

Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer, Bureau of Air Regulation
FROM: Russell Wider, Title V Section
DATE: June 3, 2008
SUBJECT: Draft Air Permit No. 0970014-014-AV
Concurrent Draft Air Permit No. PSD-FL-268B (0970014-013-AC)
Progress Energy Florida, Inc., Intercession City Plant
Data Exclusion Conditions for Units 018, 019 and 020

Attached for your review are the following items:

- Written Notice of Intent to Issue Air Permits;
- Public Notice of Intent to Issue Air Permits;
- Statement of Basis;
- Technical Evaluation and Preliminary Determination;
- Draft Permits; and
- P.E. Certification.

The Draft Permit incorporates the specific conditions of air construction permit 0970014-013-AC and concurrently revises the Title V air operation permit, which further defines the methodology for the exclusion of excess emissions data at the Intercession City Plant, which is located in Osceola County, Florida. The Statement of Basis and the Technical Evaluation and Preliminary Determination provides a summary of the project and the rationale for issuance.

The application was received and deemed complete on April 21, 2008. Day 90 is July 8, 2008. There is no ongoing/open enforcement case for this facility, as informed to us by the Central District.

I recommend your approval of the attached Draft Permits.

Attachments

P.E. CERTIFICATION STATEMENT

PERMITTEE

Progress Energy Florida
6525 Osceola-Polk County Line Road
Intercession City, Florida 33848

Project No. 0970014-014-AV
Facility ID No. 0970014
Intercession City
Data Exclusion Conditions
Osceola County, Florida

PROJECT DESCRIPTION

Progress Energy Florida (PEF) operates the Intercession City Plant, an existing electrical generating power plant (SIC No. 49) located in Osceola County at 6525 Osceola-Polk County Line Road, Intercession City, Florida. Progress Energy Florida applied on December 6, 2007, for an air construction permit to modify the methodology for the exclusion of excess emissions data recorded during startups, shutdowns and malfunctions from the calculation of 24-hour nitrogen oxides (NO_x) averages. This methodology was to apply to Units P12, P13 and P14, which are dual-fuel simple cycle combustion turbines with a nominal power production output of 91 MW each. The Department gave written notice of its intent to issue a permit (Permit No. 0970014-012-AC) to PEF on March 4, 2008.

Prior to publication of the Public Notice, PEF provided comments and additional information for consideration by the Department. The original written notice and accompanying documents are withdrawn and replaced with these permitting actions that will revise air construction Permit no. PSD-FL-268B (DEP File No. 0970014-013-AC) and concurrently revise Title V Permit No. 0970014-014-AV. These permitting actions further define the above methodology while also adding periods of Dry low-NO_x tuning as an allowable exclusion from the calculation of the 24-hour NO_x averages. Dry low-NO_x (DLN) combustion technology is used to control NO_x emissions when firing the primary fuel of pipeline quality natural gas. Major tuning sessions are intended to return the unit to manufacturer's specifications for efficient operation and should result in lower actual emissions.

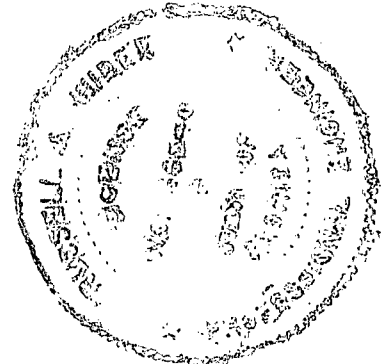
I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).

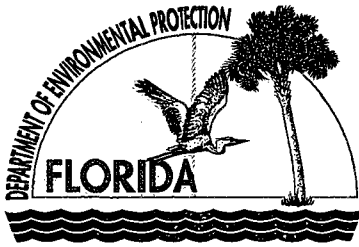
Russell A. Wider

Russell A. Wider, P.E.
Registration Number: 66540

6 - 05 - 08

(Date)





Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

June 6, 2008

Electronic Mail – Received Receipt Requested

Ms. Julie Turner, Plant Manager
Progress Energy Florida, Inc.
6525 Osceola-Polk County Line Road
Intercession City, Florida 33848

Re: Draft Air Permit No. 0970014-014-AV, Title V Permit Revision
Draft Air Permit No. 0970014-013-AC, Concurrent Air Construction Permit
Intercession City Plant

Dear Ms. Turner:

Enclosed is a permit package to revise the Title V air operation permit and the air construction permit for the Intercession City Plant. This permitting action withdraws draft air construction permit No. 0970014-012-AC issued on March 4, 2008 and replaces it with this permit package. The facility is located in Osceola County at 6525 Osceola-Polk County Line Road, Intercession City, Florida. The permit package includes the following documents:

- The Statement of Basis, which summarizes the facility, the equipment, the primary rule applicability, and the changes since the last Title V revision.
- The Technical Evaluation and Preliminary Determination, which summarizes the minor revisions to specific conditions from existing air construction permits.
- The draft air construction permit and the draft Title V air operation permit revision, which include the specific permit conditions that regulate the emissions units covered by the proposed project.
- The Written Notice of Intent to Issue Air Permits, which provides: the Department's written notice of intent to issue air permits for the proposed project; the requirements for publishing a Public Notice of the Department's intent to issue air permits; the procedures for submitting comments on the Draft Permits; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permits which is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The Public Notice of Intent to Issue Title V Air Operation Permit Revision must be published as soon as possible and the proof of publication must be provided to the Department within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit revision pursuant to Rule 62-110.106(11), Florida Administrative Code (F.A.C.).

If you have any questions, please contact the project engineer, Russell Wider, P.E., at 850/921-9527, or by email at Russell.Wider@dep.state.fl.us.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

TLV/raw

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMITS

*In the Matter of an
Application for Air Permits by:*

Progress Energy Florida
6525 Osceola-Polk County Line Road
Intercession City, Florida 33848

Air Permit No. 0970014-014-AV
Title V Permit Revision
Air Permit No. 0970014-013-AC
Concurrent Air Construction Permit
Intercession City Plant

Responsible Official:
Ms. Julie Turner, Plant Manager

Facility Location: Progress Energy Florida (PEF) operates the Intercession City Plant, an existing electrical generating power plant (SIC No. 49) located in Osceola County at 6525 Osceola-Polk County Line Road, Intercession City, Florida. The UTM map coordinates are: Zone 17, 446.3 km E, 3126.0 km N; and the map coordinates are Latitude 28° 15' 38", Longitude 81° 32' 51".

Project: Progress Energy Florida applied on December 6, 2007, for an air construction permit to modify the methodology for the exclusion of excess emissions data recorded during startups, shutdowns and malfunctions from the calculation of 24-hour nitrogen oxides (NO_x) averages. This methodology was to apply to Units P12, P13 and P14, which are dual-fuel simple cycle combustion turbines with a nominal power production output of 91 megawatts each. The Department gave written notice of its intent to issue a permit (Permit No. 0970014-012-AC) to PEF on March 4, 2008.

Prior to publication of the Public Notice of Intent to Issue Air Permit (Public Notice) PEF provided comments and additional information for consideration by the Department. The original written notice and accompanying documents are hereby withdrawn and replaced with the present notice and accompanying documents. These permitting actions will revise air construction Permit no. PSD-FL-268A (DEP File No. 0970014-013-AC, PSD-FL-268B) and concurrently revise Title V air operation Permit No. 0970014-014-AV. These permitting actions further define the above methodology while also adding periods of Dry low-NO_x tuning as an allowable exclusion from the calculation of the 24-hour NO_x averages. Dry low-NO_x (DLN) combustion technology is used to control NO_x emissions when firing the primary fuel of pipeline quality natural gas. Major tuning sessions are intended to return the unit to manufacturer's specifications for efficient operation and should result in lower actual emissions. This project is not expected to significantly increase emissions and as such, neither a Best Available Control Technology (BACT) determination or modeling was required.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, F.S. and Chapters 62-4, 62-210 and 62-213, F.A.C. The projects are not exempt from the permitting procedures for air construction and Title V air operation permits. The Florida Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the Draft Permits, the Statement of Basis, the Technical Evaluation and Preliminary Determination, the application, and the additional information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above.

Notice of Intent to Issue Permits: The Permitting Authority gives notice of its intent to issue a revised Title V air operation permit and a concurrent air construction permit for the project described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all applicable provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. The permitting authority will issue a final air construction permit and a proposed Title V air operation permit

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMITS

revision (and subsequent final Title V air operation permit revision) in accordance with the conditions of the Draft Permits unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at the address or phone number listed above. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments on the Draft Air Construction Permit: The Permitting Authority will accept written comments concerning the proposed draft air construction permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority at the above address by 5:00 p.m. on or before the end of the 14-day comment period. If written comments result in a significant change to the Draft Permit, the Permitting Authority will issue a revised Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Comments on the Draft Title V Air Operation Permit Revision: The Permitting Authority will accept written comments concerning the draft Title V air operation permit for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority at the above address by 5:00 p.m. on or before the end of the 30-day comment period. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on the Title V permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the Draft Permit, the Permitting Authority will issue a revised Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decisions may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241; Fax: 850/245-2303). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permits. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within fourteen 14 days of receipt of this Written Notice of Intent to Issue Air Permits, 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 14 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 appropriate 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 (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the 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 the petitioner's substantial interests will be affected by the agency

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMITS

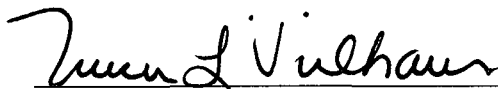
determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Written Notice of Intent to Issue Air Permits. 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: Mediation is not available in this proceeding.

Objections to the Draft Title V Air Operation Permit: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any Title V permit. Any petition shall be based only on objections to the Title V 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 objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any Title V permit properly issued 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.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMITS

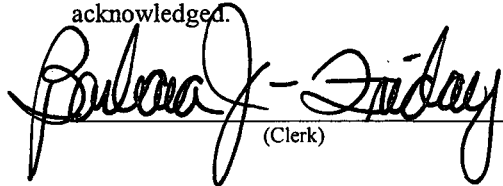
CERTIFICATE OF SERVICE

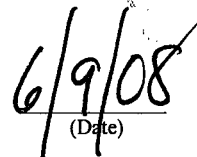
The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permits, the Public Notice of Intent to Issue Air Permits, the Statement of Basis, the Technical Evaluation and Preliminary Determination, the Draft Title V Air Operation Permit Revision and the Draft Air Construction Permit) was sent by electronic mail with received receipt requested before the close of business on 6/9/08 to the persons listed below.

Ms. Julie Turner, PEF: Julie.Turner@pgnmail.com
Mr. Scott Osbourn, P.E., Golder Associates: sosbourn@golder.com
Mr. Dave Meyer, PEF: Dave.Meyer@pgnmail.com
Mr. Mike Halpin, Siting Office: Mike.Halpin@dep.state.fl.us
Mr. James Bradner, P.E., CD: james.bradner@dep.state.fl.us
EPA Region 4 (posted)
Ms. Kathleen Forney, EPA Region 4: forney.kathleen@epa.gov

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.


(Clerk)


(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS

Florida Department of Environmental Protection

Draft Air Permit No. 0970014-014-AV, Title V Air Operation Permit Revision

Draft Air Permit No. 0970014-013-AC, Concurrent Air Construction Permit

Progress Energy Florida, Inc.
Intercession City Plant
Osceola County, Florida

Applicant: The applicant and responsible official for this project is the Progress Energy Florida's Ms. Julie Turner, Plant Manager. The applicant's mailing address is 6525 Osceola-Polk County Line Road, Intercession City, Florida 33848.

Facility Location: Progress Energy Florida, Inc. (PEF) operates an existing electrical generating power plant located in Osceola County at 6525 Osceola-Polk County Line Road, Intercession City, Florida 33848. The UTM coordinates are: Zone 17, 446.3 km E, 3126.0 km N; and the map coordinates are Latitude 28° 15' 38", Longitude 81° 32' 51".

Project: Progress Energy Florida applied on December 6, 2007, for an air construction permit to modify the methodology for the exclusion of excess emissions data recorded during startups, shutdowns and malfunctions from the calculation of 24-hour nitrogen oxides (NO_x) averages. This methodology was to apply to Units P12, P13 and P14, which are dual-fuel simple cycle combustion turbines with a nominal power production output of 91 megawatts each. The Department gave written notice of its intent to issue a permit (Permit No. 0970014-012-AC) to PEF on March 4, 2008.

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Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, F.S. and Chapters 62-4, 62-210 and 62-213, F.A.C. The projects are not exempt from the permitting procedures for air construction and Title V air operation permits. The Florida Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the Draft Permits, the Statement of Basis, the Technical Evaluation and Preliminary Determination, the application, and the additional information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above.

Notice of Intent to Issue Permits: The Permitting Authority gives notice of its intent to issue a revised Title V air operation permit and a concurrent air construction permit for the project described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all applicable provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The permitting authority will issue a final air construction permit and a proposed Title V air operation permit

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS

revision (and subsequent final Title V air operation permit revision) in accordance with the conditions of the Draft Permits unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments on the Draft Air Construction Permit: The Permitting Authority will accept written comments concerning the proposed Draft Air Construction Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority at the above address by 5:00 p.m. on or before the end of the 14-day comment period. If written comments result in a significant change to the Draft Permit, the Permitting Authority will issue a revised Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Comments on the Draft Title V Air Operation Permit Revision: The Permitting Authority will accept written comments concerning the draft Title V air operation permit for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority at the above address by 5:00 p.m. on or before the end of the 30-day comment period. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on the Title V permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the Draft Permit, the Permitting Authority will issue a revised Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decisions may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241; Fax: 850/245-2303). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permits. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within fourteen 14 days of receipt of this Written Notice of Intent to Issue Air Permits, 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 14 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 appropriate 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 (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the 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 the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Written Notice of

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS

Intent to Issue Air Permits. 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: Mediation is not available in this proceeding.

Objections to the Draft Title V Air Operation Permit: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any Title V permit. Any petition shall be based only on objections to the Title V 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 objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any Title V permit properly issued 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.

STATEMENT OF BASIS

PROJECT DESCRIPTION

This project incorporates the specific conditions of air construction permit No. 0970014-013-AC which defines the methodology for the exclusion of excess emissions data recorded during startups, shutdowns, malfunctions and periods of Dry Low Nitrogen oxides (DLN) tuning for combustion turbines P12, P13 and P14 (emission units no. 018, 019 and 020) at the Intercession City Plant.

FACILITY DESCRIPTION

Progress Energy Florida, Inc. operates the Intercession City Plant located in Osceola County which is an existing electric power plant (SIC 49). This facility is a nominal 1057 megawatts (MW) power plant that consists of fourteen simple cycle intermittent duty combustion turbines (CT). All of the CTs are considered to be peakers used during periods of greatest daily demand. The emissions units (EU) are listed in the following table.

EU No.	Brief Description
001 to 006	Six nominal fuel oil-fired 56.7 MW Twin-Pac simple cycle combustion turbines (CT) manufactured by Turbo Power & Marine.
007 to 010	Four nominal 96.3 MW natural gas and fuel oil-fired Model PG7111EA simple cycle CT manufactured by General Electric (GE).
011	One nominal 171 MW natural gas and fuel oil-fired Model V84.3 simple cycle CT manufactured by Siemens.
018 to 020	Three nominal 91 MW natural gas and fuel oil-fired Model PG7121EA simple cycle CT manufactured by General Electric (GE).

PRIMARY REGULATORY REQUIREMENTS

The existing facility is:

Title III: The facility is not a potential major source of hazardous air pollutants (HAP).

Title IV: The facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Rule 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

CAIR: The facility is subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility because EUs 001-006 do not have controls and EUs 007 -011, and 018-020 are equipped with Acid Rain continuous emissions monitoring systems (CEMS) that are also used to demonstrate compliance with the nitrogen oxides limits.

APPLICABLE REGULATIONS

In addition to federal rules above, this facility is subject to the following state rules:

APPLICABLE REGULATIONS	EU ID
40 CFR 60, Subpart A - General Provisions	001-011 and 018-020

STATEMENT OF BASIS

40 CFR 60, Subpart GG - Standards of Performance for Stationary Gas Turbines	007, 008, 009, 010, 011, 018, 019 and 020
40 CFR 75 - Acid Rain Monitoring Provisions	
Rule 62-204, F.A.C. - Ambient Air Quality Requirements, PSD Increments, and Federal Regulations adopted by Reference	001-011 and 018-020
Rule 62-212, F.A.C. - Preconstruction Review, PSD Review and BACT	007, 008, 009, 010, 011, 018, 019 and 020
Rule 62-213, F.A.C. - Title V Air Operation Permits	001-011 and 018-020
Rule 62-214, F.A.C. - Requirements for Sources Subject to Acid Rain Provisions	007, 008, 009, 010, 011, 018, 019 and 020

PROJECT REVIEW

There were several conditions in Permit Nos. 0970014-010-AV and PSD-FL-268A that defined the methodology for excess emissions data. To reduce the probability of a non-excludable malfunction and to maximize the use of more of the available data for use in 24-hour emission averages, the Department has revised the condition in terms of excludable minutes. The Department has also more clearly defined the events that may be excluded from the calculation of the 24-hour nitrogen oxides (NO_x) averages for units P12, P13 and P14. The details of these revisions are included in the technical evaluation and preliminary determination for the concurrent draft air construction permit 0970014-013-AC.

Specific conditions changed as a result of this revision are: C.17, C.18 and C.27.

CONCLUSION

This project revises Title V air operation permit No. 0970014-010-AV, which was issued on December 6, 2007. This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C. In accordance with the terms and conditions of this permit, the above named permittee is hereby authorized to operate the facility as shown on the application and approved drawings, plans, and other documents, on file with the permitting authority.

This permitting action will revise the following specific conditions in the current Title V air operation permit No. 0970014-010-AV. Deletions are shown in strikethrough; additions are shown in double-underline.

Section III. Emissions Unit(s) and Conditions.

Subsection C. This section addresses the following emissions unit.

EU ID No.	Brief Description
018, 019, 020	Combustion Turbine Units CT 12, CT 13 & CT 14

Each gas turbine consists of a General Electric Model No. PG7121 (7EA) dual-fuel, simple-cycle combustion turbine with electrical generator set. Each unit has a nominal power production capacity of 91 megawatts. These units may employ an evaporative cooling system.

Excess Emissions

{Permitting note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of an NSPS or NESHAP provision.}

C.17. Excess Emissions Prohibited: Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. Such preventable emissions shall be included in the calculation of the 24-hour averages compiled by the continuous NO_x emissions monitor.

[Rule 62-210.700(4), F.A.C. and Specific Condition 20 of Permit 0970014-006-AC (PSD-FL-268A)]

C.18. Alternate Standards and NO_x CEMS Data Exclusion: The following permit conditions establish alternate standards or allow the exclusion of monitoring data for specifically defined periods of startup, shutdown, and documented malfunction of a gas turbine. These conditions apply only if operators employ the best operational practices to minimize the amount and duration of emissions during such episodes.

- (a) **Opacity:** During startup and shutdown, visible emissions excluding water vapor shall not exceed 20% opacity for up to 2.0 hours in any 24-hour period.
- (b) **NO_x CEMS Data Exclusion:** For the following identified operational periods, 1-hour NO_x emissions rate values may be excluded from the 24-hour block compliance averages in accordance with the corresponding requirements.
 - (1) **Startup, Shutdown, and Malfunction:** No more than 1 hourly emission rate value or 60 minutes of data due to startup shall be excluded per cycle. No more than 1 hourly emission rate value or 60 minutes of data due to shutdown shall be excluded per cycle. No more than 2 hourly emission rate values or 120 minutes of data shall be excluded in a 24-hour period due to malfunction. No more than 4 hourly emission rate values or 240 minutes of data shall be excluded in a 24-hour period due to all startups, shutdowns, and malfunctions. Note: A fuel-switch is not considered "startup".
 - (2) **Tuning:** If the permittee provides at least five days advance notice prior to a major tuning session performed by the manufacturer's representative, hourly NO_x emissions rate values during tuning may be excluded from the 24-hour block compliance averages. Data excluded due to tuning shall not count towards the limit on total excluded data in a 24-hour period. {Permitting Note: As an example, a major tuning session would occur after a combustor change-out. A tuning session may take a several hours each day over a few days. No more than two major tuning sessions would be expected during any year. Major tuning sessions are intended to return the unit to manufacturer's specifications for efficient operation and should result in lower actual emissions.}

As provided by the authority in Rule 62-210.700(5), F.A.C., the above requirements are established in lieu of

the provisions of Rule 62-210.700(1), F.A.C. [Design; Rules 62-210.700(5), 62-4.130, and Rule 62-212.400(BACT), F.A.C. and Specific Condition 21 of Permit 0970014-013-AC (PSD-FL-268B)]

Continuous Monitoring Requirements

C.27. NO_x CEMS Requirements: For each gas turbine, the permittee shall install, calibrate, maintain, and operate continuous emissions monitors (CEMS) to measure and record emissions of nitrogen oxides (NO_x) and oxygen (O₂) in a manner sufficient to demonstrate compliance with the standards of this permit. A monitor for carbon dioxide (CO₂) may be used in place of the oxygen monitor, but the system shall be capable of correcting the emissions to 15% oxygen.

- (a) **Performance Specifications.** Each monitor shall be installed in a location that will provide emissions measurements representative of actual stack emissions. Each CEMS shall comply with the corresponding performance specifications that identify location, installation, design, performance, and reporting requirements.
- (1) Each NO_x monitor shall be certified pursuant to 40 CFR Part 75 and shall be operated and maintained in accordance with the applicable requirements of 40 CFR Part 75, Subparts B and C. Record keeping and reporting shall be conducted pursuant to 40 CFR Part 75, Subparts F and G. The RATA tests required for the NO_x monitor shall be performed using EPA Method 7E or 20 as defined in Appendix A of 40 CFR 60. The NO_x monitor shall have dual span capability with a low span (gas) no greater than 30 ppmvd corrected to 15% O₂ and a high span (oil) no greater than 200 ppmvd corrected to 15% O₂.
- (2) Each O₂ (or CO₂) CEMS shall comply with Performance Specification 3 in Appendix B of 40 CFR 60. The O₂ reference method for the annual RATA shall be EPA Method 3A Appendix A of 40 CFR 60.
- (b) **Data Collection.** Each CEMS shall be designed and operated to sample, analyze, and record emissions data evenly spaced over a 1-hour period during all periods of operation. Each 1-hour average shall be computed using at least one data point in each fifteen minute quadrant of the 1-hour block during which the unit combusted fuel. Notwithstanding this requirement, each 1-hour average shall be computed from at least two data points separated by a minimum of 15 minutes. All valid measurements or data points collected during a 1-hour block shall be used to calculate the 1-hour emission averages. If the NO_x CEMS measures concentration on a wet basis, the permittee shall use approved methods for correction of measured emissions to a dry basis (0% moisture). The O₂ (or CO₂) CEMS shall express the 1-hour emission rate values in terms of "percent oxygen by volume". The NO_x CEMS shall express the 1-hour emission averages in terms of "ppmvd corrected to 15% oxygen".
- (c) **Compliance Averages.** Compliance with the 24-hour block NO_x emissions standards shall be based on data collected by each required CEMS. The 24-hour block shall start at midnight of each operating day and consist of 24 consecutive 1-hour blocks. For purposes of determining compliance with the emission standards of this permit, missing data shall not be substituted. Instead the 24-hour block average shall be determined using the remaining hourly data in the 24-hour block. If a unit operates continuously throughout the day, the 24-hour block average shall be the average of 24 consecutive 1-hour emission averages. If a unit operates less than 24 hours during the day, the 24-hour block average shall be the average of the available valid 1-hour emission averages collected during actual operation. If monitoring data is authorized for exclusion (due to startup, shutdown, malfunction, or tuning), the 24-hour block average shall be the average of the remaining valid 1-hour emission averages collected during actual operation. In cases of reduced operation or data exclusion, the compliance average will be based on less than 24, 1-hour emission averages. Upon completion of each 24-hour block, the permittee shall determine separate compliance averages for gas firing and oil firing. A 1-hour emissions average that includes any amount of oil firing shall only be included in the compliance average for oil firing. Upon a

request from the Department, the NO_x emission rate shall be corrected to ISO (International Standards Organization (refers to those conditions at 288 Kelvin, 60% relative humidity and 101.3 kilopascals pressure)) conditions to demonstrate compliance with the applicable standards of 40 CFR 60.332. In the rare case where the remaining hourly data exceeds the 24 hour block NO_x emissions standards, compliance will be demonstrated by excluding startup, shutdown, and malfunction minutes from the 24 hour block as outlined in Section 3 paragraph 3 (b) (1). The remaining minute NO_x values will be averaged and compared to the emission standard. Normally compliance would be evaluated on an hourly basis.

- (d) **Data Exclusion.** Except for continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments, each CEMS shall record emissions data at all times including episodes of startup, shutdown, DLN tuning, and malfunction. Emissions data recorded during periods of startup, shutdown, or malfunction may only be excluded from the compliance averages in accordance with the requirements previously specified in this permit. All periods of data excluded shall be consecutive for each episode and only data obtained during the described episodes (startup, shutdown, malfunction, DLN tuning) may be used for the appropriate exclusion periods. To the extent practicable, the permittee shall minimize the duration of data excluded for startup, shutdown and malfunctions. Data recorded during startup, shutdown or malfunction shall not be excluded if the episode was caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure, which may reasonably be prevented. Best operational practices shall be used to minimize hourly emissions that occur during startup, shutdown and malfunction. Emissions of any quantity or duration that occur entirely or in part from poor maintenance, poor operation, or any other equipment or process failure, which may reasonably be prevented, shall be prohibited. Excluded emissions data shall be summarized in the required quarterly report.
- (e) **Reporting.** If a CEMS reports NO_x emissions in excess of a standard, the permittee shall notify the Compliance Authority within one working day with a preliminary report of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Compliance Authority may request a written summary report of the incident.
- (f) **Monitor Availability.** Monitor availability shall not be less than 95% in any calendar quarter. In the event 95% availability is not achieved, the permittee shall provide the Department with a report identifying the problems in achieving 95% availability and a plan of corrective actions that will be taken to achieve 95% availability. The permittee shall implement the reported corrective actions within the next calendar quarter. Failure to take corrective actions or continued failure to achieve the minimum monitor availability shall be violations of this permit.

[Rules 62-204.800, 62-210.700, 62-4.130, 62-4.160(8), F.A.C.; 40 CFR 60.7 and Specific Condition 35 of Permit 0970014-013-AC (PSD-FL-268B)]

**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

PROJECT

Project No. 0970014-013-AC
Draft Air Permit No. PSD-FL-268B
Changes to the Excludable Data Provisions for Startups, Shutdowns and Malfunctions
(Emissions Unit No. 018, 019, and 020)
(Also designated as Combustion Turbines P12, P13 and P14)

COUNTY

Osceola County

APPLICANT

Progress Energy Florida, Inc.
Intercession City Plant
ARMS Facility ID No. 0970014

**PERMITTING
AUTHORITY**

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation



June 6, 2008

{Filename: 268C TEPD.doc}

Applicant Name and Address

Ms. Julie Turner, Plant Manager
Intercession City Plant
6525 Osceola-Polk Line Road
Intercession City, Florida 33848

Processing Schedule

- 12/06/07 Received complete application for a minor modification.
- 03/04/08 Distributed Intent to Issue Air Permit.
- 04/09/08 Received complete application for concurrent air construction permit and Title V revision.
- 05/01/08 Withdrew Permit No. Permit No. 0970014-012-AC.
- 06/06/08 Distributed Intent to Issue Air Permit

Facility Description and Location

The applicant operates an electric power plant (SIC No. 49) located at Osceola County approximately 3.5 miles west of Intercession City. The address is 6525 Osceola Polk County Line Road, Intercession City, Florida 33848. The UTM coordinates are: Zone 17, 446.3 km E, 3126.0 km N; and the map coordinates are Latitude 28° 15' 38", Longitude 81° 32' 51".

Project Description

The applicant, Progress Energy, Florida, Inc. operates an 1170 MW electric power plant in Intercession City. In 2000/2001, three new 91 megawatt (MW) simple cycle gas turbines (Units P12-P14) were added to the facility under air construction Permit No. PSD-FL-268A (later modified as PSD-FL-268B). Because of the frequent but intermittent use of the peaking units, they undergo numerous startups and shutdowns. Often they may be started and shut down more than once in the same day.

During a portion of the startup and shutdown phases, the concentration of nitrogen oxides (NO_x) emitted in the exhaust from the three units can exceed the permitted limit of 10 parts per million by volume, dry, corrected to 15 percent oxygen (ppmvd @15%O₂). Compliance is based on valid hours recorded in a 24-hour day. The present permits allow up to 4 hours of NO_x data exclusion per day to account for excess emissions during startups, shutdowns and malfunctions.

According to the company, they occasionally exclude the four hours in a given day during two startups and shutdowns for any of the turbines. The applicant is concerned that this theoretically exposes their operation to the possibility of having a malfunction and resulting excess emissions that cannot be excluded from the 24-hour emissions calculation. To remedy this possibility, the applicant requested the following changes in the permit conditions applicable to Units P12, P13 and P14. The original permit language is shown in ~~strikeout~~ and the applicant's requested language is shown in underline format.

Alternate Standards and NO_x CEMS Data Exclusion: The following permit conditions establish alternate standards or allow the exclusion of monitoring data for specifically defined periods of startup, shutdown, and documented malfunction of a gas turbine. These conditions apply only if operators employ the best operational practices to minimize the amount and duration of emissions during such episodes.

~~(1) Startup, Shutdown, and Malfunction: No more than 1 hourly emission rate value shall be excluded per cycle. No more than 1 hourly emission rate value due to shutdown shall be excluded per cycle. No more than 2 hourly emission rate values shall be excluded in a 24 hour period due to malfunction. No more than 4 hourly emission rate values shall be excluded in a 24 hour period due to all startups, shutdowns, and malfunctions. Note: A fuel switch is not considered "startup".~~

(1) Excess emissions resulting from startup, shutdown and malfunction of any emissions unit shall be permitted providing: (1) best operational practices to minimize emissions are adhered to, and (2) the duration of excess emissions shall be minimized but in no case exceed two hours due to startup or shutdown in any 24-

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

hour period for each startup and shutdown cycle. No more than 2 hourly emission rate values shall be excluded in a 24-hour period due to malfunction. The duration of excess emissions shall be minimized but in no case exceed these durations unless specifically authorized by the Department. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.

Supporting data from Applicant

An example of the kind of daily operation scenario that can expose the applicant to the situation previously described (a malfunction after already excluding 4 hourly emission rate values) is given in the following table.

P12

Reports

Report Date: 02/13/2006

Created: 10/23/2007 09:15

HOUR	EMISSIONS FROM GAS FUEL ppmvd @ 15% O2	EMISSIONS FROM OIL FUEL ppmvd @ 15% O2	EXCEEDS VALUE	EX	EXCLUSION JUSTIFICATION
00	Off-Line				
01	Off-Line				
02	Off-Line				
03	Off-Line				
04	Off-Line				
05	46.291		Y	Y	Startup
06	8.590			N	
07	8.155			N	
08	15.309		Y	Y	Shutdown
09	Off-Line				
10	Off-Line				
11	Off-Line				
12	Off-Line				
13	Off-Line				
14	Off-Line				
15	Off-Line				
16	Off-Line				
17	Off-Line				
18	Off-Line				
19	Off-Line				
20	Off-Line				
21	19.685		Y	Y	Startup
22	12.234		Y	Y	Shutdown
23	Off-Line				

DAILY
AVERAGES: 8.373 0.000

LIMITS: 10.049 42.049

--More--(92X) Hit space to continue, Del to abort.

This data is from February 13, 2006 for Unit P12. Hours 5, 8, 21, and 22 were excluded for startup/shutdown leaving only hours 6 and 7 from which to calculate a 24-hour average. The Department accessed the adjusted

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

continuous emissions monitoring system (CEMS) data submitted to the Clean Air Markets site for the same date and unit. The values are listed in the following table.

Date	Hour	Operating Time (Hours)	Gross Load MW	Unadjusted NO _x (ppm)	Carbon Dioxide (CO ₂) Diluent (%)	Adjusted NO _x (ppm)
2/13/2006	5	0.5	16	20.6	1.5	47.1
2/13/2006	6	1	80	7.9	3.1	8.7
2/13/2006	7	1	50	7.5	3.1	8.3
2/13/2006	8	0.75	17	10.9	2.4	15.6
2/13/2006	21	0.75	26	14.6	2.5	20.0
2/13/2006	22	1	38	9.8	2.7	12.4

While 4 hourly emission rate values can be excluded according to the present condition, those 4 hours represent only 3 hours of CEMS data. This would leave another hour to account for a malfunction if one actually occurs. It is also possible that some of the time (some quarter-hours) excluded, can actually be extracted and used when calculating the 24-hour average NO_x concentration. A good candidate is Hour 22 because shutdowns (and their related excess-emissions) do not last one hour for these units.

Department Determination

The Department has determined that a change in the condition can be made without resorting to additional time than the allotted 4 hour exclusion for startups, shutdowns and malfunction. No examples where such time was actually insufficient were presented and the request is designed to cover a situation that has yet to occur for these units.

To reduce the probability of a non-excludable malfunction and to maximize the use of more of the available data for use in 24-hour emission averages, the Department will rewrite the condition in terms of excludable minutes. The Department will also more clearly define the events subject to exclusion. Specific Condition 21(b) of Permit No. PSD-FL-268A will be revised as follows: (additions are shown in underline format and deletions are shown in ~~strikeout~~ format).

(b) NO_x CEMS Data Exclusion: For the following identified operational periods, 1-hour NO_x emissions rate values may be excluded from the 24-hour block compliance averages in accordance with the corresponding requirements.

(1) *Startup, Shutdown, and Malfunction:* No more than 1 hourly emission rate value or 60 minutes of data due to startup shall be excluded per cycle. No more than 1 hourly emission rate value or 60 minutes of data due to shutdown shall be excluded per cycle. No more than 2 hourly emission rate values or 120 minutes of data shall be excluded in a 24-hour period due to malfunction. No more than 4 hourly emission rate values or 240 minutes of data shall be excluded in a 24-hour period due to all startups, shutdowns, and malfunctions. Note: A fuel-switch is not considered “startup”.

(2) **No change.**

As provided by the authority in Rule 62-210.700(5), F.A.C., the above requirements are established in lieu of the provisions of Rule 62-210.700(1), F.A.C. [Design; Rules 62-210.700(5), 62-4.130, and Rule 62-212.400(BACT), F.A.C.]

Specific Condition 35 will be revised as follows:

(a) and (b) **No change.**

(c) **Compliance Averages.** Compliance with the 24-hour block NO_x emissions standards shall be based on data collected by each required CEMS. The 24-hour block shall start at midnight of each operating day and consist of 24 consecutive 1-hour blocks. For purposes of determining compliance with the emission standards of this permit, missing data shall not be substituted. Instead the 24-hour block average shall be determined using the remaining hourly data in the 24-hour block. If a unit operates continuously throughout the day, the 24-hour block average shall be the average of 24 consecutive 1-hour emission averages. If a unit operates less than 24 hours during the day, the 24-hour block average shall be the average of the available valid 1-hour emission averages collected during actual operation. If monitoring data is authorized for exclusion (due to startup, shutdown, malfunction, or tuning), the 24-hour block average shall be the average of the remaining valid 1-hour emission averages collected during actual operation. In cases of reduced operation or data exclusion, the compliance average will be based on less than 24, 1-hour emission averages. Upon completion of each 24-hour block, the permittee shall determine separate compliance averages for gas firing and oil firing. A 1-hour emissions average that includes any amount of oil firing shall only be included in the compliance average for oil firing. Upon a request from the Department, the NO_x emission rate shall be corrected to ISO (International Standards Organization (refers to those conditions at 288 Kelvin, 60% relative humidity and 101.3 kilopascals pressure)) conditions to demonstrate compliance with the applicable standards of 40 CFR 60.332. In the rare case where the remaining hourly data exceeds the 24 hour block NO_x emissions standards, compliance will be demonstrated by excluding startup, shutdown, and malfunction minutes from the 24 hour block as outlined in Section 3 paragraph 3 (b) (1). The remaining minute NO_x values will be averaged and compared to the emission standard. Normally compliance would be evaluated using hourly emission data.

(d) **Data Exclusion.** Except for continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments, each CEMS shall record emissions data at all times including episodes of startup, shutdown, DLN tuning, and malfunction. Emissions data recorded during periods of startup, shutdown, or malfunction may only be excluded from the compliance averages in accordance with the requirements previously specified in this permit. All periods of data excluded shall be consecutive for each episode and only data obtained during the described episodes (startup, shutdown, malfunction, DLN tuning) may be used for the appropriate exclusion periods. To the extent practicable, the permittee shall minimize the duration of data excluded for startup, shutdown and malfunctions. Data recorded during startup, shutdown or malfunction shall not be excluded if the episode was caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure, which may reasonably be prevented. Best operational practices shall be used to minimize hourly emissions that occur during startup, shutdown and malfunction. Emissions of any quantity or duration that occur entirely or in part from poor maintenance, poor operation, or any other equipment or process failure, which may reasonably be prevented, shall be prohibited. Excluded emissions data shall be summarized in the required quarterly report.

(e) and (f) **No change.**

Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Additional details of this analysis may be obtained by contacting the project engineer, Russell Wider, at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, FL 32399-2400, or by calling 850-921-9527.



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
June 6, 2008

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Electronically Sent – Received Receipt Requested.

Progress Energy Florida, Inc.
6525 Osceola-Polk County Line Road
Intercession City, Florida 33848

Authorized Representative:

Ms. Julie Turner, Plant Manager

Intercession City Plant
DEP File No. 0970014-013-AC
PSD-FL-268B

Facility ID No. 0970014

SIC No. 49

Permit Expires: December 31, 2008

Re: Air Construction Permit Modification
Data Exclusion Conditions Units P12, P13 and P14

Dear Ms. Turner:

The Florida Department of Environmental Protection (“the Department”) has reviewed your application to make some minor modifications to air construction Permit No. PSD-FL-268A (0970014-006-AC). Progress Energy Florida requested modifications that would further define the methodology for the exclusion of excess emissions data recorded during startups, shutdowns and malfunctions from the calculation of 24-hour nitrogen oxides (NO_x) averages applicable to combustion turbines P12, P13 and P14 at the Intercession City Plant. Therefore, the changes requested will be addressed as an air construction Permit Modification.

MODIFICATIONS OF AIR CONSTRUCTION PERMIT NO. 0970014-006-AC

Double-underline denotes additions.

Specific Conditions 21 and 35 are revised as follows:

21. Alternate Standards and NO_x CEMS Data Exclusion: The following permit conditions establish alternate standards or allow the exclusion of monitoring data for specifically defined periods of startup, shutdown, and documented malfunction of a gas turbine. These conditions apply only if operators employ the best operational practices to minimize the amount and duration of emissions during such episodes.

- (a) **Opacity**: During startup and shutdown, visible emissions excluding water vapor shall not exceed 20% opacity for up to 2.0 hours in any 24-hour period.
- (b) **NO_x CEMS Data Exclusion**: For the following identified operational periods, 1-hour NO_x emissions rate values may be excluded from the 24-hour block compliance averages in accordance with the corresponding requirements.
 - (1) Startup, Shutdown, and Malfunction: No more than 1 hourly emission rate value or 60 minutes of data due to startup shall be excluded per cycle. No more than 1 hourly emission rate value or 60 minutes of data due to shutdown shall be excluded per cycle. No more than 2 hourly emission rate values or 120 minutes of data shall be excluded in a 24-hour period due to malfunction. No more than 4 hourly emission rate values or 240 minutes of data shall be excluded in a 24-hour period due to all startups, shutdowns, and malfunctions. Note: A fuel-switch is not considered “startup”.
 - (2) Tuning: If the permittee provides at least five days advance notice prior to a major tuning session performed by the manufacturer’s representative, hourly NO_x emissions rate values during tuning may be excluded from the 24-hour block compliance averages. Data excluded due to tuning shall not count towards the limit on total excluded data in a 24-hour period. {Permitting Note: As an example, a major tuning session would occur after a combustor change-out. A tuning session may take several hours each day over a few days. No more than two major tuning sessions would be expected during any year. Major

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tuning sessions are intended to return the unit to manufacturer's specifications for efficient operation and should result in lower actual emissions.}

As provided by the authority in Rule 62-210.700(5), F.A.C., the above requirements are established in lieu of the provisions of Rule 62-210.700(1), F.A.C. [Design; Rules 62-210.700(5), 62-4.130, and Rule 62-212.400(BACT), F.A.C.]

CONTINUOUS MONITORING REQUIREMENTS

35. **NO_x CEMS Requirements:** For each gas turbine, the permittee shall install, calibrate, maintain, and operate continuous emissions monitors (CEMS) to measure and record emissions of nitrogen oxides (NO_x) and oxygen (O₂) in a manner sufficient to demonstrate compliance with the standards of this permit. A monitor for carbon dioxide (CO₂) may be used in place of the oxygen monitor, but the system shall be capable of correcting the emissions to 15% oxygen.
- (a) **Performance Specifications.** Each monitor shall be installed in a location that will provide emissions measurements representative of actual stack emissions. Each CEMS shall comply with the corresponding performance specifications that identify location, installation, design, performance, and reporting requirements.
- (1) Each NO_x monitor shall be certified pursuant to 40 CFR Part 75 and shall be operated and maintained in accordance with the applicable requirements of 40 CFR Part 75, Subparts B and C. Record keeping and reporting shall be conducted pursuant to 40 CFR Part 75, Subparts F and G. The RATA tests required for the NO_x monitor shall be performed using EPA Method 7E or 20 as defined in Appendix A of 40 CFR 60. The NO_x monitor shall have dual span capability with a low span (gas) no greater than 30 ppmvd corrected to 15% O₂ and a high span (oil) no greater than 200 ppmvd corrected to 15% O₂.
- (2) Each O₂ (or CO₂) CEMS shall comply with Performance Specification 3 in Appendix B of 40 CFR 60. The O₂ reference method for the annual RATA shall be EPA Method 3A Appendix A of 40 CFR 60.
- (b) **Data Collection.** Each CEMS shall be designed and operated to sample, analyze, and record emissions data evenly spaced over a 1-hour period during all periods of operation. Each 1-hour average shall be computed using at least one data point in each fifteen minute quadrant of the 1-hour block during which the unit combusted fuel. Notwithstanding this requirement, each 1-hour average shall be computed from at least two data points separated by a minimum of 15 minutes. All valid measurements or data points collected during a 1-hour block shall be used to calculate the 1-hour emission averages. If the NO_x CEMS measures concentration on a wet basis, the permittee shall use approved methods for correction of measured emissions to a dry basis (0% moisture). The O₂ (or CO₂) CEMS shall express the 1-hour emission rate values in terms of "percent oxygen by volume". The NO_x CEMS shall express the 1-hour emission averages in terms of "ppmvd corrected to 15% oxygen".
- (c) **Compliance Averages.** Compliance with the 24-hour block NO_x emissions standards shall be based on data collected by each required CEMS. The 24-hour block shall start at midnight of each operating day and consist of 24 consecutive 1-hour blocks. For purposes of determining compliance with the emission standards of this permit, missing data shall not be substituted. Instead the 24-hour block average shall be determined using the remaining hourly data in the 24-hour block. If a unit operates continuously throughout the day, the 24-hour block average shall be the average of 24 consecutive 1-hour emission averages. If a unit operates less than 24 hours during the day, the 24-hour block average shall be the average of the available valid 1-hour emission averages collected during actual operation. If monitoring data is authorized for exclusion (due to startup, shutdown, malfunction, or tuning), the 24-hour block average shall be the average of the remaining valid 1-hour emission averages collected during actual operation. In cases of reduced operation or data exclusion, the compliance average will be based on less than 24, 1-hour emission averages. Upon completion of each 24-hour block, the permittee shall determine separate compliance averages for gas firing and oil firing. A 1-hour emissions average that includes any amount of oil firing shall only be included in the compliance average for oil firing. Upon a request from the Department, the NO_x emission rate shall be corrected to ISO (International Standards Organization (refers to those conditions at 288 Kelvin, 60% relative humidity and 101.3 kilopascals

pressure)) conditions to demonstrate compliance with the applicable standards of 40 CFR 60.332. In the rare case where the remaining hourly data exceeds the 24 hour block NO_x emissions standards, compliance will be demonstrated by excluding startup, shutdown, and malfunction *minutes* from the 24 hour block as outlined in Section 3 paragraph 3 (b) (1). The remaining minute NO_x values will be averaged and compared to the emission standard. Normally compliance would be evaluated on an hourly basis.

- (d) **Data Exclusion.** Except for continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments, each CEMS shall record emissions data at all times including episodes of startup, shutdown, DLN tuning, and malfunction. Emissions data recorded during periods of startup, shutdown, or malfunction may only be excluded from the compliance averages in accordance with the requirements previously specified in this permit. All periods of data excluded shall be consecutive for each episode and only data obtained during the described episodes (startup, shutdown, malfunction, DLN tuning) may be used for the appropriate exclusion periods. To the extent practicable, the permittee shall minimize the duration of data excluded for startup, shutdown and malfunctions. Data recorded during startup, shutdown or malfunction shall not be excluded if the episode was caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure, which may reasonably be prevented. Best operational practices shall be used to minimize hourly emissions that occur during startup, shutdown and malfunction. Emissions of any quantity or duration that occur entirely or in part from poor maintenance, poor operation, or any other equipment or process failure, which may reasonably be prevented, shall be prohibited. Excluded emissions data shall be summarized in the required quarterly report.
- (e) **Reporting.** If a CEMS reports NO_x emissions in excess of a standard, the permittee shall notify the Compliance Authority within one working day with a preliminary report of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Compliance Authority may request a written summary report of the incident.
- (f) **Monitor Availability.** Monitor availability shall not be less than 95% in any calendar quarter. In the event 95% availability is not achieved, the permittee shall provide the Department with a report identifying the problems in achieving 95% availability and a plan of corrective actions that will be taken to achieve 95% availability. The permittee shall implement the reported corrective actions within the next calendar quarter. Failure to take corrective actions or continued failure to achieve the minimum monitor availability shall be violations of this permit.

[Rules 62-204.800, 62-210.700, 62-4.130, 62-4.160(8), F.A.C.; 40 CFR 60.7]

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

Joseph Kahn, Director
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this PERMIT MODIFICATION was sent electronically (with Received Receipt Requested) before the close of business on _____ to the person(s) listed below:

- Ms. Julie Turner, PEF: Julie.Turner@pgnmail.com
- Mr. Scott Osbourn, P.E., Golder Associates: sosbourn@golder.com
- Mr. Dave Meyer, PEF: Dave.Meyer@pgnmail.com
- Mr. Mike Halpin, Siting Office: Mike.Halpin@dep.state.fl.us
- Mr. James Bradner, P.E., CD: james.bradner@dep.state.fl.us
- EPA Region 4 (posted)
- Ms. Kathleen Forney, EPA Region 4: forney.kathleen@epa.gov

Clerk Stamp
FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

(Clerk)

(Date)

Friday, Barbara

To: Julie.Turner@pgnmail.com; 'sosbourn@golder.com'; Meyer, Dave; Halpin, Mike; Bradner, James; Forney.Kathleen@epamail.epa.gov

Cc: Holtom, Jonathan

Subject: DRAFT Air Construction Permit 0970014-013-AC(PSD-FL-268B)/Title V Permit Revision No.: 0970014-014-AV - Progress Energy Florida, Inc. - Intercession City Plant

Attachments: 0970014014SOBIntercessionCity.pdf; 0970013AC&014AVCombinedIntent.pdf; 0970014014DraftAVIntercession2.pdf; 0970013-013-AC-Draft2.pdf; 268BTEPD2.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <<http://www.adobe.com/products/acrobat/readstep.html> <<http://www.adobe.com/products/acrobat/readstep.html>> > .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

6/9/2008

Friday, Barbara

From: System Administrator
To: Halpin, Mike; Holtom, Jonathan
Sent: Monday, June 09, 2008 10:20 AM
Subject: Delivered:DRAFT Air Construction Permit 0970014-013-AC(PSD-FL-268B)/Title V Permit Revision No.: 0970014-014-AV - Progress Energy Florida, Inc. - Intercession City Plant

Your message

To: 'Julie.Turner@pgnmail.com'; 'sosbourn@golder.com'; 'Meyer, Dave'; Halpin, Mike; Bradner, James; 'Forney.Kathleen@epamail.epa.gov'
Cc: Holtom, Jonathan
Subject: DRAFT Air Construction Permit 0970014-013-AC(PSD-FL-268B)/Title V Permit Revision No.: 0970014-014-AV - Progress Energy Florida, Inc. - Intercession City Plant
Sent: 6/9/2008 10:20 AM

was delivered to the following recipient(s):

Halpin, Mike on 6/9/2008 10:20 AM
Holtom, Jonathan on 6/9/2008 10:20 AM

Friday, Barbara

From: System Administrator
To: Bradner, James
Sent: Monday, June 09, 2008 10:20 AM
Subject: Delivered:DRAFT Air Construction Permit 0970014-013-AC(PSD-FL-268B)/Title V Permit Revision No.: 0970014-014-AV - Progress Energy Florida, Inc. - Intercession City Plant

Your message

To: 'Julie.Turner@pgnmail.com'; 'sosbourn@golder.com'; 'Meyer, Dave'; Halpin, Mike; Bradner, James; 'Forney.Kathleen@epamail.epa.gov'
Cc: Holtom, Jonathan
Subject: DRAFT Air Construction Permit 0970014-013-AC(PSD-FL-268B)/Title V Permit Revision No.: 0970014-014-AV - Progress Energy Florida, Inc. - Intercession City Plant
Sent: 6/9/2008 10:20 AM

was delivered to the following recipient(s):

Bradner, James on 6/9/2008 10:20 AM

Friday, Barbara

From: Halpin, Mike
To: Friday, Barbara
Sent: Monday, June 09, 2008 10:20 AM
Subject: Read: DRAFT Air Construction Permit 0970014-013-AC(PSD-FL-268B)/Title V Permit Revision No.: 0970014-014-AV - Progress Energy Florida, Inc. - Intercession City Plant

Your message

To: 'Julie.Turner@pgnmail.com'; 'sosbourn@golder.com'; 'Meyer, Dave'; Halpin, Mike; Bradner, James; 'Forney.Kathleen@epamail.epa.gov'
Cc: Holtom, Jonathan
Subject: DRAFT Air Construction Permit 0970014-013-AC(PSD-FL-268B)/Title V Permit Revision No.: 0970014-014-AV - Progress Energy Florida, Inc. - Intercession City Plant
Sent: 6/9/2008 10:20 AM

was read on 6/9/2008 10:20 AM.

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive02.rtp.epa.gov]
Sent: Monday, June 09, 2008 10:21 AM
To: Friday, Barbara
Subject: Successful Mail Delivery Report

Attachments: Delivery report; Message Headers



Delivery report.txt
(501 B)



Message
Headers.txt (2 KB)

This is the mail system at host mseive02.rtp.epa.gov.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<Forney.Kathleen@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250
OK, sent 484D3C2C_32330_1734_1 2E7C6214002

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@sophos.golder.com]
Sent: Monday, June 09, 2008 10:21 AM
To: Friday, Barbara
Subject: Successful Mail Delivery Report

Attachments: Delivery report; Message Headers



Delivery report.txt
(474 B)



Message
Headers.txt (2 KB)

This is the mail system at host sophos.golder.com.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<sosbourn@golder.com>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent
484D3C2E_22240_40_1 5279210AB269

Friday, Barbara

From: Osbourn, Scott [Scott_Osbourn@golder.com]
To: undisclosed-recipients
Sent: Monday, June 09, 2008 10:23 AM
Subject: Read: DRAFT Air Construction Permit 0970014-013-AC(PSD-FL-268B)/Title V Permit
Revision No.: 0970014-014-AV - Progress Energy Florida, Inc. - Intercession City Plant

Your message

To: Scott_Osbourn@golder.com
Subject:

was read on 6/9/2008 10:23 AM.

Friday, Barbara

From: Halpin, Mike
Sent: Monday, June 09, 2008 11:44 AM
To: Friday, Barbara
Subject: Delivered: DRAFT Air Construction Permit 0970014-013-AC(PSD-FL-268B)/Title V Permit
Revision No.: 0970014-014-AV - Progress Energy Florida, Inc. - Intercession City Plant

Attachments: ATT82690.txt



ATT82690.txt (153
B)

Your message was delivered to the recipient.

Sent via BlackBerry

<><

Friday, Barbara

From: Turner, Julie [julie.turner@pgnmail.com]
Sent: Monday, June 09, 2008 3:17 PM
To: Friday, Barbara
Subject: RE: DRAFT Air Construction Permit 0970014-013-AC(PSD-FL-268B)/Title V Permit Revision No.: 0970014-014-AV - Progress Energy Florida, Inc. - Intercession City Plant

received

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Monday, June 09, 2008 10:20 AM
To: Turner, Julie; sosbourn@golder.com; Meyer, Dave; Halpin, Mike; Bradner, James; Forney.Kathleen@epamail.epa.gov
Cc: Holtom, Jonathan
Subject: DRAFT Air Construction Permit 0970014-013-AC(PSD-FL-268B)/Title V Permit Revision No.: 0970014-014-AV - Progress Energy Florida, Inc. - Intercession City Plant

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

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<<http://www.adobe.com/products/acrobat/readstep.html>
<<http://www.adobe.com/products/acrobat/readstep.html>> > .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey <<http://survey.dep.state.fl.us/?refemail=Barbara.Friday@dep.state.fl.us>> . Thank you in advance for completing the survey.

Friday, Barbara

From: Meyer, Dave [Dave.Meyer@pgnmail.com]
To: undisclosed-recipients
Sent: Monday, June 09, 2008 3:26 PM
Subject: Read: DRAFT Air Construction Permit 0970014-013-AC(PSD-FL-268B)/Title V Permit
Revision No.: 0970014-014-AV - Progress Energy Florida, Inc. - Intercession City Plant

Your message

To: Dave.Meyer@pgnmail.com
Subject:

was read on 6/9/2008 3:26 PM.

Friday, Barbara

From: Bradner, James
To: Friday, Barbara
Sent: Thursday, June 12, 2008 10:59 AM
Subject: Read: DRAFT Air Construction Permit 0970014-013-AC(PSD-FL-268B)/Title V Permit Revision No.: 0970014-014-AV - Progress Energy Florida, Inc. - Intercession City Plant

Your message

To: 'Julie.Turner@pgnmail.com'; 'sosbourn@golder.com'; 'Meyer, Dave'; Halpin, Mike; Bradner, James; 'Forney.Kathleen@epamail.epa.gov'
Cc: Holton, Jonathan
Subject: DRAFT Air Construction Permit 0970014-013-AC(PSD-FL-268B)/Title V Permit Revision No.: 0970014-014-AV - Progress Energy Florida, Inc. - Intercession City Plant
Sent: 6/9/2008 10:20 AM

was read on 6/12/2008 10:59 AM.