



Progress Energy

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BUREAU OF AIR REGULATION

April 1, 2008

Mr. Russell Wider, P.E.
DEP/DARM
South Permitting Section
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

Re: Air Construction Permit No. 0970014-012-AC
Title V Permit No. 0970014-011-AV Revision
Progress Energy Florida—Intercession City Power Plant
Request for Additional Information—Combustion Turbine Nos. 12, 13 and 14

Dear Mr. Wider:

Project No. 0970014-013-AC/0970014-014-AV

Based on our discussions between Progress Energy Florida (PEF) and the Department on March 12, 2008, this letter serves as our request to expand our application for processing of only the above-referenced air construction permit. Rather, PEF requests that the permit revision be addressed by the Department as a concurrent permit processing action for a minor source air construction permit and Title V revision. PEF understands that this would be a more efficient process requiring only one application request and one public notice. Although this request effectively restarts the air construction permit processing time schedule, PEF would still like to receive the air construction permit at the earliest possible date.

Accordingly, attached is a revised page 2 of the air application form with the box checked for concurrent processing. The revised page is accompanied by a professional engineer certification form, as well as a certification form completed by the facility's responsible official. If you should have any questions regarding this request, please contact Mr. Dave Meyer at (727) 820-5295. Thank you in advance for your timely consideration of this permit revision request.

Sincerely,

Julie Turner
Plant Manager and Responsible Official

Enclosure

Cc: Scott Osbourn, P.E., Golder Associates

APPLICATION INFORMATION

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Purpose of Application

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

BUREAU OF AIR REGULATION

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

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.

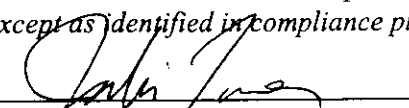
Application Comment

This application for an air construction permit and Title V revision for Intercession City CT Nos. 12, 13 and 14. Specifically, minor revisions are requested for permit language relating to allowable emissions during startup, shutdowns and malfunctions.

APPLICATION INFORMATION

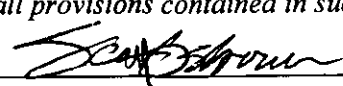
Application Responsible Official Certification

Complete if applying for an initial/revise/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: Julie Turner
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: Florida Power Corporation dba Progress Energy Florida Street Address: 6525 Osceola-Polk County Line Road City: Intercession City State: Osceola Zip Code: 33848
4. Application Responsible Official Telephone Numbers... Telephone: (863) 679-3020 ext. Fax: () -
5. Application Responsible Official Email Address: Julie.Turner@pgnmail.com
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 _____ Date <u>4/1/2008</u>

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Scott Osbourn, Senior Consultant Registration Number: 57557
2. Professional Engineer Mailing Address... Organization/Firm: Golder Associates, Inc.* Street Address: 5100 Lemon Street, Suite 114 City: Tampa 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: sosbourn@golder.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> (1) <i>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> (2) <i>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> (3) <i>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> (4) <i>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 checked="" 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> (5) <i>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 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 (seal) Date <u>4/7/08</u>

* Board of Professional Engineers Certificate of Authorization No. 000016

