

Department of Environmental Protection

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

Virginia B. Wetherell Secretary

July 17, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. W. Jeffrey Pardue, Director Environmental Services Department H2G Florida Power Corporation Post Office Box 14042 St. Petersburg, Florida 33733

Dear Mr. Pardue:

Re: Intercession City - Permit Nos. AC 49-203114, PSD-FL-180 Request to Burn Natural Gas in Units P7 through P11

Attached is one copy of the Proposed Permit Amendment, Intent to Issue and the Public Notice of Intent to Issue Permit Amendment (for publication by FPC) for peaking units P7 through P11 at the Intercession City Power Plant.

Please submit any comments you may have concerning the Department's proposed action to Mr. A. A. Linero, P.E., at the above address. If you have any questions, please call Ms. Teresa Heron or Mr. Linero at (904)488-1344.

Princerery

C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

CHF/al/t

cc: M. Kennedy, FPC

C. Collins, CD

J. Harper, EPA

J. Bunyak, NPS

| TURN ADDRESS completed on the reverse side? | SENDER: • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so the return this card to you. • Attach this form to the front of the mailpiece, or on the back is does not permit. • Write "Return Receipt Requested" on the mailpiece below the article The Return Receipt will show to whom the article was delivered a delivered. 3. Article Addressed to: **White Addressed to: **White Addressed to: **White Addressed to: **White Addressed to: **Supplementary Addr | if space 1. Addressee's Address itide number. 2. Restricted Delivery |
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| your RET | 6. Signature (Agent) PS Form 3811 , December 1991 au.s. GPO: 1993—352 | 2-714 DOMESTIC RETURN RECEIPT |

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| PS Form 3800, March 1993 | Receipt for Certified Mail No Insurance Coverage Provided Do not use for International Mail (See Reverse) Section 19 (See Reverse) | | | | | |
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| 3800 | Postays. | \$ | | | | |
| orm | Certified Fee | | | | | |
| PS F | Special Delivery Fee | | | | | |
| | Restricted Delivery File | | | | | |
| | Return Receipt Showing to Whom & Date Delivered | | | | | |
| | Return Receipt Snowing to Whom, Date, and Addressee's Address | | | | | |
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Department of Environmental Protection

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

Virginia B. Wetherell Secretary

August XX, 1995

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. W. Jeffrey Pardue, Director Environmental Services Department H2G Florida Power Corporation Post Office Box 14042 St. Petersburg, Florida 33733

Dear Mr. Pardue:

RE: Intercession City-DEP Permit No. AC 49-203114 and PSD-F1-180 Request to Burn Natural Gas in Units P7 through P11

The Department is in receipt of your April 28, May 31, and July 7, 1995, letters requesting a permit modification to burn natural gas as a supplemental fuel in combustion turbines P7 through P11. The Bureau of Air Regulation has evaluated your request and approves the burning of natural gas for these turbines since there will not be an increase in either lb/hr/unit or tons/yr/unit of the permitted emission rates. Consequently, the following condition will be added:

SPECIFIC CONDITION No. 1

A new condition, No. 1A, will be added to this permit.

These emission units are allowed to burn natural gas. Emissions of each pollutant shall not exceed the following limits:

GE PG7111(EA), 4 units

| | <pre>lb/hr/unit</pre> | ton/hr/unit | | | | | |
|-----------|-----------------------|-----------------------------------|--|--|--|--|--|
| PM | 7.50 | 12.71 | | | | | |
| SO2 | 2.99 | 5.06 | | | | | |
| CO | 21.3 | 36.10 | | | | | |
| NOx | 107 | 181.37 and 25 ppmvd at 15% oxygen | | | | | |
| VOC | 3.0 | 5.08 | | | | | |
| H_2SO_4 | 0.44 | 0.75 | | | | | |

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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Mr. W. Jeffrey Pardue August XX, 1995 Page Two

SIEMENS V84.3, 1 unit

| | lb/hr | ton/yr | | | | | | |
|-------|-------|--------|-----|----|-------|----|-----|--------|
| PM | 7.5 | 12.71 | | | | | | |
| SO2 | 4.22 | 7.15 | | | | | | |
| co | 30.9 | 52.37 | | | | | | |
| NOx | 149 | 252.56 | and | 25 | ppmvd | at | 15% | oxygen |
| VOC | 5.3 | 8.98 | | | | | | |
| H2S04 | 0.64 | 1.08 | | | | | | |

Allowable emissions are calculated at 59°F. Annual emissions rates are based on 3390 hours per year.

BACT Determination

The BACT determination is hereby revised to include the burning of natural gas at an emission standard of 25 ppmvd at 15%02.

It is the Department understanding that natural gas is available on an interruptible basis at this time. In the future, if natural gas become available on a non-interruptible basis, the Department may reassess the BACT and may require stricter NOx control over a reasonable period of time.

A copy of this amendment letter shall be attached to and shall become a part of Air Construction Permit AC49-203114, PSD-FL-180.

Sincerely,

Howard L. Rhodes, Director Division of Air Resources Management

HLR/th/t

enclosures

cc: Charles Collins, CD Mike Kennedy, FPC

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF INTENT TO ISSUE PERMIT AMENDMENT

PSD-FL-180A AC49-203114

The Department of Environmental Protection gives notice of its intent to issue an amendment of permit PSD-FL-180 (AC49-203114) to Florida Power Corporation to allow the use of natural gas, an inherently less polluting fuel available on an interruptible basis as a supplemental fuel for electrical Peaking Units P7 through P11 located in Intercession City, Osceola County. When using natural gas, actual and allowable emissions of nitrogen oxides, sulfur dioxide, and particulate matter will be lower than actual and allowable emissions when burning fuel oil. These benefits are reflected in a revision to the previously-issued Best Available Control Technology (BACT) determination pursuant to Prevention of Significant Deterioration (PSD).

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and, (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application/request is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection Bureau of Air Regulation 111 S. Magnolia Drive, Suite 4 Tallahassee, Florida 32301

Department of Environmental Protection Central District 3319 Maguire Blvd., Suite 232 Orlando, Florida 32803-3767

Any person may send written comments on the proposed action to Administrator, New Source Review Section, at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an Application for Permit Amendment DEP File Nos. AC49-203114

DEP File Nos. AC49-203114 PSD-FL-180A Osceola County

Mr. W. Jeffrey Pardue, Director Environmental Services Department H2G Florida Power Corporation Post Office Box 14042 St. Petersburg, Florida 33733

INTENT TO ISSUE

The Department of Environmental Protection gives notice of its intent to issue a permit amendment for a (copy attached) to the applicant's facility as detailed in the application/request specified above and for the reasons stated below.

The applicant, Florida Power Corporation, Inc. applied on April 28, 1995, to the Department of Environmental Protection for an amendment of their current air construction permit previously issued pursuant to Prevention of Significant Deterioration (PSD permit). The request is to allow use of surplus natural gas, an inherently less polluting fuel available on an interruptible basis, as a supplemental fuel for peaking units P7 through P11. When using natural gas, actual and allowable emissions of nitrogen oxides, sulfur dioxide, and particulate matter will be lower than actual and allowable emissions when burning fuel oil. The facility is located in Intercession City, 6525 Osceola-Polk County Line Road, Osceola County Florida.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-212 and 62-4, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that a permit amendment is required for the proposed change.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit Amendment. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of

general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. publish the notice and provide proof of publication within the allotted time may result in the denial of the permit amendment.

The Department will issue the permit amendment with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
 (c) A statement of how each petitioner's substantial interests are
- affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's

final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/ request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

C. H. Fancy, P.E., Chief Bureau of Air Regulation 2600 Blair Stone Road Tallahassee, Florida 32399 904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE PERMIT AMENDMENT all copies were mailed by certified mail before the close of business on 9-17-95 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Copies furnished to:

- M. Kennedy, FPC
- C. Collins, CD
- J. Harper, EPA
- J. Bunyak, NPS