

MEMORANDUM

To: Trina Vielhauer

Through: Al Linero

From: Teresa Heron

T.H. Heron

Date: September 13, 2007

Re: Progress Energy Avon Park Plant

DRAFT Title V Operation Permit Renewal No. 0550003-005-AV

Attached is the intent-to-issue package to renew the Progress Energy Avon Park Title V Permit. The facility consists of two nominal 33.8 MW "pre-NSPS" combustion turbines. An old steam unit was permanently retired years ago but retains acid rain allowances.

We contacted the South District regarding compliance status and were advised that "there are no outstanding compliance and enforcement actions against this facility at this time".

The South District also recommended that we roll over visible emissions testing requirements into the following fiscal year if the emissions units achieve 400 hours of operation in the previous fiscal year. We plan to rely on rule language rather than attempt a clarification within a permit.

There are no meaningful changes in the Draft renewal permit compared with the previous renewal permit. The application was received on July 5, 2007. Today is approximately day 70. We recommend your approval of the intent to issue documents.

P.E. CERTIFICATION STATEMENT

PERMITTEE

Progress Energy Florida
6525 Osceola-Polk County Line Rd
Intercession City, Florida 33848

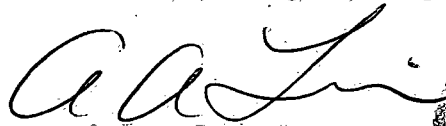
Progress Energy Avon Park Plant
DEP File No. 0550003-005-AV
Title V Operation Permit Renewal

PROJECT DESCRIPTION

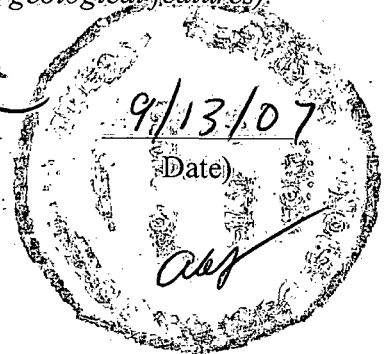
The applicant proposes to renew the Avon Park Power Plant Title V Operation Permit. The facility is located at 1172 Memorial Drive, Avon Park in Highlands County, Florida. The facility consists of two nominal 33.8 MW "pre-NSPS" combustion turbines. An old steam unit was permanently retired years ago but retains acid rain allowances.

There has been no construction and there have been no new application requirements for this facility since the previous Title V Permit. The renewal is basically a duplicate of the previous Title V Operation Permit. According to the South District who are the compliance authority for the facility, there are no compliance or enforcements issues at this time.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).



Alvaro A. Linero, P.E.
Registration Number: 26032



STATEMENT OF BASIS

Progress Energy Florida
Avon Park Plant
Facility ID No. 0550003
Highlands County

DRAFT Permit Project No. 0550003-005-AV
Title V Operation Permit Renewal

The application is for a routine renewal of the 5 year Title V Operation Permit (Permit Renewal) for the Progress Energy Avon Park Power Plant. There are no significant changes in the present renewal compared with the previous one.

This Title V Permit Renewal 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.

This facility consists of two nominal 33.8 megawatt gas turbine peaking units that are permitted to fire natural gas or No. 2 fuel oil with a maximum sulfur limitation of 1 percent. The two units began commercial service in 1968.

Based on the application received July 5, 2007, this facility is not a major source of hazardous air pollutants (HAP). These units are not subject to the Standards of Performance for Stationary Gas Turbines at 40 CFR 60, Subpart GG. There is no emission control equipment on these units. Therefore a compliance assurance monitoring (CAM) plan is not required.

A fossil fuel fired steam generator is listed in the Draft Permit Renewal as ARMS E.U. ID No. 002 and EPA ID 2. It was retired in 1995. It has since been dismantled and removed from the facility. The facility holds ORIS facility code 0624 for that unit under the Federal Acid Rain Program. The final "Retired Unit Exemption" was issued by the U.S. EPA Region 4 on January 31, 1997. The allowances corresponding to this retired unit are included in this Permit Renewal.



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor
Jeff Kottkamp
Lt. Governor
Michael W. Sole
Secretary

September 17, 2007

Electronically Sent – Received Receipt Requested

Julie.Turner@pgnmail

Ms. Julie Turner
Responsible Official
Progress Energy Florida, Inc.
6525 Osceola-Polk County Line Rd
Intercession City, Florida 33848

Re: DRAFT Title V Permit No. 0550003-005-AV
Progress Energy Florida- Avon Park Power Plant

Dear Ms. Turner:

On July 5, 2007, you submitted an application for a Title V Air Operation Permit Renewal for the Avon Park Power Plant located at 1172 Memorial Drive, Avon Park, Highlands County. Enclosed are the following documents: "Statement of Basis", "DRAFT Permit", "Written Notice of Intent to Issue Title V Air Operation Permit", and "Public Notice of Intent to Issue Title V Air Operation Permit".

The "Statement of Basis" summarizes the Permitting Authority's technical review of the application and provides the rationale for making the preliminary determination to issue a DRAFT Permit. The proposed "DRAFT Permit" includes specific conditions that regulate the emissions units at this facility.

The "Written Notice of Intent to Issue Title V Air Operation Permit" provides important information regarding: the Permitting Authority's intent to issue a Title V air operation permit (DRAFT Permit); the requirements for publishing a Public Notice of the Permitting Authority's intent to issue the DRAFT Permit; the procedures for submitting comments on the DRAFT Permit; the requirements for requesting a public meeting; the requirements for filing a petition for an administrative hearing; and the availability of mediation.

The "Public Notice of Intent to Issue Title V Air Operation Permit" is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the Project Engineer, Teresa Heron, at 850-921-9529

Sincerely,

Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/aal/tmh
Enclosures

**WRITTEN NOTICE OF INTENT TO ISSUE
TITLE V AIR OPERATION PERMIT**

In the Matter of an
Application for Permit by:

Progress Energy Florida
6525 Osceola-Polk County Line Road
Intercession City, Florida 33848

Title V Operating Permit Renewal
DRAFT Permit Project No. 0550003-005-AV
Avon Park Power Plant
Highlands County

INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL

Applicant: The applicant for this project is Progress Energy Florida, 6525 Osceola-Polk County Line Rd, Intercession City, Florida 33848. The applicant's responsible official is Ms. Julie Turner.

Facility Location: The applicant operates a Power Electric Utility, which is located at 1172 Memorial Drive, Avon Park, Highlands County.

Project: On July 5, 2007, the applicant applied to the Permitting Authority for a Title V Air Operation Permit Renewal. Details of the project are provided in the application and the enclosed "Statement of Basis" that summarizes the emissions units regulated by the Title V permit.

Permitting Authority: Applications for processing Title V Air Operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-212, 62-213 and 62-214 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to operate the facility in the manner requested. The Department of Environmental Protection, Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination regarding this project. The Permitting Authority's physical address is: Florida Department of Environmental Protection, Bureau of Air Regulation, 111 South Magnolia Drive, Suite 4, Tallahassee, Florida, 32301. The Permitting Authority's mailing address is: Florida Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, Mail Station #5505. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above or at the following email address: <http://www.dep.state.fl.us/air/eproducts/ards/>. A copy of the complete project file is also available at the Florida Department of Environmental Protection South District Office, 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33901-2549. Telephone: 239/332-6975. Fax 239/332-6969.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue a permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a 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 a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice of Intent to Issue Title V Air Operation Permit" (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within seven (7) days of publication.

**WRITTEN NOTICE OF INTENT TO ISSUE
TITLE V AIR OPERATION PERMIT**

No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form presented in Section 50.051, F.S., to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the DRAFT Permit for a period of thirty (30) days from the date of publication of this Public Notice. Written comments must be post-marked, and all e-mail or facsimile comments must be received by the close of business (5 pm), on or before the end of this 30-day period by the Permitting Authority at the above address, email or facsimile. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location on the Federal Administrative Weekly (FAW) website at <http://faw.dos.state.fl.us> and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the DRAFT Permit, the Permitting Authority will issue a Revised DRAFT Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Title V Air Operation Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Title V Air Operation Permit, 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 (14) 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 appropriate 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 (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, 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; the 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 the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each 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, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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.

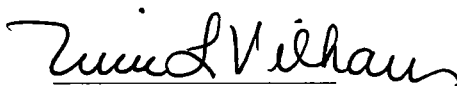
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Title V Air Operation Permit. Persons whose substantial 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: Mediation is not available in this proceeding.

**WRITTEN NOTICE OF INTENT TO ISSUE
TITLE V AIR OPERATION PERMIT**

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within sixty (60) 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 the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the thirty (30) day public comment period provided in the Public 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. For more information regarding EPA review and objections, visit EPA's web site at: www.epa.gov/region4/air/permits/Florida.htm

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

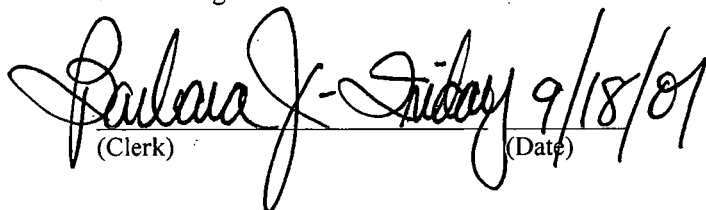
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this "Written Notice of Intent to Issue Air Permit" package (including the Public Notice, the Statement of Basis, and the DRAFT Permit) was sent by electronic mail before the close of business on 9/18/01 to the persons listed below:

Julie Turner, PEF: Julie.Turner@pgnmail
Scott Osbourn, P.E: sosbourn@golder.com
Dave Meyer, PEF: Dave.Meyer@pgnmail.com
Jim Little, EPA Region 4: little.james@epamail.epa.gov
Kathy Forney, EPA Region 4: forney.kathleen@epamail.epa.gov
James Bradner, DEP: james.bradner@dep.state.fl.us

Clerk Stamp

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


(Clerk) _____ (Date) 9/18/01

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Title V Air Operation Permit Renewal

DRAFT Permit Project No. 0550003-005-AV
Progress Energy - Avon Park Power Plant

Highlands County

Applicant: The applicant for this project is Progress Energy Florida, 6525 Osceola-Polk County Line Rd, Intercession City, Florida 33848. The applicant's responsible official is Ms. Julie Turner.

Facility Location: The applicant operates a Power Electric Utility, which is located at 1172 Memorial Drive, Avon Park, Highlands County.

Project: The applicant submitted an application for a Title V Air Operation Permit Renewal.

This facility consists of two gas turbine peaking units. Both units are permitted to fire No. 2 fuel oil or natural gas. Each turbine is rated at 33.8 megawatts. These units began commercial service in 1968. These units are not subject to the Standards of Performance for Stationary Gas Turbines at 40 CFR 60, Subpart GG. A compliance assurance monitoring (CAM) plan is not required. These are not affected units under the Federal Acid Rain Program. The facility holds ORIS facility code 0624 under the Federal Acid Rain Program for an affected unit that was retired and dismantled.

Permitting Authority: Applications for processing Title V Air Operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-212, and 62-213 and 62-214 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to operate the facility in the manner requested. The Department of Environmental Protection, Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination regarding this project. The Permitting Authority's physical address is: Florida Department of Environmental Protection, Bureau of Air Regulation, 111 South Magnolia Drive, Suite 4, Tallahassee, Florida, 32301. The Permitting Authority's mailing address is: Florida Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, Mail Station #5505. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above or at the following email address: www.dep.state.fl.us/air/eproducts/ards/. A copy of the complete project file is also available at the Florida Department of Environmental Protection South District Office, 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33902-2549. Telephone: 239/332-6975. Fax 239/332-6969.

Notice of Intent to Issue a Permit: The Permitting Authority gives notice of its intent to issue a permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a 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 a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the DRAFT Permit for a period of thirty (30) days from the date of publication of this Public Notice. Written comments must be post-marked and all e-mail or facsimile comments must be received by the close of business (5 pm) on or before the end of this 30-day period by the Permitting Authority at the above address, email or facsimile. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location on the Florida Administrative Weekly (FAW) at <http://faw.dos.state.fl.us> and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Department at the above address or phone number. If written comments or comments received at a public meeting result in a

significant change to the DRAFT Permit, the Permitting Authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of this Public Notice or receipt of a written notice, 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 (14) 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 appropriate 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, 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; the 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 the 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, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Public 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: Mediation is not available for this proceeding.

Objections: In addition to the above right to petition, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within sixty (60) 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 the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the thirty (30) day public comment period provided in the Public 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. For more information regarding EPA review and objections, visit EPA's Region 4 web site at www.epa.gov/region4/air/permits/Florida.htm .

Progress Energy Florida
Avon Park Plant
Facility ID No.: **0550003**
Highlands County

Title V Air Operation Air Permit Renewal

DRAFT Permit Project No. **0550003-005-AV**



Permitting Authority:

State of Florida
Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation

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

Phone: 850/488-0114
Fax: 850/922-6979

Title V Air Operation Permit Renewal
DRAFT Permit Renewal No. 0550003-005-AV

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Permittee:
Progress Energy Florida, Inc
6525 Osceola-Polk County Line Rd
Intercession City, Florida 33848

DRAFT Permit Renewal No. **0550003-005-AV**
Facility ID No. **0550003**
SIC No.: 4911
Project: Title V Air Operation Permit Renewal

The purpose of this permit is for the renewal of the Title V Air Operating Permit. This facility is located at 1172 Memorial Drive, Avon Park, Highlands County. UTM Coordinates: Zone 17, 451.4 km East and 3050.5 km North; Latitude: 27° 34' 45" North and Longitude: 81° 29' 33" West.

This Title V air operation permit renewal 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-6, Title V Conditions, version dated 06/23/06.
- Retired Unit Exemption dated June 20, 2007.

Effective Date: January 1, 2008
Renewal Application Due Date: July 5, 2012
Expiration Date: December 31, 2012

Joseph Kahn, Director
Division of Air Resource
Management

TLV/aal/tmh

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of two gas turbine peaking units, designated No. 1 and No. 2. Both units have separate exhaust stacks, and are permitted to fire No. 2 fuel oil or natural gas. Each turbine is rated at 33.8 MW, at a maximum heat input of 562.6 mmBtu/hr. The facility also includes a retired Acid Rain unit. In addition, included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the Title V permit renewal application received July 5, 2007, this facility is *not* a major source of hazardous air pollutants (HAPs).

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

E.U. ID No.	Brief Description
-003	Gas Turbine Peaking Unit No. 1
-004	Gas Turbine Peaking Unit No. 2
-002	Fossil Fuel Fired Steam Generator (Retired Acid Rain Unit)

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.

Statement of Basis.

These documents and related correspondence are on file with the permitting authority:

Initial Title V Permit, 0550003-001-AV, issued on December 29, 1997

Title V Permit Renewal, 0550003-002-AV, issued on December 24, 2002

Title V Permit Revision, No. 0550003-004-AV, effective date August 4, 2005

Title V Permit Renewal, No. 0550003-005-AV, effective date January 1, 2008

Documents listed in Appendix H-1- History

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. Appendix TV-6, Title V Conditions, is a part of this permit.
{Permitting note: Appendix TV-6, Title V Conditions, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided with only one copy when requested or otherwise appropriate.}
 2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not 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 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, 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 method of compliance pursuant to Chapter 62-297, F.A.C.
[Rule 62-296.320(4)(b)1., & 4., F.A.C.]
 4. Prevention of Accidental Releases (Section 112(r) of CAA).
 - a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, Maryland 20703-1515
Telephone: 301/429-5018
- and,
- b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[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 62-213.430(6), F.A.C.]
7. [Reserved.]
8. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle,

process, load, unload or use in any process or installation, VOCs or OSs without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1)(a), F.A.C.]

9. Not federally enforceable. Reasonable precautions shall be taken to prevent emissions of unconfined particulate matter at this facility. Specific steps shall be taken at the facility to minimize particulate emissions as follows:

- Maintenance of paved areas as needed,
- Regular mowing of grass and care of vegetation, and
- Limiting access to plant property by unnecessary vehicles.

[Rule 62-296.320(4)(c)2., F.A.C.; and, proposed by applicant in the Title V permit renewal application received July 5, 2007.]

{Note: This condition implements the requirements of Rules 62-296.320(4)(c)1., 3., & 4., F.A.C. (see Condition 57. of Appendix TV-6, Title V Conditions).}

10. Timely Recording, Monitoring and Reporting: 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.]

11. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.

[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of Appendix TV-6, Title V Conditions).}

12. State Compliance Authority: The permittee shall submit all compliance related notifications and reports required of this permit to the Department's South District office:

Department of Environmental Protection
South District Office
2295 Victoria Avenue, Suite 364
Fort Myers, Florida 33902-2549
Telephone: (239) 332-6975
Fax: (239) 332-6969

13. EPA Compliance Authority: Any reports, data, notifications, certifications, and requests required for 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 and EPCRA Enforcement Branch
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155
Fax: 404/562-9163

14. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.
[Rule 62-213.420(4), F.A.C.]

Section III. Emissions Unit(s) & Conditions.

Subsection A. This section addresses the following emissions units.

E. U. ID No.	Brief Description
-003	Gas Turbine Peaking Unit No. 1
-004	Gas Turbine Peaking Unit No. 2

The above referenced gas turbines may fire natural gas or No. 2 fuel oil having a maximum sulfur content of 1.0 percent by weight. Each gas turbine is rated at 33.8 MW (megawatts of electricity), and has a maximum heat input of 562.6 mmBtu/hr. Emissions are *not controlled*, and each turbine exhausts through a separate stack. The units began commercial service in 1968.

{Permitting Note: The emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. However, these units are *not* subject to any federal requirements, NSPS - 40 CFR 60 Subpart GG, Standards of Performance for Stationary Gas Turbines, or the Federal Acid Rain Program.}

The following specific conditions apply to both of the above referenced emissions units:

Essential Potential to Emit (PTE) Parameters

A.1. 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.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

{Permitting note: 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. 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.}

A.2. Emissions Unit Operating Rate Limitation After Testing. See Specific Condition A.13.

A.3. Methods of Operation - Fuels. Only natural gas or No. 2 fuel oil, having a maximum sulfur content of 1.0 percent, by weight, shall be fired in the turbines.
[Rules 62-4.160(2) and 62-213.440(1), F.A.C.]

A.4. Hours of Operation. These emissions units may operate continuously, i.e., 8,760 hours/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

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.}

A.5. Visible Emissions. Visible emissions from each turbine shall not be equal to or greater than 20 percent opacity.

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

[Rule 62-296.320(4)(b)1., F.A.C.; and, AO28-202500.]

A.6. Not federally enforceable. Sulfur Content. The sulfur content of the No. 2 fuel oil shall not exceed 1.0 percent, by weight.

[0550003-001-AV, Specific Condition A.6.]

Excess Emissions

A.7. Excess emissions from these emissions units resulting from startup, shutdown or 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.8. 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.9. The permittee shall demonstrate compliance with the sulfur content limit with a fuel analysis provided by the vendor or permittee upon each fuel delivery. See Specific Condition A.12.

[Rule 62-213.440, F.A.C.; and, AO28-202500.]

A.10. 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: 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.11. The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C.
[Rules 62-204.800, 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

A.12. 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 D1552-90 or later editions, ASTM D2622-94, ASTM D4294-90, or both ASTM D4057-88 and ASTM D129-91, or later edition(s). In addition, any ASTM method (or later editions) referenced in Rule 62-297-440(1) F.A.C., or in 40 CFR 60.335 (b) (10) is acceptable.
[Rules 62-213.440 and 62-297.440, F.A.C.]

A.13. Operating Rate During Testing.

Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. 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.

[Rule 62-297.310(2), F.A.C.]

A.14. Applicable Test Procedures.

(a) Required Sampling Time.

2. Opacity Compliance Tests. When EPA 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.

[Rule 62-297.310(4)(a)2.c., F.A.C.]

A.15. 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;
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.
10. An annual compliance test conducted for visible emissions shall not be required for units exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62-210.300(4), F.A.C.

(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.16. Visible Emissions Testing - Annual. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:

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

[Rules 62-297.310(7)(a)4. and 8., F.A.C.]

Recordkeeping and Reporting Requirements

A.17. Malfunction Reporting. 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.18. 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.

[Rule 62-297.310(8), F.A.C.]

Section IV. Acid Rain Part.

Operated by: Progress Energy Florida
ORIS code: 0624

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

The emissions unit listed below is regulated under Phase II of the Federal Acid Rain Program.

E.U. ID No.	Description
-002	Fossil Fuel Fired Steam Generator - PERMANENTLY RETIRED

1. The "Retired Unit Exemption" form submitted for this facility constitutes the Acid Rain Part application pursuant to 40 CFR 72.8 and is a part of this permit. The owners and operators of this acid rain unit shall comply with the standard requirements and special provisions set forth in DEP Form No. 62-210.900(1)(a)3., dated April 16, 2001, and signed by the designated representative on July 30, 2002. This unit is subject to the following: 40 CFR 72.1 which requires the unit to have an Acid Rain Part as part of its Title V permit; 40 CFR 72.2 which provides associated definitions; 40 CFR 72.3 which provides measurements, abbreviations, and acronyms; 40 CFR 72.4 which provides the federal authority of the Administrator; 40 CFR 72.5 which provides the authority of the states; 40 CFR 72.6 which makes the boiler a Phase II unit; 40 CFR 72.10 which gives the public access to information about this unit; and, 40 CFR 72.13 which incorporates certain ASTM methods into 40 CFR Part 72. [Chapter 62-213 and Rule 62-214.340, F.A.C.]

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

E.U. ID No.	EPA ID	Year	2008	2009	2010	2011	2012
-002	2	SO ₂ allowances, under Table 2 of 40 CFR 73	495*	495*	495*	495*	495*

*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the U. S. EPA under Table 2 of 40 CFR 73.

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.

a. 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 62-213.440(3), F.A.C.

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

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

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

4. The designated representative of this acid rain unit applied for an exemption from the requirements of the Federal Acid Rain Program by submitting a completed and signed "Retired Unit Exemption" form (DEP Form No. 62-210.900(1)(a)3., F.A.C., attached) to the Department. The date of

permanent retirement is January 1, 1995. The unit has been completely dismantled and removed from the facility. Permit AO 28-211596 for this unit has been formally surrendered by letter on November 21, 1996. The final "Retired Unit Exemption" was issued by the U.S. EPA Region 4 on January 31, 1997. [Rule 62-214.340(2), F.A.C.; and, 40 CFR 72.8.]

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

[40 CFR 70.6(a)(1)(ii); and, Rule 62-210.200, F.A.C., Definitions – Applicable Requirements.]

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

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions unit is neither a “regulated emissions unit” nor an “insignificant emissions unit”.

E.U. ID No.	Brief Description of Emission Unit(s) and/or Activity
-002	Fossil Fuel Fired Steam Generator (Retired Acid Rain Unit)

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

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, or that meet the criteria specified in Rule 62-210.300(3)(b)1., F.A.C., Generic Emissions Unit Exemption, are exempt from the permitting requirements of Chapters 62-210, 62-212 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities
1. Lube Oil Vent with demister
2. Fuel Oil Storage Tanks (underground) - 2600 gal.
3. Two Waste Oil Storage Tanks - 550 gal.
4. Tank No. CT5 - No. 2 Fuel Oil (10,000 bbls)
5. Turbine Lube Oil Tank - 800 gal.

Appendix H-1. Permit History/ID Number Changes.

Permit History (for tracking purposes):

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date	Extended Date	Revised Date(s)
-003	Gas Turbine Peaking Unit (GTPU) No. 1	AO28-202500	10/10/91	10/10/96	08/16/96	
		0550003-001-AV	01/01/98	12/31/02		
-004	Gas Turbine Peaking Unit (GTPU) No. 2	AO28-202500	10/10/91	10/10/96	08/16/96	
		0550003-001-AV	01/01/98	12/31/02		
-002	Fossil Fuel Fired Steam Generator (Retired Acid Rain Unit)	AO28-211596	05/12/92	05/12/97*		
		0550003-001-AV	01/01/98	12/31/02		
003 & 004	GTPU No. 1 and No. 2	0550003-002-AV	12/24/2002			Renewal
		0550003-003-AV				No assigned
003 & 004	GTPU No. 1 and No. 2	0550003-004-AV				Revision
003 & 004	GTPU No. 1 and No. 2	0550003-005-AV				Renewal

ID Number Changes (for tracking purposes):

From: **Facility ID No.:** 52FTM280003

To: **Facility ID No.:** 0550003

*Permit AO28-211596 was formally surrendered on November 21, 1996. This Retired Acid Rain Unit was permanently shutdown on January 21, 1984. It has been dismantled and removed from the plant site.

Retired Unit Exemption

For more information, see instructions and refer to Rule 62-214.340(2), F.A.C., and 40 CFR 72.8

This submission is:

New

Revised

Renewal

Page 1

STEP 1

Identify the unit by plant name, State, ORIS code and unit ID#.

Avon Park Plant	Florida	0624	1
Plant Name	State	ORIS Code	Unit ID#

STEP 2

Identify the first full calendar year in which the unit meets (or will meet) the requirements of Rule 62-214.340(2)(a), F.A.C.

January 1, 1995

STEP 3

Read the special provisions.

Special Provisions


- (1) A unit exempt under Rule 62-214.340(2), F.A.C., shall not emit any sulfur dioxide and nitrogen oxides starting on the date that the exemption takes effect. The owners and operators of the unit will be allocated allowances in accordance with 40 CFR part 73 subpart B. If the unit is a Phase I unit, for each calendar year in Phase I, the designated representative of the unit shall submit a Phase I permit application in accordance with 40 CFR part 72 subparts C and D and an annual certification report in accordance with 40 CFR 72.90 through 72.92 and is subject to 40 CFR 72.95 and 72.96.
- (2) A unit exempt under Rule 62-214.340(2), F.A.C., shall not resume operation unless the designated representative of the source that includes the unit submits a complete Acid Rain part application under Rule 62-214.320, F.A.C., for the unit not less than 24 months prior to the date on which the unit is first to resume operation.
- (3) The owners and operators and, to the extent applicable, the designated representative of a unit exempt under Rule 62-214.340(2), F.A.C., shall comply with the requirements of Chapter 62-214, F.A.C., and the Acid Rain Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (4) For any period for which a unit is exempt under Rule 62-214.340(2), F.A.C., the unit is not an Acid Rain unit and is not eligible to be an opt-in source under 40 CFR part 74. As a non-Acid Rain Unit, the unit shall continue to be subject to any other applicable requirements under 40 CFR part 70.
- (5) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under Rule 62-214.340(2), F.A.C., shall retain at the source that includes the unit records demonstrating that the unit is permanently retired. The 5-year period for keeping records may be extended for cause, at any time prior to the end of the period, in writing by the EPA or the Department. The owners and operators bear the burden of proof that the unit is permanently retired.
- (6) On the earlier of the following dates, a unit exempt under Rule 62-214.340(2), F.A.C., shall lose its exemption and become an Acid Rain Unit: (i) the date on which the designated representative submits an Acid Rain part application under paragraph (2); or (ii) the date on which the designated representative is required under paragraph (2) to submit an Acid Rain part application. For the purpose of applying monitoring requirements under 40 CFR part 75, a unit that loses its exemption under Rule 62-214.340(2), F.A.C., shall be treated as a new unit that commenced commercial operation on the first date on which the unit resumes operation.

STEP 4

Read the appropriate certification and sign and date.

Certification (for designated representatives only)

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name J. Michael Kennedy, QEP	
Signature 	Date 6/20/07

Plant Name (from Step 1)
Avon Park Plant

STEP 4, cont'd.
Read the appropriate
certification and sign
and date.

Certification (for certifying officials only)

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	
Signature	Date

Certification (for additional certifying officials, if applicable)

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	
Signature	Date

Certification (for additional certifying officials, if applicable)

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	
Signature	Date

Friday, Barbara

To: Julie.Turner@pgnmail.com; sosbourn@golder.com; Meyer, Dave; 'Little.James@epamail.epa.gov'; Forney.Kathleen@epamail.epa.gov; Bradner, James

Cc: Heron, Teresa

Subject: DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant

Attachments: 0550003005NoticeofIntent.pdf; 0550003005DraftPermit.pdf; 0550003005DraftRenewalCoverLetter.pdf; 0550003005DRAFTStatement of Basis.pdf; 0550003005DRAFTTable 1.pdf; 0550003005DraftTable 2.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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Thank you,

DEP, Bureau of Air Regulation

9/18/2007

Friday, Barbara

From: System Administrator
To: Bradner, James
Sent: Tuesday, September 18, 2007 11:47 AM
Subject: Delivered:DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant

Your message

To: 'Julie.Turner@pgnmail.com'; 'sosbourn@golder.com'; 'Meyer, Dave'; 'Little.James@epamail.epa.gov'; 'Forney.Kathleen@epamail.epa.gov'; Bradner, James
Cc: Heron, Teresa
Subject: DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant
Sent: 9/18/2007 11:47 AM

was delivered to the following recipient(s):

Bradner, James on 9/18/2007 11:47 AM

Friday, Barbara

From: System Administrator
To: Heron, Teresa
Sent: Tuesday, September 18, 2007 11:47 AM
Subject: Delivered:DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant

Your message

To: 'Julie.Turner@pgnmail.com'; 'sosbourn@golder.com'; 'Meyer, Dave'; 'Little.James@epamail.epa.gov'; 'Forney.Kathleen@epamail.epa.gov'; Bradner, James
Cc: Heron, Teresa
Subject: DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant
Sent: 9/18/2007 11:47 AM

was delivered to the following recipient(s):

Heron, Teresa on 9/18/2007 11:47 AM

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive01.rtp.epa.gov]
Sent: Tuesday, September 18, 2007 11:45 AM
To: Friday, Barbara
Subject: Successful Mail Delivery Report

Attachments: Delivery report; Message Headers



Delivery report.txt
(724 B)

Message
Headers.txt (2 KB)

This is the mail system at host mseive01.rtp.epa.gov.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<Forney.Kathleen@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250
OK, sent 46EFF270_3537_124156_1

<Little.James@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250
OK, sent 46EFF270_3537_124156_1

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@sophos.golder.com]
Sent: Tuesday, September 18, 2007 11:46 AM
To: Friday, Barbara
Subject: Successful Mail Delivery Report

Attachments: Delivery report; Message Headers



Delivery report.txt
(459 B)

Message
Headers.txt (2 KB)

This is the mail system at host sophos.golder.com.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<sosbourn@golder.com>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent
46EFF2A8_4856_59_1

Friday, Barbara

From: Bradner, James
To: Friday, Barbara
Sent: Tuesday, September 18, 2007 11:53 AM
Subject: Read: DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant

Your message

To: 'Julie.Turner@pgnmail.com'; 'sosbourn@golder.com'; 'Meyer, Dave'; 'Little.James@epamail.epa.gov'; 'Forney.Kathleen@epamail.epa.gov'; Bradner, James
Cc: Heron, Teresa
Subject: DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant
Sent: 9/18/2007 11:47 AM

was read on 9/18/2007 11:53 AM.

Friday, Barbara

From: Bradner, James
Sent: Tuesday, September 18, 2007 11:53 AM
To: Friday, Barbara
Subject: Re: DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant

Thanks!

----- Original Message -----

From: Friday, Barbara
To: 'Julie.Turner@pgnmail.com' <Julie.Turner@pgnmail.com>; 'sosbourn@golder.com' <sosbourn@golder.com>; 'Meyer, Dave' <Dave.Meyer@pgnmail.com>; 'Little.James@epamail.epa.gov' <Little.James@epamail.epa.gov>; 'Forney.Kathleen@epamail.epa.gov' <Forney.Kathleen@epamail.epa.gov>; Bradner, James
Cc: Heron, Teresa
Sent: Tue Sep 18 11:46:31 2007
Subject: DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant

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Thank you,

DEP, Bureau of Air Regulation

Friday, Barbara

From: Osbourn, Scott [Scott_Osbourn@golder.com]
To: Friday, Barbara
Sent: Tuesday, September 18, 2007 11:53 AM
Subject: Read: DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant

Your message

To: Scott_Osbourn@golder.com
Subject:

was read on 9/18/2007 11:53 AM.

Friday, Barbara

From: Turner, Julie [julie.turner@pgnmail.com]
To: Friday, Barbara
Sent: Tuesday, September 18, 2007 12:41 PM
Subject: Read: DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant

Your message

To: julie.turner@pgnmail.com
Subject:

was read on 9/18/2007 12:41 PM.

Friday, Barbara

From: Turner, Julie [julie.turner@pgnmail.com]
Sent: Tuesday, September 18, 2007 12:44 PM
To: Friday, Barbara
Subject: RE: DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant

received

-----Original Message-----

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Tuesday, September 18, 2007 11:47 AM
To: Turner, Julie; sosbourn@golder.com; Meyer, Dave; Little.James@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov; Bradner, James
Cc: Heron, Teresa
Subject: DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant

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Thank you,

DEP, Bureau of Air Regulation

Friday, Barbara

From: Heron, Teresa
To: Friday, Barbara
Sent: Tuesday, September 18, 2007 1:02 PM
Subject: Read: DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant

Your message

To: 'Julie.Turner@pgnmail.com'; 'sosbourn@golder.com'; 'Meyer, Dave'; 'Little.James@epamail.epa.gov'; 'Forney.Kathleen@epamail.epa.gov'; Bradner, James
Cc: Heron, Teresa
Subject: DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant
Sent: 9/18/2007 11:47 AM

was read on 9/18/2007 1:02 PM.

Friday, Barbara

From: Forney.Kathleen@epamail.epa.gov
Sent: Tuesday, September 18, 2007 1:18 PM
To: Friday, Barbara
Cc: Little.James@epamail.epa.gov
Subject: Re: DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant

thanks
KT

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30024

Phone: 404-562-9130
Fax: 404-562-9019

"Friday,
Barbara"
<Barbara.Friday@
dep.state.fl.us>

09/18/2007 11:46
AM

To
<Julie.Turner@pgnmail.com>,
<sosbourn@golder.com>, "Meyer,
Dave" <Dave.Meyer@pgnmail.com>,
James Little/R4/USEPA/US@EPA,
Kathleen Forney/R4/USEPA/US@EPA,
"Bradner, James"
<James.Bradner@dep.state.fl.us>

cc
"Heron, Teresa"
<Teresa.Heron@dep.state.fl.us>
Subject

DRAFT Title V Permit Renewal No.:
0550003-005-AV - Progress Energy
Florida, Inc. - Avon Park Power
Plant

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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Thank you,

DEP, Bureau of Air Regulation

[attachment "0550003005NoticeofIntent.pdf" deleted by Kathleen Forney/R4/USEPA/US]
[attachment "0550003005DraftPermit.pdf" deleted by Kathleen Forney/R4/USEPA/US]
[attachment "0550003005DraftRenewalCoverLetter.pdf" deleted by Kathleen Forney/R4/USEPA/US] [attachment "0550003005DRAFTStatement of Basis.pdf" deleted by Kathleen Forney/R4/USEPA/US] [attachment "0550003005DRAFTTable 1.pdf" deleted by Kathleen Forney/R4/USEPA/US] [attachment "0550003005DraftTable 2.pdf" deleted by Kathleen Forney/R4/USEPA/US]

Friday, Barbara

From: Meyer, Dave [Dave.Meyer@pgnmail.com]
To: Friday, Barbara
Sent: Tuesday, September 18, 2007 3:51 PM
Subject: Read: DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant

Your message

To: Dave.Meyer@pgnmail.com
Subject:

was read on 9/18/2007 3:51 PM.

Friday, Barbara

From: Meyer, Dave [Dave.Meyer@pgnmail.com]
Sent: Tuesday, September 18, 2007 3:52 PM
To: Friday, Barbara
Subject: RE: DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant

Hi Barbara,

Got the files. Thanks so much!

Best Regards, Dave 727 820 5295

-----Original Message-----

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Tuesday, September 18, 2007 11:47 AM
To: Turner, Julie; sosbourn@golder.com; Meyer, Dave; Little.James@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov; Bradner, James
Cc: Heron, Teresa
Subject: DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant

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Thank you,

DEP, Bureau of Air Regulation

Friday, Barbara

From: Meyer, Dave [Dave.Meyer@pgnmail.com]
To: Friday, Barbara
Sent: Friday, September 21, 2007 8:32 AM
Subject: Read: RE: DRAFT Title V Permit Renewal No.: 0550003-005-AV - Progress Energy Florida, Inc. - Avon Park Power Plant

Your message

To: Dave.Meyer@pgnmail.com
Subject:

was read on 9/21/2007 8:32 AM.