



**Progress Energy**

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BUREAU OF AIR REGULATION

**UPS OVERNIGHT TRACKING No: 1Z 363 196 22 1039 8567**

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

RE: Comments on Draft/Proposed Title V Air Operation Renewal Permit  
Project No: 1270020-004-AV  
Florida Power Corporation d/b/a Progress Energy Florida, Inc.  
G.E. Turner Power Plant  
Facility ID: 1270020

Dear Mr. Holtom:

Included below are comments on the Draft/Proposed Title V Air Operation Renewal Permit for the Florida Power Corporation d/b/a Progress Energy Florida, Inc. ("PEF") G.E. Turner Power Plant. Requested changes are shown in red with strikethrough for deletion and underline for insertion.

*Draft/Proposed Title V Air Operation Permit Renewal: 1270020-004-AV*

1. *Section I, Subsection B – Summary of Emission Units:* The requested change is to correct the designation of the DEP Emission Unit (EU) Number designations for the Combustion Turbine Peaking (CTP) Units. The correct DEP Emission Unit designations are as follows:

**Subsection B. Summary of Emissions Units.**

<b>E.U. ID No.</b>	<b>Brief Description</b>
<i>Regulated Emissions Units</i>	
<i>Simple Cycle Turbines</i>	
<del>012</del> <u>011</u>	Combustion Turbine Peaking Unit (CTP) No. 1
<del>011</del> <u>012</u>	Combustion Turbine Peaking Unit (CTP) No. 2
<del>010</del> <u>009</u>	Combustion Turbine Peaking Unit (CTP) No. 3
<del>009</del> <u>010</u>	Combustion Turbine Peaking Unit (CTP) No. 4

2. *Section III, Subsection A – Emission Unit(s) -012, -011, -010 & -009:* The requested change is to correct the designation of the DEP Emission Unit (EU) Number designations for the Combustion Turbine Peaking (CTP) Units. The DEP Emission Unit designations corresponding to the CTP designations are as follows:

**The specific conditions in this section apply to the following emissions unit(s):**

<b>E.U. ID No.</b>	<b>Brief Description</b>
	<i>Simple Cycle Turbines</i>
<del>-012</del> <u>-011</u>	Combustion Turbine Peaking Unit (CTP) No. 1
<del>-011</del> <u>-012</u>	Combustion Turbine Peaking Unit (CTP) No. 2
<del>-010</del> <u>-009</u>	Combustion Turbine Peaking Unit (CTP) No. 3
<del>-009</del> <u>-010</u>	Combustion Turbine Peaking Unit (CTP) No. 4

3. *Section III, Subsection A, Specific Condition A.10 – Fuel Sulfur Summary:* The requested change is to clarify the No. 2 fuel oil sampling process. The delivery of No. 2 fuel oil to the facility is accomplished via tanker trucks. On any particular day the transfer of fuel from a number of tanker trucks may take place. At the end of each delivery day the storage tank is sampled and analyzed. Therefore the requested clarification is as follows:

**A.10. Fuel Sulfur Monitoring.** The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor or the permittee upon each fuel delivery day.

4. *Section III, Subsection A, Specific Condition A.12 – Fuel Sulfur Content:* The requested change is to include other approved methods other than those delineated in this specific condition. The requested language for insertion has been approved by the Bureau of Air Regulation - Permitting Section for other Title V Air Operation Permits. The requested change is as follows:

**A.12. Fuel Sulfur Content.** The fuel sulfur content, percent by weight, provided by the vendor or permittee for each delivery of liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, or both ASTM D4057-88 and ASTM D129-91, or the respective successor ASTM method(s). In addition, other applicable approved ASTM methods as adopted in Rule 62-297.440(1), F.A.C. are also acceptable.

5. *Section IV, Subsection A – CAIR Part:* The requested change is to correct the designation of the DEP Emission Unit (EU) Number designations for the Combustion Turbine Peaking (CTP) Units. The DEP Emission Unit designations corresponding to the CTP designations are as follows:

**Subsection A. This Subsection addresses CAIR.**

The emissions units below are regulated under the Clean Air Interstate Rule.

E.U. ID No.	EPA Unit ID#	Brief Description
<del>-010</del> <u>-009</u>	P3	Combustion Turbine Peaking Unit (CTP) No. 3
<del>-009</del> <u>-010</u>	P4	Combustion Turbine Peaking Unit (CTP) No. 4

1. Clean Air Interstate Rule Application. The Clean Air Interstate Rule Part Form submitted for this facility is a part of this permit. The owners and operators of these CAIR units as identified in this form must comply with the standard requirements and special provisions set forth in the CAIR Part Form (DEP Form No. 62-210.900(1)(b) - Form, Effective: 3/16/08), which is attached at the end of this subsection. [Chapter 62-213, F.A.C. and Rule 62-210.200, F.A.C.]
  2. Comments, notes, and justifications: The ARMS E.U. ID Nos. corresponding to the EPA Unit ID# shown on the form were incorrect, i.e., EPA Unit ID# P3 corresponds to E.U. ID No. ~~-010~~ -009 and EPA Unit ID# P4 corresponds to E.U. ID No. ~~-009~~ -010.
6. *Referenced Attachment – Table 1, Summary of Air Pollutant Standards and Terms, Page 1 of 2:* The requested change is to correct the DEP Emission Unit (EU) designations for the Combustion Turbine Peaking (CTP) Units in this table. The DEP Emission Unit designations corresponding to the CTP designations are as follows:

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

E.U. ID No.	Brief Description
<del>-012</del> <u>-011</u>	Combustion Turbine Peaking Unit (CTP) No. 1
<del>-011</del> <u>-012</u>	Combustion Turbine Peaking Unit (CTP) No. 2

7. *Referenced Attachment – Table 1, Summary of Air Pollutant Standards and Terms, Page 2 of 2:* The requested change is to correct the DEP Emission Unit (EU) designations for the Combustion Turbine Peaking (CTP) Units in this table. The DEP Emission Unit designations corresponding to the CTP designations are as follows:

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

<b>E.U. ID No.</b>	<b>Brief Description</b>
<del>-010</del> <u>-009</u>	Combustion Turbine Peaking Unit (CTP) No. 3
<del>-009</del> <u>-010</u>	Combustion Turbine Peaking Unit (CTP) No. 4

8. *Section V – Appendix I - List of Insignificant Emissions Units and/or Activities:* The requested change is to correct the identification of one of the storage tanks. From a regulatory standpoint the use of the waste oil storage tanks included in the Appendix I Table needs to be clarified and the name should be changed as follows:

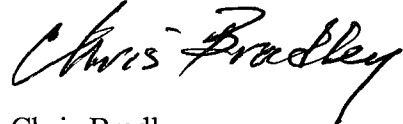
Brief Description of Emissions Units and/or Activities	
1.	Lube Oil System Vents
2.	Lube Oil Reservoir Tank
3.	Oil Water Separators
4.	Hazardous Waste Building
5.	Parts Washers/Degreasers
6.	<del>Waste Used</del> Oil Storage Tanks
7.	Lube Oil Storage Building
8.	Portable Unleaded Gasoline Tank
9.	No. 2 Diesel Fuel Tank
10.	Surface Coating Operations
11.	Solvent Cleaning
12.	Emergency Diesel Fuel Truck Loading Station
13.	2 - 30 hp (horsepower) diesel engines rented for emergency use during hurricanes provided they are exempt from 40 CFR 60 Subpart IIII also known as (a.k.a.) NSPS “4-I’s” or “CI-ICE” and 40 CFR 60 Subpart JJJJ a.k.a. NSPS “4-J’s” or “SI-ICE” {CI engines pre-May 2006 and SI engines pre-7/2/2007 are exempt from the NSPS}.

Comments on Draft/Proposed Title V Air Operating Permit  
Renewal Project No. 1270020-004-AV  
Facility ID No: 1270020  
G.E. Turner Power Plant  
Page 5 of 5

Finally, during a telephone conversation on October 27, 2009, you and I discussed the exclusion of the Acid Rain Forms from the draft/proposed Title V Renewal permit (Permit No. 1270020-004-AV) for this facility. You explained that, although the three fossil fuel-fired steam generators (SG Nos. 2, 3 and 4) previously located at the site were permanently retired on January 1, 1998 and completely dismantled and removed from the facility in early 2008, the facility still retains the allowances for these units under the Acid Rain Program. Since the Acid Rain Program-applicable emission units have been removed, the Acid Rain Forms, previously included in Title V Air Operating Permit No. 1270020-002-AV, have been excluded from the draft/proposed Title V renewal permit.

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

Sincerely,



Chris Bradley  
Sr. Environmental Specialist  
Progress Energy Florida, Inc.

cc: Mr. Scott Sheplak, P.E., Permitting Engineer – DEP/DARM (via e-mail)  
Mr. Lyndon Dupont, Plant Manager – DB 44 (via e-mail)