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Jantha

November 1, 2002

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BUREAU OF AIR REGULATION

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: Intercession City Facility
Title V Permit – Draft Renewal Permit
File No.: 0970014-007-AV
Comments on Draft Permit

Dear Mr. Sheplak:

Please find below Florida Power's comments on the above referenced draft permit.

Section I Comments:

Please insert the words "nominal generating" prior to the word "capacity" in the second and third sentences in the first paragraph in Subsection A.

Please remove the word "initial" from the last paragraph in Subsection A. This conflicts with the renewal application referenced as received on July 1, 2002.

Please remove Subsection D. in its entirety.

Section III Comments:

Please add the following permitting note to condition A.1.:

(Permitting Note: 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. 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.)

Mr. Scott Sheplak
November 1, 2002
Page 2

Please remove the words "at a maximum consumption rate of 123 bbls/hr/turbine" as this is redundant of condition A.1. and not necessary here, or please add the following permitting note to condition A.3.:

[Permitting Note: The fuel consumption 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. 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.]

Please add the following 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.]

Please add the words "or permittee", as noted below, in the language of permit condition A.9.

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 add the words "or permittee", as noted below, in the language of permit condition A.12.

The fuel sulfur content, percent by weight, provided by the vendor or permittee for each delivery of liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90 (95), both ASTM D4057-88 and ASTM D129-9(95)1, or the latest edition(s).

Please remove the words "provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit" from condition A.13., as this language is beyond the scope of the language found in Rule 62-297.310 (2), F.A.C.

Please modify the language in condition A.16., as noted below, to clarify the intent.

Visible Emissions Testing – Annual. By this permit, annual emissions compliance testing for visible emissions is only required for these emissions units if oil is consumed for more than 400 hours in a federal fiscal year. If required, testing shall be conducted no later than 90 days following the end of the federal fiscal year triggering this condition.

Please insert the clarifying language "as defined in conditions A.7. and A.8." to permit condition A.17. so that it reads:

In the case of excess emissions resulting from malfunctions, as defined in conditions A.7. and A.8., 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.

The closing bracket (“)”) in the permitting note in the description section of Subsection B. should be moved from the middle of the note to the end of the note.

Please add the following permitting note to condition B.1.:

{Permitting Note: 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. 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.}

Please add the clarifying language “(CTs 7-10)” following the word “four” in the first sentence of condition B.3.b.

Please modify the permitting note prior to condition B.6. to read:

{Permitting note: Unless otherwise specified, the averaging time for conditions B.6. – B.8. are based on the specified averaging time of the applicable test method.}

Please modify condition B.7. and B.8. to clarify that the standards are based on a 24-hour block average.

Please add a permitting note to condition B.9. referencing condition B.42., where additional authorized excess emissions are identified.

Please remove the last sentence of condition B.28., as it should not be necessary to cap the rate at which compliance testing is conducted.

Please add a clarifying condition following condition B.29. similar to the following;

Visible Emissions Testing – Annual. By this permit, annual emissions compliance testing for visible emissions is only required for these emissions units if oil is consumed for more than 400 hours in a federal fiscal year. If required, testing shall be conducted no later than 90 days following the end of the federal fiscal year triggering this condition.

Please remove “Table 297.310-1” from condition B.30. and return it to an attachment, as it has been in previous versions of the permit.

Please add the clarifying language "as defined in conditions B.9., B.10. and B.42." after the word "malfunction" in the first sentence of condition B.37.

Please replace the phrase "with the requirements previously specified in this permit" found in condition B.41.(d), with the phrase "with the requirements specified in condition B.42.".

The two references to a January date in the initial permitting note in Subsection C. should be "January 30, 2002".

In an effort to more closely track the language of the construction permit, please modify the language in condition C.4. to read as follows:

Operating Procedures. All operators and supervisors shall be properly trained to operate and maintain the combustion turbines and pollution control devices in accordance with the guidelines and procedures established by the equipment manufacture. The training shall include good operating practices as well as methods of minimizing excess emissions.

Please modify the language in condition C.5. to read as follows. This removes the past-tense reference to requirements addressed in the construction permit.

Permitted Capacity: Each combustion turbine shall operate only in simple-cycle mode and generate a nominal 91 MW of electrical power. Operation of each unit shall not exceed 905 mmBTU per hour of heat input from firing natural gas or 978 mmBTU per hour of heat input from firing low sulfur distillate oil. Excluding startup and shutdown, operation below 50% base load is prohibited. The maximum heat inputs are based on the lower heating value (LHV) of each fuel, an inlet air temperature of 59°F, a relative humidity of 60%, an ambient air pressure of 14.7 psi, and 100% of base load. Therefore, heat input rates will vary depending upon ambient conditions and the combustion turbine characteristics. Manufacturer's performance curves, corrected for site conditions or equations for correction to other ambient conditions, shall be used to determine the heat input rate at other conditions.

Please remove the second permitting note following condition C.5. as it is not correct. The operating rate during the compliance testing conducted on these units was within the permitted capacity. As noted in condition C.39., adjustments for temperature must be made to determine if the heat input at the test conditions is within the permitted capacity. Documentation from the most recent stack test report for Unit 12 (included in the application) shows that the unit was test at 94.9 percent of capacity on natural gas and 98.8 percent of capacity on oil. Documentation from the most recent stack test report for Units 13 and 14 (enclosed with this letter and intended to supplement the application) shows that Unit 13 was tested at 93.7 percent of capacity on gas and 97.1 percent on oil and that Unit 14 was tested at 93.9 percent on gas and 98.6 percent on oil. A copy of the temperature vs. heat input curve, based on manufacture's data, is also enclosed.

Please modify the language in the permitting note prior to condition C.10. to read:

{Permitting note: Unless otherwise specified, the averaging time for conditions C.10. – C.15. are based on the specified averaging time of the applicable test method.}

In order to remove historical requirements, please revise condition C.22. as follows:

Water Injection: To control NOx emissions when firing low sulfur distillate oil, the permittee shall install, calibrate and operate an automated water injection system for each combustion turbine in accordance with the manufacturer's recommendations. Each water injection system shall be maintained and adjusted to minimize NOx emissions.

Please remove the phrase "Subject to EPA approval" found twice in condition C.25., as this is a historical reference and no longer needed.

Please correct the lettering used to identify the subsections of condition C.27.

Please remove "Table 297.310-1" from condition C.41. and return it to an attachment, as it has been in previous versions of the permit.

Please delete condition C.45., as it is redundant of condition C.42.8.

Please add the clarifying language "as defined in conditions C.17. and C.18." after the word "malfunction" in the first sentence of condition C.50.

General Section III Comments:

For overall consistency, it is requested that all the NSPS (40 CFR Part 60) requirements applicable to Units 7-14 be removed from Subsections B. and C. and placed in a newly created Subsection D. - Common Requirements. This new subsection should list each of the applicable NSPS requirements along with appropriate permitting notes to clarify the current interpretation and intent of these conditions as they apply to modern combustion turbine units with continuous emissions monitors and/or dry low NOx burners for NOx control.

Comments on Appendices:

Please remove Emissions Units -013 and -014 from Appendix U-1 and add the associated activities (Surface Coating and Solvent Cleaning and General Purpose Engines) to the list in Appendix I-1, as these activities meet the requirements of 62-213.439 (6)(b).

Please remove Emission Units -016 and -017 from Appendix U-1, as these activities do not exist at this facility and should not have been identified in previous permits.

Comments on Attachments:

Units 12 – 14 (E.U. ID Nos. -018, -019 and -020) information is missing from Tables 1-1 and 2-1.

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

I, the undersigned, am the responsible official as defined in Chapter 62-210.200, F.A.C., of the Title V source for which this document is being submitted. I hereby certify, based on the information and

Mr. Scott Sheplak
November 1, 2002
Page 6

belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate, and complete.

Sincerely,

A handwritten signature in black ink that reads "Kris A. Edmondson". The signature is written in a cursive style with a large initial "K" and "E".

Kris Edmondson
Plant Manager/ Responsible Official
Central Florida CT Sites

enclosure

jhb/JJH047

c: Jonathan Holtom, FDEP- Tallahassee

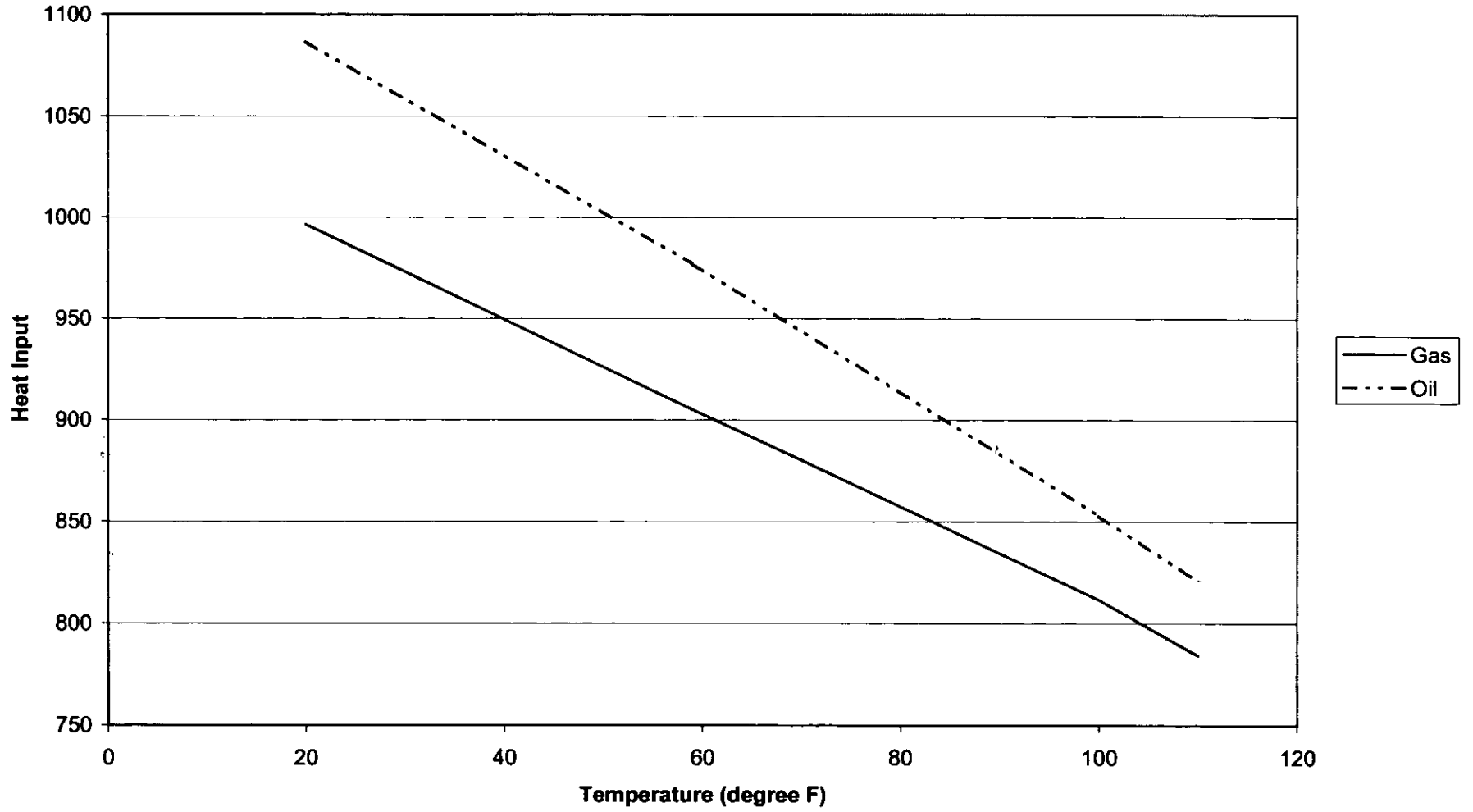
Mr. Scott Sheplak
November 1, 2002
Page 7

bc: Jamie Hunter, BB1A

Address for FDEP - Tallahassee Office:

Mr. Jonathan Holtom, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation, Title V Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

**Intercession City Units P12-P14
Temperature vs. Heat Input
(2002)**





Florida Power

A Progress Energy Company

October 9, 2002

Mr. Jonathan Holtom, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation, Title V Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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BUREAU OF AIR REGULATION

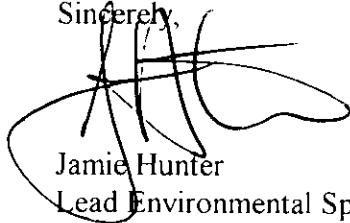
Re: Intercession City Facility
Title V Permit – Draft Renewal Permit
File No.: 0970014-007-AV
Public Notice – Proof of Publication

Dear Mr. Holtom:

Please find enclosed the “proof of publication” for the public notice of the above referenced draft permit. The notice was published on October 5, 2002.

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

Sincerely,



Jamie Hunter
Lead Environmental Specialist

enclosure

jjh/JJH045

PROOF OF PUBLICATION

FROM

Osceola News-Gazette

Kissimmee, Florida
OSCEOLA COUNTY

In the Matter of

.... Public Notice ..
.. Of Intent To Issue ..
Title V Air Operation ..
Permit Renewal

RECEIVED

OCT 10 2002

BUREAU OF AIR REGULATION

Filed day of 20
First Publication ... October 5 ... 20 02
Last Publication ... October 5 ... 20 02

Make Remittance to Osceola News-Gazette
Kissimmee, Florida

PROOF OF PUBLICATION

STATE OF FLORIDA,
COUNTY OF OSCEOLA

Before me, the undersigned authority, personally appeared Paula A. Stark, who on oath says that she is General Manager of the Osceola News-Gazette, a twice weekly newspaper published at Kissimmee, in Osceola County, Florida; that the attached copy of the advertisement was published weekly in the regular and entire edition of said newspaper in the issues of:

..... October 5, 2002

Affiant further says that the Osceola News-Gazette is a newspaper published in Kissimmee, in said Osceola County, Florida, and that the said newspaper has heretofore been continuously published in said Osceola County, Florida, each week and has been entered as periodicals postage matter at the post office in Kissimmee, in said Osceola County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

..... Paula A. Stark

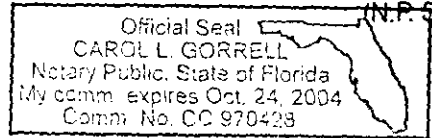
Sworn to and subscribed before me by Paula A. Stark, who is personally known to me, this ... 5 ... day of

..... October 20 02

..... Carol L. Gorrell

Carol L. Gorrell

(N.P. Seal)



PUBLIC NOTICE OF INTENT
TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DRAFT Permit No.: 0970014-007-AV
Renewal of Title V Air Operation
Permit No.: 0970014-001-AV

Florida Power/Progress Energy - Intercession City Facility
Osceola County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V Air Operation Permit Renewal to Florida Power/Progress Energy for the Intercession City Facility located at 6525 Osceola Pulk County Line Road, Intercession City, Osceola County. The applicant's name and address are: Kris Edmondson - Plant Manager Central CT Sites, Florida Power/Progress Energy, 100 Central Avenue, Mail Code 1C44, St. Petersburg, Florida 33701.

The permitting authority will issue the PROPOSED Permit, and subsequent FINAL Permit, in accordance with the conditions of the DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station # 5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-1344; Fax #: 850/922-6979). Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 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 of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station # 35, Tallahassee, Florida 32399-3000 (Telephone: 850/ 245-2242; Fax #: 850/ 245-2303). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, whichever occurs first. Under Section 120.60 (3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, Florida Administrative Code (F.A.C.).

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- The name and address of each agency affected and each agency's file or identification number, if known;
- The name, address and telephone number of the petitioner; name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding, and an explanation of how petitioner's substantial rights will be affected by the agency determination.
- A statement of how and when the petitioner received notice of the agency action or proposed action;
- A statement of all disputed issues of material fact. If there are none, the petition must so state;
- A concise statement of the ultimate facts alleged as well as the rules and statutes, which entitle petitioner to relief;
- A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,
- A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.), Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established a 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objections arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit property issues pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2), and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

A complete project file 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:

Permitting Authority:	Affected District/Local Program
Department of Environmental Protection	Department of Environmental Protection
Bureau of Air Regulation	Central District Office
111 South Magnolia Drive, Suite 4	3319 Maguire Boulevard, Suite 232
Tallahassee, Florida 32301	Orlando, Florida 32803-3131
Telephone: 850/488-0114	Telephone: 407/894-7555
Fax #: 850/922-6979	Fax #: 407/897-2996

The complete project file includes the DRAFT Permit, the action, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. If interested persons may contact Mr. SCOTT M. SHEPLAK, P.E., for additional information.

October 5, 2002

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an
Application for Permit by:

OGC CASE NO.: _____

FDEP Draft Permit No.: 0970014-007-AV

Florida Power Corporation
Intercession City Facility
Osceola County, Florida

REQUEST FOR ENLARGEMENT OF TIME

By and through undersigned counsel, Florida Power Corporation ("FPC") hereby requests, pursuant to Florida Administrative Code Rule 62-110.106(4), an enlargement of time, to and including November 8, 2002, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, FPC states the following:

1. On October 2, 2002, FPC received from the Department of Environmental Protection ("Department") by Certified Mail an "Intent to Issue Title V Air Operation Permit Renewal" (Draft Permit No. 0970014-007-AV) for the Intercession City Facility, located in Osceola County, Florida. Along with the Intent to Issue, FPC received a Draft Title V Permit and "Public Notice of Intent to Issue Title V Air Operation Permit Renewal."

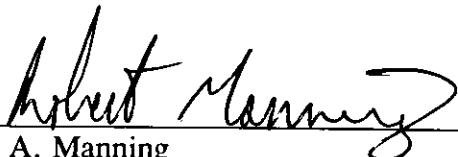
2. Based on FPC's review, the Draft Permit and associated documents contain several provisions that warrant clarification or corrections.

3. This request is filed simply as a protective measure to avoid waiver of FPC's right to challenge certain conditions contained in the Draft Title V Permit. Grant of this request will

not prejudice either party, but will further their mutual interest and hopefully avoid the need to file a Petition and proceed to a formal administrative hearing. In the event all issues are resolved prior to November 8, 2002, FPC will withdraw this Request.

WHEREFORE, FPC respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Permit No. 0970014-007-AV be formally extended to and including November 8, 2002.

RESPECTFULLY SUBMITTED this 8th day of October, 2002.

By: 
Robert A. Manning
Florida Bar ID No. 0035173
Hopping Green & Sams, P.A.
123 South Calhoun Street
Post Office Box 6526
Tallahassee, Florida 32314
(850) 222-7500
(850) 224-8551 Facsimile

Attorneys for FLORIDA POWER CORPORATION

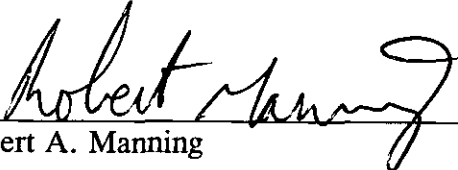
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to the following by U.S. Mail this 8th day of October, 2002:

Scott Sheplak, P.E. Administrator
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

W. Douglas Beason
Office of the General Counsel
Department of Environmental Protection
3900 Commonwealth Blvd., Room 353-A
Tallahassee, FL 32399-2600

10/10/02 cc = Jonathan Holton
Scott Sheplak



Robert A. Manning