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SEP 27 2004

BUREAU OF AIR REGULATION

September 23, 2004

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

RE: DRAFT Title V Permit Renewal No. 1010017-006-AV
Anclote Power Plant

Dear Mr. Bobby Bull:

Progress Energy Florida (PEF) has reviewed the subject draft permit and has the following comments.

Section III, Subsection A

In the first and second paragraphs of this section, the heat input capacities of the units are given as maximum heat input limits. As you know, these capacities are subject to variations in ambient temperature and pressure, monitoring error, etc. It is more appropriate to include the term "nominal" with these maximum heat input capacities, in a fashion similar to the way in which "nominal" is used in association with the generating capacities of the units in MW.

In addition, the heat input while burning natural gas is limited to a maximum of 2300 mmBtu/hr. In that natural gas is a cleaner-burning fuel than oil, it is again more appropriate to use the following language: "Pipeline natural gas may be fired alone or co-fired with fuel oil at a nominal maximum rate of 2300 mmBtu/hr."

Section III, Subsection A.1.1

Progress Energy understands that there have been recent conversations between the Florida Electric Coordinating Group and DEP regarding the most appropriate location for the permitted capacity information, as well as the permitting note regarding the heat input limitations, and that it has been agreed that this information should be placed in A.22, which describes the operation rate during compliance testing. Progress Energy requests that the capacity information table and the permitting note language regarding the heat input during compliance testing be moved to Condition A.22.

Section IV, Subsection A, Item 1a.

A revised Acid Rain permit application was submitted to the DEP on May 14, 2004. Please replace the reference to July 1, 1995 with this revision.


Company Name

Al Linero
September 20, 2004
Page 2

At various points throughout the permit, the company is referred to as PGN. Please change these references to Progress Energy Florida, or PEF.

Thank you for your consideration of these comments. Please contact Dave Meyer at (727) 826-4187 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Bernie M. Cumbie". The signature is fluid and cursive, with a large initial "B" and "C".

Bernie M. Cumbie
Responsible Official

Dave Meyer
Senior Environmental Specialist
Progress Energy Florida, Inc.
Environmental Services Section
100 Central Avenue BB1A
St. Petersburg, FL 33701
Office (727) 826-4187
Internal 7 230-4187
Mobile (727) 415-4652
Email dave.meyer@pgnmail.com



Progress Energy

Fax

| | |
|--------------------------|-------------------------|
| To: Bobby Bull | From: Dave Meyer |
| Fax: 850 921 9533 | Pages: |
| Phone: | Date: 10/6/2004 |
| Re: | CC: |

Urgent For Review Please Comment Please Reply Please Recycle

● **Comments:**

Hi Bobby,

Please see PP4 Section III A 2....

Please call me at 727 826 4187.

Thanks very much.

Best Regards, Dave

Best Available Copy

cc: D. Buell, Murphy, G. Kelley



RECEIVED

OCT 15 1998

Environmental Svcs
Department

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit

Mr. W. Jeffrey Pardue
Florida Power Corporation
3201 34th Street South
St. Petersburg, Florida 33733

DEP File No. 1010017-004-AC
Pasco County

Enclosed is the FINAL Permit Number 1010017-004-AC for the installation of natural gas burners and natural gas supply equipment at the Anclote Power Plant Units 1 and 2 located at Anclote Road, West of U.S. 19, Tarpon Springs, Pasco County. This permit is issued pursuant to Chapter 403.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

C.H. Fancy, P.E., Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 10-13-98 to the person(s) listed:

Mr. W. Jeffrey Pardue, FPC*
Mr. Doug Neeley, EPA
Mr. John Bunyak, NPS
Mr. Bill Thomas, DEP

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.

K. J. Baker
(Clerk)

10-13-98
(Date)

**Final Determination
Florida Power Corporation Anclote Facility
Natural Gas Co-Firing Units 1 and 2
Permit No. 1010017-004-AC**

An Intent to Issue Air Construction Permit to install natural gas burners and natural gas supply equipment at the Anclote Power Plant Units 1 and 2 located at Anclote Road, West of U.S. 19, Tarpon Springs, Pasco County, Florida was distributed on September 4, 1998. The Public Notice of Intent to Issue Air Construction Permit was published in the Pasco Times on September 10, 1998. Copies of the draft construction permit and related documents were available for public inspection at the Department's offices in Tallahassee and Tampa. No comments were received.

FPC representative Mike Kennedy talked to Clair Fancy of the Bureau of Air Regulation in person on September 23 regarding sulfur fuel sampling and analysis. It was agreed to address this in the Title V permit.

Therefore, the final action of the Department will be to issue the final permit in accordance with the draft permit.



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

PERMITTEE:

Florida Power Corporation
3201 34th Street South
St. Petersburg, Florida 33733

| | |
|------------|------------------|
| Permit No. | 1010017-004-AC |
| SIC No. | 4911 |
| Expires: | December 1, 1999 |

Authorized Representative:
W. Jeffrey Pardue
Director Environmental Services

PROJECT AND LOCATION:

Permit for the installation of natural gas burners and natural gas supply equipment at the Anclote Power Plant Units 1 and 2, located at Anclote Road, West of US 19, Tarpon Springs, Pasco County, Florida.

UTM: Zone 17 ; 324.4 km E ; 3118.7 km N

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-214, 62-296 and 62-297. The above named Permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

Attached Appendix made a part of this permit:

Appendix GC

Construction Permit General Conditions

HL Rhodes
Howard L. Rhodes, Director
Division of Air Resources
Management

AIR CONSTRUCTION PERMIT No. 1010017-004-AC**SECTION I. FACILITY INFORMATION**

FACILITY DESCRIPTION

This permit authorizes the installation and testing of natural gas burners to utility boilers unit 1 and unit 2. Unit 1 is a nominal 535(summer)/540(winter) megawatt (electric) steam generator. Unit 2 is a nominal 525(summer)/530(winter) megawatt (electric) steam generator. Both units share a common 499 foot exhaust stack. There is no air pollution control equipment on these units.

REGULATORY CLASSIFICATION

The Anclote Generating Station is classified as a major air pollutant emitting facility. Units 1 and 2 are regulated under Rule 62-296.405 F.A.C., Fossil Fuel Steam Generators with more than 250 million Btu per Hour Heat Input.

This facility is regulated under Title IV and Title V of the Clean Air Act Amendments of 1990.

This facility is classified as a major source of Hazardous Air Pollutants (HAPs).

RELEVANT DOCUMENTS:

The documents listed below are the basis of the permit. They are specifically related to this permitting action but do not supersede the conditions given in this permit. These documents are on file with the Department.

Application received by DEP on 2/26/98
Department's letters dated 3/26/98, and 5/19/98
FPC response letters and faxes dated 3/23/98 4/28/98, 6/5/98, and 6/23/98
FPC letter dated 9/1/98
Department's Intent to Issue dated 09/04/98 and associated documents
Department's Final Determination accompanying permit

AIR CONSTRUCTION PERMIT No. 1010017-004-AC

SECTION II. EMISSION UNITS ADMINISTRATIVE REQUIREMENTS

1. Regulating Agencies: All documents related to applications for permits to operate, and associated reports, tests, minor modifications and notifications or for permits to construct or modify an emission unit(s) should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (DEP) mailing address: 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, Mail Station 5505, and phone number (850) 488-0114.

The Permittee shall submit all compliance related notifications and reports required of this permit to the Department's Southwest District office:

Department of Environmental Protection
Southwest District Office
3804 Coconut Palm Drive
Tampa, Florida 33619-8218
Telephone: 813/744-6100
Fax: 813/744-6458

Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

U. S. Environmental Protection Agency - Region 4
Air, Pesticides & Toxics Management Division
Operating Permits Section
61 Forsyth Street
Atlanta, Georgia 32303
Telephone: 404/562-9099
Fax: 404/562-9095

2. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in *Appendix GC* of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]

3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.

4. Forms and Application Procedures: The Permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. [Rule 62-210.900, F.A.C.]

5. Expiration: This air construction permit shall expire on December 1, 1999.

AIR CONSTRUCTION PERMIT: No. 1010017-004-AC

SECTION III. SPECIFIC CONDITIONSA. General Operation Requirements

1. **Applicable Regulations:** Unless otherwise indicated in this permit, the construction and operation of the subject emission unit(s) shall be in accordance with the capacities and specifications stated in the application and supplemental information referenced in Section I, Subsection C with the exception of used oil firing. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-103, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [Rule 62-210.300, F.A.C.]
2. Unit 1 is authorized to fire fuel oils No. 1 through No. 6 with a maximum heat input of 4964 MMBtu per hour. Unit 2 is authorized to fire fuel oils No. 1 through No. 6 with a maximum heat input of 4850 MMBtu per hour. Pipeline quality natural gas may be fired alone or cofired with fuel oil in either boiler and shall be limited to a maximum heat input of 2300 MMBtu per hour per boiler. Unit 1 is authorized to co-fire natural gas with fuel oils No. 1 through No. 6 with a maximum heat input of 5073 MMBtu per hour. Unit 2 is authorized to co-fire natural gas with fuel oils No. 1 through No. 6 with a maximum heat input of 4957 MMBtu per hour.

The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.

3. ~~Anclote~~ Power Plant Units 1 and 2 may operate continuously (i.e., 8760 hours per year).
4. Only pipeline quality natural gas or No. 1 - 6 fuel oils with an as-fired maximum sulfur content of 1.8% by weight shall be fired in Units 1 and 2.
5. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the owner or operator shall notify the Permitting Authority as soon as possible, but at least within (1) working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; the steps being taken to correct the problem and prevent future recurrence; and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the Permittee from any liability for failure to comply with the conditions of this permit and the regulations. [Rule 62-4.130, F.A.C.]
6. **Operating Procedures:** Operating procedures shall include good operating practices and proper training of all operators and supervisors. The good operating practices shall meet the guidelines and procedures as established by the equipment manufacturers. [Rule 62-4.070(3), F.A.C.]



RECEIVED
JUN 17 2004
DIVISION OF AIR
RESOURCE MANAGEMENT

June 14, 2004

Mr. Michael Cooke, Director
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, FL 32399-2400

Re: Progress Energy Florida, Inc.
Anclote Power Plant
Submittal of Additional Responsible Officials for Title V

Dear Mr. Cooke:

As the Responsible Official for the Anclote Plant, enclosed is the Department of Environmental Protection Responsible Official Notification Form which identifies additional Responsible Officials.

If you have any questions regarding this submittal, please contact me at (727) 943-3006.

Sincerely,

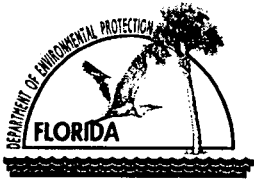
A handwritten signature in black ink, appearing to read "Bernie M. Cumbie".

Bernie M. Cumbie
Plant Manager

BMC/pag

Enclosure

Cc: Mr. Leonard Kozlov (FDEP-Orlando)
Mr. Scott Sheplak (FDEP-Tallahassee)



Department of Environmental Protection

Division of Air Resource Management

RESPONSIBLE OFFICIAL NOTIFICATION FORM

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

Identification of Facility

| | |
|---|------------------|
| 1. Facility Owner/Company Name: Progress Energy Florida, Inc. | |
| 2. Site Name: Anclote Plant | 3. County: Pasco |
| 4. Title V Air Operation Permit/Project No. <i>(leave blank for initial Title V applications)</i> : 1010017-005-AV | |

Notification Type *(Check one or more)*

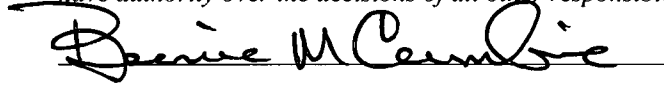
| | |
|-------------------------------------|---|
| <input type="checkbox"/> | INITIAL: Notification of responsible officials for an initial Title V application. |
| <input type="checkbox"/> | RENEWAL: Notification of responsible officials for a renewal Title V application. |
| <input checked="" type="checkbox"/> | CHANGE: Notification of change in responsible official(s). Effective date of change in responsible official(s) <u>May 6, 2004</u> |

Primary Responsible Official

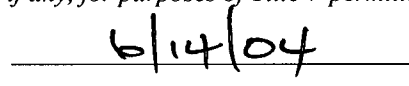
| |
|--|
| 1. Name and Position Title of Responsible Official: Bernie M. Cumbie -- Plant Manager |
| 2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc./Anclote Plant Street Address: 1729 Baillies Bluff Road City: Hoilday State: FL Zip Code: 34691 |
| 3. Responsible Official Telephone Numbers: Telephone: (727) 943-3006 Fax: (727) 943-3050 |
| 4. Responsible Official Qualification <i>(Check one or more of the following options, as applicable)</i> : <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source. |

5. Responsible Official Statement:

I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.



Signature



Date

Additional Responsible Official

| |
|---|
| 1. Name and Position Title of Responsible Official: Charles M. Gates, General Manager Operations South |
| 2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc. Street Address: 8202 W. Venable Street City: Crystal River State: FL Zip Code: 34429-9043 |
| 3. Responsible Official Telephone Numbers: Telephone: (352) 563-4335 Fax: (352) 563-4727 |
| 4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source. |

Additional Responsible Official

| |
|---|
| 1. Name and Position Title of Responsible Official: Michelle E. Crane, Superintendent - Operations & Results |
| 2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc./Anclote Plant Street Address: 1729 Baillies Bluff Road City: Hoilday State: FL Zip Code: 34691 |
| 3. Responsible Official Telephone Numbers: Telephone: (727) 943-3007 Fax: (727) 943-3050 |
| 4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source. |

Additional Responsible Official

| |
|---|
| 1. Name and Position Title of Responsible Official: J. Michael Kennedy, DR |
| 2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc./Environmental Services Section Street Address: 100 Central Avenue Mail Code: BB1A City: St. Petersburg State: FL Zip Code: 33701 |
| 3. Responsible Official Telephone Numbers: Telephone: (727) 826-4334 Fax: (727) 826-4216 |
| 4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input checked="" type="checkbox"/> The designated representative at an Acid Rain source. |