



Florida Power
A Progress Energy Company

RECEIVED

OCT 29 2002

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
Page 2

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 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

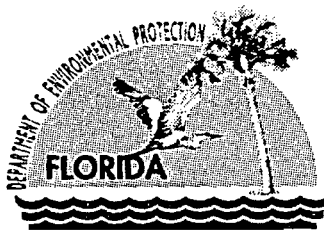
Permit Clock: Application was complete on August 7, 2002.
60 days from the completion date: October 7, 2002

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.



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

Certified Mail – Return Receipt Requested

July 24, 2002

Mr. Kris Edmondson
Plant Manager Central CT Sites and Responsible Official
Florida Power Corporation
100 Central Avenue
St. Petersburg, FL 33701

Re: Title V Air Operation Permit Renewal Application
Avon Park Plant
Facility ID: 0550003; ORIS Code: 0624

Dear Mr. Edmondson:

Thank you for your recent submission of a Title V Air Operation Permit Renewal Application for the referenced plant. However, we must deem your application *incomplete*, due to the omission of an updated Phase II Acid Rain Part Application. Please be advised that Department Rule 62-214.320(1)(i) requires that, "the designated representative of any Title V source having a Title V permit with an Acid Rain Part shall submit a complete application for renewal of the Title V permit with the Acid Rain Part for each Acid Rain unit at the source."

Also, please check if there are any changes to the Designated Representative for the facility, and submit an updated Certificate of Representation if necessary.

When we receive this information we will continue processing your application. If you have any questions, please contact Tom Cascio at 850/921-9526.

Sincerely,

Scott M. Sheplak, P.E.
Administrator
Title V Section

cc: Kennard F. Kosky, P.E., Golder Associates, Inc. (regular mail)

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Kris Edmondson
 Plant Manager Central CT Sites and
 Responsible Official
 Florida Power Corporation
 100 Central Avenue
 St. Petersburg, Florida 33701

2. Article Number (Copy from service label)
 7000 0520 0020 9371 3223

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

Dana Clark 7/29/02

C. Signature

X Dana Clark

 Agent AddresseeD. Is delivery address different from item 1? YesIf YES, enter delivery address below: No

3. Service Type

 Certified Mail Express Mail Registered Return Receipt for Merchandise Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes

7000 0520 0020 9371 3223

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)**

Mr. Kris Edmondson

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here**Recipient's Name (Please Print Clearly) (To be completed by mailer)**

Mr. Kris Edmondson

Street, Apt. No.; or PO Box No.

100 Central Avenue

City, State, ZIP+4

St. Petersburg, Florida 33701

PS Form 3800, February 2000

See Reverse for Instructions

11-20-03
ARMS Updated
Bauer



September 16, 2003

RECEIVED
SEP 22 2003
DIVISION OF AIR
RESOURCE MANAGEMENT

Mr. Michael Cooke, Director
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Rd. MS 5500
Tallahassee, FL 32399-2400

Subject: Additional Responsible Officials for Title V – Florida Power Corporation d/b/a
Progress Energy Florida Intercession City Plant and Avon Park Plant

Dear Mr. Cooke:

As the Responsible Official for the Intercession City Plant and the Avon Park Plant, I am submitting a Department of Environmental Protection form 62-213.900(8) for each plant to identify additional Responsible Officials.

If you have any questions, please contact me at (863) 679-3020.

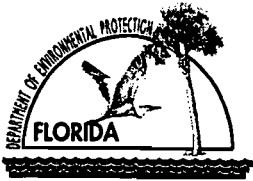
Very truly yours,

A handwritten signature in blue ink that reads 'Kris Edmondson'.

Kris Edmondson

Attachments

c: Mr. Paul V. Crimi
Mr. William Dudley
Mr. J. Michael Kennedy
Mr. Leonard Kozlov (FL-DEP)
Mr. Scott Sheplak (FL-DEP)



Department of Environmental Protection

RECEIVED

Division of Air Resource Management

SEP 22 2003

RESPONSIBLE OFFICIAL NOTIFICATION FORM

DIVISION OF AIR
RESOURCE MANAGEMENT

Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.

Identification of Facility

1. Facility Owner/Company Name: Florida Power Corporation d/b/a Progress Energy Florida, Inc.	
2. Site Name: Avon Park Plant	3. County: Highlands County
4. Title V Air Operation Permit/Project No. (<i>leave blank for initial Title V applications</i>): 0550003-002-AV	

Notification Type (*Check one or more*)

<input type="checkbox"/> INITIAL:	Notification of responsible officials for an initial Title V application.
<input type="checkbox"/> RENEWAL:	Notification of responsible officials for a renewal Title V application.
<input checked="" type="checkbox"/> CHANGE:	Notification of change in responsible official(s). Effective date of change in responsible official(s) <u>September 10, 2003</u>

Primary Responsible Official

1. Name and Position Title of Responsible Official: Kris Edmondson – Plant Manager Central CT Sites
2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc. Street Address: 100 Central Ave. Mail Code IC44 City: St. Petersburg State: FL Zip Code: 33701
3. Responsible Official Telephone Numbers: Telephone: (863)679-3020 Fax: (863) 679-3055
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

11-20-03
ARMS Updated
B...

5. Responsible Official Statement:

I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.

Kris A. Edmundson

Signature

9/16/03

Date

Additional Responsible Official

RECEIVED

1. Name and Position Title of Responsible Official: William Dudley, Production Manager – CT	SEP 22 2003
2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc. Street Address: 100 Central Ave. Mail Code IC44 City: St. Petersburg State: FL Zip Code: 33701	DIVISION OF AIR RESOURCE MANAGEMENT 11-20-03 ARMS Updated Bmm
3. Responsible Official Telephone Numbers: Telephone: (863) 679-3030 Fax: (863) 679-3055	
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.	

Additional Responsible Official

1. Name and Position Title of Responsible Official: Paul V. Crimi, General Manager CT Operations	11-20-03 ARMS Updated Bmm
2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc. Street Address: 100 Central Ave. Mail Code BB1C City: St. Petersburg State: FL Zip Code: 33701	
3. Responsible Official Telephone Numbers: Telephone: (727) 826-4224 Fax: (727) 826-4222	
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.	



RECEIVED

SEP 16 2003

Progress Energy Florida, Inc
Bayboro Plant
160 13th Ave., S.
St. Petersburg, FL 33701

DIVISION OF AIR
RESOURCE MANAGEMENT

Bruce M. Baldwin
Vice President
CT – Operations Department
(727) 826-4201

September 10, 2003

Mr. Howard Rhodes, Director
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Rd. MS 5500
Tallahassee, FL 32399-2400

Subject: Alternate Responsible Officials: Title V Air Permits

Dear Mr. Rhodes:

This letter is intended to delegate the alternate “responsible officials” for Title V air permits for Florida Power Corporation d/b/a Progress Energy Florida combustion turbine facilities. All delegations are made in accordance with a corporate procedure, and each person is duly qualified in accordance with applicable statute and regulation. The delegations being made today are noted on Attachment 1. Each facility will submit a Department of Environmental Protection form 62-213.900(8) at a later date.

By copy of this letter, notification of this delegation is provided to individuals newly authorized to sign on behalf of the company. This letter supersedes and negates any previous correspondence relating to the responsible officials for these facilities. Delegations for Progress Energy facilities not referenced in this letter and provided to you previously are not changed.

Very truly yours,

Bruce M. Baldwin
Vice President – Combustion Turbine Operations

Attachment

C: Mr. Reginald D. Anderson
Mr. Ernie L. Bass
Mr. Paul V. Crimi
Mr. Martin J. Drango
Mr. William Dudley
Mr. Kris Edmondson
Mr. Wilson B. Hicks, Jr.
Mr. David R. Karp
Mr. J. Michael Kennedy
Mr. Leonard Kozlov (FL-DEP)
Mr. George Kerst
Mr. Mike W. Lentz
Mr. Dennis A. Merrick
Mr. Scott Sheplak (FL-DEP)
Mr. Roger B. Zirkle

Attachment 1
Progress Energy Florida Combustion Turbine
Title V Responsible Officials

Facility	Current RO: Plant Managers	Alternate: General Manager CT Operations	Alternate: Production Managers - CT	Alternate: DR if applicable
Avon Park	Kris Edmondson	Paul V. Crimi	William Dudley	
Bayboro	Mike W. Lentz	Paul V. Crimi	David R. Karp	
DeBary	Martin J. Drango	Paul V. Crimi	Reginald D. Anderson	J. Michael Kennedy
Higgins	Mike W. Lentz	Paul V. Crimi	David R. Karp	
Hines	Roger B. Zirkle	Paul V. Crimi	George Kerst	J. Michael Kennedy
Intercession City	Kris Edmondson	Paul V. Crimi	William Dudley	J. Michael Kennedy
Rio Pinar	Martin J. Drango	Paul V. Crimi	Reginald D. Anderson	
Tiger Bay	Roger B. Zirkle	Paul V. Crimi	Dennis A. Merrick	J. Michael Kennedy
Turner	Martin J. Drango	Paul V. Crimi	Reginald D. Anderson	
University of Florida Cogen	Wilson B. Hicks, Jr.	Paul V. Crimi	Ernie L. Bass	J. Michael Kennedy



RECEIVED

JUL 15 2002

BUREAU OF AIR REGULATION

July 12, 2002

Mr. Howard Rhodes, Director
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Rd. MS 5500
Tallahassee, FL 32399-2400

Subject: Responsible Official Notification Form

Dear Mr. Rhodes:

On July 10, 2002 Mr. Habermeyer, Jr. President & Chief Executive Officer of Florida Power Corp. sent you a letter delegating me as a Title V Primary Responsible Official. As indicated in Mr. Habermeyer's letter I am attaching the Responsible Official Notification Forms.

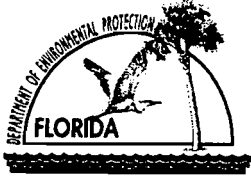
If you have any questions, please contact me at (863) 679-3020.

Very truly yours,

Kris G. Edmondson
Plant Manager Central CT Sites

Attachment

c: Mr. Ron Blackburn (FL-DEP)
Mr. William Dudley
Mr. J. Michael Kennedy
Mr. Leonard Kozlov (FL-DEP)
Mr. David Sorrick
Mr. Scott Sheplak, (FL-DEP)



Department of Environmental Protection

Division of Air Resource Management

RESPONSIBLE OFFICIAL NOTIFICATION FORM

Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.

Identification of Facility

1. Facility Owner/Company Name: Florida Power Corporation	
2. Site Name: Avon Park Plant	3. County:
	4. Highlands County
4. Title V Air Operation Permit/Project No. <i>(leave blank for initial Title V applications)</i> : 0550003-001-AV	

Notification Type *(Check one or more)*

<input type="checkbox"/>	INITIAL:	Notification of responsible officials for an initial Title V application.
<input type="checkbox"/>	RENEWAL:	Notification of responsible officials for a renewal Title V application.
<input checked="" type="checkbox"/>	CHANGE:	Notification of change in responsible official(s). Effective date of change in responsible official(s) <u>July 8, 2002</u>

Primary Responsible Official

1. Name and Position Title of Responsible Official: Kris Edmondson – Plant Manger Central CT Sites
2. Responsible Official Mailing Address: Organization/Firm: Florida Power Corporation Street Address: 100 Central Avenue MAC: IC44 City: St. Petersburg State: FL Zip Code: 33701
3. Responsible Official Telephone Numbers: Telephone: (863) 675-3020 Fax: (863) 679-3055
4. Responsible Official Qualification <i>(Check one or more of the following options, as applicable)</i> : <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

5. Responsible Official Statement:

I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.

Kris A. Edrula

Signature

July 11, 2002

Date

Additional Responsible Official

1. Name and Position Title of Responsible Official: William Dudley, Production Manager – CT
2. Responsible Official Mailing Address: Organization/Firm: Florida Power Corporation Street Address: 100 Central Avenue MAC: IC44 City: St. Petersburg State: FL Zip Code: 33701
3. Responsible Official Telephone Numbers: Telephone: (863) 679-3030 Fax: (863) 679-3055
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

Additional Responsible Official

1. Name and Position Title of Responsible Official: David Sorrick, General Manager CT Operations, Florida
2. Responsible Official Mailing Address: Organization/Firm: Florida Power Corporation Street Address: 100 Central Avenue MAC: BB1C City: St. Petersburg State: FL Zip Code: 33701
3. Responsible Official Telephone Numbers: Telephone: (727)826-4026 Fax: (727)826-4222
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

Additional Responsible Official

1. Name and Position Title of Responsible Official: J. Michael Kennedy, Manager, Air Programs, DR
2. Responsible Official Mailing Address: Organization/Firm: Florida Power Corporation Street Address: 100 Central Avenue MAC: BB1A City: St. Petersburg State: FL Zip Code: 33701
3. Responsible Official Telephone Numbers: Telephone: (727) 826-9334 Fax: (727) 826-4216
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input checked="" type="checkbox"/> The designated representative at an Acid Rain source.

Matt Lydon
Florida Power
MAC: BBIA
100 Central Ave
St. Petersburg FL 33701

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

Hand
delivered

RECEIVED

SEP 26 2002

BUREAU OF AIR REGULATION