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BUREAU OF AIR REGULATION

November 21, 2001

Mr. Al Linero, P.E., Administrator
New Source Review Section
Division of Air Resources Management
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400

Dear Mr. Linero:

Re: Intercession City Units P12 – P14
Application to Modify Permit 097001-003-AC/PSD-FL-268

Please find enclosed four copies of an application to modify the Intercession City PSD air permit. The main focus of this request is to incorporate an upgrade to these units in conjunction with routine warranty work that is planned. This upgrade results in an increase in the firing temperature of these peaking units in order to maximize output and optimize efficiency. In addition, modifications to the current permit language are requested to address concerns related to the NOx excess emissions requirements. The requested changes are necessary to address the somewhat unique operating scenarios demonstrated by these units, as well as clarify the interpretation of the NOx compliance demonstration methodology and associated reporting requirements.

Although the two issues above are the primary focus of this modification, there are also several minor issues that Florida Power would like to address at this time. These include a request to reduce the annual visible emissions test period from 60 minutes to 30 minutes, clarification that required fuel oil analysis may be provided by either the facility or the fuel vendor, and removal of language requiring that each of these units to be capable of accommodating both oil and gas fuels.

Please contact Jamie Hunter at (727) 826-4363 or me if you have any questions or need additional information.

Sincerely,

Martin Drango
Plant Manager/Responsible Official
Intercession City Plant

jjh/JJH019

Enclosures

c: Jeff Koerner, FDEP - Tallahassee ✓
Scott Osbourn, ENSR – St. Petersburg