



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

January 20, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. J. Michael Kennedy  
Manager of Air Programs  
Florida Power Corporation  
Post Office Box 14042  
St. Petersburg, Florida 33733

Dear Mr. Kennedy:

PSD-FL-180E

RE: Amendment to Construction Permit  
AC 49-203114 [PSD-FL-180(A)]  
Intercession City Facility

The Department has reviewed your January 5, 1995 request to amend the compliance testing requirements of the subject permit. Subsequent to a review of the compliance test results, the Department finds your request to be acceptable and the following will be changed and/or added:

## A. Compliance Determination

**Specific Condition No. 8 is amended as follows:**

### From

8. Compliance with the NO<sub>x</sub>, SO<sub>2</sub>, CO, PM, PM<sub>10</sub>, and VOC standards shall be determined (on each unit while operating within 10% of the permitted maximum heat rate input) within 180 days of initial operation and annually thereafter, by the following reference methods as described in 40 CFR 60, Appendix A (July 1991 version) and adopted by reference in F.A.C. Rule 17-2.700.

- Method 1. Sample and Velocity Traverses
- Method 2. Volumetric Flow Rate
- Method 3A. Gas Analysis
- Method 5. Determination of Particulate Matter Emissions from Stationary Sources
- Method 9. Determination of the Opacity of the Emissions from Stationary Sources
- Method 8. Determination of the Sulfuric Acid of the Emissions from Stationary Sources
- Method 10. Determination of the Carbon Monoxide Emission from Stationary Sources

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

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- Method 20. Determination of Nitrogen Oxides, Sulfur Dioxide, and Diluent Emissions from Stationary Gas Turbines
- Method 25A. Determination of the Volatile Organic Compounds Emissions from Stationary Sources

**To**

8. Compliance with the NO<sub>x</sub>, SO<sub>2</sub>, CO, PM, PM<sub>10</sub>, and VOC standards shall be determined (on each unit while operating within 10% of the permitted maximum heat rate input) within 180 days of initial operation and annually thereafter, by the following reference methods as described in 40 CFR 60, Appendix A (July, 1991 version) and adopted by reference in F.A.C. Chapter 62-297, and the ASTM method/procedure contained in 40 CFR 60.17.

- Method 1 Sample and Velocity Traverses
- Method 2 Volumetric Flow Rate
- Method 3A Gas Analysis
- Method 5 Determination of Particulate Matter Emissions from Stationary Sources
- Method 9 Determination of the Opacity of the Emissions from Stationary Sources
- <sup>1</sup>Method 8 Determination of the Sulfuric Acid of the Emissions from Stationary Sources
- Method 10 Determination of the Carbon Monoxide Emission from Stationary Sources
- Method 20 Determination of Nitrogen Oxides, Sulfur Dioxide, and Diluent Emissions from Stationary Gas Turbines
- <sup>2</sup>Method 25A Determination of the Volatile Organic Compounds Emissions from Stationary Sources

- 1 - No. 2 fuel oil analysis using ASTM D4294-90 may be used in lieu of EPA Reference Method 8 for the determination of H<sub>2</sub>SO<sub>4</sub> mist, only if compliance with the permit limit for the sulfur content in the No. 2 fuel oil fired at the facility has been demonstrated.
- 2 - If compliance with the CO limits in this permit are demonstrated, testing for VOCs using EPA Reference Method 25A is not necessary.

**B. Attachments to be Incorporated:**

- FPC letter with enclosure received January 6, 1995.
- Mr. Garry Kuberski's FAX received January 11, 1995.
- Mr. Mike Kennedy's FAXs received January 11, 1995.

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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. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. 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 the petitioner wants the Department to take with respect to the Department's action or proposed action.

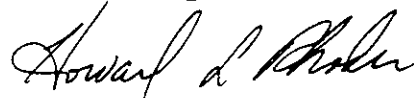
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial

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interests will be affected by any decision of the Department with regard to the request/application 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 amendment 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.

This letter amendment must be attached to the construction permit, No. AC 49-203114, and the federal permit, No. PSD-FL-180(A), and shall become part of the permits.

Sincerely,



Howard L. Rhodes  
Director  
Division of Air Resources  
Management

HLR/CSL/csl


Attachments

cc: A. Zahm, CD  
J. Harper, EPA  
J. Bunyak, NPS

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this PERMIT AMENDMENT and all copies were mailed by certified mail before the close of business on 1/24/95 to the listed persons.

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.

  
Clerk

1/24/95  
Date

Is your RETURN 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 that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
 Mr. J. Michael Kennedy  
 Manager of Air programs  
 Florida Power Corporation  
 P. O. Box 14042  
 St. Petersburg, FL 33733

4a. Article Number  
 P 872 563 671

4b. Service Type

<input type="checkbox"/> Registered	<input type="checkbox"/> Insured
<input type="checkbox"/> Certified	<input type="checkbox"/> COD
<input type="checkbox"/> Express Mail	<input type="checkbox"/> Return Receipt for Merchandise

7. Date of Delivery  
 JAN 26 95

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

PS Form 3811, December 1991    ★U.S. GPO: 1992-323-402    **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

P 872 563 671



### Receipt for Certified Mail

No Insurance Coverage Provided  
 Do not use for International Mail  
 (See Reverse)

Sent to Mr. J. Michael Kennedy	
Street and No. P. O. Box 14042 FPC	
P.O., State and ZIP Code St. Petersburg, FL 33733	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 1-24-95 Permit: AC49-203114 PSD-FL-180(A)	

PS Form 3800, JUNE 1991

RECEIVED

JAN 23 1995

TO: Howard L. Rhodes  
FROM: Clair Fancy *CF*  
DATE: January 20, 1995  
SUBJECT: Approval of Construction Permit Amendment  
AC 49-203114 [PSD-FL-180(A)]  
Intercession City Facility

Bureau of  
Air Regulation

Attached for your approval and signature is an amendment to the Florida Power Corporation Intercession City facility's construction permit prepared by the Bureau of Air Regulation. The purpose of this amendment is change the testing requirements of the permit for sulfuric acid mist and volatile organic compounds (VOC) emissions. If compliance with the permit limit for carbon monoxide is demonstrated, testing for VOC emissions will not be required. If compliance with the permit limit for the sulfur content in the No. 2 fuel oil is demonstrated, an analysis of the No. 2 fuel oil using ASTM D4294-90, in lieu of an EPA Reference Method 8 test, may be used to demonstrate compliance with the sulfuric acid mist limit in this permit. This amendment will not cause an increase in annual allowable emission limits or result in any equipment change.

This amendment is recommended for your approval and signature.

CF/CSL

Attachment