Progress Energy

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BUREAU OF AIR REGULATION

November 6, 2009

UPS OVERNIGHT TRACKING NO: **1Z 363 196 22 1039 8272**

Mr. Jonathan Holtom, P.E.
Title V Program Administrator
Division of Air Resource Management
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 23
Tallahassee, Florida 32301-2973

RE: Comments on Draft/Proposed Title V Air Operation Renewal Permit
Project No: 1010017-012-AV
Florida Power Corporation d/b/a Progress Energy Florida, Inc.
Anclote Power Plant
Facility ID: 1010017

Dear Mr. Holtom:

Please find below comments on the draft Title V Air Operation Renewal/Revision Permit for the Florida Power Corporation d/b/a Progress Energy Florida, Inc. (PEF) Anclote Power Plant. Any requested changes are shown in red with ~~strikethrough~~ for deletion and underline for insertion.

Draft Title V Air Operation Permit Revision & Renewal: 1010017-012-AV

1. *Requested changes throughout the Draft Permit:* PEF requests the following changes/corrections throughout the permit – wherever the location or address of the facility is identified as 'Baileys' please change the spelling to 'Baillies'; i.e., ~~Baileys~~ Baillies

2. *Section III, Subsection A, Specific Condition A.21- Continuous Monitoring Systems*: The requested change corrects a typographical error in this condition. The correction changes the word "Optimal" to "Optional"; therefore, the requested change is as follows:

   A.21. Continuous Monitoring Systems. The permittee shall install, calibrate, maintain, and operate continuous monitoring systems to measure and record the nitrogen oxides (NOx) emissions, sulfur dioxide (SO_2) emissions, and opacity from Unit Nos. 1 and 2. The continuous emission monitoring systems must comply with the certification and quality assurance, and other applicable requirements from 40 CFR 75. For SO_2 emissions monitoring, the permittee elected to demonstrate

Progress Energy Florida, Inc.
P.O. Box 14042
St. Petersburg, FL 33733

compliance by using the procedures of Appendix D in 40 CFR 75, "~~Optimal~~ Optional SO_2 Emissions Data Protocol for Gas-Fired and Oil-Fired Units", which are based on fuel monitoring, sampling, and analyses. Periods of startup, shutdown, malfunction, and fuel switching shall be monitored, recorded, and reported as excess emissions when emission levels exceed the standards following the format of 40 CFR 60.7 (1998 version).

3. *Section III, Subsection A, Specific Condition A.33 – SO_2 Emissions Data Protocol:* The requested change corrects a typographical error in this condition. The correction changes the word "Optimal" to "Optional"; therefore, the requested change is as follows:

A.33. SO_2 Emissions Data Protocol. Compliance with the liquid fuel sulfur limit shall be verified by fuel analysis and the monitoring provisions of Appendix D of 40 CFR 75, "~~Optimal~~ Optional SO_2 Emissions Data Protocol for Gas-Fired and Oil-Fired Units." In cases where No. 6 fuel oil is received with a sulfur content exceeding 1.5% by weight, and blending is required to obtain a fuel mix equal to the applicable percent sulfur limit, an analysis of a fuel sample representative of fuel from the fuel storage tanks shall be performed prior to firing oil at the plant. Reports of percent sulfur content of these analyses shall be maintained at the power plant facility.

4. *Section III, Subsection A, Specific Condition A.38 – Records:* The requested change is to incorporate approved analytical methods other than those specifically identified in this condition. The requested language for insertion expanding the number of acceptable methods for fuel sulfur analysis has been approved by the Bureau of Air Regulation - Permitting Section for other Title V Air Operation Permits. The requested change is as follows:

A.38. Records. The owner or operator shall maintain records of the fuel oil heating value, density or specific gravity, and the percent sulfur content. Fuel sulfur content, percent by weight, for liquid fuels shall be determined by either ASTM D2622-94, ASTM D4294-90 (95), ASTM D1552-95, ASTM D1266-91, or both ASTM D4057-88, and ASTM D129-95 (or latest editions) to analyze a representative sample of the fuel oil. In addition, any ASTM method (or later editions) referenced in Rule 62-297.440(1) F.A.C. is acceptable.

5. *Section III, Subsection B – Facility Description:* Please add a definition for the word "virgin" that is employed to describe the No. 2 fuel oil. However, if "virgin" is synonymous with "new", please remove the redundant word "virgin".

This emissions unit consists of three relocatable Caterpillar Model 3508-DITA 820kilowatt (kW) diesel generators. These relocatable diesel fired engine driven generator(s) shall have a maximum (combined) heat input of 25.74 MMBtu/hour while being fueled by 186.3 gallons per hour (62.1 gph per generator) of new/virgin No. 2 fuel oil with a maximum (combined) rating of 2.460 megawatt (MW) (820 kilowatt {kW} per generator). Each engine's maximum heat input is 8.58 MMBtu/hour. Air pollutant emissions from the generator(s) are uncontrolled. Each engine generator has its own stack. The individual stack parameters are identical: height, 5 feet; diameter, 1 foot; exit temperature, 1,004 degrees F; and, actual stack gas flow rate, 7,283 acfm.

6. *Section III, Subsection b, Specific Condition B.6 – Methods of Operation:* Please add a definition for the word "virgin" that is employed to describe the No. 2 fuel oil. However, if "virgin" is synonymous with "new", please remove the redundant word "virgin".

   B.6. Methods of Operation - Fuels. Only new/virgin No. 2 fuel oil with a maximum sulfur content of 0.5%, by weight, shall be burned in these units.

7. *Section III, Subsection b, Specific Condition B.8 – Sulfur Dioxide - Sulfur Content:* Please add a definition for the word "virgin" that is employed to describe the No. 2 fuel oil. However, if "virgin" is synonymous with "new", please remove the redundant word "virgin".

   B.8. Sulfur Dioxide - Sulfur Content. The sulfur content of the new/virgin No. 2 fuel oil shall not exceed 0.5 percent, by weight.

8. *Section III, Subsection b, Specific Condition B.15 – Annual Compliance Test:* As conveyed in a number of conversations with the Division of Air Resource Management, Bureau of Air Regulation, Permitting Section, PEF does not own these relocatable generators and only plans to relocate these generators on-site in the event of an emergency. These units have not been relocated to the Anclote site within the last 15 years and likely have never been relocated to the site. Since PEF does not own these relocatable generators and is required to conduct a visible emissions (VE) test if relocated to the Anclote site, PEF requests this condition be removed. To accomplish any required VE testing Condition **B.19** would ensure the units were tested in the event the units are relocated to the Anclote site. Therefore, the requested change is as follows:

~~**B.15.** Annual Compliance Test. Unless otherwise specified by this permit, during each federal fiscal year (October 1st to September 30th), each diesel generator shall be tested to demonstrate compliance with the emission limitations and standards for VE.~~

9. *Section III, Subsection b, Specific Condition B.17 – Compliance Test Prior To Renewal:* As conveyed in a number of conversations with the Division of Air Resource Management, Bureau of Air Regulation, Permitting Section, PEF does not own these relocatable generators and only plans to relocate these generators on-site in the event of an emergency. These units have not been relocated to the Anclote site within the last 15 years and likely have never been relocated to the site. Since PEF does not own these relocatable generators and is required to conduct a visible emissions (VE) test if relocated to the Anclote site, PEF believes additional language to clarify this condition to cover the scenario in which these units are not brought on-site during the 5-year permit cycle. Therefore, the requested clarification is as follows:

B.17. Compliance Test Prior To Renewal. Prior to permit renewal, each diesel generator shall be tested to demonstrate compliance with the emission limitations and standards for VE. If the diesel generators are not brought on-site during the 5-year permit cycle, a VE is not required to be conducted and submitted as part of the permit renewal application process.

10. *Section III, Subsection b, Specific Condition B.18 – Common Testing Requirements:* Please clarify that PEF is only required to comply with Appendix TR as it relates to these units if and when the units are relocated to the Anclote site. Therefore, the requested clarification is as follows:

B.18. Common Testing Requirements. Unless otherwise specified and only if the units are relocated to the Anclote site, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.

11. *Section III, Subsection b, Specific Condition B.19 – Testing after Relocation:* Please clarify that the units are only required to be tested by PEF if and when the units are relocated to the Anclote site. Therefore, the requested clarification is as follows:

B.19. Testing after Relocation. After each relocation to the Anclote site, each diesel generator shall be tested within 30 days of startup for opacity and the fuel shall be analyzed for the sulfur content to demonstrate compliance with the permit limits in this section.

12. *Appendix I – List of insignificant Emission Units and/or Activities:* Please add the No. 6 Fuel Oil Storage Tanks to Appendix I of the permit. These tanks have been demonstrated to be an insignificant source of VOC emissions employing the EPA TANKS Program. Analyses using this program are enclosed and include the required signature and seal of a professional engineer (P.E.) registered in the State of Florida.

13. *Section I, Subsection B – Summary of Emissions Units:* Please remove Emissions Unit (E.U.) ID No. -004 from the Unregulated Emissions Units Section from the table and place these tanks in Appendix I of the permit. These tanks have been demonstrated to be an insignificant source of VOC emissions employing the EPA TANKS Program. Analyses using this program are enclosed and include the required signature and seal of a professional engineer (P.E.) registered in the State of Florida. Therefore the requested change is as follows:

Subsection B. Summary of Emissions Units.

E.U. ID No.	Brief Description
Regulated Emissions Units	
	Fossil Fuel Fired Steam Generator Units
-001	Fossil Fuel Fired Steam Generator Unit No. 1
-002	Fossil Fuel Fired Steam Generator Unit No. 2
-007	Two, 12-cell Mechanical Draft Helper Cooling Towers
-008	Relocatable Diesel Fired Engine Driven Generator(s)
Unregulated Emissions Units and/or Activities	
-003	Surface Coating Operations
~~-004~~	~~Fuel Storage Tanks~~
-005	Emergency Diesel Generator
-006	Diesel Air Compressor

14. *Appendix U – List of Unregulated Emissions Units and/or Activities:* Please remove Emission Unit (E.U.) ID No. -004 from the table included in Appendix U and place the No. 6 Fuel Oil Storage Tanks in Appendix I of the permit. These tanks have been demonstrated to be an insignificant source of VOC emissions employing the EPA TANKS Program. Analyses using this program are enclosed and include the required signature and seal of a professional engineer (P.E.) registered in the State of Florida. Therefore the requested change is as follows:

E.U. ID No.	Brief Description of Emissions Units and/or Activity				
-006	Diesel Air Compressor. The following engine(s) is/are considered to be *'existing'* units for purposes of *40 CFR 60 Subpart IIII also known as (a.k.a.) NSPS "4-I's" or "CI-ICE"* {CI engines pre-May 2006 are exempt from the NSPS}:				
	Identification	**Model year/construction (manufacturer) date**	**Type**	**Horsepower (HP)**	
	Diesel Air Compressor	Pre-1999	Compression Ignition (CI)	1200	
	There is no air pollution control equipment associated with this/ese unit(s).				
~~-004~~	~~Fuel storage tanks~~				
-005	Emergency Diesel Generator The following engine(s) is/are considered to be *'existing'* units for purposes of *40 CFR 60 Subpart IIII also known as (a.k.a.) NSPS "4-I's" or "CI-ICE"* {CI engines pre-May 2006 are exempt from the NSPS}:				
	Identification	**Model year/construction (manufacturer) date**	**Type**	**Horsepower (HP)**	
	Emergency Diesel Generator	2003	Compression Ignition (CI)	1500	
	There is no air pollution control equipment associated with this/ese unit(s).				
-003	Surface coating operations				

Thank you for your assistance and if you have any questions, you may contact me by e-mail at Chris.Bradley@pgnmail.com or via telephone at (727) 820-5962.

Sincerely,

Chris Bradley

Chris Bradley
Sr. Environmental Specialist
Progress Energy Florida, Inc.

Attachments

cc: Mr. Scott Sheplak, Permitting Engineer – DEP/DARM (via e-mail)
Mr. Reginald Anderson, Plant Manager – AF39 (via e-mail)

APPLICATION INFORMATION

Application Responsible Official Certification

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

1. Application Responsible Official Name:
   Reginald Anderson, Plant Manager

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

3. Application Responsible Official Mailing Address...
   Organization/Firm: **Florida Power Corporation dba Progress Energy Florida, Inc.**
   Street Address: **1729 Baillies Bluff Road**
   City: **Holiday** State: **Florida** Zip Code: **34691-9753**

4. Application Responsible Official Telephone Numbers...
   Telephone: (**727**) **943-3006** ext. Fax: (**727**) **943-3050**

5. Application Responsible Official E-mail Address: **Reginald.Anderson@pgnmail.com**

6. Application Responsible Official Certification:

   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.

Signature 11/5/09 Date

ANCLOTE POWER PLANT
FUEL OIL STORAGE TANK EMISSION ESTIMATES

Appendix U (List of Unregulated Emission Units and/or Activities) of the draft/proposed Title V permit for the Anclote Power Plant (Permit No. 1010017-012-AV) includes "fuel oil storage tanks" (EU ID -004).

The Anclote Power Plant includes two large fixed roof storage tanks (Tank A-1 and A-2) that are used to store No. 6 fuel oil. Each tank is 40 feet high with a 225 foot diameter. Nominal storage capacity of each No. 6 fuel oil storage tank is 10.7 million gallons.

The Anclote Power Plant also includes two small tanks that store No. 2 fuel oil (Tanks LOT-1 and LOT-2). These tanks have a height and diameter of 40 and 30 feet, respectively. Nominal storage capacity of each No. 2 fuel oil storage tank is 211,000 gallons.

Potential emissions of volatile organic compounds (VOCs) were estimated using maximum potential annual No. 6 and No. 2 fuel oil throughput rates and the EPA TANKS program (Version 4.0.9d). Due to the low volatility of No. 6 and No. 2 fuel oils, storage tank VOC emissions are low. TANKS program annual VOC emission estimates for Tanks A-1 and A-2 are 0.083 and 0.091 tons per year, respectively. The TANKS program estimated annual VOC emission rate for Tanks LOT-1 and LOT-2 is 1.2 tpy for each tank. The estimates for the No. 2 fuel oil storage tanks significantly over-estimate actual emissions since maximum potential throughput rates were used; actual throughput rates are approximately 1,000 times lower. TANKS Emissions Reports for Tanks A-1, A-2, LOT-1, and LOT-2 are attached.

Tanks A-1, A-2, LOT-1, and LOT-2 are not subject to any unit-specific requirements and have potential emissions below the thresholds stated in Department Rule 62-213.430(6), F.A.C. The Anclote Power Plant No. 6 and No. 2 fuel oil storage tanks therefore qualify as "insignificant emission units".

Thomas W. Davis
FL PE 36777

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: **Thomas W. Davis**
   Registration Number: **36777**
2. Professional Engineer Mailing Address...
   Organization/Firm: **Environmental Consulting & Technology, Inc.**
   Street Address: **3701 Northwest 98th Street**
   City: **Gainesville** State: **Florida** Zip Code: **32606-5004**
3. Professional Engineer Telephone Numbers...
   Telephone: **(352) 332 – 0444** ext. Fax: **(352) 332 - 6722**
4. Professional Engineer Email Address: **tdavis@ectinc.com**
5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☒, 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.

(4) If the purpose of this application is to obtain an air construction permit (check here ☐, 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 ☐, 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.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here 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.

Signature

11/5/09
Date

(seal)

*Attach any exception to certification statement.

Certification for PEF Anclote Power Plant Fuel Oil Storage Tank Emission Estimates

TANKS 4.0.9d
Emissions Report - Summary Format
Tank Indentification and Physical Characteristics

Identification

User Identification:	PEF Anclote Fuel Oil Tank No. A-1
City:	Holiday, Pasco County
State:	Florida
Company:	Progress Energy Florida
Type of Tank:	Vertical Fixed Roof Tank
Description:	10.7 Million Gallon No. 6 Fuel Oil Storage Tank

Tank Dimensions

Shell Height (ft):	40.00
Diameter (ft):	225.00
Liquid Height (ft) :	36.00
Avg. Liquid Height (ft):	27.00
Volume (gallons):	10,707,562.42
Turnovers:	23.21
Net Throughput(gal/yr):	248,483,997.86
Is Tank Heated (y/n):	N

Paint Characteristics

Shell Color/Shade:	Gray/Medium
Shell Condition	Good
Roof Color/Shade:	Gray/Medium
Roof Condition:	Good

Roof Characteristics

Type:	Cone
Height (ft)	0.00
Slope (ft/ft) (Cone Roof)	0.06

Breather Vent Settings

Vacuum Settings (psig):	-0.02
Pressure Settings (psig)	0.02

Meterological Data used in Emissions Calculations: Tampa, Florida (Avg Atmospheric Pressure = 14.76 psia)

TANKS 4.0.9d
Emissions Report - Summary Format
Liquid Contents of Storage Tank

PEF Anclote Fuel Oil Tank No. A-1 - Vertical Fixed Roof Tank
Holiday, Pasco County, Florida

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F) Avg.	Min.	Max.	Liquid Bulk Temp (deg F)	Vapor Pressure (psia) Avg.	Min.	Max.	Vapor Mol. Weight.	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
Residual oil no. 6	All	82.31	71.62	92.99	75.39	0.0001	0.0001	0.0001	190.0000			387.00	Option 1: VP70 = .00006 VP80 = .00009

TANKS 4.0.9d
Emissions Report - Summary Format
Individual Tank Emission Totals

Emissions Report for: Annual

PEF Anclote Fuel Oil Tank No. A-1 - Vertical Fixed Roof Tank
Holiday, Pasco County, Florida

	Losses(lbs)		
Components	Working Loss	Breathing Loss	Total Emissions
Residual oil no. 6	111.54	54.96	166.50

TANKS 4.0.9d
Emissions Report - Summary Format
Tank Indentification and Physical Characteristics

Identification

User Identification:	PEF Anclote Fuel Oil Tank No. A-2
City:	Holiday, Pasco County
State:	Florida
Company:	Progress Energy Florida
Type of Tank:	Vertical Fixed Roof Tank
Description:	10.7 Million Gallon No. 6 Fuel Oil Storage Tank

Tank Dimensions

Shell Height (ft):	40.00
Diameter (ft):	224.50
Liquid Height (ft) :	36.00
Avg. Liquid Height (ft):	27.00
Volume (gallons):	10,707,562.42
Turnovers:	26.45
Net Throughput(gal/yr):	283,240,000.00
Is Tank Heated (y/n):	N

Paint Characteristics

Shell Color/Shade:	Gray/Medium
Shell Condition	Good
Roof Color/Shade:	Gray/Medium
Roof Condition:	Good

Roof Characteristics

Type:	Cone
Height (ft)	0.00
Slope (ft/ft) (Cone Roof)	0.06

Breather Vent Settings

Vacuum Settings (psig):	-0.02
Pressure Settings (psig)	0.02

Meterological Data used in Emissions Calculations: Tampa, Florida (Avg Atmospheric Pressure = 14.76 psia)

TANKS 4.0.9d
Emissions Report - Summary Format
Liquid Contents of Storage Tank

PEF Anclote Fuel Oil Tank No. A-2 - Vertical Fixed Roof Tank
Holiday, Pasco County, Florida

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F) Avg.	Min.	Max.	Liquid Bulk Temp (deg F)	Vapor Pressure (psia) Avg.	Min.	Max.	Vapor Mol. Weight.	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
Residual oil no. 6	All	82.31	71.62	92.99	75.39	0.0001	0.0001	0.0001	190.0000			387.00	Option 1: VP70 = .00006 VP80 = .00009

TANKS 4.0.9d
Emissions Report - Summary Format
Individual Tank Emission Totals

Emissions Report for: Annual

PEF Anclote Fuel Oil Tank No. A-2 - Vertical Fixed Roof Tank
Holiday, Pasco County, Florida

	Losses(lbs)		
Components	Working Loss	Breathing Loss	Total Emissions
Residual oil no. 6	127.14	54.70	181.84

TANKS 4.0.9d
Emissions Report - Summary Format
Tank Indentification and Physical Characteristics

Identification

User Identification:	PEF Anclote Fuel Oil Storage Tank LOT-1
City:	Holiday, Pasco County
State:	Florida
Company:	Progress Energy Florida
Type of Tank:	Vertical Fixed Roof Tank
Description:	211,000 Gallon No. 2 Fuel Oil Storage Tank

Tank Dimensions

Shell Height (ft):		40.00
Diameter (ft):		30.00
Liquid Height (ft) :		36.00
Avg. Liquid Height (ft):		27.00
Volume (gallons):		190,356.67
Turnovers:		1,757.21
Net Throughput(gal/yr):		334,497,000.00
Is Tank Heated (y/n):	N	

Paint Characteristics

Shell Color/Shade:	Gray/Light
Shell Condition	Good
Roof Color/Shade:	Gray/Light
Roof Condition:	Good

Roof Characteristics

Type:	Dome	
Height (ft)		0.00
Radius (ft) (Dome Roof)		30.00

Breather Vent Settings

Vacuum Settings (psig):	-0.02
Pressure Settings (psig)	0.02

Meterological Data used in Emissions Calculations: Tampa, Florida (Avg Atmospheric Pressure = 14.76 psia)

TANKS 4.0.9d
Emissions Report - Summary Format
Liquid Contents of Storage Tank

PEF Anclote Fuel Oil Storage Tank LOT-1 - Vertical Fixed Roof Tank
Holiday, Pasco County, Florida

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F) Avg.	Min.	Max.	Liquid Bulk Temp (deg F)	Vapor Pressure (psia) Avg.	Min.	Max.	Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
Distillate fuel oil no. 2	All	80.13	70.96	89.31	74.55	0.0121	0.0093	0.0157	130.0000			188.00	Option 1: VP70 = .009 VP80 = .012

TANKS 4.0.9d
Emissions Report - Summary Format
Individual Tank Emission Totals

Emissions Report for: Annual

PEF Anclote Fuel Oil Storage Tank LOT-1 - Vertical Fixed Roof Tank
Holiday, Pasco County, Florida

	Losses(lbs)		
Components	Working Loss	Breathing Loss	Total Emissions
Distillate fuel oil no. 2	2,292.92	68.41	2,361.33

TANKS 4.0.9d
Emissions Report - Summary Format
Tank Indentification and Physical Characteristics

Identification

User Identification:	PEF Anclote Fuel Oil Storage Tank LOT-2
City:	Holiday, Pasco County
State:	Florida
Company:	Progress Energy Florida
Type of Tank:	Vertical Fixed Roof Tank
Description:	211,000 Gallon No. 2 Fuel Oil Storage Tank

Tank Dimensions

Shell Height (ft):	40.00
Diameter (ft):	30.00
Liquid Height (ft) :	36.00
Avg. Liquid Height (ft):	27.00
Volume (gallons):	190,356.67
Turnovers:	1,716.86
Net Throughput(gal/yr):	326,815,000.00
Is Tank Heated (y/n):	N

Paint Characteristics

Shell Color/Shade:	Gray/Light
Shell Condition	Good
Roof Color/Shade:	Gray/Light
Roof Condition:	Good

Roof Characteristics

Type:	Dome
Height (ft)	0.00
Radius (ft) (Dome Roof)	30.00

Breather Vent Settings

Vacuum Settings (psig):	-0.02
Pressure Settings (psig)	0.02

Meterological Data used in Emissions Calculations: Tampa, Florida (Avg Atmospheric Pressure = 14.76 psia)

TANKS 4.0.9d
Emissions Report - Summary Format
Liquid Contents of Storage Tank

PEF Anclote Fuel Oil Storage Tank LOT-2 - Vertical Fixed Roof Tank
Holiday, Pasco County, Florida

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F) Avg.	Min.	Max.	Liquid Bulk Temp (deg F)	Vapor Pressure (psia) Avg.	Min.	Max.	Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
Distillate fuel oil no. 2	All	80.13	70.96	89.31	74.55	0.0121	0.0093	0.0157	130.0000			188.00	Option 1: VP70 = .009 VP80 = .012

TANKS 4.0.9d
Emissions Report - Summary Format
Individual Tank Emission Totals

Emissions Report for: Annual

PEF Anclote Fuel Oil Storage Tank LOT-2 - Vertical Fixed Roof Tank
Holiday, Pasco County, Florida

	Losses(lbs)		
Components	Working Loss	Breathing Loss	Total Emissions
Distillate fuel oil no. 2	2,245.16	68.41	2,313.57

Progress Energy

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BUREAU OF AIR REGULATION

August 25, 2009

UPS Tracking No: **1Z 363 196 22 1039 8665**

Mr. Scott Sheplak, P.E.
Permitting Engineer – Title V Section
Bureau of Air Regulation
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

Re: Response to Request for Additional Information (RAI)
Title V Air Operation Permit Renewal Application
File No: 1010017-012-AV
Anclote Power Plant
Facility ID No: 1010017

Dear Mr. Sheplak:

Thank you for your letter to Mr. Jackson dated June 30, 2009 regarding the submission of additional information for the Title V Air Operation Renewal Permit application for the Florida Power Corporation d/b/a Progress Energy Florida, Inc. ("PEF") Anclote Power Plant. The following is PEF's response to this request:

- Item No. 1 – Several large and mid-sized engines are permanently located at the Anclote Power Plant. The identity of these engines and associated information are included in the enclosed table and identify two large (2) and two (2) mid-sized compression ignition (i.e., diesel-fired) engines. The large engines consist of a 1440 HP Caterpillar emergency generator manufactured in 1984 and a 1200 HP Cummins powered air compressor manufactured before 1999. The mid-sized engines identified are a 525 HP Cummins emergency fire pump manufactured in 1972 and a portable "cherry picker" powered with a 215 HP Cummins GR300XL-1 manufactured in 2005. Based on the dates of manufacture, these engines are not subject to either 40 CFR Part 60, Subpart IIII or Subpart JJJJ. In addition, based on the applicability of 40 CFR Part 63, Subpart ZZZ and the exemptions listed in Part 63.6590(b)(3), none of these engines are subject to 40 CFR Part 63 Subpart ZZZZ. Furthermore, there are no other engines over 200 brake horsepower permanently located on the Anclote site; however, this table also includes several smaller miscellaneous spark-ignition (SI) or compression ignition (CI) engines.

Progress Energy Florida, Inc.
P.O. Box 14042
St. Petersburg, FL 33733

- Item No. 2 – This is a request to complete and submit the current Acid Rain Part Application Form (Effective date: 03-16-2008). The appropriate Acid Rain Forms have been completed, signed by the Alternate Designated Representative (DR) and enclosed for submission to the Department.

Also included with this response to the RAI is the Responsible Official (RO) Certification. However, the Professional Engineer Certification has been excluded because PEF believes the submitted information is not of an engineering nature.

If you require further information or clarification, or if you have any questions, please contact me at (727) 820-5962 or by e-mail at Chris.Bradley@pgnmail.com. Thank you for your attention to this matter.

Best Regards,

Chris Bradley

Chris Bradley
Senior Environmental Specialist
Progress Energy Florida, Inc.

Enclosures:

cc: Mr. Jonathon Holtom, P.E., DEP TV Program Admin.
Mr. Reggie Anderson, Plant Manager, AF 39

APPLICATION INFORMATION

Application Responsible Official Certification

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

1. Application Responsible Official Name:
   Reginald Anderson, Plant Manager

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

3. Application Responsible Official Mailing Address...
   Organization/Firm: **Florida Power Corporation dba Progress Energy Florida, Inc.**
   Street Address: **1729 Baillies Bluff Road**
   City: **Holiday** State: **Florida** Zip Code: **34691-9753**

4. Application Responsible Official Telephone Numbers...
   Telephone: **(727) 943-3006** ext. Fax: **(727) 943-3050**

5. Application Responsible Official E-mail Address: **Reginald.Anderson@pgnmail.com**

6. Application Responsible Official Certification:

   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.

Signature Date 9/21/09

ANCLOTE POWER PLANT

List of On-Site Engines

Compression Ignition and Spark Ignition

Facility ID for Engine	Year of Manufacture	Engine Make & Model	Engine Horsepower	Engine Type	Fuel Type	Purpose of the engine (e.g., emergency generator, water pump, etc.)
				CI (Compression Ignition) or SI (Spark Ignition)	(gasoline, natural gas, propane,	
Emergency Diesel Generator	1984	Caterpiller SR4B	1440	CI (Compression Ignition)	Diesel	Emergency Generator
Diesel Fire Pump	1972	Cummins 618-74	525	CI (Compression Ignition)	Diesel	Fire Pump
Diesel Air Compressor	Pre-1999	Cummins NTA855C360	1200	CI (Compression Ignition)	Diesel	Ingersoll Rand/Cummins Engine (May be removed from site in 2010; currently in a non-operating condition.)
Cherry Picker	2005	Cummins GR300XL-1	215	CI (Compression Ignition)	Diesel	
Diesel Backhoe	Pre-1999	John Deere TO310 SE	31	CI (Compression Ignition)	Diesel	Backhoe
Diesel Welder	1994	Duetz Puggerini MD151	16	CI (Compression Ignition)	Diesel	Portable Welder - Not operatoional

Acid Rain Part Application

For more information, see instructions and refer to 40 CFR 72.30, 72.31, and 74; and Chapter 62-214, F.A.C.

This submission is: ☐ New ☐ Revised ☒ Renewal

STEP 1

Identify the source by plant name, state, and ORIS or plant code.

Anclote Power Plant	FL	8048
Plant name	State	ORIS/Plant Code

STEP 2
Enter the unit ID# for every Acid Rain unit at the Acid Rain source in column "a."

If unit a SO_2 Opt-in unit, enter "yes" in column "b".

For new units or SO_2 Opt-in units, enter the requested information in columns "d" and "e."

a	b	c	d	e
Unit ID#	SO_2 Opt-in Unit? (Yes or No)	Unit will hold allowances in accordance with 40 CFR 72.9(c)(1)	New or SO_2 Opt-in Units Commence Operation Date	New or SO_2 Opt-in Units Monitor Certification Deadline
1		Yes		
2		Yes		

Anclote Power Plant

Plant Name (from STEP 1)

STEP 3

Read the standard requirements.

Acid Rain Part Requirements.

(1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
(i) Submit a complete Acid Rain Part application (including a compliance plan) under 40 CFR Part 72 and Rules 62-214.320 and 330, F.A.C., in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
(ii) Submit in a timely manner any supplemental information that the DEP determines is necessary in order to review an Acid Rain Part application and issue or deny an Acid Rain Part;
(2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
(i) Operate the unit in compliance with a complete Acid Rain Part application or a superseding Acid Rain Part issued by the DEP; and
(ii) Have an Acid Rain Part.

Monitoring Requirements.

(1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR Part 75, and Rule 62-214.420, F.A.C.
(2) The emissions measurements recorded and reported in accordance with 40 CFR Part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
(3) The requirements of 40 CFR Part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.
(4) For applications including a SO_2 Opt-in unit, a monitoring plan for each SO_2 Opt-in unit must be submitted with this application pursuant to 40 CFR 74.14(a). For renewal applications for SO_2 Opt-in units include an updated monitoring plan if applicable under 40 CFR 75.53(b).

Sulfur Dioxide Requirements.

(1) The owners and operators of each source and each Acid Rain unit at the source shall:
(i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another Acid Rain unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
(ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
(2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
(3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
(i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
(ii) Starting on the later of January 1, 2000, or the deadline for monitor certification under 40 CFR Part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
(6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain Part application, the Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

(1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR Part 77.
(2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
(i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR Part 77; and
(ii) Comply with the terms of an approved offset plan, as required by 40 CFR Part 77.

Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the EPA or the DEP:
(i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
(ii) All emissions monitoring information, in accordance with 40 CFR Part 75, provided that to the extent that 40 CFR Part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply;
(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,

Anclote Power Plant
Plant Name (from STEP 1)

STEP 3, Continued.

Recordkeeping and Reporting Requirements (cont)

(iv) Copies of all documents used to complete an Acid Rain Part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR Part 72, Subpart I, and 40 CFR Part 75.

Liability.

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain Part application, an Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
(4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.
(5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.
(6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_X averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR Part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
(7) Each violation of a provision of 40 CFR Parts 72, 73, 74, 75, 76, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities.

No provision of the Acid Rain Program, an Acid Rain Part application, an Acid Rain Part, or an exemption under 40 CFR 72.7or 72.8 shall be construed as:
(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
(2) Limiting the number of allowances a unit can hold; *provided,* that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
(3) Requiring a change of any kind in any state law regulating electric utility rates and charges, affecting any state law regarding such state regulation, or limiting such state regulation, including any prudence review requirements under such state law;
(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
(5) Interfering with or impairing any program for competitive bidding for power supply in a state in which such program is established.

STEP 4
For SO_2 Opt-in units only.

In column "f" enter the unit ID# for every SO_2 Opt-in unit identified in column "a" of STEP 2.

For column "g" describe the combustion unit and attach information and diagrams on the combustion unit's configuration.

In column "h" enter the hours.

f	g	h (not required for renewal application)
Unit ID#	Description of the combustion unit	Number of hours unit operated in the six *months preceding initial* application

Anclote Power Plant
Plant Name (from STEP 1)

STEP 5

For SO_2 Opt-in units only.

(Not required for SO_2 Opt-in renewal applications.)

In column "i" enter the unit ID# for every SO_2 Opt-in unit identified in column "a" (and in column "f").

For columns "j" through "n," enter the information required under 40 CFR 74.20-74.25 and attach all supporting documentation required by 40 CFR 74.20-74.25.

i	j	k	l	m	n
Unit ID#	Baseline or Alternative Baseline under 40 CFR 74.20 (mmBtu)	Actual SO_2 Emissions Rate under 40 CFR 74.22 (lbs/mmBtu)	Allowable 1985 SO_2 Emissions Rate under 40 CFR 74.23 (lbs/mmBtu)	Current Allowable SO_2 Emissions Rate under 40 CFR 74.24 (lbs/mmBtu)	Current Promulgated SO_2 Emissions Rate under 40 CFR 74.25 (lbs/mmBtu)

STEP 6

For SO_2 Opt-in units only.

Attach additional requirements, certify and sign.

A. If the combustion source seeks to qualify for a transfer of allowances from the replacement of thermal energy, a thermal energy plan as provided in 40 CFR 74.47 for combustion sources must be attached.
B. A statement whether the combustion unit was previously an affected unit under 40 CFR 74.
C. A statement that the combustion unit is not an affected unit under 40 CFR 72.6 and does not have an exemption under 40 CFR 72.7, 72.8, or 72.14.
D. Attach a complete compliance plan for SO_2 under 40 CFR 72.40.
E. The designated representative of the combustion unit shall submit a monitoring plan in accordance with 40 CFR 74.61. For renewal application, submit an updated monitoring plan if applicable under 40 CFR 75.53(b).
F. The following statement must be signed by the designated representative or alternate designated representative of the combustion source: "I certify that the data submitted under 40 CFR Part 74, Subpart C, reflects actual operations of the combustion source and has not been adjusted in any way."

Signature	Date

STEP 7

Read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign, and date.

Certification (for designated representative or alternate designated representative only)

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

Name Brenda E. Brickhouse	Title Director, Environmental, Health & Safety Section, Progress Energy Inc.
Owner Company Name Florida Power Corporation dba Progress Energy Florida, Inc.	
Phone (727) 820-5153	E-mail address Brenda.Brickhouse@pgnmail.com
Signature	Date 9/21/09

Acid Rain Program
Instructions for
Acid Rain Part Application
(40 CFR 72.30 - 72.31, and 74; and Rule 62-214.320, F.A.C.)

The Acid Rain Program requires the designated representative to submit an Acid Rain Part application for each source with an Acid Rain unit. A complete Certificate of Representation must be received by EPA before the Acid Rain Part application is submitted to the DEP Bureau of Air Regulation. A complete Acid Rain Part application, once submitted, is binding on the owners and operators of the Acid Rain source and is enforceable in the absence of an Acid Rain Part until the DEP Bureau of Air Regulation either issues an Acid Rain Part to the source or disapproves the application.

DEFINITIONS
"Act" – The federal Clean Air Act:
"CFR" - Code of Federal Regulations
"DOE" – U.S. Department of Energy
"EIA" – U.S. Energy Information Agency
"F.A.C." - Florida Administrative Code
"DEP" - Florida Department of Environmental Protection
"lbs" - pounds
"mmBtu" – million British thermal units
"NO_x" – Nitrogen oxides
"SO_2 Opt-in unit" - A combustion unit that has elected to become an affected unit under the Acid Rain Program. For the purposes of applying 40 CFR Parts 72, 73, 75, 77, and 78, and Chapter 62-214, F.A.C., each SO_2 Opt-in unit shall be treated as an Acid Rain unit.
"ORIS" - Office of Regulatory Information Systems

Please type or print. The alternate designated representative may sign in lieu of the designated representative. If assistance is needed, contact the DEP Bureau of Air Regulation at (850) 488-0114.

STEP 1 Use the plant name and ORIS Code listed on the Certificate of Representation for the plant. An ORIS code is a 4-digit number assigned by the EIA at the DOE to power plants owned by utilities. If the plant is not owned by a utility but has a 5-digit plant code (also assigned by EIA), use the plant code. If no code has been assigned or if there is uncertainty regarding what the code number is, contact EIA at (202) 586-2402.

STEP 2 For column "a," identify each Acid Rain unit at the Acid Rain source by providing the appropriate unit identification numbers, consistent with the unit identification numbers entered on the Certificate of Representation and with unit identification numbers used in reporting to the DOE and/or EIA. For new units without identification numbers, owners and operators may assign such numbers consistent with EIA and DOE requirements. If the unit is a SO_2 Opt-in unit, or electing to become one, enter "yes" in column "b." For columns "d" and "e," enter the commence operation date(s) and monitor certification deadline(s) for new units in accordance with 40 CFR 72.2 and 75.4, respectively.

STEP 3 Read the standard requirements.

STEP 4 **For SO_2 Opt-in units only.** In column "f" enter the unit ID# for every SO_2 Opt-in unit identified in column "a" of STEP 2. For column "g" describe the combustion unit and attach information and diagrams on the combustion unit's configuration. If not a renewal application, in column "h" enter the number of hours each unit operated in the six months preceding initial application and attach supporting documentation.

STEP 5 **For SO2 Opt-in units only. (Not required for renewal applications.)** In column "i" enter the unit ID# for every SO_2 Opt-in unit identified in column "a" (and in column "f"). For columns "j" through "n," enter the information required under 40 CFR 74.20-74.25 and attach all supporting documentation required by 40 CFR 74.20-74.25.

STEP 6 **For SO_2 Opt-in units only.** Complete the additional requirements A - F. The designated representative or alternate designated representative must read the certification statement, sign and date.

The Administrator shall be responsible for the following activities under the opt-in provisions of the Acid Rain Program:

(1) *Calculating* the baseline or alternative baseline and allowance allocation, and allocating allowances for combustion or process sources that become affected units under 40 CFR Part 74;

(2) Certifying or recertifying monitoring systems for combustion or process sources as provided under 40 CFR 74.20;

(3) Establishing allowance accounts, tracking allowances, assessing end-of-year compliance, determining reduced utilization, approving thermal energy transfer and accounting for the replacement of thermal energy, closing accounts for opt-in sources that shut down, are reconstructed, become affected under 40 CFR 72.6, or fail to renew their opt-in permit, and deducting allowances as provided under 40 CFR Part 74, Subpart E; and

(4) Ensuring that the opt-in source meets all withdrawal conditions prior to withdrawal from the Acid Rain Program as provided under 40 CFR 74.18; and

(5) Approving and disapproving the request to withdraw from the Acid Rain Program.

The DEP shall be responsible for the following activities:

(1) Issuing the draft and final opt-in permit;

(2) Revising and renewing the opt-in permit; and

(3) Terminating the opt-in permit for an opt-in source as provided in 40 CFR 74.18 (withdrawal), 40 CFR 74.46 (shutdown, reconstruction or change in affected status) and 40 CFR 74.50 (deducting allowances).

STEP 7 The designated representative or alternate designated representative must read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign and date.

Submission Deadlines

For new units, an initial Acid Rain Part application must be submitted to the DEP Bureau of Air Regulation 24 months before the date the unit commences operation.

Acid Rain Part renewal applications must meet the same submission deadline as the Title V permit renewal application for the source.

The designated representative of any operating combustion unit that wishes the unit to become a SO_2 Opt-in unit may submit an Acid Rain Part application and a monitoring plan to the Administrator and DEP Bureau of Air Regulation at any time. Within 21 calendar days from the date the DEP Bureau of Air Regulation issues or denies a draft Title V permit revision incorporating the unit as an acid rain unit, the designated representative of the unit must submit to the Administrator and DEP Bureau of Air Regulation, in writing, a confirmation or rescission of the unit's intention to become a SO_2 Opt-in unit. The Administrator shall treat the failure to make a timely submission as a rescission of the unit's intention to become a SO_2 Opt-in unit and as a withdrawal of the application.

Submit this form and a copy to:

DEP Bureau of Air Regulation
MS 5505
2600 Blair Stone Rd
Tallahassee, FL 32399-2400

For SO_2 Opt-in units, also send this form or its equivalent to the Administrator at:

U.S. Environmental Protection Agency
Clean Air Markets Division (6204J)
1200 Pennsylvania Ave NW
Washington, DC 20460