be provided for Condition A.31.

8. Condition A.33. There is no direct authority for the inclusion of the provisions contained in this Condition. Neither FPC's existing operating permit nor the rule citations provided by DEP as authority include such conditions. In fact, certain draft provisions contained in Condition A.33. directly conflict with FPC's existing permit conditions and prior DEP interpretations that this facility was capable of accommodating this fuel prior to January 6, 1975, and therefore is exempt from PSD applicability for such activities. Therefore, FPC requests that this Condition be deleted.

Section III. Subsection B.

1. Condition B.7. CTP's 1 and 2 are existing units and therefore the excess emissions provisions under Rule 62-210.700(2) and (3), F.A.C. are applicable. FPC is still in the process of researching whether CTP's 3 and 4 meet the criteria for "existing units."

2. Condition B.13. FPC requests that this condition be revised in accordance with DEP guidance titled DARM-EM-05, dated November 22, 1995, and thereby allow the capacity to be determined based on heat input/temperature curves.

3. Condition B.21. The ASTM methods should be updated as follows to reflect the current methods: ". . . ASTM D4292-90 (1995), or both"

Section IV. Acid Rain Part

1. Condition 1. The reference to the Acid Rain application form should be to the form submitted by FPC for the Turner Plant, rather than generically to DEP's form.

2. Condition 4. Because this Condition applies to all requirements at the site, this Condition should be moved to the "facility-wide" section of the permit.

Table 1-1, Air Pollutant Allowables and Terms

1. In accordance with the comments above, the reference in footnote 1 to the limit on used oil utilization should be deleted.

Tables 1-2, Summary of Air Pollutant Standards and Terms

1. In accordance with the comments above, this Table should be deleted.

Table 2-1, Compliance Testing Requirements

1. The EPA test method for PM on SG 2, 3, and 4 should be revised to include methods 17, 5B, or 5F.

Appendix E-1. list of Exempt Emissions Units and/or Activities

1. The word "citrosolv" is misspelled. The following units/activities should be deleted from the this list because the emissions, if any, are trivial: the hazardous waste building, the lube oil storage building, and portable unleaded gasoline tank.

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

1. The surface coating and solvent cleaning activities should be moved to Appendix E-1. Also, the reference to helper cooling towers should be deleted because this site does not contain them. The reference to "emergency generator" should be made plural.