



Florida Power
A Progress Energy Company

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BUREAU OF AIR REGULATION

October 17, 2002

Mr. Scott Sheplak, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation, Title V Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Comment on Draft Title V Air Operation Permit No. 0550003-001-AV
Avon Park Plant

Dear Mr. Sheplak:

Florida Power wishes to express several comments on the above referenced draft permit.
Florida Power requests a change in the language of permit condition A.1. to read:

Permitted Capacity. The maximum heat input rate to each turbine shall not exceed 562.6 mmBtu/hour while firing No. 2 fuel oil or natural gas. The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. This is not a limit, therefore regular record keeping is not required for heat input. Instead, the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Please revise the permitting note corresponding to permit condition A.5. to read:

{Permitting note: Unless otherwise specified, the averaging time for condition A.5. is based on the specified averaging time of the applicable test method.}

Florida Power requests a change in the language of permit condition A.9. to read:

The permittee shall demonstrate compliance with the sulfur content limit with a fuel analysis provided by the vendor or permittee upon each fuel delivery.

Mr. Scott Sheplak
October 17, 2002
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Florida Power requests a change in the language of permit condition A.12. to read:

*The fuel sulfur content, percent by weight, provided by the vendor or permittee of liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition(s).
[Rules 62-213.440 and 62-297.440, F.A.C.]*

Florida Power requests a change in the language of permit condition A.17. to read:

In the case of malfunctions resulting in excess emissions greater than two hours in a 24 hour period, the 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.]

Please contact Matt Lydon at (727) 826-4152 if you have any questions or need additional information.

Sincerely,



Kris G. Edmondson
Plant Manager



Florida Power
A Progress Energy Company

September 25, 2002

Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blaire Stone Road
Mail Station: 5505
Tallahassee, FL 32399-2400

Re: Avon Park Facility's Title V Draft Permit Public Notice Proof of Publication

I have enclosed the original proof of publication of the intent to issue the Title V air operating permit renewal public notice. The public notice was published on September 20, 2002 in the News-Sun newspaper.

Please contact me (727) 826-4152 if you have any questions.

Sincerely,

Matt Lydon
Associate Environmental Specialist

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THE NEWS-SUN
2227 U.S. 27 SOUTH
Published three (3) times weekly
SEBRING, HIGHLANDS COUNTY, FLORIDA

STATE OF FLORIDA,
COUNTY OF HIGHLANDS:

Before the undersigned authority personally appeared Michele Stevens, who on oath says that she is Business Manager of the News-Sun, a tri-weekly newspaper published at Sebring, in Highlands County, Florida; that the attached copy of advertisement, being a Proof of Publication in the matter of:

Intent to Issue Title V Air Operation Permit Renewal Permit No. 0550003-001-AV, Avon Park Plant, Highlands County

Was published in said newspaper in the issue(s) of

September 20, 2002

Affiant further says the News-Sun is a newspaper published at Sebring, in Highlands County, Florida, and that the said newspaper has heretofore been continuously published in said County, Florida, Wednesday, Friday and/or Sunday and has been entered as a second class mail matter at the post office Sebring, in said county, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund of the purchase of securing this advertisement of publication in the said newspaper.

Michele Stevens
Michele Stevens, Business Manager

Swore to and subscribed before me

On this 20th ___ day of September
A.D. 2002

Denise W. Knudson
Notary Public, State of Florida

 Denise W. Knudson
My Commission CC970772
Expires November 24, 2004

PUBLIC NOTICE OF INTENT TO ISSUE
TITLE V AIR OPERATION PERMIT RENEWAL
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DRAFT Permit Project No. 0550003-002-AV
Renewal of Title V Air Operation Permit No. 0550003-001-AV, Avon Park Plant, Highlands County
The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V Air Operation Permit Renewal to the Florida Power Corporation for the Avon Park Plant located at 1415 South Highlands Avenue, Avon Park, Highlands County. This is a renewal of Title V Air Operation Permit No. 0550003-001-AV. The applicant's name and address are: Mr. Kris Edmondson, Plant Manager, Central CT Sites, Florida Power Corporation, 100 Central Avenue, St. Petersburg, FL 33701.
The permitting authority will issue the PROPOSED Permit and subsequent FINAL Permit, in accordance with the conditions of the DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.
The permitting authority will accept written comments concerning the proposed DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.
A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code (F.A.C.).
A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:
(a) The name and address of each agency affected and each agency's file or identification number, if known;
(b) The name, address and telephone number of the petitioner, name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how petitioner's substantial rights will be affected by the agency determination.

(c) A statement of how and when the petitioner received notice of the agency action or proposed action.

(d) A statement of all disputed issues of material fact; if there are none, the petition must so state.

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief.

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

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

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

Mediation is not available for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

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

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Affected District/Local Program:
Department of Environmental Protection
South District Office
2295 Victoria Avenue
Fort Myers, Florida 33902-3381
Telephone: 841/332-6975
Fax: 841/332-6969

The complete project file includes the

DRAFT Permit, the application for renewal, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/921-9532 for additional information.

September 20, 2002

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Florida Power
A Progress Energy Company

September 16th, 2002

Mr. Scott Sheplak, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation, Title V Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Comment on Draft Title V Air Operation Permit No. 0550003-001-AV
Avon Park Plant

Dear Mr. Sheplak:

Florida Power wishes to express its comment on the above referenced draft permit. Currently, there is one comment in the Monitoring of Operations section of the permit. Permit condition A.9. reads:

The permittee shall demonstrate compliance with the sulfur content limit with a fuel analysis provided by the vendor upon each fuel delivery.

Florida Power requests a change in the language of Permit condition A.9. to read:

The permittee shall demonstrate compliance with the sulfur content limit with a fuel analysis provided by the vendor or permittee upon each fuel delivery.

Please contact me at (727) 826-4152 if you have any questions or need additional information.

Sincerely,

Matt Lydon
Associate Environmental Specialist

cc. Tom Cascio
Kris Edmondson
J. Michael Kennedy

MEMORANDUM

TO: Scott M. Sheplak, P.E. /
FROM: Tom Cascio /
DATE: August 13, 2002
Re: Intent Package for DRAFT Permit Renewal No.: **0550003-002-AV**
Florida Power Corporation
Avon Park Plant

Permit Clock: Application was complete on August 7, 2002.
60 days from the completion date: October 7, 2002

This permit is for the renewal of the Title V air operation permit for the subject facility.

The application was received originally on July 1, 2002, and was deemed *incomplete* on July 24, 2002, due to lack of an updated Phase II Acid Rain Part Application. The application was subsequently deemed complete on August 7, 2002, when the needed documents were received from the applicant.

This facility reported no noncompliance items at the time of the application.

I recommend that this Intent to Issue be sent out as attached.