



Florida Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 15, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Jeffrey Pardue
C.E.P., Manager
Florida Power Corporation
Post Office Box 14042
St. Petersburg, FL 33733

PSD-FL-180B

Dear Mr. Pardue:

RE: Florida Power Corporation
Amendment to Construction Permit
AC 49-203114 (PSD-FL-180)
Intercession Facility

The Department has determined that the above permit should be amended to specify No. 2 Fuel Oil, rather than a numerical value, as the control strategy for Fluorides, Mercury, Lead, Inorganic Arsenic and Beryllium. Because of the inherent nature of the combustion process, these constituents in the fuel oil will be emitted after firing. Consequently, specifying the type of fuel oil (i.e., No. 2 fuel oil) is sufficient to control the emissions of the various constituents. Specifying No. 2 fuel oil is recognized to be BACT for Mercury, Arsenic and Beryllium. Therefore, the following will be changed and/or added:

A. Specific Condition No. 1

FROM:

Table 1
Allowable Emission Limits
92.9 MW Simply Cycle Combustion Turbines

Pollutant	Standard Oil Firing	Each Unit lb/hr	Total T/yr	Bases
Fluorides	-	3.34×10^{-2}	0.23(b)	Application
Mercury (Hg)	3.0×10^{-6} lbs/MMBtu	3.09×10^{-3}	0.02(b)	Application
Lead (Pb)	8.9×10^{-6} lbs/MMBtu	9.16×10^{-3}	0.06(b)	Application
Inorganic Arsenic	4.2×10^{-6} lbs/MMBtu	4.32×10^{-3}	0.03(b)	BACT
Beryllium (Be)	2.5×10^{-6} lbs/MMBtu	2.57×10^{-3}	0.02(b)	BACT

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TO:

**Table 1-A
 Emission Control
 92.9 MW Simply Cycle Combustion Turbines**

Pollutant	Method of Control	Basis
Fluorides	No. 2 Fuel Oil(a)	(b)
Mercury(Hg)	No. 2 Fuel Oil(a)	(b)
Lead(Pb)	No. 2 Fuel Oil(a)	(b)
Inorganic Arsenic	No. 2 Fuel Oil(a)	BACT
Beryllium(Be)	No. 2 Fuel Oil(a)	BACT

(a) The No. 2 Fuel Oil's sulfur content, by weight, shall not exceed a maximum sulfur content of 0.2%.

(b) Since this pollutant is an inherent constituent in distillate fuel oil, it will be regulated by specifying that only No. 2 Fuel Oil be fired at this facility.

and

FROM:

**Table 2
 Allowable Emission Limits
 185.5 MW Simply Cycle Combustion Turbines**

Pollutant	Standard Oil Firing	Each Unit lb/hr	Total 2 Units T/yr	Bases
Fluorides	-	6.13	0.20(b)	Application
Mercury (Hg)	3.0 x 10 ⁻⁶ lbs/MMBtu	5.66 x 10 ⁻³	0.02(b)	Application
Lead (Pb)	8.9 x 10 ⁻⁶ lbs/MMBtu	1.68 x 10 ⁻³	0.06(b)	Application
Inorganic Arsenic	4.2 x 10 ⁻⁶ lbs/MMBtu	7.9 x 10 ⁻³	0.02(b)	BACT
Beryllium (Be)	2.5 x 10 ⁻⁶ lbs/MMBtu	4.72 x 10 ⁻³	0.02(b)	BACT

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TO:

**Table 2-A
Emission Control
185.5 MW Simply Cycle Combustion Turbines**

Pollutant	Method of Control	Basis
Fluorides	No. 2 Fuel Oil(a)	(b)
Mercury(Hg)	No. 2 Fuel Oil(a)	(b)
Lead(Pb)	No. 2 Fuel Oil(a)	(b)
Inorganic Arsenic	No. 2 Fuel Oil(a)	BACT
Beryllium(Be)	No. 2 Fuel Oil(a)	BACT

- (a) The No. 2 Fuel Oil's sulfur content, by weight, shall not exceed a maximum sulfur content of 0.2%.
- (b) Since this pollutant is an inherent constituent in distillate fuel oil, it will be regulated by specifying that only No. 2 Fuel Oil be fired at this facility.

B. Attachment to be Incorporated:

° Mr. Jeffrey Pardue's letter dated October 7, 1993.

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. 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, Florida Statutes.

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The Petition shall contain the following information:

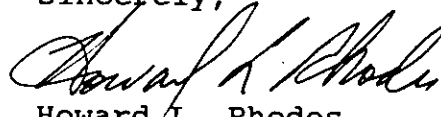
- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) 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;
- (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 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.

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

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/TH/bjb

Attachment

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

P 872 562 498



Receipt for Certified Mail

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

PS Form 3800, JUNE 1991

Sent to Mr. Jeffrey Pardue	
Street and No. P. O. Box 14042	
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: 11/19/93 AC 49-203114, PSF-FL-180	

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. Jeffrey Pardue
C.E.P., Manager
Florida Power Corporation
Post Office Box 14042
St. Petersburg, Florida 33733

4a. Article Number
P 372 562 498

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery

5. Signature (Addressee)

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

6. Signature (Agent)

PS Form 3811, December 1991

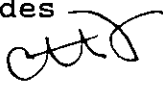
U.S. GPO: 1992-323-402

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.

Memorandum

Florida Department of
Environmental Protection

TO: Howard L. Rhodes
FROM: Clair Fancy 
DATE: November 15, 1993
SUBJ: Approval of an Amendment to Construction Permit
AC 49-203114, PSD-FL-180
Florida Power Corporation: Intercession Facility
Osceola County

Attached for your approval and signature is an amendment to a construction permit prepared by the Bureau of Air Regulation for the above referenced company. The purpose of the amendment is to reflect the method of control for fluorides, Hg, Pb, Be and Inorganic Arsenic in Table 1 and 2 of the BACT and the construction permit. The changes are consistent with the application package associated with this Construction Permit. The facility is located in Osceola County, which is an attainment area for all pollutants.

I recommend your approval and signature.

CF/TH/bb

Attachment