



September 2, 2005

Ms. Vivian Garfein, District Director  
Department of Environmental Protection  
Central District Office  
3319 Maguire Boulevard, Suite 232  
Orlando, FL 32803

Subject: Responsible Official Notification for Title V – Intercession City Plant

Dear Ms. Garfein:

As the plant manager for the Florida Power Corporation (d/b/a Progress Energy Florida, Inc.) Intercession City Plant, I am submitting a Department of Environmental Protection form 62-213.900(8) to identify newly named Responsible Officials.

If you have any questions, please contact me at (863) 679-3020.

Sincerely,

Kris G. Edmondson  
Plant Manager

Attachment

cc: Mr. Michael Cooke

RECEIVED

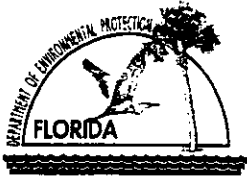
SEP 06 2005

Bureau of Air Quality  
& Mobile Sources

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SEP 03 2005

DIVISION OF AIR  
RESOURCE MANAGEMENT



# Department of Environmental Protection

## Division of Air Resource Management

### RESPONSIBLE OFFICIAL NOTIFICATION FORM

**Note:** A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.

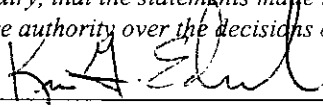
#### Identification of Facility

1. Facility Owner/Company Name: Florida Power Corporation d/b/a Progress Energy Florida, Inc.	
2. Site Name: Intercession City Plant	3. County: Osceola
4. Title V Air Operation Permit/Project No. (leave blank for initial Title V applications): 0970014-009-AV	

#### Notification Type (Check one or more)

<input type="checkbox"/> <b>INITIAL:</b>	Notification of responsible officials for an initial Title V application.
<input type="checkbox"/> <b>RENEWAL:</b>	Notification of responsible officials for a renewal Title V application.
<input checked="" type="checkbox"/> <b>CHANGE:</b>	Notification of change in responsible official(s).
Effective date of change in responsible official(s) <u>September 5, 2005</u>	

#### Primary Responsible Official

1. Name and Position Title of Responsible Official: Kris G. Edmondson – Plant Manager
2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc./Intercession City Plant Street Address: 6525 Osceola-Polk Line Road (PO Box 368) City: Intercession City State: FL Zip Code: 33848
3. Responsible Official Telephone Numbers: Telephone: 863/679-3020 Fax: 863/679-3055
4. Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
5. Responsible Official Statement: <i>I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.</i>  _____ Signature 9-1-05 _____ Date

**Additional Responsible Official**

1. Name and Position Title of Responsible Official: Paul Crimi, General Manager CT Operations Florida
2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc. Street Address: 200 Central Avenue, Mail Code: BT11 City: St. Petersburg State: FL Zip Code: 33701
3. Responsible Official Telephone Numbers: Telephone: 727/820-5201 Fax: 727/820-4911
4. Responsible Official Qualification ( <i>Check one or more of the following options, as applicable</i> ): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

**Additional Responsible Official**

1. Name and Position Title of Responsible Official: Dennis Scott, Production Manager
2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc./Intercession City Plant Street Address: 6525 Osceola-Polk Line Road (PO Box 368) City: Intercession City State: FL Zip Code: 33848
3. Responsible Official Telephone Numbers: Telephone: 863/679-3033 Fax: 863/679-3055
4. Responsible Official Qualification ( <i>Check one or more of the following options, as applicable</i> ): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

**Additional Responsible Official**

1. Name and Position Title of Responsible Official: J. Michael Kennedy, DR
2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc./Environmental Services Street Address: 100 Central Ave. Mail Code: CX1B City: St. Petersburg State: FL Zip Code: 33701

3. Responsible Official Telephone Numbers:

Telephone: 727/820-5567

Fax: 727/820-5229

4. Responsible Official Qualification (*Check one or more of the following options, as applicable*):

- For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.
- For a partnership or sole proprietorship, a general partner or the proprietor, respectively.
- For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.
- The designated representative at an Acid Rain source.



**Progress Energy**

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APR 11 2005

BUREAU OF AIR REGULATION

April 8, 2005

Mr. Al Linero P.E.  
Division of Air Resource Management  
2600 Blair Stone Road MS 5500  
Tallahassee, Florida 32399-2400

Re: Progress Energy - Intercession City Facility - Facility ID - 0970014

Dear Mr. Linero:

Project No.: 0970014-009-AV

The Progress Energy would like to update the Title V permit to include additional ASTM methods for testing sulfur in the fuel (please see the attached application). We would appreciate having the permit updated by letter (the new wording to be incorporated in the permit during the next renewal process). The requested wording is included in the attached application.

As requested by Teresa Heron we have included the Statement of Compliance for 2004.

If you have any questions please feel free to contact Dave Meyer at (727) 820-5295. Thank you very much for your help in this matter.

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

Sincerely,

Kris G. Edmondson  
Plant Manager

Attachments.

bcc: Gus Schaefer, BT11 (Plant Files)  
D. K. Meyer, CX1B (ESS Files)

Scott Osbourn, P.E.  
Golder  
5100 West Lemon St. Suite 114  
Tampa Fl. 33609



# Department of Environmental Protection

## Division of Air Resource Management

### APPLICATION FOR AIR PERMIT - LONG FORM

#### I. APPLICATION INFORMATION

**Air Construction Permit** – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

**Air Operation Permit** – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

**Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option)** – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

#### Identification of Facility

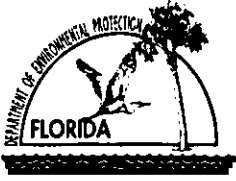
1. Facility Owner/Company Name: Progress Energy Florida, Inc.	
2. Site Name: Intercession City Facility	
3. Facility Identification Number: 0970014	
4. Facility Location... Street Address or Other Locator: 6525 Osceola Polk Line Road City: Intercession City                      County: Osceola                      Zip Code: 33848	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

#### Application Contact

1. Application Contact Name: Dave Meyer, P.E. , Senior Environmental Specialist	
2. Application Contact Mailing Address... Organization/Firm: Progress Energy Florida Street Address: 100 Central Ave CX1B City: St. Petersburg                      State: Fl.                      Zip Code: 33701	
3. Application Contact Telephone Numbers... Telephone: (727) 820-5295                      ext.                      Fax: (727) 820-5229	
4. Application Contact Email Address: dave.meyer@pgnmail.com	

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Project Number(s):	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	



# Department of Environmental Protection

Division of Air Resource Management

## APPLICATION FOR AIR PERMIT - LONG FORM

### Purpose of Application

This application for air permit is submitted to obtain: (Check one)

#### **Air Construction Permit**

Air construction permit.

#### **Air Operation Permit**

Initial Title V air operation permit.

Title V air operation permit revision.

Title V air operation permit renewal.

Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.

Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

#### **Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)**

Air construction permit and Title V permit revision, incorporating the proposed project.

Air construction permit and Title V permit renewal, incorporating the proposed project.

**Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:**

I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

### Application Comment



Applicant requests permit revisions to incorporate pertinent ASTM fuel sulfur content test methods, as follows:

**Current Version**

**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 D129-91(95), or the latest edition(s).  
[Rules 62-213.440 and 62-297.440, F.A.C.]

**Requested Revisions**

**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 D1552-90 or later editions, ASTM D2622-94, ASTM D4294-90(95), or both ASTM D4057-88 and ASTM D129-91(95), or later edition(s). In addition, any ASTM method (or later editions) referenced in 62-297.440(1), F.A.C. or in 40 CFR 60.335(b)(10) is acceptable.  
[Rules 62-213.440 and 62-297.440, F.A.C.]

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**Current Version**

**B.16.** The test method for sulfuric acid mist (H<sub>2</sub>SO<sub>4</sub>) emissions shall be EPA Method 8, incorporated and adopted by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C. No. 2 fuel oil analysis using ASTM D4294-90, or the latest edition, may be used in lieu of EPA Method 8 for the determination of H<sub>2</sub>SO<sub>4</sub> mist, only if compliance with the permit allowable for the sulfur content in the No. 2 fuel oil fired at the facility has been demonstrated.  
[Rules 62-204.800 and 62-297.401, F.A.C.; and, AC 49-203114/PSD-FL-180(A)]

**Requested Revisions**

**B.16.** The test method for sulfuric acid mist (H<sub>2</sub>SO<sub>4</sub>) emissions shall be EPA Method 8, incorporated and adopted by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C. No. 2 fuel oil analysis using ASTM D1552-90 or later editions, ASTM D4294-90, or later editions, may be used in lieu of EPA Method 8 for the determination of H<sub>2</sub>SO<sub>4</sub> mist, only if compliance with the permit allowable for the sulfur content in the No. 2 fuel oil fired at the facility has been demonstrated. In addition, any ASTM method (or later editions) referenced in 62-297.440(1), F.A.C. or in 40 CFR 60.335(b)(10) is acceptable.  
[Rules 62-204.800 and 62-297.401, F.A.C.; and, AC 49-203114/PSD-FL-180(A)]

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**Current Version**

**B.25.** The permittee shall determine compliance with the sulfur content standard in 40 CFR 60.333(b) as follows: ASTM D2880-96 shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-90(94)E-1, D 3031-81(86), D 4084-94, or D 3246-92 shall be used for the sulfur content of gaseous fuels [incorporated by reference in 40 CFR 60.17 or the latest

edition(s)]. The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the Dilution ratio) may be used, subject to approval of the Administrator.  
[40 CFR 60.335(d)]

***Requested Revisions***

**B.25.** The permittee shall determine compliance with the sulfur content standard in 40 CFR 60.333(b) as follows: ASTM D 1552-90 or later editions shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-90(94)E-1, D 3031-81(86), D 4084-94, or D 3246-92 shall be used for the sulfur content of gaseous fuels [incorporated by reference in 40 CFR 60.17 or the latest edition(s)]. In addition, any ASTM method (or later editions) referenced in 62-297.440(1), F.A.C. or in 40 CFR 60.335(b)(10) is acceptable. The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the Dilution ratio) may be used, subject to approval of the Administrator.  
[40 CFR 60.335(d)].

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**Scope of Application**

<b>Emissions Unit ID Number</b>	<b>Description of Emissions Unit</b>	<b>Air Permit Type</b>	<b>Air Permit Proc. Fee</b>
N/A			

**Application Processing Fee**

Check one:  Attached - Amount: \$ \_\_\_\_\_  Not Applicable


**Owner/Authorized Representative Statement**

**Complete if applying for an air construction permit or an initial FESOP.**

1. Owner/Authorized Representative Name :
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
4. Owner/Authorized Representative Email Address:
5. Owner/Authorized Representative Statement:  <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.</i>  _____ Signature  _____ Date

**Application Responsible Official Certification**

**Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."**

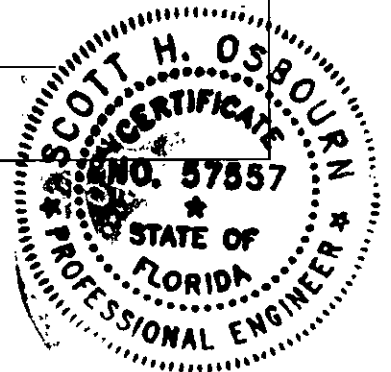
1. Application Responsible Official Name: Kris G. Edmondson
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: Progress Energy Florida Street Address: P.O. Box 14042 IC 44 City: St. Petersburg      State: Fl.      Zip Code: 33733-4042
4. Application Responsible Official Telephone Numbers... Telephone: (863) 679-3020      ext. Fax: (863) 679-3055
5. Application Responsible Official Email Address:
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  _____ Signature <u>4-8-2005</u> Date

### Professional Engineer Certification

1. Professional Engineer Name: Scott Osbourn Registration Number: 57557
2. Professional Engineer Mailing Address... Organization/Firm: Golder Associates ** Street Address: 5100 West Lemon St., Suite 114 City: St. Petersburg State: FL Zip Code: 33609
3. Professional Engineer Telephone Numbers... Telephone: (813) 287-1717 ext. 211 Fax: (813) 287-1716
4. Professional Engineer Email Address: <a href="mailto:sosbourn@golder.com">sosbourn@golder.com</a>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input checked="" type="checkbox"/> , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature _____ Date <u>4/4/05</u> (seal)

\* Attach any exception to certification statement.

\*\* Board of Professional Engineers Certificate of Authorization No. 00001670



IC - Air Correspondence



**Progress Energy**

February 18, 2005

Ms. Vivian Garfein  
Florida Department of Environmental Protection  
Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, FL 32803-3767

Dear Ms. Garfein:

Re: Annual Statement of Compliance  
Florida Power Intercession City Facility  
Facility ID No. 0970014

As required by Rule 62-213.440(3)(a)(2), Florida Power submits the attached Annual Statement of Compliance for the above-referenced facility.

Please contact Gus Schaefer at (727) 409-3989 if you have any questions or would like additional information.

Sincerely,

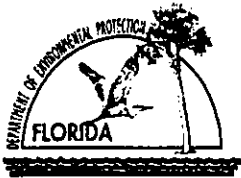
Kris G. Edmondson  
Plant Manager

cc: Ms. Roselyn Hughes, EPA Region IV

bcc: K. G. Edmondson IC44  
D. Meyer CX1B

File: Intercession City Air Correspondence





# Department of Environmental Protection

## Division of Air Resources Management

### STATEMENT OF COMPLIANCE - TITLE V SOURCE

Facility Owner/Company Name: Progress Energy Florida, Inc.

Site Name: Intercession City County: Osceola

Title V Air Operation Permit No.: 0970014-007-AV

REPORTING PERIOD	REPORT DEADLINE*
January 1 through December 31 of 2004 (year)	March 1, 2005

\*See Rule 62-213.440(3)(a)2, F.A.C.

#### COMPLIANCE STATEMENT (Check only one of the following three options)

A. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, and there were no reportable incidents of deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above.

B. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part; however, there were one or more reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each incident of deviation, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

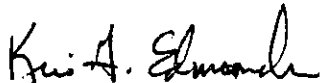
C. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, EXCEPT those identified in the pages attached to this report. For each item of noncompliance, the following information is included:

1. Emissions unit identification number.
2. Specific permit condition number.
3. Description of the requirement of the permit condition.
4. Basis for the determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e., recorded at least every 15 minutes, or intermittent).
5. Beginning and ending dates of periods of noncompliance.
6. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented.
7. Dates of any reports previously submitted identifying this incident of noncompliance.

## STATEMENT OF COMPLIANCE - TITLE V SOURCE

### RESPONSIBLE OFFICIAL CERTIFICATION

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. With respect to all matters other than Acid Rain program requirements, I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate, and complete.



\_\_\_\_\_  
(Signature of Title V Source Responsible Official)


2-18-05

\_\_\_\_\_  
(Date)

Name: Kris G. Edmondson Title: Plant Manager

### DESIGNATED REPRESENTATIVE CERTIFICATION (only applicable to Acid Rain source)

I, the undersigned, am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

  
\_\_\_\_\_  
(Signature of Acid Rain Source Designated Representative)

2/17/05

\_\_\_\_\_  
(Date)

Name: J. Michael Kennedy Title: Permitting and Compliance Mgr.

*{Note: Attachments, if required, are created by the responsible official or the designated representative, as appropriate, and should consist of the information specified and any supporting records. Additional information may also be attached by the responsible official or designated representative when elaboration is required for clarity. This report is to be submitted to both the compliance authority (DEP district or local air program) and the U.S. EPA (U.S. EPA Region 4, Air and EPCRA Enforcement Branch, 61 Forsyth Street, Atlanta GA 30303).}*

Progress Energy Florida  
Intercession City Combustion Turbines - January 1, 2004 thru June 30, 2004  
Malfunction Events

During the first two quarters of calendar year 2004, no deviations occurred for Unit CTP 1, CTP 2, CTP 3, CTP 4, CTP 5, and CTP 6. This was previously summarized in the quarterly excess emissions reports.

<u>Date</u>	<u>Time</u>	<u>Duration</u>	<u>Parameter</u>	<u>Description</u>
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None to report for the first two quarters of 2004

This event occurred with respect to the following permit condition:

The No. 2 fuel oil at Intercession City was analyzed for Sulfur content using ASTM Method D 1552-95 and is referenced in Rule 62-297.440(1)(m). This ASTM method for Sulfur determination is an approved method but was not included in our current permit, Permit Condition: A.12. Progress Energy will request by separate letter to the Florida Department of Environmental Protection that ASTM Method D 1552-95 be added to the Intercession City Title V air permit.

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 D129-91(95), or the latest edition(s).

[Rules 62-213.440 and 62-297.440, F.A.C.]

Progress Energy Florida  
Intercession City - January 1, 2004 thru June 30, 2004  
Malfunction Events

During the first two quarters of calendar year 2004, the following deviations occurred for CT 7, CT 8, and CT 9. No deviations were recorded for CT 10, and CT 11. These were previously summarized in the quarterly excess emissions reports.

CT 7

<u>Date</u>	<u>Time</u>	<u>Duration</u>	<u>Parameter</u>	<u>Description</u>
6/26	11:00	1:00	NOx	Process Malfunction

CT 8

<u>Date</u>	<u>Time</u>	<u>Duration</u>	<u>Parameter</u>	<u>Description</u>
4/08	1500	1:00	NOx	Process Malfunction
4/10	15:00	1:00	NOx	Process Malfunction
4/26	12:00	1:00	NOx	Process Malfunction
4/26	14:00	1:00	NOx	Process Malfunction
4/27	09:00	1:00	NOx	Process Malfunction
4/27	12:00	1:00	NOx	Process Malfunction
5/23	12:00	1:00	NOx	Process Malfunction
5/27	13:00	1:00	NOx	Process Malfunction
6/10	13:00	1:00	NOx	Process Malfunction
6/15	13:00	1:00	NOx	Process Malfunction
6/16	19:00	1:00	NOx	Process Malfunction
6/23	10:00	1:00	NOx	Process Malfunction

CT 9

<u>Date</u>	<u>Time</u>	<u>Duration</u>	<u>Parameter</u>	<u>Description</u>
5/26	19:00	1:00	NOx	Process Malfunction
6/23	10:00	1:00	NOx	Process Malfunction

This event occurred with respect to the following permit condition:

The No. 2 fuel oil at Intercession City was analyzed for Sulfur content using ASTM Method D 1552-95 and is referenced in Rule 62-297.440(1)(m). This ASTM method for Sulfur determination is an approved method but was not included in our current permit, Permit Condition: B.25. Progress Energy will request by separate letter to the Florida Department of Environmental Protection that ASTM Method D 1552-95 be added to the Intercession City Title V air permit.

B.25. The permittee shall determine compliance with the sulfur content standard in 40 CFR 60.333(b) as follows: ASTM D2880-96 shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-90(94)E-1, D 3031-81(86), D 4084-94, or D 3246-92 shall be used for the sulfur content of gaseous fuels [incorporated by reference in 40 CFR 60.17 or the latest edition(s)]. The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the Dilution ratio) may be used, subject to approval of the Administrator.  
[40 CFR 60.335(d)]

Progress Energy Florida  
Intercession City - January 1, 2004 thru June 30, 2004  
Malfunction Events

During the first two quarters of calendar year 2004, the following deviations occurred for CT 12 and CT14. No deviations were recorded for CT 13. These were previously summarized in the quarterly excess emissions reports.

CT 12

<u>Date</u>	<u>Time</u>	<u>Duration</u>	<u>Parameter</u>	<u>Description</u>
4/14	09:00	1:00	NOx	Process Malfunction
4/26	16:00	1:00	NOx	Process Malfunction
5/22	15:00	1:00	NOx	Process Malfunction
5/23	15:00	1:00	NOx	Process Malfunction
5/24	12:00	1:00	NOx	Other Known Causes
5/25	14:00	1:00	NOx	Process Malfunction
5/27	14:00	1:00	NOx	Process Malfunction
6/15	12:00	1:00	NOx	Other Known Causes

CT 14

<u>Date</u>	<u>Time</u>	<u>Duration</u>	<u>Parameter</u>	<u>Description</u>
5/20	13:00	1:00	NOx	Other Known Causes

This event occurred with respect to the following permit condition:

The No. 2 fuel oil at Intercession City was analyzed for Sulfur content using ASTM Method D 1552-95 and is referenced in Rule 62-297.440(1)(m). This ASTM method for Sulfur determination is an approved method but was not included in our current permit, Permit Condition: C. 46(b). Progress Energy will request by separate letter to the Florida Department of Environmental Protection that ASTM Method D 1552-95 be added to the Intercession City Title V air permit.

C.46. Fuel Records.

(b) Low Sulfur Distillate Oil: For all bulk shipments of low sulfur distillate oil received at this facility, the permittee shall obtain an analysis identifying the sulfur content. An analysis provided by the fuel vendor is acceptable. Methods for determining the sulfur content of the distillate oil shall be ASTM D129-91, D2622-94, or D4294-90 or equivalent methods. Records shall specify the test method used and shall comply with the requirements of 40 CFR 60.335(d).

[Rules 62-4.070(3) & 62-4.160(15), F.A.C.; and, 0970014-006-AC.]

Progress Energy Florida  
Intercession City Combustion Turbines - July 1, 2004 thru December 31, 2004  
Malfunction Events

During the second two quarters of calendar year 2004, no deviations occurred for Unit CTP 1, CTP 2, CTP 3, CTP 4, CTP 5, and CTP 6. This was previously summarized in the quarterly excess emissions reports.

<u>Date</u>	<u>Time</u>	<u>Duration</u>	<u>Parameter</u>	<u>Description</u>
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None to report for the second two quarters of 2004

This event occurred with respect to the following permit condition:

The No. 2 fuel oil at Intercession City was analyzed for Sulfur content using ASTM Method D 1552-95 and is referenced in Rule 62-297.440(1)(m). This ASTM method for Sulfur determination is an approved method but was not included in our current permit, Permit Condition: A.12. Progress Energy has requested by separate letter to the Florida Department of Environmental Protection that ASTM Method D 1552-95 be added to the Intercession City Title V air permit.

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 D129-91(95), or the latest edition(s).

[Rules 62-213.440 and 62-297.440, F.A.C.]



Progress Energy Florida  
 Intercession City - July 1, 2004 thru December 31, 2004  
 Malfunction Events

During the second two quarters of calendar year 2004, the following deviations occurred for CT 8, CT 9 and CT 10. No deviations were recorded for CT 7 and CT 11. These were previously summarized in the quarterly excess emissions reports.

CT 8

<u>Date</u>	<u>Time</u>	<u>Duration</u>	<u>Parameter</u>	<u>Description</u>
7/09	08:00	1:00	NOx	Process Malfunction
7/20	16:00	1:00	NOx	Process Malfunction
7/22	10:00	1:00	NOx	Other Known Causes
8/25	16:00	1:00	NOx	Invalid Data-Probe tube broken
9/02	17:00	1:00	NOx	Other Known Causes
9/19	19:00	1:00	NOx	Process Malfunction
9/28	09:00	1:00	NOx	Process Malfunction
9/28	13:00	1:00	NOx	Process Malfunction
9/30	10:00	1:00	NOx	Process Malfunction
10/04	07:00	1:00	NOx	Process Malfunction
11/01	19:00	1:00	NOx	Process Malfunction
12/26	13:00	1:00	NOx	Process Malfunction
12/27	23:00	1:00	NOx	Process Malfunction

CT 9

<u>Date</u>	<u>Time</u>	<u>Duration</u>	<u>Parameter</u>	<u>Description</u>
9/19	13:00	1:00	NOx	Process Malfunction
10/07	07:00	1:00	NOx	Process Malfunction

10/27	04:00	1:00	NOx	Process Malfunction
<u>CT 10</u>				
<u>Date</u>	<u>Time</u>	<u>Duration</u>	<u>Parameter</u>	<u>Description</u>
8/02	16:00	1:00	NOx	Process Malfunction
8/31	12:00	1:00	NOx	Process Malfunction
9/18	12:00	1:00	NOx	Control Malfunction
11/23	13:00	1:00	NOx	Process Malfunction
11/23	14:00	1:00	NOx	Process Malfunction
12/26	18:00	1:00	NOx	Other known Causes
12/27	00:00	1:00	NOx	Control Malfunction
12/27	01:00	1:00	NOx	Process Malfunction
12/27	05:00	1:00	NOx	Other known Causes

This event occurred with respect to the following permit condition:

The No. 2 fuel oil at Intercession City was analyzed for Sulfur content using ASTM Method D 1552-95 and is referenced in Rule 62-297.440(1)(m). This ASTM method for Sulfur determination is an approved method but was not included in our current permit, Permit Condition: B.25. Progress Energy has requested by separate letter to the Florida Department of Environmental Protection that ASTM Method D 1552-95 be added to the Intercession City Title V air permit.

B.25. The permittee shall determine compliance with the sulfur content standard in 40 CFR 60.333(b) as follows: ASTM D2880-96 shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-90(94)E-1, D 3031-81(86), D 4084-94, or D 3246-92 shall be used for the sulfur content of gaseous fuels [incorporated by reference in 40 CFR 60.17 or the latest edition(s)]. The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the Dilution ratio) may be used, subject to approval of the Administrator.  
[40 CFR 60.335(d)]

Progress Energy Florida

Intercession City - July 1, 2004 thru December 31, 2004

Malfunction Events

During the second two quarters of calendar year 2004, the following deviations occurred for CT 12, CT 13 and CT14. These were previously summarized in the quarterly excess emissions reports.

CT 12

<u>Date</u>	<u>Time</u>	<u>Duration</u>	<u>Parameter</u>	<u>Description</u>
9/27	07:00	1:00	NOx	Process Malfunction

CT 13

<u>Date</u>	<u>Time</u>	<u>Duration</u>	<u>Parameter</u>	<u>Description</u>
9/13	09:00	1:00	NOx	Process Malfunction
9/16	09:00	1:00	NOx	Other Known Causes
10/13	05:00	1:00	NOx	Other Known Causes
10/20	11:00	1:00	NOx	Process Malfunction
11/03	16:00	1:00	NOx	Process Malfunction
12/13	08:00	1:00	NOx	Other Known Causes

CT 14

<u>Date</u>	<u>Time</u>	<u>Duration</u>	<u>Parameter</u>	<u>Description</u>
7/09	16:00	1:00	NOx	Process Malfunction
9/28	01:00	1:00	NOx	Invalid Data-NOx pump diaphragm failed
11/03	11:00	1:00	NOx	Invalid Data-NOx pump insulating feet worn/replace
12/13	08:00	1:00	NOx	Other Known Causes

This event occurred with respect to the following permit condition:

The No. 2 fuel oil at Intercession City was analyzed for Sulfur content using ASTM Method D 1552-95 and is referenced in Rule 62-297.440(1)(m). This ASTM method for Sulfur determination is an approved method but was not included in our current permit, Permit Condition: C. 46(b). Progress Energy has requested by separate letter to the Florida Department of Environmental Protection that ASTM Method D 1552-95 be added to the Intercession City Title V air permit.

C.46. Fuel Records.

(b) Low Sulfur Distillate Oil: For all bulk shipments of low sulfur distillate oil received at this facility, the permittee shall obtain an analysis identifying the sulfur content. An analysis provided by the fuel vendor is acceptable. Methods for determining the sulfur content of the distillate oil shall be ASTM D129-91, D2622-94, or D4294-90 or equivalent methods. Records shall specify the test method used and shall comply with the requirements of 40 CFR 60.335(d).

[Rules 62-4.070(3) & 62-4.160(15), F.A.C.; and, 0970014-006-AC.]



# Progress Energy

January 12, 2005

Mr. Jim Pennington  
Division of Air Resource Management  
2600 Blair Stone Road MS 5500  
Tallahassee, Florida 32399-2400

Dear Mr. Pennington:

Re: Intercession City Facility fuel oil testing standard  
FDEP Permit No. 0970014-007-AV

~~0970014-008-AG~~ 0970014-009-AV

OSCEOLA COUNTY  
CENTRAL DISTRICT

I would like to add "ASTM D 1552-90 or latest edition" to the list of acceptable fuel oil test methods listed in Section III A.12, B16, and B.25 of our Intercession City Title V permit referenced above:

**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 D129-91(95), or the latest edition(s).  
[Rules 62-213.440 and 62-297.440, F.A.C.]

**B.16.** The test method for sulfuric acid mist (H<sub>2</sub>SO<sub>4</sub>) emissions shall be EPA Method 8, incorporated and adopted by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C. No. 2 fuel oil analysis using ASTM D4294-90, or the latest edition, may be used in lieu of EPA Method 8 for the determination of H<sub>2</sub>SO<sub>4</sub> mist, only if compliance with the permit allowable for the sulfur content in the No. 2 fuel oil fired at the facility has been demonstrated.  
[Rules 62-204.800 and 62-297.401, F.A.C.; and, AC 49-203114/PSD-FL-180(A)]

**B.25.** The permittee shall determine compliance with the sulfur content standard in 40 CFR 60.333(b) as follows: ASTM D2880-96 shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-90(94)E-1, D 3031-81(86), D 4084-94, or D 3246-92 shall be used for the sulfur content of gaseous fuels [incorporated by reference in 40 CFR 60.17 or the latest edition(s)]. The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the Dilution ratio) may be used, subject to approval of the Administrator.  
[40 CFR 60.335(d)]

ASTM D 1552 is referenced in Rule 62-297.440(1)(m) and 40 CFR 60.335.

If you have any questions, please contact Dave Meyer at (727) 826-4187.

I hereby certify that, based on the information and belief formed after reasonable inquiry, the statements and information in the attached documents are true, accurate and complete.

Sincerely,

A handwritten signature in black ink, appearing to read "Kris G. Edmondson". The signature is fluid and cursive, with the first name "Kris" being the most prominent.

Kris G. Edmondson  
Plant Manager