

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.

## P.E. Certification Statement

**Permittee:**  
Florida Power Corporation

**DRAFT Permit No.** 1010017-004-AC

**Facility ID No.:** 1010017

**Project type:** Anclote Power Plant  
Unit 1 and Unit 2 Gas Co-firing Project

*I HEREBY CERTIFY that the 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, and geological features).*

---

Martin Costello, P.E.  
Registration Number: 47587  
Professional Engineer II

---

Date

Department of Environmental Protection  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Phone (850) 488-01144  
Fax (850) 922-6979

**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

---

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.

**SECTION III. SPECIFIC CONDITIONS**

---

**A. 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.]

**SECTION III. SPECIFIC CONDITIONS**

**B. Emission Limits and Standards**

1. The following is a summary of emission limits applicable to Units 1 and 2:

Table 1. Emission Limits

Pollutant	Standard
SO2	1.5% sulfur content by weight, based upon 12 month rolling average
PM/PM10	0.1 lb/MMBtu
Visible Emissions	40 percent opacity

2. Visible Emissions. Visible emissions (VE) shall not exceed 40 percent opacity. Owners or operators shall conduct a compliance test for particulate matter emissions and opacity annually. Failure to demonstrate compliance with the particulate matter standard or the opacity standard of this condition shall constitute grounds for immediate revocation of this 40% standard in which case the standard from Rule 62-296.405(1)(a) F.A.C. shall apply (20% opacity limit except for one six-minute period per hour during which opacity shall not exceed 27%). [Rule 62-296.405(1)(a), F.A.C.; and, OGC File Nos. 86-1574 and 86-1575/Orders dated December 11, 1986.]
3. Visible Emissions - Soot Blowing and Load Change. Excess emissions from existing fossil fuel steam generators resulting from boiler cleaning (soot blowing) and load change shall be permitted provided the duration of such excess emissions shall not exceed 3 hours in any 24-hour period and visible emissions shall not exceed 60 percent opacity, and providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized. A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more. Visible emissions above 60 percent opacity shall be allowed for not more than 4, six (6)-minute periods, during the 3-hour period of excess emissions allowed by this subparagraph, for boiler cleaning and load changes on Units 1 and 2 which are required to operate continuous opacity monitors. [40 CFR 75 and Rule 62-210.700(3), F.A.C.]
4. Sulfur Dioxide. The sulfur content of fuel oils burned shall not exceed 1.8% by weight, as fired at the plant. The 12 month rolling average shall not exceed 1.5% by weight.
5. Particulate Matter. Particulate matter emissions shall not exceed 0.1 lb/MMBtu as measured by Method 5 or Method 17. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) or load change.

**SECTION III. SPECIFIC CONDITIONS**

---

6. To minimize acid smut, at low load operation (less than 80 MW per unit), the use of natural gas shall be at least 40 % of the heat input to the unit or 7,000 MMBtu/day, whichever is less.

**C. Excess Emissions**

1. Excess emissions resulting from malfunction shall be permitted provided that best operational practices are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period unless specifically authorized by the DEP Southwest District Office for longer duration. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized. [Rule 62-210.700(2), F.A.C.]
2. 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. [Rule 62-210.700(4) F.A.C.]
3. Excess Emissions Report: If excess emissions occur due to malfunction, the owner or operator shall notify DEP's Southwest District office within (1) working day 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 Department may request a written summary report of the incident. Excess emissions shall be reported in accordance with 40 CFR 60.7. [Rules 62-4.130 and 62-210.700(6), F.A.C.]

**SECTION III. SPECIFIC CONDITIONS**

---

**D. Compliance Determination**

1. Compliance with the allowable emission limiting standards shall be determined within 60 days after achieving the maximum production rate for natural gas firing, but not later than 180 days from the initial operation date on natural gas, and annually thereafter as indicated in this permit, by using the following reference methods as described in 40 CFR 60, Appendix A (1998 version), and adopted by reference in Chapter 62-297, F.A.C.

Initial (I) compliance tests for VE and particulate emissions shall be performed on Units 1 and 2 while cofiring the maximum capacity of natural gas (approximately 40% to 44% of total heat input) and No. 6 Fuel oil. Annual (A) compliance tests shall be performed during every federal fiscal year (October 1 - September 30) pursuant to Rule 62-297.340, F.A.C., on Units 1 and 2 as indicated. The following reference methods shall be used:

- DEP Method 9 Visual Determination of the Opacity of Emissions from Stationary Sources (I, A).
- EPA Method 17 or Method 5. The minimum sample volume shall be 30 dry standard cubic feet.

For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. EPA Method 3A shall be used with the oxygen based F-factor and emission rates (lb/MMBtu) shall be computed according to EPA Method 19. Acetone wash shall be used with EPA Method 5 or 17. Stack testing shall be conducted using the fuel (and additive injection levels) which is representative of worst case for particulate emissions rate (i.e. using the fuel or fuel blend representative of that which has been fired during the past federal fiscal year which results in the highest potential emissions rate). (I, A) [Rules 62-213.440, 62-296.405(1)(e)2., and 62-297.401, F.A.C.]

Note: No other methods may be used for compliance testing unless prior DEP approval is received in writing. The DEP may request a special compliance test pursuant to Rule 62-297.340(2), F.A.C., when, after investigation (such as complaints, increased visible emissions, or questionable maintenance of control equipment), there is reason to believe that any applicable emission standard is being violated. The DEP's Southwest District office shall be notified, in writing, at least 30 days prior to the initial and annual compliance test(s)

2. Testing of emissions shall be conducted with each boiler operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum heat input rate allowed by the permit. If it is impracticable to test at permitted capacity, the source may be tested at less than permitted capacity. In this case, subsequent operation is limited by adjusting the heat input limit to 110 percent of the value reached during the test until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity.
3. EPA Method 6C may be used to determine compliance with the SO<sub>2</sub> emission limit. The following fuel sampling and analysis protocol may be used as an alternate sampling procedure authorized by this permit to demonstrate compliance with the sulfur dioxide standard: Determine and record the fuel sulfur content, percent by weight, for fuel oil delivered to the facility using

**SECTION III. SPECIFIC CONDITIONS**

---

either ASTM D2622-924, ASTM D4294-90, or both ASTM D4057-88 and ASTM D129-95 (or latest editions).

Co-firing natural gas with fuel oil having more than 1.8% sulfur content by weight as-fired is prohibited. [Rules 62-213.440(1), 62-4.070(3), 62-296.405(1)(e)3., 62-296.405(1)(f)1.b., 62-297.440, F.A.C., and FPC's letter dated 9/1/98].

4. An initial test for CO is required while co-firing No. 6 fuel oil and natural gas at the design maximum capacity for gas operation (approximately 40% to 44% of total heat input) and within 90 -100% of the permitted overall heat input rate for each unit. The initial CO test results shall be the average of three valid one-hour runs using EPA method 10. A second test for CO shall be conducted firing only No. 6 fuel oil within 90-100% of the overall heat input rate for comparison. This test is not required annually.
5. All fuel oil delivered to the facility shall be analyzed using ASTM D240-76 (or equivalent) to record the gross heating value (HHV). Analysis may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency.
6. Compliance with the liquid fuel sulfur limit shall be verified by a fuel analysis provided by the vendor or performed by FPC upon each fuel delivery with the following exception: 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 by FPC prior to firing oil at the plant. Reports of percent sulfur content of these analyses shall be maintained at the power plant facility.

The owner or operator shall maintain records of the as-fired 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.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C., and applicant agreement with DEP on September 1, 1998.

**E. Notification, Reporting and Recordkeeping**

**SECTION III. SPECIFIC CONDITIONS**

---

1. All measurements, records, and other data required to be maintained by FPC shall be retained for at least five (5) years following the date on which such measurements, records, or data are recorded. These records shall be made available to DEP representatives upon request.
2. Compliance Test Reports: A test report indicating the results of the required compliance tests shall be filed with the DEP Southwest District Office as soon as practical, but no later than 45 days after the last sampling run is completed. The test report shall provide sufficient detail on the tested emission unit and the procedures used to allow the Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8), F.A.C.

**F. Monitoring Requirements**

1. The Permittee shall install, calibrate, maintain, and operate a continuous emission monitor in the stack to measure and record the nitrogen oxides, sulfur dioxide emissions and opacity from Units 1 and 2. The continuous emission monitoring systems must comply with the certification and quality assurance, and other applicable requirements from 40 CFR 75. Periods of startup, shutdown, malfunction, and fuel switching shall be monitored, recorded, and reported as excess emissions when emission levels exceed the standards in Table 1 following the format of 40 CFR 60.7 (1998 version).
2. The following monitoring schedule for No. 1 - 6 fuel oil shall be followed: For all shipments of fuel oil received at the Anclote Power Plant Station, an analysis which reports the sulfur and ash content and heat content (HHV) of the fuel shall be provided by the fuel vendor or other sources which follow the appropriate fuel test methods listed in Specific Condition D1. The analysis record shall specify the origin of the fuel sample, the methods by which the analyses were conducted, the person conducting the sampling and analysis, and date of sampling and analysis.
4. Determination of Process Variables:
  - (a) The Permittee shall operate and maintain equipment and/or instruments necessary to determine process variables, such as process weight input or heat input, when such data is needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
  - (b) Equipment and/or instruments used to directly or indirectly determine such process variables, including devices such as belt scales, weigh hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. [Rule 62-297.310(5), F.A.C]

**G. Rule Requirements**

## AIR CONSTRUCTION PERMIT: No. 1010017-004-AC

### SECTION III. SPECIFIC CONDITIONS

---

1. The emission unit shall be operated in compliance with all applicable requirements of Rules 62-4, 204, 210, 212, 214, 296, and 297 except as otherwise specified herein. All notifications and reports specified in this section shall be submitted to the DEP's Southwest District office.
2. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements and regulations (Rule 62-210.300(1), F.A.C.).
3. Except as otherwise specified herein, the emission unit shall be operated in compliance with all applicable provisions of Rule 62-210.700, F.A.C.: Excess Emissions; Chapter 62-297, F.A.C.: Stationary Sources - Emissions Monitoring; and, Rule 62-4.130, F.A.C.: Plant Operation - Problems.
4. Quarterly excess emission reports, in accordance with 40 CFR 60.7 (7) (c) (1998 version), shall be submitted to the DEP's Southwest District office.
5. Pursuant to Rule 62-210.370(2), F.A.C., Annual Operation Reports, the Permittee is required to submit annual reports on the actual operating rates and emissions from this facility. Annual operating reports shall be sent to the DEP's Southwest District office by March 1st of each year.
6. Stack sampling facilities shall be available in accordance with Rule 62-297.310(6), F.A.C.
7. The Permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (Rule 62-4.090, F.A.C.).

#### **H. Modifications**

1. The Permittee shall give written notification to the Department when there is any modification to this facility. This notice shall be submitted sufficiently in advance of any critical date involved to allow sufficient time for review, discussion, and revision of plans, if necessary. Such notice shall include, but not be limited to, information describing the precise nature of the change; modifications to any emission control system; production capacity of the facility before and after the change; and the anticipated completion date of the change.



Florida Power Corporation  
Anclote Power Plant

Facility ID No.: 1010017  
Pasco County

Initial Title V Air Operation Permit  
**PROPOSED Permit No.:** 1010017-003-AV

Permitting Authority:

State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
Title V Section

Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Telephone: 850/488-1344  
Fax: 850/922-6979

Initial Title V Air Operation Permit  
**PROPOSED Permit No.: 1010017-003-AV**

**Table of Contents**

<u>Section</u>	<u>Page Number</u>
Placard Page .....	1
I. Facility Information .....	2 - 3
A. Facility Description.	
B. Summary of Emissions Unit ID Nos. and Brief Descriptions.	
C. Relevant Documents.	
II. Facility-wide Conditions .....	4 - 5
III. Emissions Unit(s) and Conditions	
A. Fuel Oil Fired Steam Generators (E.U. ID Nos. -001 and -002).....	6 - 17
B. Diesel Fired Generators.....	18 - 23
IV. Acid Rain Part	
A. Acid Rain, Phase II .....	24 - 25
V. Attachments	
Table 1-1, Summary of Air Pollutant Standards and Terms	
Table 1-2, Summary of Air Pollutant Standards and Terms (Additional Standards for On-Specification Used Oil (OSUO))	
Table 2-1, Summary of Compliance Requirements	
Appendix I-1. List of Insignificant Emissions Units and/or Activities	
Appendix U-1. List of Unregulated Emissions Units and/or Activities	
Appendix H-1. Permit History/ID Number Changes	
Appendix SS-1, Stack Sampling Facilities	
Appendix TV-1, Title V Conditions	

**Permittee:**  
**Florida Power Corporation**  
**Anclote Power Plant**

**PROPOSED Permit No.:** 1010017-003-AV  
**Facility ID No.:** 1010017  
**SIC Nos.:** 4911  
**Project:** Initial Title V Air Operation Permit

This permit is for the operation of the Anclote Power Plant. This facility is located at 1729 Baileys Bluff Road, Holiday, Pasco County; UTM Coordinates: Zone 17, 324.4 km East and 3118.7 km North; Latitude: 28° 48' 17" North and Longitude: 82° 47' 08" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

**Referenced attachments made a part of this permit:**

Appendix U-1, List of Unregulated Emissions Units and/or Activities  
Appendix I-1, List of Insignificant Emissions Units and/or Activities  
APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97)  
APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)  
Phase II Acid Rain Application/Compliance Plan received December 14, 1995

**Effective Date:** January 1, 2000  
**Renewal Application Due Date:** July 5, 2004  
**Expiration Date:** December 31, 2004

---

Howard L. Rhodes, Director  
Division of Air Resource  
Management

HLR/sms/mph

**Section I. Facility Information.**

**Subsection A. Facility Description.**

This facility consists of two fuel oil fired steam electric generating stations, E.U. ID No. -001 (Unit No. 1) and -002 (Unit No. 2). Unit No. 1 consists of a Combustion Engineering, Inc., Type CCRR boiler/steam generator and steam turbine which drives a generator with a nameplate rating of 535(summer)/540(winter) Megawatts. Unit No. 2 consists of a Combustion Engineering, Inc., Type CCRR boiler/steam generator and steam turbine which drives a generator with a nameplate rating of 525(summer)/530(winter) Megawatts. Units No. 1 and No. 2 share a common stack. Also included in this permit are miscellaneous unregulated and insignificant emissions units and/or activities. Relocatable diesel fired generator(s) with a maximum heat input of 25.74 MMBtu/hour and a maximum rating of 2460 Kilowatts are permitted to be located at this facility and may be relocated to other FPC facilities.

Based on the initial Title V permit application received on June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

**Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).**

<b>E.U. ID No.</b>	<b>Brief Description</b>
-001	Fuel Oil Fired Steam Electric Generator No. 1
-002	Fuel Oil Fired Steam Electric Generator No. 2
-7775047 -001	Relocatable Diesel Generator(s)

Unregulated Emissions Units and/or Activities

- xxx Surface Coating and Solvent Cleaning
- xxx Fuel Storage Tanks
- xxx Emergency Generators
- xxx General Purpose Engines
- xxx Helper Cooling Towers

*Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.*

**Subsection C. Relevant Documents.**

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 1-2, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/ID Number Changes

These documents are on file with the permitting authority:

Initial Title V Permit Application received June 14, 1996.

Letter from Mr. Scott H. Osbourn dated and received by fax on October 13, 1997.

Phase II Acid Rain Application submitted on December 14, 1995.

Petition for Formal Administrative Hearing received September 4, 1997.

Notice of Withdrawal of Petition for Formal Administrative Hearing received December 15, 1998.

Letter from Mr. Scott H. Osbourn dated February 11, 1999.

## Section II. Facility-wide Conditions.

### The following conditions apply facility-wide:

1. APPENDIX TV-1, TITLE V CONDITIONS is a part of this permit.  
{Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}
2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.  
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard.  
Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.  
[Rule 62-296.320(4)(b)1. & 4., F.A.C.]
4. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:
  - a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and
  - b. certification forms and/or RMPs according to the promulgated rule schedule.[40 CFR 68]
5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.  
[Rule 62-213.440(1), F.A.C.]
6. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.  
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]
7. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall not store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.  
[Rule 62-296.320(1)(a), F.A.C.]

**8. Not federally enforceable.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include:

- a. Maintenance of paved areas as needed,
- b. Regular mowing of grass and care of vegetation, and
- c. Limiting access to plant property by unnecessary vehicles.

[Rule 62-296.320(4)(c)2., F.A.C.; Proposed by applicant in the initial Title V permit application received June 14, 1996]

**9.** When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

**10.** 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

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

United States Environmental Protection Agency  
Region 4  
Air, Pesticides & Toxics Management Division  
Air and EPCRA Enforcement Branch, Air Compliance Section  
61 Forsyth Street  
Atlanta, Georgia 32303  
Telephone: 404/562-9099  
Fax: 404/562-9095

**12. Statement of Compliance.** The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within sixty (60) days after the end of the calendar year.

{See condition No. 52., Appendix TV-1, Title V Conditions}

[Rule 62-214.420(11), F.A.C.]

**Section III. Emissions Unit(s) and Conditions.**

**Subsection A. This section addresses the following emissions units.**

<b>E.U. ID No.</b>	<b>Brief Description</b>
-001	Fossil Fuel Fired Steam Generator # 1
-002	Fossil Fuel Fired Steam Generator # 2

Fossil fuel fired steam generator # 1 is a nominal 535(summer)/540(winter) megawatt (electric) steam generator designated as Anclote Unit # 1. The emission unit is fired on new No. 6 or lighter grades of fuel oil and on-specification used oil, as permitted herein, with a maximum heat input of 4964 MMBtu per hour.

Fossil fuel fired steam generator # 2 is a nominal 525(summer)/530(winter) megawatt (electric) steam generator designated as Anclote Unit # 2. The emission unit is fired on new No. 6 or lighter grades of fuel oil and on-specification used oil, as permitted herein, with a maximum heat input of 4850 MMBtu per hour. Each boiler/steam generator, units #1 and #2, drives a turbine generator and both units share a common 499 foot exhaust stack. Emissions from these units are uncontrolled.

{Permitting note(s): The emissions units are regulated under the Federal Acid Rain Program, and Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input. Fossil fuel fired steam generator # 1 began commercial operation on October 16, 1974; and, fossil fuel fired steam generator # 2 began commercial operation on October 31, 1978.}

**The following specific conditions apply to the emissions units listed above:**

**Essential Potential to Emit (PTE) Parameters**

**A.1. Permitted Capacity.** The maximum operation heat input rates are as follows:

<b>Unit No.</b>	<b>MMBtu/hr Heat Input</b>	<b>Fuel Type</b>
1	4964	No. 1, 2, 3, 4, 5 or 6 Fuel Oil & On-Specification Used Oil
2	4850	No. 1, 2, 3, 4, 5, or 6 Fuel Oil & On-specification Used Oil

\* The on-specification used oil burned at this facility may be generated on or off-site.

[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.405, F.A.C.]

{Permitting note: 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. Regular record keeping is not required for heat input. Instead the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.}

[Rule 62-4.160(2), and Rule 62-297.310(2), F.A.C.]



**A.2. Emissions Unit Operating Rate Limitation After Testing.** See specific condition **A.22.**  
[Rule 62-297.310(2), F.A.C.]

**A.3. Methods of Operation. Fuel(s).**

a. **Startup:** The only fuels allowed to be burned are new #6 or lighter grades of fuel oils. On-specification used oil shall only be burned if the PCB's are less than 2 ppm and may be blended with new #6 or lighter grades of fuel oil. The maximum sulfur content is 2.5 percent, by weight.

b. **Normal:** The only fuels allowed to be burned are new #6 or lighter grades of fuel oils and on-specification used oil. The maximum sulfur content is 2.5 percent, by weight.

c. **Not federally enforceable.** The maximum amount of on-specification used oil, whether generated on or off-site, that can be burned facility-wide shall not exceed 10 percent of the heat input (monthly) or 30 million gallons per year cumulatively.

[Rule 62-213.410, F.A.C.; and, AO 51-254492A & 1010017-001-AO]

**A.4. Hours of Operation.** These emissions units may operate continuously, i.e., 8,760 hours/year.  
[Rule 62-210.200(PTE), F.A.C.]

### **Emission Limitations and Standards**

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**A.5. Visible Emissions.** Visible emissions shall not exceed 40 percent opacity. Emissions units governed by this visible emissions standard shall conduct a compliance test for particulate matter emissions annually. Failure of the facility to demonstrate compliance with the particulate matter allowable in specific condition **A.7.** or the opacity standard of this condition shall constitute grounds for revocation of this condition.  
[Rule 62-296.405(1)(a), F.A.C.; and, OGC File Nos. 86-1574 and 86-1575/Orders dated December 11, 1986.]

**A.6. Visible Emissions - Soot Blowing and Load Change.** Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change. Visible emissions above 60 percent opacity shall be allowed for not more than 4, six-minute averages during this 3-hour period. A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.  
[Rule 62-210.700(3), F.A.C.]

**A.7. Particulate Matter.** Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods. See specific condition **A.18.**  
[Rule 62-296.405(1)(b), F.A.C.]

**A.8. Particulate Matter - Soot Blowing and Load Change.** Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.  
[Rule 62-210.700(3), F.A.C.]

**A.9. Sulfur Dioxide.** When burning fuel oils, sulfur dioxide emissions shall not exceed 2.75 pounds per million Btu heat input, as measured by applicable compliance methods. See specific conditions **A.19.** and **A.20.**

[Rule 62-296.405(1)(c)1.j., F.A.C.]

**A.10. Sulfur Dioxide - Sulfur Content.** The sulfur content of fuel oils, on-specification used oil, or any combination of the two burned in these units, shall not exceed 2.5 percent, by weight. See specific condition **A.20.**

[Rule 62-296.405(1)(e)3., F.A.C.; and, requested by the applicant in Title V Application dated June 12, 1996.]

#### Excess Emissions

**A.11.** Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

**A.12.** Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.

[Rule 62-210.700(2), F.A.C.]

**A.13.** 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.

[Rule 62-210.700(4), F.A.C.]

#### Monitoring of Operations

**A.14. Sulfur Dioxide. The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor or permittee upon each fuel delivery.** This protocol is allowed because the emissions units do not have an operating flue gas desulfurization device. See specific conditions **A.10., A.19.** and **A.20.**

[Rule 62-296.405(1)(f)1.b., F.A.C.]

**A.15. Determination of Process Variables.**

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

### **Test Methods and Procedures**

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**A.16. Visible emissions.** The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. See specific condition **A.17.**  
[Rule 62-296.405(1)(e)1., F.A.C.]

**A.17. DEP Method 9.** The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.

2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.

b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.]

**A.18. Particulate Matter.** The test methods for particulate emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17.

[Rules 62-296.405(1)(e)2. and 62-297.401, F.A.C.]

**A.19. Sulfur Dioxide.** The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedances of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. **The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, as an alternate sampling procedure authorized by permit, the permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery.** See specific conditions A.9., A.10. and A.20.

[Rules 62-213.440, 62-296.405(1)(e)3. and 62-297.401, F.A.C.; and, Permits 1010017-001-AO and AO 51-254492A.]

**A.20. Sulfur Content of Liquid Fuel.** The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s).

[Rules 62-213.440, 62-296.405(1)(e)3, 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

**A.21. Required Number of Test Runs.** For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

**A.22. Operating Rate During Testing.** Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

**A.23. Calculation of Emission Rate.** The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

**A.24. Applicable Test Procedures.**

**(a) Required Sampling Time.**

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. **Opacity Compliance Tests.** The required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) **Minimum Sample Volume.** Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) **Required Flow Rate Range.** For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) **Calibration of Sampling Equipment.** Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.

(e) **Allowed Modification to EPA Method 5.** When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

[Rule 62-297.310(4), F.A.C.]

**A.25. Required Stack Sampling Facilities.** When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.  
[Rule 62-297.310(6), F.A.C.]

**A.26. Frequency of Compliance Tests.** The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

**(a) General Compliance Testing.**

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid for more than 400 hours other than during startup.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate; or

b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

TABLE 297.310-1  
 CALIBRATION SCHEDULE

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/-0.001" mean of at least three readings Max. deviation between readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually 3. Check after each test series	Spirometer or calibrated wet test or dry gas test meter	2%
		Comparison check	5%

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

a. Visible emissions, if there is an applicable standard;

b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; or 100 tons per year or more of any other regulated air pollutant.

5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; SIP approved]

**A.27. Compliance Testing for Visible Emissions**. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning only liquid fuel(s) for less than 400 hours per year.

[Rule 62-297.310(7)(a)4., F.A.C.]

**A.28. Compliance Testing for PM**. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.]

### **Record keeping and Reporting Requirements**

**A.29. Excess Emissions Notification**. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department's Southwest District Office in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department's Southwest District Office.

[Rule 62-210.700(6), F.A.C.]

**A.30.** Submit to the Department's Southwest District Office a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years. [Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

**A.31. Test Reports.**

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department's Southwest District Office on the results of each such test.
- (b) The required test report shall be filed with the Department's Southwest District Office as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department's Southwest District Office to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
1. The type, location, and designation of the emissions unit tested.
  2. The facility at which the emissions unit is located.
  3. The owner or operator of the emissions unit.
  4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
  5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
  6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
  7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
  8. The date, starting time and duration of each sampling run.
  9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
  10. The number of points sampled and configuration and location of the sampling plane.
  11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
  12. The type, manufacturer and configuration of the sampling equipment used.
  13. Data related to the required calibration of the test equipment.
  14. Data on the identification, processing and weights of all filters used.
  15. Data on the types and amounts of any chemical solutions used.
  16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
  17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
  18. All measured and calculated data required to be determined by each applicable test procedure for each run.
  19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
  20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.



21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

**A.32. COMS for Periodic Monitoring.** The owner or operator is required to install continuous opacity monitoring systems (COMS) pursuant to 40 CFR Part 75. The owner or operator shall maintain and operate COMS and shall make and maintain records of opacity measured by the COMS, for purposes of periodic monitoring.

[Rule 62-213.440, F.A.C.]

**Addition limitations for On-Specification Used Oil**

**A.33. Not federally enforceable.** On-specification used oil generated at this facility or off-site may only be burned in these emissions units if compliance with all the conditions of this permit and the following additional conditions are demonstrated:

- a. **On-specification Used Oil Allowed as Fuel:** This permit allows the burning of used fuel oil meeting EPA “on-specification” used oil specifications, with a maximum sulfur content of 2.5 percent, by weight, and a PCB concentration of less than 50 ppm. On-specification used oil shall meet the following specifications [40 CFR 279, Subpart B.]

1. Arsenic shall not exceed 5.0 ppm;
2. Cadmium shall not exceed 2.0 ppm;
3. Chromium shall not exceed 10.0 ppm;
4. Lead shall not exceed 100.0 ppm;
5. Total halogens shall not exceed 1000 ppm;
6. Flash point shall not be less than 100 degrees F.

Used oil that does not meet the specifications for on-specification used oil shall not be burned at this facility.

- b. **Quantity Limited:** The maximum amount of on-specification used oil, whether generated on or off-site, that can be burned facility-wide shall not exceed 10 percent of the heat input (monthly) or 30 million gallons per year cumulatively.
- c. **Used Oil Containing PCBs  $\geq$  50 ppm Not Allowed:** Used oil containing a PCB concentration of 50 ppm or greater shall not be burned at this facility. Used oil shall not be blended to meet this requirement or any part of this condition.
- d. **PCB Concentration of 2 to 50 ppm:** On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall be burned only at normal source operating temperatures. On specification used oil with a PCB concentration of 2 to less than 50 ppm shall not be burned during periods of startup or shutdown.

Before accepting from each marketer the first shipment of on-specification used oil with a PCB concentration of 2 to less than 50 ppm, the owner or operator shall provide each marketer with a one-time written and signed notice certifying that the owner or operator will burn the used oil in a qualified combustion device. The notice must state that EPA or a RCRA-delegated state agency has been given a description of the used oil management activities at the facility and that an industrial boiler or furnace will be used to burn the used oil with a PCB concentration of 2 to less than 50 ppm. The description of the used oil management activities shall be submitted to the Administrator, Hazardous Waste Regulation Section, Florida Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. [40 CFR 279 and 761.20(e)]

- e. Certification Required: The owner or operator shall receive from the marketer, for each load of used oil received, a certification that the used oil meets the specifications for on-specification used oil and contains a PCB concentration of less than 50 ppm. This certification shall also describe the basis for the certification, such as analytical results. Note that a claim that used oil does not contain quantifiable levels of PCBs (that is, that the used oil contains less than 2 ppm of PCBs) must be documented by testing or other information. The first person making the claim that the used oil does not contain PCBs is responsible for furnishing the documentation. The documentation can be tests, personal or special knowledge of the source and composition of the used oil, or a certification from the person generating the used oil claiming that the used oil contains no detectable PCBs.
- f. Testing Required: If the owner or operator does not receive certification from the marketer as described above, the owner or operator shall properly sample and test each load of used oil received for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point, PCBs\*, and percent sulfur content by weight, ash, and BTU value (BTU per gallon).

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

\* Testing for PCB's is not necessary if quantifiable levels are less than 2 ppm (Refer to specific condition A.33.e. above)

If the owner or operator relies on certification from the marketer, the owner or operator shall be responsible for ensuring that the certification complies with all the requirements of this condition and all conditions of this permit.

If the analytical results show that the used oil does not meet the specification for on-specification used oil, or that it contains a PCB concentration greater than or equal to 50 ppm, the owner or operator shall immediately notify and provide the analytical results to the Department's Southwest District Office. The owner or operator shall immediately cease burning of the used oil.

g. Special Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil: [40 CFR 761.20(e)]

- (1) The gallons of on-specification used oil received and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (2) The total gallons of on-specification used oil burned in the preceding calendar year.
- (3) The name and address of all marketers delivering used oil to the facility.
- (4) Copies of the marketer certifications, if obtained, and any supporting information.
- (5) Documentation that the used oil contains less than 2 ppm PCBs, if claimed, including the name and address of the person making the claim.
- (6) Results of the analyses required above.
- (7) A copy of the notice to EPA and a copy of the one-time written notice provided to each marketer.

The records shall be retained in a form suitable for inspection at the facility by the Department, and shall be retained for 5 years.

h. Reporting Required: The owner or operator shall submit, with the Annual Operation Report (AOR) form, the total amount of on-specification used oil burned during the previous calendar year to the Southwest District Office.

[Rules 62-4.070(3), 62-212.400(2)(f)1. and 62-213.440, F.A.C.; and, AO 51-254492A & 1010017-001-AO]

**Section III. Emissions Units and Conditions.**

**Subsection B. This section addresses the following emissions units.**

<b>E.U. ID No.</b>	<b>Brief Description</b>
-7775047 -001	Relocatable Diesel Fired Generator(s)

The relocatable diesel generator(s) will have a maximum (combined) heat input of 25.74 MMBtu/hour while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum (combined) rating of 2460 kilowatts. Emissions from the generator(s) are uncontrolled. These conditions were requested in the Initial Title V Permit Application for the Anclote Power Plant received June 14, 1996. The generator(s) may be relocated at this facility and any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Anclote Power Plant, 1729 Baileys Bluff Road, Holliday, Pasco County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. Hines Energy Complex, County Road 555, 1 mi. southwest of Homeland, Polk County.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. Each generator has its own stack.}

**The following specific conditions apply to the emissions units listed above regardless of location:**

**Essential Potential to Emit (PTE) Parameters**

**B.1.** These conditions become active and enforceable once FPC has given notification to the SWD of the Department of Environmental Protection, if appropriate, that these units will be relocated to this facility.

[Rule 62-4.070(3), F.A.C.; Anclote Power Plant Permit AC 09-202080; and, Initial Title V Permit Application for the Anclote Power Plant received June 14, 1996.]

**B.2. Permitted Capacity.** The maximum operation heat input rates are as follows:

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

<b>Unit No.</b>	<b>MMBtu/hr/generator(s) Heat Input</b>	<b>Fuel Type</b>
-7775047 -001	25.74	New Low Sulfur No. 2 Fuel Oil

**B.3. Emissions Unit Operating Rate Limitation After Testing.** See specific condition **B.14.**  
[Rule 62-297.310(2), F.A.C.]

**B.4. Methods of Operation - Fuels.** Only new low sulfur No. 2 fuel oil shall be fired in the diesel generator(s).  
[Rule 62-213.410, F.A.C.]

**B.5. Hours of Operation.** The hours of operation expressed as “engine-hours” shall not exceed 2970 hours in any consecutive 12 month period. The total hours of operation expressed as “engine-hours” shall be the summation of the individual hours of operation of each generator.  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, Anclote Power Plant Permit AO 09-205952.]

#### **Emission Limitations and Standards**

{Permitting Note: The attached Table 1-4, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**B.6. Visible Emissions.** Visible emissions from each generator shall not be equal to or greater than 20 percent opacity.  
[Rule 62-296.320(4)(b)1., F.A.C.; and, Anclote Power Plant Permit AO 09-205952.]

**B.7. Sulfur Dioxide - Sulfur Content.** The sulfur content of the new No. 2 fuel oil shall not exceed 0.50 percent, by weight.  
[Requested in initial Title V permit application dated June 14, 1996; and, Anclote Power Plant Permit AC 09-202080.]

#### **Excess Emissions**

**B.8.** Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.  
[Rule 62-210.700(1), F.A.C.]

**B.9.** 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.  
[Rule 62-210.700(4), F.A.C.]

### Monitoring of Operations

**B.10.** The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor or permittee upon each fuel delivery. See specific condition **B.13**. [Rule 62-213.440, F.A.C.]

**B.11.** Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. [Rule 62-297.310(5), F.A.C.]

### Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**B.12.** The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

**B.13.** The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s). [Rules 62-213.440 and 62-297.440, F.A.C.]

**B.14.** Operating Rate During Testing. Testing of emissions shall be conducted with the generator(s) operating at 90 to 100 percent of the maximum fuel firing rate of 186.3 gallons per hour. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operations may be limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance

testing to regain the authority to operate at the permitted capacity. Failure to submit the actual operating rate may invalidate the test.

[Rules 62-297.310(2), F.A.C.; and, Anclote Power Plant Permit AO 09-205952.]

**B.15. Applicable Test Procedures.**

**(a) Required Sampling Time.**

2. **Opacity Compliance Tests.** The required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

- c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2.c., F.A.C.]

**B.16. Frequency of Compliance Tests.** The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

**(a) General Compliance Testing.**

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
  - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;
8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.
9. The owner or operator shall notify the Southwest District Office at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department of Environmental Protection, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the appropriate D.E.P. office.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; SIP approved; and, Anclote Power Plant Permit AO 09-205952.]

**B.17. Visible Emissions Testing - Annual**. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning liquid fuels for less than 400 hours per year.

[Rules 62-297.310(7)(a)4. & 8., F.A.C.]

**B.18.** After each relocation, each generator shall be tested within 30 days of startup for opacity and the fuel shall be analyzed for the sulfur content. See specific conditions **B.6.**, **B.7.**, **B.10.**, **B.13.**, and **B.14.**

[Rules 62-4.070(3) and 62-297.310(7)(b), F.A.C.; and, Anclote Power Plant Permit AO 09-205952.]

### **Recordkeeping and Reporting Requirements**

**B.19. Malfunction Reporting**. In the case of excess emissions resulting from malfunctions, the owner or operator shall notify the Southwest District Office of the Department of Environmental Protection in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested.

[Rule 62-210.700(6), F.A.C.]



**B.20. Test Reports.**

- (a) Each generator shall be tested on an annual basis within 30 days of the date October 25.
- (b) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Southwest District Office on the results of each such test.
- (c) The required test report shall be filed with the Southwest District Office as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (d) The test reports for a unit that has been relocated shall be submitted to the Department office that will handle compliance issues for the new location within 45 days of testing.

[Rule 62-297.310(8), F.A.C.; and, Anclote Power Plant Permit AO 09-25952.]

**B.21.** To demonstrate compliance with specific condition **B.5.**, records shall indicate the daily hours of operation for each diesel generator, the daily hours of operation expressed as “engine- hours”, and a cumulative total hours of operation expressed as “engine hours” for each month. The records shall be maintained for a minimum of 5 years and made available to the Southwest District Office upon request.

[Rules 62-213.440 and 62-297.310(8), F.A.C.; and, Anclote Power Plant Permit AO 09-205952.]

**B.22.** To demonstrate compliance with specific condition **B.7.**, records of the sulfur content, in percent by weight, of all the fuel burned shall be kept based on either vendor provided as-delivered or as-received fuel sample analysis. The records shall be maintained for a minimum of 5 years and made available to the Southwest District Office upon request.

[Rule 62-297.310(8), F.A.C.; and, AO 09-205952.]

**Section IV. This section is the Acid Rain Part.**

**Operated by:** Florida Power Corporation  
**ORIS code:** 8048

**Subsection A. This subsection addresses Acid Rain, Phase II.**

The emissions units listed below are regulated under Acid Rain Part, Phase II.

<b>E.U. ID No.</b>	<b>Description</b>
-001	Fossil Fuel Fired Steam Generator No. 1
-002	Fossil Fuel Fired Steam Generator No. 2

1. The Phase II permit application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these acid rain units must comply with the standard requirements and special provisions set forth in the application listed below:

a. DEP Form No. 62-210.900(1)(a), dated 07/01/95.

[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

2. Sulfur dioxide (SO<sub>2</sub>) allowance allocations for each Acid Rain unit:

<b>E.U. ID No.</b>	<b>EPA I.D.</b>	<b>Year</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>
<b>-001</b>	<b>1</b>	<b>SO<sub>2</sub> allowances, under Table 2, 3, or 4 of 40 CFR 73</b>	12931*	12931*	12931*	12931*	12931*
<b>-002</b>	<b>2</b>	<b>SO<sub>2</sub> allowances, under Table 2, 3, or 4 of 40 CFR 73</b>	12853*	12853*	12853*	12853*	12853*

\*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2, 3, or 4 of 40 CFR 73.

3. Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.440(3), F.A.C.
- b. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain program.
- c. Allowances shall be accounted for under the Federal Acid Rain Program.

[Rule 62-213.440(1)(c), F.A.C.]

4. Fast-Track Revisions of Acid Rain Parts. Those Acid Rain sources making a change described in Rule 62-214.370(4), F.A.C., may request such changes as provided in Rule 62-213.413, Fast-Track Revisions of Acid Rain Parts.

[Rules 62-213.413 and 62-214.370(4), F.A.C.]

5. Comments, notes, and justifications: None.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION  
POLLUTION CONTROL PROJECT AND PSD APPLICABILITY REVIEW  
FPC ANCLOTE GAS CO-FIRING PROJECT

## BACKGROUND

Florida Power Corporation (FPC) operates the Anclote Power Plant in Pasco County. Anclote Units 1 and 2 are nominal 530 megawatts (MW) oil-fired units which exhaust through a common stack. There is no add-on air pollution control equipment on these units. In March, 1998, FPC applied to modify Units 1 and 2 to accommodate co-firing with natural gas.

The modifications will consist of adding gas spuds and new nozzle tips to the bottom two burner decks. Each tangential fired boiler has 5 burner decks and a total of 20 burners. Only one fuel (either gas or fuel oil) will be fired in these lower burner decks at a time. Natural gas piping will be added to the facility which will be capable of delivering up to 40 percent (%) of the heat input to each boiler.

The total heat input to the boiler when co-firing natural gas will be higher due to the additional latent heat losses when firing natural gas. The increased heat input when firing natural gas is 2% higher (5% latent heat losses times the maximum fraction of gas, 40%). According to FPC, annual average fuel sulfur levels are as follows: 1993 - 1.56%; 1994 - 1.34%; 1995 - 1.49%; 1996 - 1.36%; 1997 - 1.08%. The units are permitted to burn 2.5 % sulfur (S) No. 6 fuel oil.<sup>1</sup> According to FPC, they fired lower sulfur oil in 1996-97 to earn special SO<sub>2</sub> allowances. These were awarded to the company in August, 1998.<sup>2</sup>

The specifications for the burners indicated that they could co-fire natural gas with the 2.5% S fuel oil. Correspondence from FPC indicated that *FPC has no plans to burn higher sulfur fuel oils when co-firing with gas but would like the flexibility to do so if the cost savings available would be significant.*<sup>3</sup> Theoretically co-firing with natural gas could make it possible to more easily fire the less expensive high sulfur fuel oil thus increasing actual hourly sulfur dioxide emissions. The burner manufacturer, Ansaldo Inc., has guaranteed that hourly emissions of NO<sub>x</sub>, PM, CO, and opacity will not increase when co-firing natural gas with No. 6 fuel oil.

In its application, FPC applied to fire used oil in quantities up to 10% of the annual heat input of the units. But it was mutually agreed that issues related to used oil will be addressed separately in the Anclote Title V Operation Permit action.

Because natural gas is an inherently cleaner fuel, FPC did not believe the project would trigger review for the Prevention of Significant Deterioration (PSD). The Department initially did not have reasonable assurance that there would not be PSD-significant increases because the use of lower cost natural gas together with lower cost high sulfur fuel oil could actually stimulate use of the units and thus increase annual NO<sub>x</sub> and SO<sub>2</sub> emissions. FPC has presented information in subsequent submittals in support of its contention that the project is exempt from by rule from PSD as a Pollution Control Project (PCP).

## REGULATIONS

The co-firing of natural gas is a change in method of operation with at least the possibility of causing *significant net emissions increase* as described in Rules 62-212.400(2)(d)4.a(ii) and 62-212.400(2), F.A.C. Therefore it may be a *Modification to a Major Facility*. As such, the PSD requirements in Rule 62-212.400, F.A.C. may apply.

Per Rule 62-212.400(5)(c), F.A.C.:

*The proposed facility or modification shall apply Best Available Control Technology (BACT) for each pollutant subject to preconstruction review requirements as set forth in Rule 62-212.400(2)(f), F.A.C.*

It is obvious that the definitions and applicability of facility modification and any exemptions are of key importance in this review.

A pollution control project (PCP) is defined at 40CFR52.21(b)(32) as:

***Any activity or project undertaken at an existing electric steam generating unit for purposes of reducing emissions from such unit. Such activities and projects are limited to:***

***(1) The installation of conventional or innovative pollution control technology, including but not limited to advanced flue gas desulfurization, sorbent injection for sulfur dioxide control and nitrogen oxides control and electrostatic precipitators;***

***(2) An activity or project to accommodate switching to a fuel which is less polluting than the fuel in use prior to the activity or project, including, but not limited to natural gas or coal reburning, or the co-firing of natural gas and other fuel for the purpose of controlling emissions;***

***(3) A permanent clean coal technology demonstration project conducted under title II, Section 101(d) of the Further Continuing Appropriations Act of 1985.....; or***

***(4) A permanent clean coal technology demonstration project that constitutes a repowering project.***

The PCP exemption rule was promulgated pursuant to the Wisconsin Electric Power Company (WEPCO) Decision and only to electric steam generating units. The rationale explained in EPA's July 1, 1994 Guidance (to Regions and Delegated State PSD Programs) as follows:

***“Because WEPCO was directed at the utility industry which faced ‘massive industry-wide undertakings of pollution control projects’ to comply with the acid rain provisions of the Act (57 FR 32314), EPA limited the types of projects eligible for the exclusion to add-on controls and fuel switches at utilities.”***

The above definition is not specifically listed in the State Rules in Chapter 62, F.A.C. However it is obvious that it is the intent of the State to abide by the Federal definition. Per **Rule 62-212.400(2)(a)2., F.A.C., Pollution Control Project Exemption:**

*A **pollution control project** that is being added, replaced, or used at an existing electric utility steam generating unit and that meets the requirements of **40CFR52.21(b)(2)(iii)(h)** shall not be subject to the preconstruction requirements of this rule.*

According to **40CFR52.21(b)(2)(iii)(h)**, one of the exemptions from review for PSD is:

*The addition, replacement or use of a pollution control project at an existing electric utility steam generating unit, **unless the Administrator determines such addition, replacement, or use renders the unit less environmentally beneficial, or except (1) When the Administrator has reason to believe that the pollution control project would result in a significant net increase in representative actual annual emissions of any criteria pollutant over levels used for that source in the most recent air quality impact analysis in the area conducted for the purpose of title I if any, and (2) The Administrator determines the increase will cause or contribute to a violation of any national ambient air quality standard or PSD increment, or visibility limitation.***

A fuel switch is not actually included in the definition of PCP nor is it listed as an activity in support of a PCP. However, it is not excluded. Furthermore, according to the EPA rule analysis at FR Vol. 57, No. 140, Pages 32320-32321:

*“Thus EPA is today adopting revisions to its PSD and nonattainment regulations for the addition, replacement or use at an electric steam generating unit of any system or device whose primary function is the reduction of pollutants (including the switching to a less-polluting fuel where the primary purpose of the switch is the reduction of air pollutants).”*

If it is established that the primary purpose of the switch is to reduce emissions, then it can be evaluated for qualification as a PCP. Even if there is an increase in a PSD pollutant associated with the project, it is not necessarily precluded from consideration as a PCP. Per the EPA analysis:

*“Several commentors pointed out that a pollution control project that reduces one pollutant should not be allowed to increase emissions of another pollutant if that increase will cause or exacerbate a different pollution problem..... Although a pollution control project could theoretically cause a small collateral increase in some emissions, it will substantially reduce emissions of other pollutants. In recognition of this, the rule provides for a case-by-case assessment of the pollution control project’s net emissions and overall impact on the environment.”*

Therefore, the criteria which the Department must follow are clear. The collateral increase in any PSD pollutant should be small and the decrease in one or more PSD pollutants should be substantial. The increases in any pollutant should not cause or contribute to violation of an ambient air quality standard or PSD increment.

## DESCRIPTION OF PROJECTS

One **project is the installation of natural gas burners.** It can be considered for qualification as “*an activity or **project to accommodate** switching to a fuel which is less polluting than the fuel in use prior to the activity or project, including, but not limited to natural gas or coal reburning, or the **co-firing of natural gas and other fuel.**” The **other project is the actual “switching to a less-polluting fuel or co-firing of natural gas.”***

It only remains to demonstrate that the installation of the burners is “*for the purpose of **controlling emissions**” and that “the **primary purpose co-firing natural gas is the reduction of air pollutants.**”*

## INFORMATION IN SUPPORT OF PCP DESIGNATION

All factors being equal, use of natural gas should reduce hourly and annual emissions. Because use of an additional fuel can lower costs and increase availability of the units a utility may well be motivated to add fuel flexibility for ***primarily economic purposes.*** The initial press release from FPC suggested that the main purpose was to “save customers money for its customers.”<sup>4</sup> The press release also mentioned “taking advantage of the environmental advantage of the environmental aspects of the clean burning fuel.” Florida Gas Transmission Company will install, own, and operate a 22 mile connecting pipeline to deliver natural gas to the plant.

With its application, FPC provided forecast estimates of use of the Anclote units with and without gas co-firing.<sup>5</sup> According to the projections, FPC believes that “*the availability of gas, whenever it is lower cost, would help the Anclote Units be more competitive within the intermediate load category, but would not change the units’ category by an increase in capacity factor.*” FPC provided historical data indicating that although natural gas has tended to be less expensive than residual fuel oil, by mid-1997, gas was more expensive. Since mid-1997, the price of gas has remained higher than residual fuel oil.<sup>6</sup>

The decrease in world oil prices is a well-known fact. Additionally many gas combustion turbine projects have been recently built, are being implemented, or planned throughout the state that will likely tighten the gas supply. These include:

- FPC Hines Energy Complex ~ 485 MW (startup)
- FPC Tiger Bay ~ 270 MW (operating)
- Lakeland McIntosh Unit 5 ~ 250-350 MW (construction)
- SECI Hardee Unit 3 ~ 250 MW (permitted)
- TECO Polk Power Partners ~ 250 MW (built)
- Tallahassee Purdom Unit 8 ~ 250 MW (permitted)
- Kissimmee Cane Island Unit 3 ~ 250 MW (application)
- Santa Rosa Energy ~ 250 MW plus steam (application)
- FPL Fort Myers Repowering ~ 1400 MW (application expected shortly)
- Duke/New Smyrna ~ 500 MW (PSC Review)
- Gulf Power ~ 500 MW (application expected shortly)
- JEA Kennedy ~ 160 MW (application expected shortly)

The Department has been contacted by numerous other companies planning or exploring the possibility of gas projects in Florida. Florida Gas Transmission is evaluating the need for additional pipeline capacity. However the permitting will take several years and will not likely prevent a tightening of supply and increases in the costs of firm and interruptible supplies. Therefore the price advantage foreseen by FPC when it announced the project may have diminished. Also the above projects (including those by FPC) are much more efficient users of natural gas achieving thermal efficiencies as high as 56%. It is not likely that Anclote will become a high availability competitor with these projects or with coal-fired plants.

On August 28, 1998 members of the Department met with a representative from FPC and described the additional specific documentation needed to provide reasonable assurance that the primary reason for the gas co-firing project is for the control of emissions. On August 31, FPC provided an engineering study that clearly outlined solutions to a recognized particulate fallout problem at Anclote.<sup>7</sup> According to the report:

*A portion of the **particulate** responsible for the fallout may result from very low load operation when ash deposits could accumulate in the air heater cold end, boiler exit flues, and stack --agglomerated and bound to the surfaces of these components by a sticky sulfuric acid solution which forms as a result of the low exit gas temperatures, high excess air, and moderate sulfur content of the fuel. When the units are started up, ramped up, from low load conditions, or when sootblowing is implemented in the boiler cold end surfaces, particularly in the air heater, the accumulations are agitated or loosened and are entrained with the flue gas out the stack. Due to the mass of these agglomerations, they could fall within close proximity of the stack; due to their acid content they could tightly adhere to and corrode the surfaces they fall on. This type of particulate fallout is commonly referred to as **acid smut**.*"

The report describes one of the options to solving the problem as **firing at minimum load with natural gas**. The option and the project to implement it is clearly consistent with the project described by FPC in its application.

The problem and solution are described in a brief from Department compliance personnel clearly describes the problem and FPC's solution.<sup>8</sup> According to the brief:

*"In late December of 1994 ... it came to the District's attention that **oily soot fallout from the Anclote Plant** was impacting residents within a one-half mile radius of the plant..... The use of **natural gas at low load**, such as during idle, **could only improve the condensable problem**."*

On September 3, FPC, through its Responsible Official and Designated Representative provided a statement to the effect that the purpose of the project is to reduce emissions and therefore qualifies for the PCP exemption from PSD<sup>9</sup>. With all the above facts, the Department has no reason to reject this assertion. Also information was provided to indicate that the project will not cause or contribute to a violation of any national ambient air quality standard or PSD increment.



## CONCLUSION

Based on the foregoing analysis, the Department's Preliminary Determination is that co-firing with natural gas constitutes a Pollution Control Project per Department and EPA regulations. Additionally the installation of the burners constitutes a project and activities to accommodate switching to a fuel that is less polluting than the fuel in use prior to the project. The projects address one of the most obvious manifestations of acid rain - namely sulfuric acid smut fallout in the vicinity of the plant.

To insure that the project does not result in higher SO<sub>2</sub> emissions by using natural gas in conjunction with high sulfur fuel oil, the Department and FPC have agreed to limit fuel oil sulfur content to 1.8% on a short term basis and 1.5% on an annual basis. Additionally, the Department requires that FPC actually implement the use of natural gas at low load to insure the problems of acid smut fallout are actually ameliorated. This will be accomplished through FPC's "firm supply" contract to purchase the equivalent of 40 MW of natural gas at all times.

With natural gas co-firing, an emissions decrease is now expected. The increased competition, construction of more efficient gas turbines, tightening of the gas supply, and FPC's assessment of future demand provide reasonable assurance that this project will not actually cause the units to become high availability units and cause annual emissions increases. FPC is only firmly committed to take 40 MW of natural gas and the economic benefits and risks appear to be mostly borne by Florida Gas Transmission Company.

This Preliminary Determination that the PCP exemption to PSD Review applies, will be public-noticed in conjunction with the Intent to Issue an Air Construction Permit.

September 4, 1998

## REFERENCES

---

- 1 Letter. Osbourn, S., FPC to Fancy, C.H., DEP. Fuel Oil Use - Anclote Units 1 and 2. August 31, 1998.
- 2 Letter. EPA to Pardue, W.J., FPC. Allowances Earned From Anclote Plant. August, 1998.
- 3 Letter. Osbourn, S., FPC, to Costello, M., DEP. Anclote Power Plant, Response to DEP Information Request. April 28, 1998.
4. Press Release. Florida Power Corporation. "Florida Power Corporation's Partial Conversion of Plant to Save Customers Money." November 13, 1997.
5. Letter. Osbourn, S., FPC, to Linero, A., DEP. Request to Burn Natural Gas at FPC's Anclote Facility. February 19, 1998.
- 6 Report. Energy Information Administration. "Monthly Energy Review." August, 1998.
- 7 Gilbert/Commonwealth. Anclote Units 1 and 2 Particulate Fallout Investigation. June 23, 1995.
8. E-Mail. Soich, Robert, DEP Southwest District, to Fancy, C.H., DEP. FPC Anclote Plant Gas Conversion. September 1, 1998.
9. Letter. Pardue, W. J., FPC, to Fancy, C. H., DEP. Anclote Pollution Control Project Exemption. September 1, 1998.



RECEIVED

February 24, 1999

MAR 02 1999

Mr. Clair Fancy, Chief  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, Florida 32399-2400

BUREAU OF  
AIR REGULATION

BAR conference room

Dear Mr. Fancy:

March 17 (10-12 noon  
1-3 p.m.)

Re: Status of Title V Permits

As you know, several of Florida Power Corporation's (FPC) Title V permits remain in the *Initial Draft* or *Revised Draft* stages and progress is being made very slowly. This is no one's fault in particular; it's difficult to establish any momentum when the involved parties are processing so many permits and some of the issues (e.g., periodic monitoring) are moving targets. As you and Mr. Scott Osbourn recently discussed, it may be helpful if all involved parties at FPC and the Department were to meet at one time to discuss any remaining unresolved issues.

FPC proposes, with your concurrence, to arrange for a one- or two-day meeting between FPC and the Department to resolve issues associated with the following Title V permits that remain in either the *Initial Draft* or *Revised Draft* stage: Anclote, Bartow, Crystal River, Suwannee, Tiger Bay, Bayboro and the University of Florida. It would be desirable to have you, Scott Sheplak and the permit engineers responsible for these facilities in attendance. Mr. Scott Osbourn and I will represent FPC.

It is FPC's desire to advance these Title V permits to the *Final Permit* stage as expeditiously as possible. FPC has recently requested additional extensions of time on the above-mentioned permits until April 1, 1999 and would like to resolve these permits prior to that date. We will contact you in the next day or two to coordinate a meeting date. If you should have any questions in the meantime, please contact either Scott Osbourn at (727) 826-4258 or me at (727) 826-4334.

Sincerely,

J. Michael Kennedy, O.E.P.  
Manager, Air Programs

cc: Scot. Sheplak  
Doug Eason, OGC  
Jeffrey Brown, OGC  
Robert Manning, HGS&S

propiessor

Anclote	Mike
Bartow	Ed
Crystal	Ed
Suwannee	Brue
Tiger Bay	Jonathan
Bayboro	Ed
UofK	Brue

{ See responses to  
FPC comments for  
Bartow or Crystal  
River for  
consistency }

THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Florida Power Corporation  
(Anclote Power Plant)

OGC CASE NO. 98-3107

vs.

State of Florida Department  
of Environmental Protection,

---

**RECEIVED**

MAR 25 1999

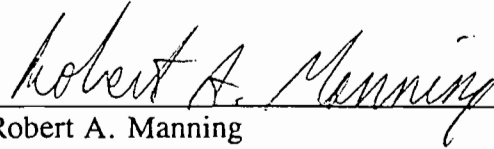
BUREAU OF  
AIR REGULATION

**WITHDRAWAL OF REQUEST FOR EXTENSION OF TIME**

The Florida Power Corporation (FPC), by and through undersigned counsel, hereby withdraws its Request for Extension of Time to file a petition for formal administrative proceedings in accordance with Chapter 120, Florida Statutes. FPC filed its last Request for Extension of Time until April 1, 1999, in response to the "Intent to Issue Title V Air Operation Permit" (Permit No. 1010017-003-AV) for the Anclote Plant located in Pasco County, Florida, to negotiate certain changes in the draft Title V permit with the Department of Environmental Protection (Department). FPC and the Department have now come to an agreement on the issues involved in the above-referenced draft Title V permit. This agreement is contained in the preliminary proposed Title V permit, a copy of which is attached to this Withdrawal. In addition, FPC and the Department have agreed that Condition B.4. will be changed to read as follows: "Methods of Operation - Fuels. Only new low sulfur No. 2 fuel oil shall be fired in the diesel generator(s)." Therefore, FPC hereby withdraws its Request for Extension of Time, conditioned upon the Department's issuance of the Proposed Permit in accordance with the Department's agreement with FPC.

Respectfully submitted this 24 day of March, 1999.

HOPPING GREEN SAMS & SMITH, P.A.

A handwritten signature in cursive script that reads "Robert A. Manning". The signature is written in black ink and is positioned above a horizontal line.

Robert A. Manning  
Fla. Bar No. 0035173  
123 South Calhoun Street  
Post Office Box 6526  
Tallahassee, FL 32314  
(850) 222-7500

Attorney for Florida Power Corporation

CERTIFICATE OF SERVICE

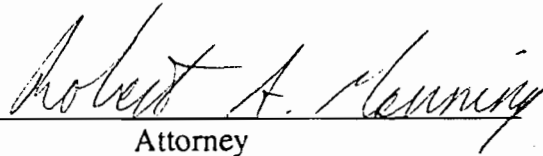
I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by

U.S. Mail on this 27 day of March, 1999.

Clair H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2600

Doug Beason  
Office of General Counsel  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2600

Ed Svec  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2600

  
\_\_\_\_\_  
Attorney

For FPC permits

- 1) Add to each permit below the condition titled Permitted Capacity and add to the Statement of Basis:

{Permitting note: 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. Regular record keeping is not required for heat input. Instead the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.}

- 2) For SIP boilers regulated under acid rain add a new condition to each permit in the titled **Record Keeping and Reporting Requirements**:

**X.x. COMS for Periodic Monitoring.** The owner or operator is required to install continuous opacity monitoring systems (COMS) pursuant to 40 CFR Part 75. The owner or operator shall maintain and operate COMS and shall make and maintain records of opacity measured by the COMS, for purposes of periodic monitoring.  
[Rule 62-213.440, F.A.C.]

- 3) For SIP boilers add to the statement of basis for each permit:

The Department has determined that the appropriate particulate matter testing frequency for the fossil fuel steam generators is annually whenever fuel oil is used for more than 400 hours in the preceding year. This frequency is justified by the low emission rate documented in previous emissions tests while firing fuel oil. These units are subject to a steady-state PM emission limit of 0.1 lb/mmBtu, which is effectively equivalent to 0.149 lb/mmBtu because of rounding, and 0.3 lb/mmBtu for soot blowing, which is equivalent to 0.349 lb/mmBtu. The applicant has presented historical PM test results which show that the steady-state and soot blowing average results are less than half the applicable effective standards. The Department has determined that sources with emissions less than half of the effective standard shall test annually. A five year average of results of particulate matter emission testing in lb/mmBtu for Unit (# designation) are #.### (steady-state) and #.### (soot-blowing).

- 4) Relocatable conditions for

3/19/99

v:/models/fpc1

**Florida  
Power  
CORPORATION**

SCOTT

# FAX Transmittal Sheet

FAX #: (727) 826-4216

DATE: 3/18/99

TO: Mike Halpin (850) 922-6979

COMPANY: DEP - Air

FROM: Scott Johnson

(Phone: (727) 826-4258)

# OF PAGES 2

*Faint illegible text*

Please notify \_\_\_\_\_ at (727) 826-\_\_\_\_\_ for any problems concerning the receipt of this FAX.

**COMMENTS:**

As we discussed.

---



---



---



---



---



---



---



---



---

*Faint illegible text*



*Anclote*

Add to the statement of basis:

The Department has determined that the appropriate particulate testing frequency for the fossil fuel steam generators is annually whenever fuel oil is used for more than 400 hours in the preceding year. This frequency is justified by the low emission rate documented in previous emissions tests while firing fuel oil. These units are subject to a steady-state PM emission limit of 0.1 lb/mmBtu, which is effectively equivalent to 0.149 lb/mmBtu because of rounding, and 0.3 lb/mmBtu for soot blowing, which is equivalent to 0.349 lb/mmBtu. The facility has presented historical PM test results which show that the steady-state and soot blowing average results are less than half the applicable effective standards. The Department has determined that sources with emissions less than half of the effective standard shall test annually. A summary of results of particulate emission testing in lb/mmBtu for the units are 0.041 (steady-state) and 0.056 (soot-blowing) for Unit 1 and 0.033 (steady-state) and 0.066 (soot-blowing) for Unit 2.

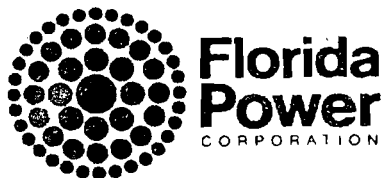
YEAR	Unit 1		Unit 2	
	NS	S	NS	S
1994	.051	.076	.049	.092
1995	.028	.038	.031	.043
1996	.046	.043	.038	.059
1997	.028	.025	.024	.049
1998	.051	.099	.023	.088
5 yr avg	.041	.056	.033	.066

*Mike Halpin*

**RECEIVED**

FEB 12 1999

BUREAU OF  
AIR REGULATION



February 11, 1999

Mr. Scott Sheplak, P.E.  
Bureau of Air Regulation  
Division of Air Resources Management  
Department of Environmental Protection  
2600 Blair Stone Rd., MS 5505  
Tallahassee, Florida 32399-2400

Dear Mr. Sheplak:

Re: Anclote Facility  
Revised DRAFT Permit No.: 1010017-003-AV

Florida Power Corporation (FPC) is providing comments related to the Revised DRAFT Title V permit referenced above. The comments are presented below in the same order as the conditions appear in the permit. FPC has filed a Request for Extension of Time until April 1, 1999. If we are unable to resolve each of the issues described below before this time, FPC intends to file an additional Request for Extension. Accordingly, at your earliest convenience after reviewing this letter, please contact me at (727) 826-4258 to discuss.

1. Page i. In the Table of Contents, Section III.B should read as follows: "Diesel Fired Generators (~~3~~—820 Kilowatt each).
2. Page 1. The Statement of Basis should include clarifying language on the intent of the heat input limits. This has been done, where appropriate, in other Title V permits (see attached EPA letter regarding FPL resolution).
3. Page 7. The permitting note under the heat input limits (Condition A.1) is incomplete. The note should also include language regarding recordkeeping requirements (see attachment per no. 2 above).
4. Condition A.32 (pages 16-18). Condition A.32.g(2) requires used oil records to be kept for the "preceding consecutive 12-month period". FPC interprets this as a 12 month rolling period. This requirement is inconsistent with Conditions A32.b and A.32.h, that require recordkeeping on a calendar year basis. In order to be consistent with the references to calendar year in the other requirements, FPC requests that Condition A.32.g(2) be revised to a calendar year basis. Finally, FPC requests that the last sentence of Condition A.32.h

be deleted. If lead meets the threshold for reporting in the AOR, it will be duly reported anyway.

5. Section III, Subsection B. The provisions governing the operation of these relocatable diesel generators when they are located at the Anclote facility should be essentially identical to the provisions contained in FPC's Final Title V permit for the Higgins Facility (see attached page from Final Title V permit for Higgins).
6. Table 1-1. The fuel oil sulfur content limit for Steam Units 1 and 2 should be 2.5%, not 2.50%. Finally, the hours per year of operation for the relocatable diesel generators should be 2,970 hr/yr, not 8,760 hr/yr.

FPC appreciates the opportunity to comment on the Revised DRAFT Title V permit. Thank you again for your prompt attention to this matter.

Sincerely,



Scott H. Osbourn  
Senior Environmental Engineer

Attachments

cc: Robert Manning, HGS&S

## ATTACHMENTS

**BEST AVAILABLE COPY**

Mr. R. Douglas Neeley

March 10, 1998

Page 6 of 9

and blending at the terminal 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 by FPL prior to transferring oil to the Manatee plant. Reports of percent sulfur content of these analyses shall be maintained at the power plant facility.

The owner or operator shall maintain records of the as-fired 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.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C., and applicant agreement with EPA on March 3, 1998]

Lauderdale, Manatee, Martin, Putnam and Turkey Point

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. A note will be added to the permitted capacity condition for each permit clarifying this, and an explanation that regular record keeping is not required for heat input will be added to the statement of basis. The following specific changes will be made:

Add to the statement of basis for each permit:

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. A note below the permitted capacity condition clarifies this. Regular record keeping is not required for heat input. Instead the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, is requires measurement of process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.

Add to each permit below the condition titled Permitted Capacity:

{Permitting note: 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.}

Manatee, Martin, Port Everglades, Riviera and Turkey Point

No revisions of the permits are necessary to address the comment related to records of soot blowing and load changes. All parties in the meeting agreed that the current permit requirements related to reporting of excess emissions are sufficient to satisfy this comment. FPL will continue to document and report excess emission events. This issue is considered resolved, so no changes to the permits will be made.

Subsection C. This section addresses the following emissions units.

E.U. ID No.	Brief Description
-7775047 -001	Relocatable Diesel Fired Generator(s)

The relocatable diesel generator(s) will have a maximum (combined) heat input of 25.74 MMBtu/hour while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum (combined) rating of 2460 kilowatts. Emissions from the generator(s) are uncontrolled. These conditions were requested in the Initial Title V Permit Application for the Anclote Power Plant received June 14, 1996. The generator(s) may be relocated at this facility and any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Anclote Power Plant, 1729 Baileys Bluff Road, Holliday, Pasco County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. ~~The future FPC Polk County Site~~, *Hines Energy Complex*, County Road 555, 1 mi. southwest of Homeland, Polk County.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. Each generator has its own stack.}

The following specific conditions apply to the emissions units listed above regardless of location:

Essential Potential to Emit (PTE) Parameters

C.1. These conditions become active and enforceable once FPC has given notification to the Air Quality Division of the Pinellas County Department of Environmental Management, if appropriate, that these units will be relocated to this facility. Notification shall be given as per specific condition C.24. [Rule 62-4.070(3), F.A.C.; Anclote Power Plant Permit AC 09-202080; and, Initial Title V Permit Application for the Anclote Power Plant received June 14, 1996.]

C.2. Permitted Capacity. The maximum operation heat input rates are as follows:  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Unit No.	MMBtu/hr/generator(s) Heat Input	Fuel Type
-7775047 -001	25.74	New Low Sulfur No. 2 Fuel Oil

*Mike Halpin*

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

**RECEIVED**

FLORIDA POWER CORPORATION  
(ANCLOTE POWER PLANT),

Petitioner,

FEB 09 1999

BUREAU OF  
AIR REGULATION

vs.

OGC CASE NO. 98-3107

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION,

Respondent.

---

ORDER GRANTING REQUEST FOR EXTENSION  
OF TIME TO FILE PETITION FOR HEARING

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, Florida Power Corporation (Anclote Power Plant), to grant an extension of time to file a petition for an administrative hearing on application No. 1010017-003-AV. See Exhibit 1.

Respondent, State of Florida Department of Environmental Protection, which has no objection to it. Therefore,

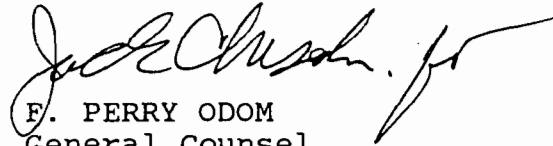
IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until March 1, 1999, to file a petition in this matter.

Filing shall be complete on receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 5th day of February, 1999, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
F. PERRY ODOM  
General Counsel

Douglas Building  
3900 Commonwealth Boulevard  
Mail Station #35  
Tallahassee, Fl. 32399-3000  
Telephone: (850) 488-9314

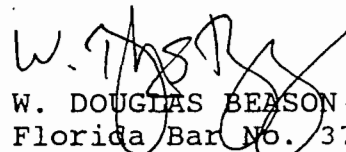
CERTIFICATE OF SERVICE

I CERTIFY that a copy of the foregoing has been mailed to:

Robert A. Manning, Esq.  
123 South Calhoun Street  
Tallahassee, Florida 32314

on this 8th day of February, 1999.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
W. DOUGLAS BEASON  
Florida Bar No. 379239  
Assistant General Counsel

Douglas Building  
3900 Commonwealth Boulevard  
Mail Station #35  
Tallahassee, Fl. 32399-3000  
Telephone: (850) 488-9314



THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an  
Application for Permit by:

OGC CASE NO.: 98-3107  
FDEP Revised Draft Permit No.: 1010017-003-AV

Florida Power Corporation  
Anclote Power Plant, Pasco County, Florida

---

REQUEST FOR ENLARGEMENT OF TIME

By and through undersigned counsel, Florida Power Corporation (FPC) hereby requests, pursuant to Florida Administrative Code Rule 62-110.106(4), an enlargement of time, to and including April 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, FPC states the following:

1. On or about August 21, 1997, FPC received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Draft Permit No. 1010017-003-AV) for the FPC Anclote Power Plant located in Pasco County, Florida. On September 4, 1997, FPC filed a Petition for Administrative Proceeding on this permit.
2. On or about November 30, 1998, FPC received from the Department an "Intent to Issue Title V Air Operation Permit" (REVISED Draft Permit No. 1010017-003-AV) for the FPC Anclote Power Plant. FPC previously requested and the Department granted an enlargement of time to February 1, 1999.
3. The Department's cover letter to the Revised permit states that the initial Draft Title V permit is withdrawn. In reliance on this representation, FPC hereby files this second Request for Extension of Time on the Revised Draft permit. Nonetheless, insofar as the initial Draft Title V permit

may be determined to still be in effect, FPC respectfully reserves its right to pursue its Petition on the initial Draft Title V permit.

4. Based on FPC's review, the Revised Draft permit and associated documents contain several provisions that warrant clarification or correction.

5. This request is filed simply as a protective measure to avoid waiver of FPC's right to challenge certain conditions contained in the Revised Draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and hopefully avoid the need to file a petition and proceed to a formal administrative hearing.

WHEREFORE, FPC respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Revised Draft Permit No. 1010017-003-AV be formally extended to and including April 1, 1999.

Respectfully submitted this 28 day of January, 1999.

HOPPING GREEN SAMS & SMITH, P.A.

By: 

Robert A. Manning  
Fla. Bar No. 0035173  
123 South Calhoun Street  
Post Office Box 6526  
Tallahassee, FL 32314  
(850) 222-7500

Attorneys for FLORIDA POWER  
CORPORATION

CERTIFICATE OF SERVICE

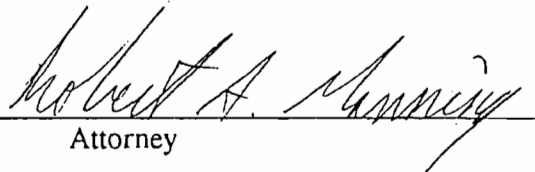
I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by U.S.

Mail on this 28 day of January, 1999:

Clair H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Jeff Brown, Esq.  
Department of Environmental Protection  
Room 669  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Ed Svec  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

  
\_\_\_\_\_  
Attorney



*Scott Sheplak*

*m.h.,  
please  
draft a  
response,  
SA*

**RECEIVED**  
FEB 12 1999  
BUREAU OF  
AIR REGULATION

February 11, 1999

Mr. Scott Sheplak, P.E.  
Bureau of Air Regulation  
Division of Air Resources Management  
Department of Environmental Protection  
2600 Blair Stone Rd., MS 5505  
Tallahassee, Florida 32399-2400

Dear Mr. Sheplak:

Re: Anclote Facility  
Revised DRAFT Permit No.: 1010017-003-AV

Florida Power Corporation (FPC) is providing comments related to the Revised DRAFT Title V permit referenced above. The comments are presented below in the same order as the conditions appear in the permit. FPC has filed a Request for Extension of Time until April 1, 1999. If we are unable to resolve each of the issues described below before this time, FPC intends to file an additional Request for Extension. Accordingly, at your earliest convenience after reviewing this letter, please contact me at (727) 826-4258 to discuss.

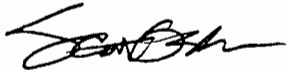
1. Page i. In the Table of Contents, Section III.B should read as follows: "Diesel Fired Generators (~~3~~ 820 Kilowatt each).
2. Page 1. The Statement of Basis should include clarifying language on the intent of the heat input limits. This has been done, where appropriate, in other Title V permits (see attached EPA letter regarding FPL resolution).
3. Page 7. The permitting note under the heat input limits (Condition A.1) is incomplete. The note should also include language regarding recordkeeping requirements (see attachment per no. 2 above).
4. Condition A.32 (pages 16-18). Condition A.32.g(2) requires used oil records to be kept for the "preceding consecutive 12-month period". FPC interprets this as a 12-month rolling period. This requirement is inconsistent with Conditions A32.b and A.32.h, that require recordkeeping on a calendar year basis. In order to be consistent with the references to calendar year in the other requirements, FPC requests that Condition A.32.g(2) be revised to a calendar year basis. Finally, FPC requests that the last sentence of Condition A.32.h

be deleted. If lead meets the threshold for reporting in the AOR, it will be duly reported anyway.

5. Section III, Subsection B. The provisions governing the operation of these relocatable diesel generators when they are located at the Anclote facility should be essentially identical to the provisions contained in FPC's Final Title V permit for the Higgins Facility (see attached page from Final Title V permit for Higgins).
6. Table 1-1. The fuel oil sulfur content limit for Steam Units 1 and 2 should be 2.5%, not 2.50%. Finally, the hours per year of operation for the relocatable diesel generators should be 2,970 hr/yr, not 8,760 hr/yr.

FPC appreciates the opportunity to comment on the Revised DRAFT Title V permit. Thank you again for your prompt attention to this matter.

Sincerely,



Scott H. Osbourn  
Senior Environmental Engineer

Attachments

cc: Robert Manning, HGS&S

## ATTACHMENTS

Mr. R. Douglas Neeley

March 10, 1998

Page 6 of 9

and blending at the terminal 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 by FPL prior to transferring oil to the Manatee plant. Reports of percent sulfur content of these analyses shall be maintained at the power plant facility.

The owner or operator shall maintain records of the as-fired 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.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C., and applicant agreement with EPA on March 3, 1998]

Lauderdale, Manatee, Martin, Putnam and Turkey Point

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. A note will be added to the permitted capacity condition for each permit clarifying this, and an explanation that regular record keeping is not required for heat input will be added to the statement of basis. The following specific changes will be made:

Add to the statement of basis for each permit:

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. A note below the permitted capacity condition clarifies this. Regular record keeping is not required for heat input. Instead the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.

Add to each permit below the condition titled Permitted Capacity:

{Permitting note: 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.}

Manatee, Martin, Port Everglades, Riviera and Turkey Point

No revisions of the permits are necessary to address the comment related to records of soot blowing and load changes. All parties in the meeting agreed that the current permit requirements related to reporting of excess emissions are sufficient to satisfy this comment. FPL will continue to document and report excess emission events. This issue is considered resolved, so no changes to the permits will be made.

**Subsection C. This section addresses the following emissions units.**

E.U. ID No.	Brief Description
-7775047 -001	Relocatable Diesel Fired Generator(s)

The relocatable diesel generator(s) will have a maximum (combined) heat input of 25.74 MMBtu/hour while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum (combined) rating of 2460 kilowatts. Emissions from the generator(s) are uncontrolled. These conditions were requested in the Initial Title V Permit Application for the Anclote Power Plant received June 14, 1996. The generator(s) may be relocated at this facility and any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Anclote Power Plant, 1729 Baileys Bluff Road, Holliday, Pasco County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. ~~The future FPC Polk County Site~~, *Hines Energy Complex*, County Road 555, 1 mi. southwest of Homeland, Polk County.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. Each generator has its own stack.}

The following specific conditions apply to the emissions units listed above regardless of location:

**Essential Potential to Emit (PTE) Parameters**

C.1. These conditions become active and enforceable once FPC has given notification to the Air Quality Division of the Pinellas County Department of Environmental Management, if appropriate, that these units will be relocated to this facility. Notification shall be given as per specific condition C.24. [Rule 62-4.070(3), F.A.C.; Anclote Power Plant Permit AC 09-202080; and, Initial Title V Permit Application for the Anclote Power Plant received June 14, 1996.]

C.2. Permitted Capacity. The maximum operation heat input rates are as follows:  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Unit No.	MMBtu/hr/generator(s) Heat Input	Fuel Type
-7775047 -001	25.74	New Low Sulfur No. 2 Fuel Oil



Mike Halpern Scott 12/14

THE STATE OF FLORIDA  
DIVISION OF ADMINISTRATIVE HEARINGS

RECEIVED

DEC 15 1998

BUREAU OF  
AIR REGULATION

FLORIDA POWER CORPORATION

Petitioner,  
vs.

DOAH Case No. 97-004388  
DEP OGC Case No. 97-1584

STATE OF FLORIDA, DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

Respondent.

NOTICE OF WITHDRAWAL OF PETITION FOR  
FORMAL ADMINISTRATIVE HEARING

The Florida Power Corporation (FPC), by and through undersigned counsel, hereby withdraws its Petition for Formal Administrative Hearing, which was filed pursuant to Sections 120.569, 120.57 and 403.0872(5), Florida Statutes and Florida Administrative Code Rules 62-103.155, 28-106.201, and 60Q-2.004, based upon the understanding that the initial Draft Title V permit has been "withdrawn." This Notice is based upon the following:

1. FPC filed a Petition on the initial Draft Title V permit on September 4, 1997, in response to the Department of Environmental Protection's (Department) issuance of the "Intent to Issue Title V Air Operation Permit" (Permit No. 1010017-003-AV) for the Anclote Power Plant located in Pasco County, Florida.

2. FPC filed a Status Report and Request for Extension of Time on December 1, 1998, requesting until February 1, 1999 within which to negotiate a settlement of the Petition.

3. On or about November 30, 1998, FPC received from the Department a Revised Draft Title V permit, which stated that the initial Draft Title V permit, upon which the Petition is based, is "withdrawn."

4. Based on the Department's withdrawal of the initial Draft Title V permit, FPC has no basis for retaining its Petition on this initial Draft permit. Therefore, FPC is voluntarily withdrawing its petition on the initial Draft Title V permit based upon the understanding that FPC will have all rights under the Administrative Procedure Act associated with the issuance of the Revised Draft Title V permit, including the right to Petition for an Administrative Hearing on this Revised Draft.

5. In this regard, FPC is also filing today, separately, a Request for Extension of Time to file a Petition for Administrative Hearing on the Revised Draft Title V permit.

6. FPC is not waiving any of its rights in relation to the initial or Revised Draft Title V permits. To the extent the initial Draft Title V permit remains in existence, FPC retains its Petition on the initial Draft Title V permit.

Respectfully submitted this 14 day of December, 1998.

HOPPING GREEN SAMS & SMITH, P.A.

By: Robert A. Manning  
Robert A. Manning, Fla. Bar No. 0035173  
123 South Calhoun Street  
Post Office Box 6526  
Tallahassee, FL 32314  
(850) 222-7500

Attorneys for Florida Power Corporation

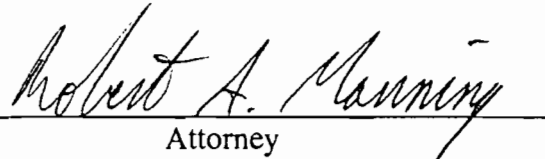
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by

U.S. Mail on this 14 day of December, 1998:

Clair H. Fancy, P.E., Chief  
Division of Air Resources Management  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Doug Beason, Esq.  
Office of General Counsel  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2600

  
\_\_\_\_\_  
Attorney

SEP 4 1997

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

FLORIDA POWER CORPORATION

Petitioner,

vs.

DEP OGC Case No. 97-\_\_\_\_\_

STATE OF FLORIDA, DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

Respondent.

\_\_\_\_\_ /

PETITION FOR FORMAL ADMINISTRATIVE HEARING

Petitioner Florida Power Corporation (FPC), by and through undersigned counsel, hereby petitions for a formal administrative hearing in opposition to certain conditions in the "Intent to Issue Title V Air Operation Permit" and associated draft Title V permit (Permit No. 1010017-003-AV) for the Anclote Power Plant as issued by the Department of Environmental Protection ("Department") on August 13, 1997 in response to an application for Title V air operation permit submitted by FPC on June 14, 1996. (A copy of the draft Title V permit is included as Attachment A.) This Petition is filed pursuant to Sections 120.569, 120.57, and 403.0872(5), Florida Statutes, and Florida Administrative Code Rules 62-103.155, 28-106.201, and 60Q-2.004. In support of this Petition, FPC states:

Identification of Parties

4. The name, address, and telephone number of the Petitioner, the Department file number, and the county in which the project is located are as follows:

Florida Power Corporation  
Attn: Mr. W. Jeffrey Pardue, C.E.P.  
Director, Environmental Services Department  
3201 34th Street S.  
St. Petersburg, Florida 33711  
813/866-5151  
Anclote Power Plant  
DEP File No. 1010017-003-AV  
Pasco County, Florida

5. The Respondent State of Florida, Department of Environmental Protection (FDEP), is an agency authorized by Florida Statutes to administer permitting and regulatory programs governing activities reasonably expected to be sources of air pollution, including facilities subject to Florida's "Operation permits for major sources of air pollution" program under Section 403.0872, Florida Statutes. Under this statutory provision, FDEP administers the Title V air operation permit program mandated under the federal Clean Air Act. 42 U.S.C. § 7661 et seq. FDEP maintains offices at 2600 Blair Stone Road, Tallahassee, Florida 32399, and 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000. FDEP's Division of Air Resource Management has offices at 111 S. Magnolia, Tallahassee, FL 32399.

#### Notice

6. FPC received the Intent to Issue Title V Air Operation Permit and draft Title V permit for the Anclote Power Plant on August 21, 1997, by U.S. Mail. The Intent to Issue Title V Air Operation Permit stated that the permit applicant could file a Petition for Formal Administrative Hearing within 14 days of receipt of the Intent.

#### Substantial Interests Affected

6. FPC's substantial interests are affected by FDEP's issuance of the draft Title V permit for the Anclote Power Plant with the conditions as set forth in Attachment A. The

Anclote Power Plant will be required to operate in compliance with every condition in the permit, and periodically certify that it remains in compliance. Numerous conditions in the draft permit impose new requirements that are inconsistent with provisions in the plant's existing air permits, apparently based on incorrect factual assumptions, contrary to existing law, arbitrary and capricious, unnecessary, ambiguous, and unreasonable. To require FPC's Anclote Power Plant to comply with every condition as written in the draft Title V permit (Attachment A) would substantially and detrimentally impair FPC in meeting its responsibility to operate in compliance with all applicable environmental requirements. Also, additional costs will be incurred without corresponding environmental benefits.

#### **Statement of Material Facts Disputed by Petitioners**

7. The draft Title V permit, including the cover letters and appendices, is 68 pages long and contains detailed, complex, and in several cases ambiguous new conditions and requirements. The Intent to Issue does not state the factual or legal grounds for many of the new permit conditions. Therefore, FPC has in many instances had to presume the factual justification upon which FDEP has apparently relied. FDEP has had 425 days to issue the draft Title V permit for the Anclote Power Plant (from June 14, 1996 to August 13, 1997); FPC has been afforded 14 days after receipt of the draft permit to either accept the draft permit as is, file a Petition for Administrative Hearing, or file a Request for Extension of Time. The latter option, which could be invoked to further analyze and understand the draft permit and/or negotiate the permit's content, requires advance concurrence from FDEP under Rule 28-106.111(3), Fla. Admin. Code; absent such advance concurrence, the deadline for filing a Petition for Administrative Hearing will not automatically be tolled. FDEP has been

unresponsive to FPC's telephonic requests for advance concurrence to file a Request for Extension of Time. Due to the limited time available to examine the draft permit, FPC respectfully reserves the right to amend this Petition after conducting a more detailed analysis of the contents of the draft permit, and as information concerning FDEP's rationale for certain conditions becomes available and known through the discovery process in this proceeding.

8. In the Intent to Issue Title V Air Operation Permit, FDEP indicated that it included the draft conditions in the draft Title V permit in order to provide reasonable assurance that operation of the source will not adversely impact air quality, and that "the source will comply with all appropriate provisions of [FDEP's air rules]."

(a) FPC disputes that the new requirements set forth in the draft Title V permit (i.e., provisions not currently set forth in existing air permits for the Anclote Power Plant) are necessary to provide "reasonable assurances" that the Anclote Plant is not causing or contributing to any exceedances of air quality standards or emission limitations or otherwise meet FDEP's statutory and regulatory requirements under the Title V program. There is no factual justification warranting the imposition of new provisions.

(b) FPC disputes FDEP's apparent determination, as evidenced by its inclusion of a 1200 pound per year emission cap for lead emissions (associated with the combustion of used oil) in draft Condition A.32.h., that FPC's Anclote Power Plant would be subject to the Prevention of Significant Deterioration (PSD) program if its lead emissions exceed that amount. There is no factual justification for determining that co-firing used oil under the circumstances at the Anclote Power Plant triggers PSD

applicability. FDEP is incorrect insofar as it determined that there is a factual basis supporting the conclusion that the Anclote Power Plant was not capable, prior to January 6, 1975, of accommodating used oil.

(c) FPC disputes that the new conditions will benefit the environment or otherwise serve the underlying purposes of the governing statutes and regulations.

(d) Additional disputed issues are reflected in paragraph 9.

**Statement of Facts Warranting Reversal or Modification of the Department's Action**

9. FPC states the following material facts which warrant the reversal or modification of FDEP's proposed action:

a. The Title V operating permit program is designed to consolidate a facility's existing regulatory obligations into a single document, thereby allowing the facility, the regulatory agencies and the public to quickly and easily determine what is required. Therefore, by establishing new requirements in FPC's Anclote Power Plant draft Title V permit, FDEP is misapplying the Title V process by substantially increasing (without factual cause) existing permit obligations during the Title V issuance process. For example, certain provisions contained in draft Condition A.32.f. and g., as well as all of Conditions A.32.h. and i., are not contained in any existing permit or applicable requirement to which FPC's Anclote Power Plant is subject.

b. Used Oil Provisions. FPC's Anclote Plant currently is authorized, pursuant to air operation permit number AO51-254492A (issued by FDEP on January 31, 1996), to burn "on-specification" used oil. The only express limitation on the quantity of "on-specification" used oil contained in AO51-254492A is that the "maximum annual amount of on-



specification used oil burned in this source shall not exceed 10% of the total heat input to the source." In an initial draft of that permit, FDEP proposed to place a limit of 8,000 gallons per year of on-specification used oil. After numerous discussions, FDEP determined that there was no regulatory basis for imposing that restriction (see memorandum from Clair Fancy, Chief, DEP Bureau of Air Regulation to Jerry Kissel, Southwest District, dated September 15, 1996, included as Attachment B); the agency therefore only limited the quantity of used oil based on the expected maximum utilization rate projected by FPC.

c. Draft Condition A.32.h. imposes a new 1200 pound per year lead emissions limit (when burning used oil) that has the practical effect of limiting the quantity of used oil allowed to be burned at this facility. Therefore, FDEP's inclusion of this 1200 pound per year limitation for lead emissions while burning used oil reverses, without good cause, its previous determination when issuing AO51-254492A.

d. FPC's Anclote Power Plant received its original construction permit for "Electric Generating Units 1 and 2, Oil Fired, 515 Megawatts Capacity Each" on June 4, 1971. Because a facility constructed to burn fuel oil can just as readily burn "on-specification used oil," FPC's Anclote Power Plant has been continuously "capable of accommodating" on-specification used oil throughout the life of the Plant. In fact, the memorandum from Clair Fancy, DEP's Chief of the Bureau of Air Regulation, dated September 15, 1995 and referenced in paragraph 9.b. above, specifically makes this finding.

e. Based on FDEP's citation to Rule 62-212.400(2)(f)1., Fla. Admin. Code in this draft Condition A.32., it is FPC's understanding that FDEP has included the lead limit for burning used oil to provide assurance that the Prevention of Significant Deterioration (PSD)

preconstruction permitting program is not triggered. However, because the Anclote Power Plant was "capable of accommodating" used oil prior to January 6, 1975, any increased air emissions associated with used oil are exempt from PSD review under the "capable of accommodating" exemption as set forth in Rule 62-212.400(2)(c)4., F.A.C. Accordingly, because the ongoing combustion of used oil at FPC's Anclote Power Plant cannot trigger the PSD program, there is no basis for imposing a condition limiting lead emissions associated with used oil (or the quantity of used oil burned) for PSD purposes. Moreover, the limitations on lead emissions are not justified by any considerations associated with compliance with the ambient air quality standard for lead.

f. FDEP apparently has included a provision similar to draft Condition A.32.h. in other draft Title V permits, and intends to include such a requirement in other FPC draft Title V permits. There is no current regulatory basis for the inclusion of such a condition in FPC's or any other facilities' draft Title V permits, and such inclusions reflect an underlying FDEP shift in interpretation based on a statement of general applicability (essentially eliminating the capable of accommodating exemption) that implements, interprets, or prescribes law or policy. Accordingly, FDEP's inclusion of draft Condition A.32.h. in FPC's Anclote Power Plant draft Title V permit constitutes an invalid exercise of delegated legislative authority because it represents the application of an unpromulgated rule.

g. Errors in FDEP's factual predicates and application of the law. Several draft Conditions reflect a misreading, misapplication, or misunderstanding of the legal and factual predicate required for inclusion of a Condition in a Title V permit, and therefore, these conditions as drafted by FDEP lack the requisite justification. Examples of such draft

Conditions include (requested additions are indicated by underline, requested deletions by strike-through):

(1) Condition 7. This draft Condition has no counterpart under Florida's State Implementation Plan and therefore should be specifically identified and marked as "Not Federally Enforceable," in accordance with federal law and FDEP guidance. *left*

(2) Condition A.28. This draft Condition should be deleted because it is redundant regarding the exemption from annual particulate matter testing if the unit operates less than 400 hrs/yr and reflects a misreading of the rules regarding the exemption from the renewal testing requirement, which only applies to units that have been shutdown or on standby. A new condition could be inserted in its place, if desired, which mirrors the language from Rule 62-297.310(7)(a)3., F.A.C. *changed*

(3) Condition A.32. The heading to this draft Condition is a misstatement of the requirements for this unit and should be edited as follows: "Used Oil Containing PCBs Greater Than 50 PPM Not Allowed." *changed*

(4) Condition B.22. This condition places no requirement on the permittee and therefore should be deleted. *left*

h. Need For Clarification. Numerous provisions in FPC's draft Title V permit for the Anclote Power Plant are vague, ambiguous, incorrect, or incomplete, and therefore could be read to be arbitrary and capricious, unnecessary, unsupported by FDEP's apparent factual assumptions, or in contravention of existing permit obligations or existing law. The following draft Conditions represent examples of such language:

(1) Condition 7. FPC requests that this Condition be edited as follows:

"The permittee shall ~~not allow no person to~~ store, pump, . . . ."

~~not~~ changed

(2) Condition 9. The regulatory authority cited by FDEP for this draft Condition should specify a particular paragraph number.

left  
←

(3) Condition A.7. FPC requests that this Condition be edited as follows:

"Particulate emissions shall not exceed 0.1 pound per million Btu heat input, as measured in accordance with Condition A.18. ~~by applicable compliance methods.~~"

← left  
but check!  
to be like this

(4) Condition A.9. Because the emissions unit this Condition refers to is only authorized to burn oil, FPC requests that this Condition be edited as follows:

"~~When burning liquid fuel,~~ Sulfur dioxide emissions shall not exceed 2.75 pounds per million Btu heat input, as measured in accordance with Condition A.19. ~~by applicable compliance methods.~~"

← ok

(5) Conditions A.20. and B.12. The ASTM test methods required in these draft Conditions do not reflect current methodology and therefore should be edited as follows: . . . ASTM D4292-90 (1995), or both . . . ."

← ok  
change for A20  
but not B12  
make B12 look  
like A20!

(6) Conditions A.24 and B.14. Because the draft permit specifies a particular compliance method, the first clause in these draft Conditions should be deleted:

"~~When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method . . . .~~"

A16

(7) Condition A.14. Because the emissions unit this Condition governs is subject to an applicable standard for visible emissions, this Condition should be edited as follows: "Visible emissions, ~~if there is an applicable standard . . . .~~"

ok  
(changed)

(8) Description to Unit 2. FPC requests that this description be edited to be correct and complete as follows: "These relocatable emissions units ~~are Caterpillar Model 3508-DITA 820 kilowatt diesel generators.~~ The will have a maximum combined heat input of ~~26~~ 25.74 million Btu per hour (MMBtu/hr) while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum combined rating of 2460 kilowatts. . . ."

left

(9) Condition 4. in the Acid Rain Part. Because this draft Condition pertains to the entire facility, and not just the Acid Rain units, this Condition should be moved to the "facility-wide section" of the permit.

2

i. Presumed Typographical Errors. The draft permit contains numerous presumed typographical errors, and therefore such provisions could be read to be arbitrary and capricious, unnecessary, unsupported by FDEP's apparent factual assumptions or in contravention of existing permit obligations or existing law. Examples are described below:

(1) Table of Contents Description. The description of emissions unit 1 should be edited as follows: "Fuel Oil ~~Fuel~~ Fired Steam Generators (E.U. ID Nos. -001 and -002)."

← o/c (changed)

(2) Condition A.3. In paragraph a., there appears to be a typographical error in the first line: "new #6 or higher grades of fuel oils."

← o/c (changed)

(3) Condition B.20. To be consistent with the language in AO09-205952 (which currently governs the operation of this emissions unit), the following language should be added to the first sentence of this Condition: "To demonstrate compliance with specific condition B.4., records shall indicate the daily hours of operation for each of the

← o/c (changed)

generators, the daily hours of operation expressed as "engine-hours," and a cumulative total hours of operation expressed as "engine-hours" for each month.

(4) Condition 3. in the Acid Rain Part. There appears to be a formatting problem with this condition, presumably the inclusion of "hard returns" in the codes.

**Statutes and Rules Requiring Reversal or Modification of the Department's Action**

10. The statutes and rules requiring reversal or modification of the Department's action include, but are not limited to, Chapters 120 and 403, Florida Statutes, and Chapters 62-4, 62-210, 62-212, 62-213, 62-296, and 62-297, Florida Administrative Code.

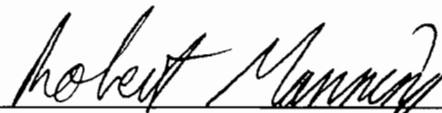
**Demand for Relief**

11. FPC respectfully requests that:

- a. The Department refer this matter to the Division of Administrative Hearings for a formal hearing pursuant to Section 120.57(1), Florida Statutes;
- b. An Order be entered issuing a Title V permit for FPC's Anclote Power Plant that authorizes the combustion of on-spec used oil in the manner currently authorized under its existing air permit, and that includes appropriate clarifications, corrections, and changes as set forth in the foregoing paragraphs; and
- c. Provide such other relief as may be appropriate.

Respectfully submitted,

HOPPING GREEN SAMS & SMITH, P.A.

By: 

James S. Alves  
Fla. Bar No. 0443750  
Robert A. Manning  
Fla. Bar No. 0035173  
Post Office Box 6526  
Tallahassee, FL 32314  
904/222-7500

Attorneys for FLORIDA POWER  
CORPORATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been mailed to W. Douglas Beason, Esquire, Florida Department of Environmental Protection, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, this 4th day of September, 1997.

  
\_\_\_\_\_  
ATTORNEY



## Memorandum

## Environmental Protection

and fax transmittal memo 7871		# of pages	2
Catt Osborne		From	Eric Reiter
E. Power		Co.	DEP
Dept.		Phone #	
Fax #		Fax #	7446100 112

To: Jerry Kissel

From: Clair Fancy *CF*

Date: June 2, 1995

Subject: Florida Power Corporation Anclote 1  
AO 51-254492  
Request to Burn On-Specification Off-Site Generated Used Oil

We have received your IM regarding the above referenced facility. Your proposed air operation permit revision to allow the use of up to 10% on-specification off-site generated used oil should not be issued.

For proper federally enforceability and incorporation into the forthcoming Title V Source operation permit, the source needs to request authority to burn on-specification off-site generated used oil through an application for an air construction permit. We believe that Secretary Tschinkel's memorandum of January 5, 1987 (attached), was intended to provide the capability to burn on-specification on-site generated used oil and the operation permit renewal, essentially an amendment, could do that.

The new air construction permit should include limitations for the used oil constituents/properties, as listed in your proposed Specific Conditions Nos. 6.B. and 6.C. See below the additional constituent/property to be tested for (**bolded**); the methods of analysis for these constituents/properties; a testing/analysis frequency for compliance verification, as contained in your proposed Specific Condition No. 7.A.; and, record keeping requirements, as contained in your proposed Specific Condition No. 7.B.

Constituent/Property	Unit	Test Method
Cadmium	ppm	EPA SW-846 (3040-7130)
Arsenic	ppm	EPA SW-846 (3050-7061)
Chromium	ppm	EPA SW-846 (3040-7190)
Lead	ppm	EPA SW-846 (3040-7420)
Total Halogens	ppm	ASTM E442
Sulfur	%	ASTM D129-64, D1552-83, D2622-87 or D1266-87
Flash Point	°F	ASTM D93
Heat of Combustion	Btu/gal	D287
Density	lbs/gal	

Memorandum  
June 2, 1995  
Page 2

Please note on page 4, in Secretary Tschinkel's memorandum, that there is a requirement of a facility that burns more than 10,000 gallons of used oil annually to register with the Department as a used oil recycler. Please check to see if the 10¢ value exceeds this threshold.

If there are any questions, please call Bruce Mitchell at (904)488-1344.

CHF/bm/m

Attachment

cc: A. Linero

Memorandum

Florida Department of Environmental Protection

TO: Jerry Kissel, Southwest District

FROM: Clair Fancy, Chief *Clair Fancy*  
Bureau of Air Regulation

DATE: September 15, 1995

SUBJECT: Florida Power Corp Anclote 1  
AO 51-254492  
Request to Burn On-Specification Off-site Generated  
Used Oil

After reviewing this situation and discussing with Scott Osborn of FPC and Bruce Mitchell of BAR, I have concluded that there are no federally enforceable restrictions to prevent FPC from burning on-spec used oil. There are no physical modifications required to burn this material, and therefore, the unit appears to be capable of accommodating this fuel, and consequently, PSD applicability is not an issue.

The draft permit sent to Al Linero on May 24 can be issued.

Rule 62-710, F.A.C., entitled Used Oil Management, requires that the hauler be registered with the Department. Permits shall not be required under this rule for the burning of used oil provided a valid Department air permit is in effect for the facility (Rule 62-710.800(5)).

CHF/h

cc: Howard L. Rhodes

**RECEIVED**  
SEP 19 1995  
Department of Environmental Protection  
BY SOUTHWEST DISTRICT

Post-It™ brand fax transmittal memo 7871		# of pages 1	
To	Scott Osborn	From	Bruce Mitchell
Co.	FL Power	Co.	DEP
Dept.	ENR	Phone #	744-6100
Fax #	866-4926	Fax #	X112



Mike Halpin

# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

November 24, 1998

Mr. W. Jeffrey Pardue, C.E.P.  
Director of Environmental Services  
Florida Power Corporation  
3201 34th Street South  
St. Petersburg, Florida 33711

Re: Title V Revised DRAFT Permit No.: 1010017-003-AV  
Anclote Power Plant

Dear Mr. Pardue:

One copy of the Title V Revised DRAFT Air Operation Permit for the Anclote Power Plant located at 1739 Baileys Bluff Road, Holiday, Pasco County, is enclosed. The previous DRAFT Title V operation permit clerked on August 19, 1997, is withdrawn.

The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" must be published as soon as possible upon receipt of this letter. This issue is important in order for you to receive your Title IV Acid Rain permit by January 1, 2000. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (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.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Scott M. Sheplak, P.E., at the above letterhead address. If you have any other questions, please contact Michael P. Halpin, P.E. at 850/921-9530.

Sincerely,

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

CHF/h

Enclosures

cc: Ms. Carla E. Pierce, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)  
Ms. Gracy Danois, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

In the Matter of an  
Application for Permit by:

Florida Power Corporation  
3201 34th Street South  
St. Petersburg, Florida 33711

Revised DRAFT Permit No.: 1010017-003-AV  
Anclote Power Plant  
Pasco County

### **INTENT TO ISSUE TITLE V AIR OPERATION PERMIT**

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit (copy of Revised DRAFT Permit enclosed) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Florida Power Corporation, applied on June 12, 1996, to the permitting authority for a Title V air operation permit for the Anclote Power Plant located at 1729 Baileys Bluff Road, Holiday, Pasco County.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, 62-213, and 62-214, F.A.C. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit is required to commence or continue operations at the described facility.

The permitting authority intends to issue this Title V air operation permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." The 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. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-1344; Fax: 850/922-6979), within 7 (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 pursuant to Rule 62-110.106, F.A.C.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the attached Title V Revised DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Revised DRAFT Permit, the permitting authority shall issue another Revised DRAFT Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision 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 (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, 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 fourteen 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 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 how and when each petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;

(f) A demand for relief.

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 notice of intent. 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 will not be available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

(a) The name, address, and telephone number of the petitioner;

(b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;

(c) Each rule or portion of a rule from which a variance or waiver is requested;

(d) The citation to the statute underlying (implemented by) the rule identified in (c) above;

(e) The type of action requested;

(f) The specific facts that would justify a variance or waiver for the petitioner;

(g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,

(h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

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 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the 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 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.

**STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION**



\_\_\_\_\_  
C. H. Fancy, P.E.

Chief

Bureau of Air Regulation



**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the Revised DRAFT permit) and all copies were sent by certified mail before the close of business on 11/25/98 to the person(s) listed:

Mr. W. Jeffrey Pardue, C.E.P. , Florida Power Corporation

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the Revised DRAFT permit) were sent by U.S. mail on the same date to the person(s) listed:

Mr. Kennard F. Kosky, P.E., Golder Associates, Inc.  
Mr. Bill Thomas, DEP - SWD  
Mrs. Gail Kamaras, LEAF (only the Intent to Issue)

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.

Barbara J. Boutwell 11/25/98  
(Clerk) (Date)

**PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT**

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Title V Revised DRAFT Permit No.: 1010017-003-AV  
Anclote Power Plant  
Pasco County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Florida Power Corporation for the Anclote Power Plant located at 1729 Baileys Bluff Road, Holiday, Pasco County. The applicant's name and address are: Florida Power Corporation, 3201 34th Street South, St. Petersburg, Florida 33711.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V Revised DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V Revised DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Revised DRAFT Permit, the permitting authority shall issue another Revised DRAFT Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, 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 fourteen 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 applicable 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 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; 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 petitioner's substantial rights will be affected by the agency determination;

(c) A statement of how and when the petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so state;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief; and

(f) A demand for relief.

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 notice of intent. 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 is not available for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the 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 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.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:

Department of Environmental Protection  
Bureau of Air Regulation  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/488-1344  
Fax: 850/922-6979

Department of Environmental Protection  
Southwest District  
8407 Laurel Fair Circle  
Tampa, Florida 33619  
Telephone: 813/744-6100  
Fax: 813/744-6458

The complete project file includes the Revised DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/921-9532, for additional information.

## **STATEMENT OF BASIS**

Florida Power Corporation  
Anclote Power Plant  
Facility ID No.: 1010017  
Pasco County  
Initial Title V Air Operation Permit  
**PROPOSED Permit No.: 1010017-003-AV**

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This facility consists of two fuel oil fired steam electric generating stations, E.U. ID No. -001 (Unit No. 1) and -002 (Unit No. 2). Unit No. 1 and No. 2 power turbines which drive generators with a nameplate ratings of 535(summer)/540(winter) megawatt and 525(summer)/ 530(winter) megawatt, respectively. Units No. 1 and No. 2 share a common stack. Relocatable diesel fired generator(s) with a maximum heat input of 25.74 MMBtu/hour and a maximum rating of 2460 Kilowatts are permitted to be located at the facility.

Fossil fuel fired steam generator # 1 is a nominal 535(summer)/540(winter) megawatt (electric) steam generator designated as Anclote Unit # 1. The emission unit is fired on No. 6 or lighter grades of fuel oil and on-specification used oil , with a maximum heat input of 4964.4 MMBtu per hour. Fossil fuel fired steam generator # 2 is a nominal 525(summer)/ 530(winter) megawatt (electric) steam generator designated as Anclote Unit # 2. The emission unit is fired on No. 6 or lighter grades of fuel oil and on-specification used oil, as permitted herein, with a maximum heat input of 4850 MMBtu per hour. Each boiler/steam generator, units #1 and #2, drives a turbine generator and both units share a common 499 foot exhaust stack. Emissions from these units are uncontrolled. The emissions units are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input. Fossil fuel fired steam generator # 1 began commercial operation on October 16, 1974; and, fossil fuel fired steam generator # 2 began commercial operation on October 31, 1978.

The relocatable diesel generator(s) have a maximum heat input of 25.74 million Btu per hour (MMBtu/hour) while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum rating of 2460 kilowatts. Emissions from the generators are uncontrolled. These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. The generators may be relocated at any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Higgins Plant, Shore Drive, Oldsmar, Pinellas County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. The future FPC Polk County Site, County Road 555, 1 mi. southwest of Homeland, Polk County.

Also included in this permit are miscellaneous unregulated and insignificant emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

Scott M. H.  
fui



January 29, 1999

**RECEIVED**

FEB 08 1999

BUREAU OF  
AIR REGULATION

Mr. Clair H Fancy, P.E., Chief  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

Re: Fuel Oil Sampling at Anclote

I am writing to follow-up on our recent telephone conversation regarding fuel sampling and analysis for demonstration of compliance with the air construction permit that allows the use of natural gas at Florida Power Corporation's (FPC) Anclote Units 1 and 2. We discussed a practicable sampling program that ensures compliance with the permit while minimizing the burden to the plant. The following summarizes the program that FPC would like to use until such time that the Title V permit is finalized and becomes effective. FPC understands that the incorporation of periodic monitoring may alter these procedures somewhat in the final permit.

- 1) FPC currently takes an as-fired sample of #6 oil on a daily basis. These samples are used to develop a monthly composite sample for analysis. These monthly composite analyses are useful for determining compliance with the annual fuel sulfur limit of 1.5%.
- 2) The permit allows a maximum as-fired fuel sulfur limit of 1.8%. If an individual oil shipment contains less than 1.8% sulfur, then no additional sampling is necessary to ensure compliance with the daily limit. The on-going sampling discussed in 1) above will continue to ensure compliance with the annual 1.5% sulfur limit.
- 3) On occasion, a fuel oil shipment will contain greater than 1.8% sulfur. If this occurs, there are two ways of assuring compliance.
  - a. As-fired sampling and analysis will be necessary in order to ensure compliance with the as-fired maximum limit. However, there may be a need to burn the fuel prior to receiving the analysis results. In such cases, a material balance calculation will be performed in order to closely estimate the sulfur content of the fuel to be burned. This can serve as assurance until the actual laboratory analysis is received. FPC understands that the calculation is not the ultimate compliance assurance, and that FPC will operate at its own risk until the final analysis is received.

Mr. Clair H. Fancy  
January 29, 1999  
Page Two

b. Similar to 2) above, if a blended sample analysis shows sulfur content under 1.8% prior to burning or prior to shipment to Anclote, then no additional daily sampling would be required.


Thank you for continuing to work with FPC on the conditions of this new permit. Please feel free to contact me at (727) 826-4334 if you have any questions.

Sincerely,



J. Michael Kennedy, Q.E.P.  
Manager, Air Programs

Memorandum

TO: Jack Chisolm, OGC  
FROM: Clair Fancy, Bureau of Air Regulation   
DATE: February 1, 1999  
Re: FPC - Anclote Power Plant, 1010017-003-AV

To the best of our knowledge we have resolved all of Florida Power Corporation's concerns on the subject project. The department has received multiple requests of extensions of time from FPC.

We recommend that the extension of time on this project be granted for only thirty (30) more days (March 1, 1999). We also recommend the following language be added to the order granting the extension of time:

"In response to FPC's petition filed September 4, 1997, the department issued a revised DRAFT permit on November 25, 1998. The applicant provided proof of publication on January 7, 1999. Within fourteen (14) days of receipt of this order, the applicant shall provide a specific list of remaining issues that warrant clarification or correction."

**RECEIVED**

THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JAN 29 1999

BUREAU OF  
AIR REGULATION

In the Matter of an  
Application for Permit by:

OGC CASE NO.:  
FDEP Revised Draft Permit No.: 1010017-003-AV

Florida Power Corporation  
Anclote Power Plant, Pasco County, Florida

---

**REQUEST FOR ENLARGEMENT OF TIME**

By and through undersigned counsel, Florida Power Corporation (FPC) hereby requests, pursuant to Florida Administrative Code Rule 62-110.106(4), an enlargement of time, to and including April 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, FPC states the following:

1. On or about August 21, 1997, FPC received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Draft Permit No. 1010017-003-AV) for the FPC Anclote Power Plant located in Pasco County, Florida. On September 4, 1997, FPC filed a Petition for Administrative Proceeding on this permit.
2. On or about November 30, 1998, FPC received from the Department an "Intent to Issue Title V Air Operation Permit" (**REVISED** Draft Permit No. 1010017-003-AV) for the FPC Anclote Power Plant. FPC previously requested and the Department granted an enlargement of time to February 1, 1999.
3. The Department's cover letter to the Revised permit states that the initial Draft Title V permit is withdrawn. In reliance on this representation, FPC hereby files this second Request for Extension of Time on the Revised Draft permit. Nonetheless, insofar as the initial Draft Title V permit



may be determined to still be in effect, FPC respectfully reserves its right to pursue its Petition on the initial Draft Title V permit.

4. Based on FPC's review, the Revised Draft permit and associated documents contain several provisions that warrant clarification or correction.

5. This request is filed simply as a protective measure to avoid waiver of FPC's right to challenge certain conditions contained in the Revised Draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and hopefully avoid the need to file a petition and proceed to a formal administrative hearing.

WHEREFORE, FPC respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Revised Draft Permit No. 1010017-003-AV be formally extended to and including April 1, 1999.

Respectfully submitted this 28 day of January, 1999.

HOPPING GREEN SAMS & SMITH, P.A.

By: 

Robert A. Manning  
Fla. Bar No. 0035173  
123 South Calhoun Street  
Post Office Box 6526  
Tallahassee, FL 32314  
(850) 222-7500

Attorneys for FLORIDA POWER  
CORPORATION

CERTIFICATE OF SERVICE

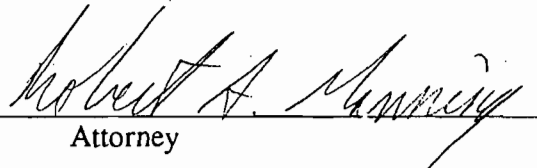
I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by U.S.

Mail on this 28 day of January, 1999:

Clair H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Jeff Brown, Esq.  
Department of Environmental Protection  
Room 669  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Ed Svec  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

  
\_\_\_\_\_  
Attorney

*Scott Sheplak*

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

**RECEIVED**

FLORIDA POWER CORPORATION  
(ANCLOTE POWER PLANT),

JAN 25 1999

Petitioner,

BUREAU OF  
AIR REGULATION

vs.

OGC CASE NO. 98-3107

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION,

Respondent.

\_\_\_\_\_ /

ORDER GRANTING REQUEST FOR EXTENSION  
OF TIME TO FILE PETITION FOR HEARING

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, Florida Power Corporation (Anclote Power Plant), to grant an extension of time to file a petition for an administrative hearing on application No. 1010017-003-AV. See Exhibit 1.

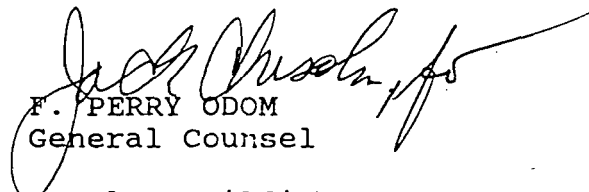
Respondent, State of Florida Department of Environmental Protection, which has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until February 1, 1999, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 20 day of January, 1999, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



F. PERRY ODOM  
General Counsel

Douglas Building  
3900 Commonwealth Boulevard  
Mail Station #35  
Tallahassee, Fl. 32399-3000  
Telephone: (850) 488-9314

**CERTIFICATE OF SERVICE**

I CERTIFY that a copy of the foregoing has been mailed to:

Robert A. Manning, Esq.  
123 South Calhoun Street  
Tallahassee, Florida 32314

on this 22 day of January, 1999.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



W. DOUGLAS BEASON  
Florida Bar No. 379239  
Assistant General Counsel

Douglas Building  
3900 Commonwealth Boulevard  
Mail Station #35  
Tallahassee, Fl. 32399-3000  
Telephone: (850) 488-9314

THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an  
Application for Permit by:

OGC CASE NO.:  
FDEP Revised Draft Permit No.: 1010017-003-AV

Florida Power Corporation  
Anclote Power Plant, Pasco County, Florida

---

REQUEST FOR ENLARGEMENT OF TIME

By and through undersigned counsel, Florida Power Corporation (FPC) hereby requests, pursuant to Florida Administrative Code Rule 62-110.106(4), an enlargement of time, to and including February 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, FPC states the following:

1. On or about August 21, 1997, FPC received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Draft Permit No. 1010017-003-AV) for the FPC Anclote Power Plant located in Pasco County, Florida. On September 4, 1997, FPC filed a Petition for Administrative Proceeding on this permit.
2. On or about November 30, 1998, FPC received from the Department an "Intent to Issue Title V Air Operation Permit" (REVISED Draft Permit No. 1010017-003-AV) for the FPC Anclote Power Plant.
3. The Department's cover letter to the Revised permit states that the initial Draft Title V permit is withdrawn. In reliance on this representation, FPC hereby files this Request for Extension of Time on the Revised Draft permit, and separately, is filing a Notice of Withdrawal of its Petition on the initial Draft Permit. Nonetheless, insofar as the initial Draft Title V permit may be determined

to still be in effect, FPC respectfully reserves its right to pursue its Petition on the initial Draft Title V permit.

4. Based on FPC's review, the Revised Draft permit and associated documents contain several provisions that warrant clarification or correction.

5. This request is filed simply as a protective measure to avoid waiver of FPC's right to challenge certain conditions contained in the Revised Draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and hopefully avoid the need to file a petition and proceed to a formal administrative hearing.

WHEREFORE, FPC respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Revised Draft Permit No. 1010017-003-AV be formally extended to and including February 1, 1999.

Respectfully submitted this 14 day of December, 1998.

HOPPING GREEN SAMS & SMITH, P.A.

By: Robert A. Manning  
Robert A. Manning  
Fla. Bar No. 0035173  
123 South Calhoun Street  
Post Office Box 6526  
Tallahassee, FL 32314  
(850) 222-7500

Attorneys for FLORIDA POWER  
CORPORATION

**CERTIFICATE OF SERVICE**

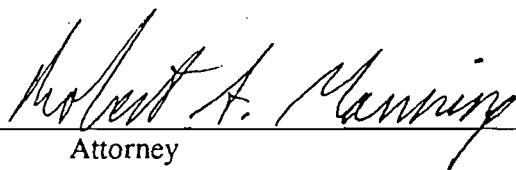
I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by U.S.

Mail on this 14 day of December, 1998:

Clair H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Jeff Brown, Esq.  
Department of Environmental Protection  
Room 669  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Ed Svec  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

  
\_\_\_\_\_  
Attorney

*Mike Halpin*

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

**RECEIVED**

FLORIDA POWER CORPORATION  
(ANCLOTE POWER PLANT),

JAN 25 1999

BUREAU OF  
AIR REGULATION

Petitioner,

vs.

OGC CASE NO. 98-3107

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION,

Respondent.

---

**ORDER GRANTING REQUEST FOR EXTENSION  
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, Florida Power Corporation (Anclote Power Plant), to grant an extension of time to file a petition for an administrative hearing on application No. 1010017-003-AV. See Exhibit 1.

Respondent, State of Florida Department of Environmental Protection, which has no objection to it. Therefore,

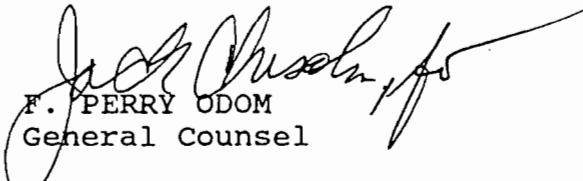
IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until February 1, 1999, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000.



DONE AND ORDERED on this 20 day of January, 1999, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
F. PERRY ODOM  
General Counsel

Douglas Building  
3900 Commonwealth Boulevard  
Mail Station #35  
Tallahassee, Fl. 32399-3000  
Telephone: (850) 488-9314

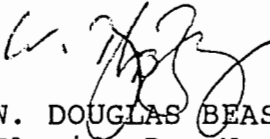
CERTIFICATE OF SERVICE

I CERTIFY that a copy of the foregoing has been mailed to:

Robert A. Manning, Esq.  
123 South Calhoun Street  
Tallahassee, Florida 32314

on this 22 day of January, 1999.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
W. DOUGLAS BEASON  
Florida Bar No. 379239  
Assistant General Counsel

Douglas Building  
3900 Commonwealth Boulevard  
Mail Station #35  
Tallahassee, Fl. 32399-3000  
Telephone: (850) 488-9314

THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an  
Application for Permit by:

OGC CASE NO.:  
FDEP Revised Draft Permit No.: 1010017-003-AV

Florida Power Corporation  
Anclote Power Plant, Pasco County, Florida

---

REQUEST FOR ENLARGEMENT OF TIME

By and through undersigned counsel, Florida Power Corporation (FPC) hereby requests, pursuant to Florida Administrative Code Rule 62-110.106(4), an enlargement of time, to and including February 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, FPC states the following:

1. On or about August 21, 1997, FPC received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Draft Permit No. 1010017-003-AV) for the FPC Anclote Power Plant located in Pasco County, Florida. On September 4, 1997, FPC filed a Petition for Administrative Proceeding on this permit.
2. On or about November 30, 1998, FPC received from the Department an "Intent to Issue Title V Air Operation Permit" (**REVISED** Draft Permit No. 1010017-003-AV) for the FPC Anclote Power Plant.
3. The Department's cover letter to the Revised permit states that the initial Draft Title V permit is withdrawn. In reliance on this representation, FPC hereby files this Request for Extension of Time on the Revised Draft permit, and separately, is filing a Notice of Withdrawal of its Petition on the initial Draft Permit. Nonetheless, insofar as the initial Draft Title V permit may be determined

to still be in effect, FPC respectfully reserves its right to pursue its Petition on the initial Draft Title V permit.

4. Based on FPC's review, the Revised Draft permit and associated documents contain several provisions that warrant clarification or correction.

5. This request is filed simply as a protective measure to avoid waiver of FPC's right to challenge certain conditions contained in the Revised Draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and hopefully avoid the need to file a petition and proceed to a formal administrative hearing.

WHEREFORE, FPC respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Revised Draft Permit No. 1010017-003-AV be formally extended to and including February 1, 1999.

Respectfully submitted this 14 day of December, 1998.

HOPPING GREEN SAMS & SMITH, P.A.

By: Robert A. Manning  
Robert A. Manning  
Fla. Bar No. 0035173  
123 South Calhoun Street  
Post Office Box 6526  
Tallahassee, FL 32314  
(850) 222-7500

Attorneys for FLORIDA POWER  
CORPORATION

CERTIFICATE OF SERVICE

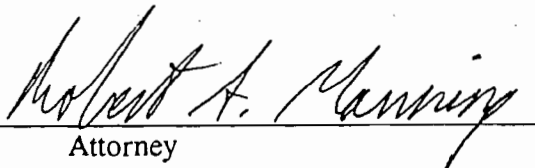
I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by U.S.

Mail on this 14 day of December, 1998:

Clair H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Jeff Brown, Esq.  
Department of Environmental Protection  
Room 669  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Ed Svec  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

  
\_\_\_\_\_  
Attorney

Mike Halpin

BEST AVAILABLE COPY

LEGAL NOTICE

LEGAL NOTICE

983382920

STATE OF FLORIDA } S.S.  
COUNTY OF PASCO }

pasco times

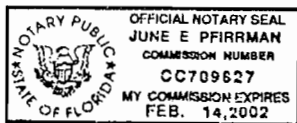
Published Daily  
Port Richey, Pasco County, Florida

Before the undersigned authority personally appeared C. Egan  
who on oath says that he is Legal Clerk  
of the Pasco Times

a daily newspaper published at Port Richey, in Pasco County, Florida: that the  
attached copy of advertisement, being a Legal Notice  
in the matter RE: Notice of Intent to Issue Title V  
Air Operation Permit  
in the December 7, 1998 Court  
was published in said newspaper in the issues of December 7, 1998

Affiant further says the said Pasco Times is a newspaper  
published at Port Richey, in said Pasco County, Florida, and that the said newspa-  
per has heretofore been continuously published in said Pasco County, Florida,  
each day and has been entered as second class mail matter at the post office in  
New Port Richey, in said Pasco County, Florida, for a period of one year next  
preceding the first publication of the attached copy of advertisement; and affiant  
further says that he has neither paid nor promised any person, firm, or corpora-  
tion any discount, rebate, commission or refund for the purpose of securing  
this advertisement for publication in the said newspaper.

C. Egan  
Sworn to and subscribed before  
me this 7th day of  
December A.D. 19 98  
June E. Jefferson  
SEAL Notary Public



My commission expires 19

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V  
AIR OPERATION PERMIT

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Title V Revised DRAFT Permit No.: 1010017-003-AV  
Anclote Power Plant  
Pasco County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a  
Title V air operation permit to Florida Power Corporation for the Anclote Power Plant located at 1729  
Baileys Bluff Road, Holiday, Pasco County. The applicant's name and address are: Florida Power  
Corporation, 3201-34th Street South, St. Petersburg, Florida 33711.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit,  
in accordance with the conditions of the Title V Revised DRAFT Permit unless a response received in  
accordance with the following procedures results in a different decision of significant change of terms  
or conditions.

The permitting authority will accept written comments concerning the proposed Title V Revised DRAFT  
Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written  
comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road,  
Mail Station #505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made avail-  
able for public inspection. If written comments received result in a significant change in this Revised  
DRAFT Permit, the permitting authority shall issue another Revised DRAFT Permit and require, if applic-  
able, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for  
an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.).  
The petition must contain the information set forth below and must be filed (received) in Office of  
General Counsel of the Department of Environmental Protection, 3500 Commonwealth Boulevard, Mail  
Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-8730; Fax: 850/487-4938). Petitions  
filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be  
filed within fourteen days of publication of the public notice or within fourteen days of receipt of the  
notice of intent, 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 fourteen 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 peti-  
tion within the applicable time period shall constitute a waiver of that person's right to request an admin-  
istrative determination (hearing) under Section 120.569 and 120.57, F.S., or to intervene in this pro-  
ceeding and participate as a party to it. Any subsequent intervention 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 upon which the permitting authority's action is based must con-  
tain 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; 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 petitioner's substantial rights will be affected by the agency determination;
- (c) A statement of how and when the petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so state;
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief; and
- (f) A demand for relief.

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 notice of intent. 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 is not available for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the 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 objections arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any 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.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:  
Department of Environmental Protection  
Bureau of Air Regulation  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/488-1344  
Fax: 850/922-6979

Department of Environmental Protection  
Southwest District  
8407 Laurel Fair Circle  
Tampa, Florida 33619  
Telephone: 813/744-6100  
Fax: 813/744-6458

The complete project file includes the Revised DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/921-9532, for additional information.

(983382920) 12/7/98

Mike Halpin Scott 12/14

**RECEIVED**

THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEC 15 1998

In the Matter of an  
Application for Permit by:

OGC CASE NO.:  
FDEP Revised Draft Permit No.: 1010017-003-AV

BUREAU OF  
AIR REGULATION

Florida Power Corporation  
Anclote Power Plant, Pasco County, Florida

REQUEST FOR ENLARGEMENT OF TIME

By and through undersigned counsel, Florida Power Corporation (FPC) hereby requests, pursuant to Florida Administrative Code Rule 62-110.106(4), an enlargement of time, to and including February 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, FPC states the following:

1. On or about August 21, 1997, FPC received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Draft Permit No. 1010017-003-AV) for the FPC Anclote Power Plant located in Pasco County, Florida. On September 4, 1997, FPC filed a Petition for Administrative Proceeding on this permit.

2. On or about November 30, 1998, FPC received from the Department an "Intent to Issue Title V Air Operation Permit" (**REVISED** Draft Permit No. 1010017-003-AV) for the FPC Anclote Power Plant.

3. The Department's cover letter to the Revised permit states that the initial Draft Title V permit is withdrawn. In reliance on this representation, FPC hereby files this Request for Extension of Time on the Revised Draft permit, and separately, is filing a Notice of Withdrawal of its Petition on the initial Draft Permit. Nonetheless, insofar as the initial Draft Title V permit may be determined

to still be in effect, FPC respectfully reserves its right to pursue its Petition on the initial Draft Title V permit.

4. Based on FPC's review, the Revised Draft permit and associated documents contain several provisions that warrant clarification or correction.

5. This request is filed simply as a protective measure to avoid waiver of FPC's right to challenge certain conditions contained in the Revised Draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and hopefully avoid the need to file a petition and proceed to a formal administrative hearing.

WHEREFORE, FPC respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Revised Draft Permit No. 1010017-003-AV be formally extended to and including February 1, 1999.

Respectfully submitted this 14 day of December, 1998.

HOPPING GREEN SAMS & SMITH, P.A.

By: Robert A. Manning

Robert A. Manning  
Fla. Bar No. 0035173  
123 South Calhoun Street  
Post Office Box 6526  
Tallahassee, FL 32314  
(850) 222-7500

Attorneys for FLORIDA POWER  
CORPORATION

CERTIFICATE OF SERVICE

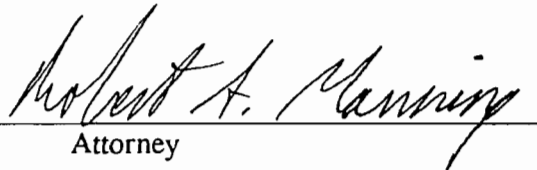
I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by U.S.

Mail on this 14 day of December, 1998:

Clair H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Jeff Brown, Esq.  
Department of Environmental Protection  
Room 669  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Ed Svec  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

  
\_\_\_\_\_  
Attorney



*Ed Spec*  
**RECEIVED**

DEC 15 1998

THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

BUREAU OF  
AIR REGULATION

In the Matter of an  
Application for Permit by:

OGC CASE NO.:  
FDEP Revised Draft Permit No.: 1010017-003-AV

Florida Power Corporation  
Anclote Power Plant, Pasco County, Florida

---

**REQUEST FOR ENLARGEMENT OF TIME**

By and through undersigned counsel, Florida Power Corporation (FPC) hereby requests, pursuant to Florida Administrative Code Rule 62-110.106(4), an enlargement of time, to and including February 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter.

As good cause for granting this request, FPC states the following:

1. On or about August 21, 1997, FPC received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Draft Permit No. 1010017-003-AV) for the FPC Anclote Power Plant located in Pasco County, Florida. On September 4, 1997, FPC filed a Petition for Administrative Proceeding on this permit.

2. On or about November 30, 1998, FPC received from the Department an "Intent to Issue Title V Air Operation Permit" (**REVISED** Draft Permit No. 1010017-003-AV) for the FPC Anclote Power Plant.

3. The Department's cover letter to the Revised permit states that the initial Draft Title V permit is withdrawn. In reliance on this representation, FPC hereby files this Request for Extension of Time on the Revised Draft permit, and separately, is filing a Notice of Withdrawal of its Petition on the initial Draft Permit. Nonetheless, insofar as the initial Draft Title V permit may be determined

to still be in effect, FPC respectfully reserves its right to pursue its Petition on the initial Draft Title V permit.

4. Based on FPC's review, the Revised Draft permit and associated documents contain several provisions that warrant clarification or correction.

5. This request is filed simply as a protective measure to avoid waiver of FPC's right to challenge certain conditions contained in the Revised Draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and hopefully avoid the need to file a petition and proceed to a formal administrative hearing.

WHEREFORE, FPC respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Revised Draft Permit No. 1010017-003-AV be formally extended to and including February 1, 1999.

Respectfully submitted this 14 day of December, 1998.

HOPPING GREEN SAMS & SMITH, P.A.

By: Robert A. Manning

Robert A. Manning  
Fla. Bar No. 0035173  
123 South Calhoun Street  
Post Office Box 6526  
Tallahassee, FL 32314  
(850) 222-7500

Attorneys for FLORIDA POWER  
CORPORATION

CERTIFICATE OF SERVICE

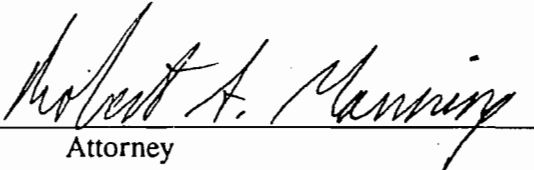
I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by U.S.

Mail on this 14 day of December, 1998:

Clair H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Jeff Brown, Esq.  
Department of Environmental Protection  
Room 669  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

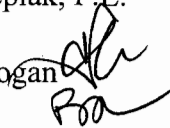
Ed Svec  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

  
\_\_\_\_\_  
Attorney

Florida Department of  
**Environmental Protection**

**Memorandum**

---

TO: Scott M. Sheplak, P.E.  
FROM: Charles S. Logan   
DATE: February 4, 1998

Re: Intent package for Revised DRAFT Permit No.: 1010017-003-AV  
Florida Power Corporation  
Anclote Power Plant

**Permit Clock:** NA

This permit is for the initial Title V air operation permit for the subject facility. This facility consists of two pre-NSPS fuel oil fired steam electric generating stations. Relocatable diesel fired generator(s) may be located at this facility and may be relocated to other facilities. Additional information was not requested. Comments were not received from the District office. Comments were received from the applicant. One of the comments resulted in a significant change to the DRAFT permit, which made it necessary to re-publish the permit. This facility reported that each emissions unit was in compliance at the time of the application.

I recommend that this Intent to Issue be sent out as attached.

csl/



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

February 10, 1998

Mr. W. Jeffrey Pardue, C.E.P.  
Director of Environmental Services  
Florida Power Corporation  
3201 34th Street South  
St. Petersburg, Florida 33711

Re: Revised DRAFT Title V Permit No.: 1010017-003-AV  
Anclote Power Plant

Dear Mr. Pardue:

One copy of the Revised DRAFT Title V Air Operation Permit for the Anclote Power Plant located at 1729 Baileys Bluff Road, Holiday, Pasco County, is enclosed. The previous DRAFT Title V Air Operation Permit dated August 19, 1997, is withdrawn. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" is also included.

The Department will publish the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT".

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Scott M. Sheplak, P.E., at the above letterhead address. If you have any other questions, please contact Charles S. Logan at 850/488-1344.

Sincerely,

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

CHF/1

Enclosures

cc: Ms. Carla E. Pierce, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)  
Ms. Yolanda Adams, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

*Printed on recycled paper.*

In the Matter of an  
Application for Permit by:

Florida Power Corporation  
3201 34th Street South  
St. Petersburg, Florida 33711

Revised DRAFT Permit No.: 1010017-003-AV  
Anclote Power Plant  
Pasco County

---

**INTENT TO ISSUE TITLE V AIR OPERATION PERMIT**

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit (copy of Revised DRAFT Permit is enclosed) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Florida Power Corporation, applied on June 12, 1996, to the permitting authority for a Title V air operation permit for the Anclote Power Plant located at 1729 Baileys Bluff Road, Holiday, Pasco County.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit is required to commence or continue operations at the described facility.

The permitting authority intends to issue this Title V air operation permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.0872, F.S., and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." However, the Department will publish the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT".

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the enclosed Title V Revised DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Revised DRAFT Permit, the permitting authority shall issue another revision and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision 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 (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any other person must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. A petitioner must 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207, F.A.C.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

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 notice of intent. 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.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of

particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

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 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the 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 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 401 M. Street, SW, Washington, D.C. 20460.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION**

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

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the Revised DRAFT permit) and all copies were sent by certified mail before the close of business on \_\_\_\_\_ to the person(s) listed:

Mr. W. Jeffrey Pardue, C.E.P., Florida Power Corporation

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the Revised DRAFT permit) were sent by U.S. mail on the same date to the person(s) listed:

Mr. Kennard F. Kosky, P.E., Golder Associates, Inc.

Mr. Bill Thomas, SWD

Mrs. Gail Kamaras, LEAF (only the Intent to Issue)

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 TITLE V AIR OPERATION PERMIT**

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Title V Revised DRAFT Permit No.: 1010017-003-AV  
Anclote Power Plant  
Pasco County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Florida Power Corporation for the Anclote Power Plant located at 1729 Baileys Bluff Road, Holiday, Pasco County. The applicant's name and address are: Florida Power Corporation, 3201 34th Street South, St. Petersburg, Florida 33711.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V Revised DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V Revised DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Revised DRAFT Permit, the permitting authority shall issue another revision and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision 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 (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. A petitioner must 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 applicable 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;

- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

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 notice of intent. 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.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the 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 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 401 M. Street, SW, Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:

Department of Environmental Protection  
Bureau of Air Regulation  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/488-1344  
Fax: 850/922-6979

Affected District:

Department of Environmental Protection  
Southwest District Office  
8407 Laurel Fair Circle  
Tampa, Florida 33619  
Telephone: 813/744-6100  
Fax: 813/744-6458

The complete project file includes the Revised DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/488-1344, for additional information.

Florida Power Corporation  
Anclote Power Plant

Facility ID No.: 1010017  
Pasco County

Initial Title V Air Operation Permit  
**Revised DRAFT Permit No.: 1010017-003-AV**

Permitting Authority:

State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
Title V Section

Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Telephone: 850/488-1344  
Fax: 850/922-6979

February 10, 1998

Initial Title V Air Operation Permit  
Revised DRAFT Permit No.: 1010017-003-AV

**Table of Contents**

<u>Section</u>	<u>Page Number</u>
Placard Page .....	1
I. Facility Information .....	2 - 3
A. Facility Description.	
B. Summary of Emissions Unit ID Nos. and Brief Descriptions.	
C. Relevant Documents.	
II. Facility-wide Conditions .....	4 - 6
III. Emissions Unit(s) and Conditions	
A. Fuel Oil Fired Steam Generators (E.U. ID Nos. -001 and -002).....	7 - 20
B. Diesel Fired Generators ( 3 - 820 Kilowatt each).....	21 - 26
IV. Acid Rain Part	
A. Acid Rain, Phase II .....	27 - 28
Table 1-1, Summary of Air Pollutant Standards and Terms.....	29
Table 1-2, Summary of Air Pollutant Standards and Terms (Additional Standards for On-Specification Used Oil (OSUO)).....	30
Table 2-1, Summary of Compliance Requirements.....	31
Appendix I-1. List of Insignificant Emissions Units and/or Activities.....	32
Appendix U-1. List of Unregulated Emissions Units and/or Activities.....	33
Appendix H-1. Permit History/ID Number Changes.....	34
Appendix SS-1, Stack Sampling Facilities.....	35
Appendix TV-1, Title V Conditions.....	36



# 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**  
**Anclote Power Plant**

**Revised DRAFT Permit No.:** 1010017-003-AV  
**Facility ID No.:** 1010017  
**SIC Nos.:** 4911  
**Project:** Initial Title V Air Operation Permit

This permit is for the operation of the Anclote Power Plant. This facility is located at 1729 Baileys Bluff Road, Holliday, Pasco County; UTM Coordinates: Zone 17, 324.4 km East and 3118.7 km North; Latitude: 28° 48' 17" North and Longitude: 82° 47' 08" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

**Referenced attachments made a part of this permit:**

Appendix U-1, List of Unregulated Emissions Units and/or Activities  
Appendix I-1, List of Insignificant Emissions Units and/or Activities  
APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97)  
APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)  
Phase II Acid Rain Application/Compliance Plan received December 14, 1995.

**Effective Date:** January 1, 1999  
**Renewal Application Due Date:** July 5, 2003  
**Expiration Date:** December 31, 2003

---

Howard L. Rhodes, Director  
Division of Air Resources  
Management

HLR/sms/csl

**Section I. Facility Information.**

**Subsection A. Facility Description.**

This facility consists of two fuel oil fired steam electric generating stations, E.U. ID No. -001 (Unit No. 1) and -002 (Unit No. 2). Unit No. 1 consists of a Combustion Engineering, Inc., Type CCR boiler/steam generator and steam turbine which drives a generator with a nameplate rating of 535(summer)/540(winter) Megawatts. Unit No. 2 consists of a Combustion Engineering, Inc., Type CCR boiler/steam generator and steam turbine which drives a generator with a nameplate rating of 525(summer)/530(winter) Megawatts. Units No. 1 and No. 2 share a common stack. Also included in this permit are miscellaneous unregulated and insignificant emissions units and/or activities. Relocatable diesel fired generator(s) with a maximum heat input of 25.74 MMBtu/hour and a maximum rating of 2460 Kilowatts are permitted to be located at this facility and may be relocated to other FPC facilities.

Based on the initial Title V permit application received on June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

**Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).**

<b><u>E.U. ID No.</u></b>	<b><u>Brief Description</u></b>
-001	Fuel Oil Fired Steam Electric Generator No. 1
-002	Fuel Oil Fired Steam Electric Generator No. 2
-7775047 -001	Relocatable Diesel Generator(s)

Unregulated Emissions Units and/or Activities

- xxx Surface Coating and Solvent Cleaning
- xxx Fuel Storage Tanks
- xxx Emergency Generators
- xxx General Purpose Engines
- xxx Helper Cooling Towers

*Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.*

**Subsection C. Relevant Documents.**

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/ID Number Changes

These documents are on file with the permitting authority:

Initial Title V Permit Application received June 14, 1996.

Letter from Mr. Scott H. Osbourn dated and received by fax on October 13, 1997.

Draft Title V Permit issued on August 19, 1997.



## Section II. Facility-wide Conditions.

### The following conditions apply facility-wide:

1. APPENDIX TV-1, TITLE V CONDITIONS is a part of this permit.  
{Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}
2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.  
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.  
[Rule 62-296.320(4)(b)1. & 4., F.A.C.]
4. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:
  - a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and
  - b. certification forms and/or RMPs according to the promulgated rule schedule.[40 CFR 68]
5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.  
[Rule 62-213.440(1), F.A.C.]
6. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.  
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]

**7. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions.** The permittee shall not store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.  
[Rule 62-296.320(1)(a), F.A.C.]

**8. Not federally enforceable.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include:  
a. Maintenance of paved areas as needed,  
b. Regular mowing of grass and care of vegetation, and  
c. Limiting access to plant property by unnecessary vehicles.  
[Rule 62-296.320(4)(c)2., F.A.C.; Proposed by applicant in the initial Title V permit application received June 14, 1996]

**9.** When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.  
[Rule 62-213.440, F.A.C.]

**10.** 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

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

United States 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

**12. Statement of Compliance.** The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within sixty (60) days after the end of the calendar year.

{See condition No. 52., Appendix TV-1, Title V Conditions}

[Rule 62-214.420(11), F.A.C.]

**Section III. Emissions Unit(s) and Conditions.**

**Subsection A. This section addresses the following emissions units.**

<u>E.U. ID No.</u>	<u>Brief Description</u>
-001	Fossil Fuel Fired Steam Generator # 1
-002	Fossil Fuel Fired Steam Generator # 2

Fossil fuel fired steam generator # 1 is a nominal 535(summer)/540(winter) megawatt (electric) steam generator designated as Anclote Unit # 1. The emission unit is fired on new No. 6 or lighter grades of fuel oil and on-specification used oil, as permitted herein, with a maximum heat input of 4964.4 MMBtu per hour.

Fossil fuel fired steam generator # 2 is a nominal 525(summer)/530(winter) megawatt (electric) steam generator designated as Anclote Unit # 2. The emission unit is fired on new No. 6 or lighter grades of fuel oil and on-specification used oil, as permitted herein, with a maximum heat input of 4850 MMBtu per hour. Each boiler/steam generator, units #1 and #2, drives a turbine generator and both units share a common 499 foot exhaust stack. Emissions from these units are uncontrolled.

{Permitting note(s): The emissions units are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input. Fossil fuel fired steam generator # 1 began commercial operation on October 16, 1974; and, fossil fuel fired steam generator # 2 began commercial operation on October 31, 1978.}

**The following specific conditions apply to the emissions units listed above:**

**Essential Potential to Emit (PTE) Parameters**

A.1. Permitted Capacity. The maximum operation heat input rates are as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
1	4964.4	No. 1, 2, 3, 4, 5 or 6 Fuel Oil & On-Specification Used Oil
2	4850.0	No. 1, 2, 3, 4, 5, or 6 Fuel Oil & On-specification Used Oil

\* The on-specification used oil burned at this facility may be generated on or off-site.  
 [Rules 62-4.160(2), 62-210.200(PTE) and 62-296.405, F.A.C.]

A.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition A.22.  
 [Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation. Fuel(s).

- a. Startup: The only fuels allowed to be burned are new #6 or lighter grades of fuel oils.

On-specification used oil shall only be burned if the PCB's are less than 2 ppm and may be blended with new #6 or lighter grades of fuel oil. The maximum sulfur content is 2.5 percent, by weight.

b. Normal: The only fuels allowed to be burned are new #6 or lighter grades of fuel oils and on-specification used oil. The maximum sulfur content is 2.5 percent, by weight.

c. **Not federally enforceable.** The maximum cumulative amount of on-specification used oil, whether generated on or off-site, that can be burned shall not exceed 10 percent of the total permitted heat input for emissions units #1 and #2.

[Rule 62-213.410, F.A.C.; and, AO 51-254492A & 1010017-001-AO]

A.4. Hours of Operation. These emissions units may operate continuously, i.e., 8,760 hours/year.

[Rule 62-210.200(PTE), F.A.C.]

#### **Emission Limitations and Standards**

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.5. Visible Emissions. Visible emissions shall not exceed 40 percent opacity. Emissions units governed by this visible emissions standard shall conduct a compliance test for particulate matter emissions annually. Failure of the facility to demonstrate compliance with the particulate matter allowable in specific condition A.7 or the opacity standard of this condition shall constitute grounds for revocation of this condition.

[Rule 62-296.405(1)(a), F.A.C.; and, OGC File Nos. 86-1574 and 86-1575/Orders dated December 11, 1986.]

A.6. Visible Emissions - Soot Blowing and Load Change. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

[Rule 62-210.700(3), F.A.C.]

A.7. Particulate Matter. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods.

[Rule 62-296.405(1)(b), F.A.C.]

A.8. Particulate Matter - Soot Blowing and Load Change. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour

period of excess emissions allowed for boiler cleaning (soot blowing) and load change.  
[Rule 62-210.700(3), F.A.C.]

A.9. Sulfur Dioxide. When burning fuel oils, sulfur dioxide emissions shall not exceed 2.75 pounds per million Btu heat input, as measured by applicable compliance methods. See specific conditions A.19 and A.20.  
[Rule 62-296.405(1)(c)1.j., F.A.C.]

A.10. Sulfur Dioxide - Sulfur Content. The sulfur content of fuel oils, on-specification used oil, or any combination of the two burned in these units, shall not exceed 2.5 percent, by weight. See specific condition A.20.  
[Rule 62-296.405(1)(e)3., F.A.C.; and, requested by the applicant in Title V Application dated June 12, 1996.]

#### **Excess Emissions**

A.11. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.  
[Rule 62-210.700(1), F.A.C.]

A.12. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.  
[Rule 62-210.700(2), F.A.C.]

A.13. 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.  
[Rule 62-210.700(4), F.A.C.]

#### **Monitoring of Operations**

A.14. Sulfur Dioxide. **The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor or permittee upon each fuel delivery.** This protocol is allowed because the emissions units do not have an operating flue gas desulfurization device. See specific conditions A.10., A.19. and A.20.  
[Rule 62-296.405(1)(f)1.b., F.A.C.]

A.15. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine

process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

### Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.16. Visible emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. See specific condition A.17.

[Rule 62-296.405(1)(e)1., F.A.C.]

A.17. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
  - a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
  - b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid

observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.]

A.18. Particulate Matter. The test methods for particulate emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17.

[Rules 62-296.405(1)(e)2. and 62-297.401, F.A.C.]

A.19. Sulfur Dioxide. The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedences of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. **The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, as an alternate sampling procedure authorized by permit, the permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery.** See specific conditions A.9., A.10. and A.20.

[Rules 62-213.440, 62-296.405(1)(e)3. and 62-297.401, F.A.C.; and, Permits 1010017-001-AO and AO 51-254492A.]

A.20. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s).

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

A.21. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a



compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

A.22. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

A.23. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

A.24. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. The required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

- (b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.
- (c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.
- (d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.
- (e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube. [Rule 62-297.310(4), F.A.C.]

A.25. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit. [Rule 62-297.310(6), F.A.C.]

A.26. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

- (a) General Compliance Testing.
  - 2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid for more than 400 hours other than during startup.
  - 3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
    - a. Did not operate; or
    - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

TABLE 297.310-1  
 CALIBRATION SCHEDULE

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/-0.001" mean of at least three readings Max. deviation between readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually 3. Check after each test series	Spirometer or calibrated wet test or dry gas test meter	2%
		Comparison check	5%

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;
- b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; or 100 tons per year or more of any other regulated air pollutant.

5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; SIP approved]

A.27. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning only liquid fuel(s) for less than 400 hours per year.  
[Rule 62-297.310(7)(a)4., F.A.C.]

A.28. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.]

**Record keeping and Reporting Requirements**

A.29. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department's Southwest District Office in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department's Southwest District Office.

[Rule 62-210.700(6), F.A.C.]

A.30. Submit to the Department's Southwest District Office a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years.

[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

A.31. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department's Southwest District Office on the results of each such test.

(b) The required test report shall be filed with the Department's Southwest District Office as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department's Southwest District Office to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.

10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

**Addition limitations for On-Specification Used Oil**

A.32. **Not federally enforceable.** On-specification used oil generated at this facility or off-site may only be burned in these emissions units if compliance with all the conditions of this permit and the following additional conditions are demonstrated:

- a. On-specification Used Oil Allowed as Fuel: This permit allows the burning of used fuel oil meeting EPA "on-specification" used oil specifications, with a maximum sulfur content of 2.5 percent, by weight, and a PCB concentration of less than 50 ppm.

On-specification used oil shall meet the following specifications: [40 CFR 279, Subpart B.]

1. Arsenic shall not exceed 5.0 ppm;
2. Cadmium shall not exceed 2.0 ppm;

3. Chromium shall not exceed 10.0 ppm;
4. Lead shall not exceed 100.0 ppm;
5. Total halogens shall not exceed 1000 ppm;
6. Flash point shall not be less than 100 degrees F.

Used oil that does not meet the specifications for on-specification used oil shall not be burned at this facility.

- b. Quantity Limited: The maximum cumulative amount of on-specification used oil, whether generated on or off-site, that can be burned shall not exceed 10 percent of the total permitted heat input for emissions units #1 and #2.
- c. Used Oil Containing PCBs  $\geq$  50 ppm Not Allowed: Used oil containing a PCB concentration of 50 ppm or greater shall not be burned at this facility. Used oil shall not be blended to meet this requirement or any part of this condition .
- d. PCB Concentration of 2 to 50 ppm: On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall be burned only at normal source operating temperatures. On specification used oil with a PCB concentration of 2 to less than 50 ppm shall not be burned during periods of startup or shutdown.

Before accepting from each marketer the first shipment of on-specification used oil with a PCB concentration of 2 to less than 50 ppm, the owner or operator shall provide each marketer with a one-time written and signed notice certifying that the owner or operator will burn the used oil in a qualified combustion device. The notice must state that EPA or a RCRA-delegated state agency has been given a description of the used oil management activities at the facility and that an industrial boiler or furnace will be used to burn the used oil with a PCB concentration of 2 to less than 50 ppm. The description of the used oil management activities shall be submitted to the Administrator, Hazardous Waste Regulation Section, Florida Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. [40 CFR 279 and 761.20(e)]

- e. Certification Required: The owner or operator shall receive from the marketer, for each load of used oil received, a certification that the used oil meets the specifications for on-specification used oil and contains a PCB concentration of less than 50 ppm. This certification shall also describe the basis for the certification, such as analytical results. Note that a claim that used oil does not contain quantifiable levels of PCBs (that is, that the used oil contains less than 2 ppm of PCBs) must be documented by testing or other information. The first person making the claim that the used oil does not contain PCBs is responsible for furnishing the documentation. The documentation can be tests, personal

or special knowledge of the source and composition of the used oil, or a certification from the person generating the used oil claiming that the used oil contains no detectable PCBs.

- f. Testing Required: If the owner or operator does not receive certification from the marketer as described above, the owner or operator shall properly sample and test each load of used oil received for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point, PCBs\*, and percent sulfur content by weight, ash, and BTU value (BTU per gallon).

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

\* Testing for PCB's is not necessary if quantifiable levels are less than 2 ppm (ref. to specific condition A.32.e., above)

If the owner or operator relies on certification from the marketer, the owner or operator shall be responsible for ensuring that the certification complies with all the requirements of this condition and all conditions of this permit.

If the analytical results show that the used oil does not meet the specification for on-specification used oil, or that it contains a PCB concentration greater than or equal to 50 ppm, the owner or operator shall immediately notify and provide the analytical results to the Department's Southwest District Office. The owner or operator shall immediately cease burning of the used oil.

- g. Special Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil: [40 CFR 761.20(e)]

- (1) The gallons of on-specification used oil received and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (3) The name and address of all marketers delivering used oil to the facility.
- (4) Copies of the marketer certifications, if obtained, and any supporting information.
- (5) Documentation that the used oil contains less than 2 ppm PCBs, if claimed, including the name and address of the person making the claim.
- (6) Results of the analyses required above.



- (7) A copy of the notice to EPA and a copy of the one-time written notice provided to each marketer.

The records shall be retained in a form suitable for inspection at the facility by the Department, and shall be retained for 5 years.

- h. Reporting Required: The owner or operator shall submit, with the Annual Operation Report (AOR) form, the total amount of on-specification used oil received, and the total amount of on-specification used oil burned during the previous calendar year to the Southwest District Office. The AOR shall include the total amount of lead emitted as a result of burning on-specification used oil during the calendar year on a monthly basis.

[Rules 62-4.070(3), 62-212.400(2)(f)1. and 62-213.440, F.A.C.; and, AO 51-254492A & 1010017-001-AO]

**Section III. Emissions Units and Conditions.**

**Subsection B. This section addresses the following emissions units.**

<b>E.U. ID No.</b>	<b>Brief Description</b>
-7775047 -001	Relocatable Diesel Fired Generator(s)

These relocatable emissions units are Caterpillar Model 3508-DITA 820 kilowatt diesel generators. The maximum heat input is 25.74 million Btu per hour (MMBtu/hour) while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum rating of 2460 kilowatts. Emissions from the generators are uncontrolled. The generators may be relocated at any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Higgins Plant, Shore Drive, Oldsmar, Pinellas County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. The future FPC Polk County Site, County Road 555, 1 mi. southwest of Homeland, Polk County.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. Each generator has its own stack.}

**The following specific conditions apply to the emissions units listed above regardless of location:**

**Essential Potential to Emit (PTE) Parameters**

B.1. Permitted Capacity. The maximum operation heat input rates are as follows:  
 [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

<b>Unit No.</b>	<b>MMBtu/hr/generator(s) Heat Input</b>	<b>Fuel Type</b>
-7775047 -001	25.74	New Low Sulfur No. 2 Fuel Oil

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition B.13.  
 [Rule 62-297.310(2), F.A.C.]

B.3. Methods of Operation - Fuels. Only new low sulfur No. 2 fuel oil shall be fired in the combustion turbine(s).  
[Rule 62-213.410, F.A.C.]

B.4. Hours of Operation. The hours of operation expressed as “engine-hours” shall not exceed 2970 hours in any consecutive 12 month period. The total hours of operation expressed as “engine-hours” shall be the summation of the individual hours of operation of each generator.  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, AO 09-205952.]

#### **Emission Limitations and Standards**

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.5. Visible Emissions. Visible emissions from each generator shall not be equal to or greater than 20 percent opacity.  
[Rule 62-296.320(4)(b)1., F.A.C.; and, AO 09-205952.]

B.6. Sulfur Dioxide - Sulfur Content. The sulfur content of the new No. 2 fuel oil shall not exceed 0.50 percent, by weight.  
[Requested in initial Title V permit application dated June 12, 1996; and, AC 09-202080.]

#### **Excess Emissions**

B.7. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.  
[Rule 62-210.700(1), F.A.C.]

B.8. 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.  
[Rule 62-210.700(4), F.A.C.]

#### **Monitoring of Operations**

B.9. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor or permittee upon each fuel delivery. See specific condition B.12.  
[Rule 62-213.440, F.A.C.]

**B.10. Determination of Process Variables.**

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

**Test Methods and Procedures**

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.11. The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C.

[Rules 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

B.12. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s).

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

B.13. **Operating Rate During Testing.** Testing of emissions shall be conducted with the generator(s) operating at 90 to 100 percent of the maximum fuel firing rate of 186.3 gallons per hour. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operations may be limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Failure to submit the actual operating rate may invalidate the test.

[Rules 62-297.310(2), F.A.C.; and, Permit AO 09-205952.]

**B.14. Applicable Test Procedures.**

(a) **Required Sampling Time.**

2. **Opacity Compliance Tests.** When either EPA Method 9 or DEP Method 9 is specified as

the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

- c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2.c., F.A.C.]

**B.15. Frequency of Compliance Tests.** The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

**(a) General Compliance Testing.**

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
- b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;
- b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; or 100 tons per year or more of any other regulated air pollutant.

8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. For each generator located in Pinellas County, FPC shall provide the same notification to the Air Quality Division of the Pinellas County Department of Environmental Management.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply. [Rule 62-297.310(7), F.A.C.; SIP approved; and, AO 09-205952.]

B.16. Visible Emissions Testing - Annual. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning liquid fuels for less than 400 hours per year. [Rules 62-297.310(7)(a)4. & 8., F.A.C.]

B.17. After each relocation, each generator shall be tested within 30 days of startup for opacity and the fuel shall be analyzed for the sulfur content. See specific conditions B.6, B.9, and B.12. [Rules 62-4.070(3) and 62-297.310(7)(b), F.A.C.; and, AO 09-205952.]

### **Recordkeeping and Reporting Requirements**

B.18. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, the owner or operator shall notify the Department's Southwest District Office, if a generator is located in Pasco County, in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]

B.19. Test Reports.

(a) Each generator shall be tested on an annual basis within 30 days of the date October 25.

(b) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(c) The required test report shall be filed with the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management, if a generator is located in Pinellas County, as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(d) The test reports for a unit that has been relocated shall be submitted to the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management, if a generator is located in Pinellas County, within 45 days of testing.  
[Rule 62-297.310(8), F.A.C.; and, AO 09-25952.]

B.20. To demonstrate compliance with specific condition B.4, records shall indicate the daily hours of operation for each of the generators, the daily hours of operation expressed as “engine-hours” for each month. The records shall be maintained for a minimum of 5 years and made available to the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management upon request.  
[Rules 62-213.440 and 62-297.310(8), F.A.C.; and, AO 09-205952.]

B.21. To demonstrate compliance with specific condition B.6, records of the sulfur content, in percent by weight, of all the fuel burned shall be kept based on either vendor provided as-delivered or as-received fuel sample analysis. The records shall be maintained for a minimum of 5 years and made available to the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management upon request.  
[Rule 62-297.310(8), F.A.C.; and, AO 09-205952.]

#### **Source Obligation**

B.22. Specific conditions in construction permit AC 09-202080, limiting the “engine hours”, were accepted by the applicant to escape Prevention of Significant Deterioration review. If Florida Power Corporation requests a relaxation of any of the federally enforceable emission limits in this permit, the relaxation of limits may be subject to the preconstruction review requirements of Rule 62-212.400(5), F.A.C., as though construction had not yet begun.  
[Rule 62-212.400(2)(g), F.A.C.; and, AC 09-202080 and AO 09-205952.]

#### **Notification**

B.23. Florida Power Corporation shall notify the Department’s Southwest District Office, in writing, at least 15 days prior to the date on which any diesel generator is to be relocated. The notification shall specify the following;

- a. which generator, by serial number, is being relocated,
- b. which location the generator is being relocated from and which location it is being relocated to, and
- c. the approximate startup date at the new location.

If a diesel generator is to be relocated within Pinellas County, then Florida Power Corporation shall provide the same notification to the Air Quality Division of the Pinellas County Department of Environmental Management.

[Rule 62-4.070(3), F.A.C.; and, AC 09-202080]

**Section IV. This section is the Acid Rain Part.**

**Operated by: Florida Power Corporation**  
**ORIS code: 8048**

**Subsection A. This subsection addresses Acid Rain, Phase II.**

The emissions units listed below are regulated under Acid Rain Part, Phase II.

<b><u>E.U. ID No.</u></b>	<b><u>Description</u></b>
-001	Fossil Fuel Fired Steam Generator No. 1
-002	Fossil Fuel Fired Steam Generator No. 2

1. The Phase II permit application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these acid rain units must comply with the standard requirements and special provisions set forth in the application listed below:

a. DEP Form No. 62-210.900(1)(a), dated 07/01/95.

[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

2. Sulfur dioxide (SO<sub>2</sub>) allowance allocations for each Acid Rain unit:

<b>E.U. ID No.</b>	<b>EPA I.D.</b>	<b>Year</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>
<b>-001</b>	<b>1</b>	<b>SO<sub>2</sub> allowances, under Table 2, 3, or 4 of 40 CFR 73</b>	12931*	12931*	12931*	12931*
<b>-002</b>	<b>2</b>	<b>SO<sub>2</sub> allowances, under Table 2, 3, or 4 of 40 CFR 73</b>	12853*	12853*	12853*	12853*

\*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2, 3, or 4 of 40 CFR 73.



3. Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

a. No permit revision shall be required for increases in emissions that are authorized by allowances

acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a

permit revision pursuant to Rule 62-213.440(3), F.A.C.

b. No limit shall be placed on the number of allowances held by the source under the Federal Acid

Rain program.

c. Allowances shall be accounted for under the Federal Acid Rain Program.

[Rule 62-213.440(1)(c), F.A.C.]

4. Fast-Track Revisions of Acid Rain Parts. Those Acid Rain sources making a change described in Rule 62-214.370(4), F.A.C., may request such changes as provided in Rule 62-213.413, Fast-Track Revisions of Acid Rain Parts.

[Rules 62-213.413 and 62-214.370(4), F.A.C.]

5. Comments, notes, and justifications: None.

**Table 1-1, Summary of Air Pollutant Standards and Terms**

Florida Power Corporation  
Anclote Power Plant

Revised DRAFT Permit No.: 1010017-003-AV  
Facility ID No.: 1010017

**E.U. ID Nos.      Brief Description**

-001		Fossil Fuel Fired Steam Generator #1				Allowable Emissions		Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
Pollutant Name	Fuel(s) *	Hours/ Year *	Standards	lb/ hour	TPY	lb/hour **	TPY **				
Visible Emissions	F.O.	8760	40% Opacity					Rule 62-296.405(1)(a), F.A.C. Rule 62.210.700(3), F.A.C. Order No. 1574	A.5 A.6		
Steady state	F.O.		60% Opacity								
Soot Blowing or Load Changing	F.O.										
PM Emissions	F.O.	8760	0.1 lb/MMBtu			496		Rule 62.296.405(1)(b), F.A.C. Rule 62.210.700(3), F.A.C.	A.7 A.8		
Steady State	F.O.		0.3 lb/MMBtu			1,489	2,174				
Soot Blowing or Load Changing	F.O.										
Sulfur Dioxide	F.O.	8760	2.75 lb/MMBtu			13,652	59,796	Rules 62-213.440, 62-296.405(1)(e)3., 62-296.40591)(c)1.i., F.A.C.	A.9 A.10		
	F.O.	8760	2.50% by wt.								

-002		Fossil Fuel Fired Steam Generator #2				Allowable Emissions		Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
Pollutant Name	Fuel(s) *	Hours/ Year *	Standards	lb/ hour	TPY	lb/hour **	TPY **				
Visible Emissions	F.O.	8760	40% Opacity					Rule 62-296.405(1)(a), F.A.C. Rule 62.210.700(3), F.A.C. Order No. 1574	A.5 A.6		
Steady state	F.O.		60% Opacity								
Soot Blowing or Load Changing	F.O.										
PM Emissions	F.O.	8760	0.1 lb/MMBtu			485	2,124	Rule 62.296.405(1)(b), F.A.C. Rule 62.210.700(3), F.A.C.	A.7 A.8		
Steady State	F.O.		0.3 lb/MMBtu			1,455					
Soot Blowing or Load Changing	F.O.										
Sulfur Dioxide	F.O.	8760	2.75 lb/MMBtu			13,652	59,796	Rules 62-213.440, 62-296.405(1)(e)3., 62-296.40591)(c)1.i.,	A.9 A.10		
	F.O.	8760	2.50% by wt.								

-7775047-001		Relocatable Generator(s)				Allowable Emissions		Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
Pollutant Name	Fuel(s) *	Hours/ Year *	Standards	lb/ hour	TPY	lb/hour **	TPY **				
Visible Emissions	#2 F.O.	8760	20% Opacity					Rule 62-296.320(4)(b)1., F.A.C.	B.5		
Sulfur Dioxide	#2 F.O.	8760	0.50% by wt.								

\* No. 1, 2, 3, 4, 5, & 6 fuel oil and on-specification used oil. Maximum amount of used oil burned shall not exceed 10 percent of the total heat input for E.U. -001 & -002.

\*\* The "Equivalent Emissions" listed are for informational purposes only.

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**Table 1-2, Summary of Air Pollutant Standards and Terms**

Florida Power Corporation  
Anclote Power Plant

Revised DRAFT Permit No.: 1010017-003-AV  
Facility ID No.: 1010017

**Additional Standards for On-Specification Used Oil (OSUO)**

**E.U. ID Nos.      Brief Description**

-001		Fossil Fuel Fired Steam Generator #1				Allowable Emissions		Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
Pollutant Name	Fuel (s)	Hours/Year*	Standards	lbs./hour	TPY	lbs./hour	TPY				
Arsenic	OSUO		5.0 ppm								
Cadmium	OSUO		2.0 ppm								
Chromium	OSUO		10.0 ppm								
Lead	OSUO		100.0 ppm								
Total Halogens	OSUO		1000 ppm								
Flash Point	OSUO		≥ 100 degrees F								
PCB	OSUO		≤ 49 ppm								
SO <sub>2</sub>			2.5 % by weight								

-002		Fossil Fuel Fired Steam Generator #2				Allowable Emissions		Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
Pollutant Name	Fuel (s)	Hours/Year*	Standards	lbs./hour	TPY	lbs./hour	TPY				
Arsenic	OSUO		5.0 ppm								
Cadmium	OSUO		2.0 ppm								
Chromium	OSUO		10.0 ppm								
Lead	OSUO		100.0 ppm								
Total Halogens	OSUO		1000 ppm								
Flash Point	OSUO		≥ 100 degrees F								
PCB	OSUO		≤ 49 ppm								
SO <sub>2</sub>			2.5 % by weight								

\* The maximum quantity of used oil that may be burned in each emissions unit shall not exceed 10 percent of the total heat input per emissions unit.  
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

## Table 2-1, Summary of Compliance Requirements

Florida Power Corporation  
Anclote Power Plant

Revised DRAFT Permit No.: 1010017-003-AV  
Facility ID No.: 1010017

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. # -001 & -002		Fossil Fuel Fired Steam Generator #1 & #2					
Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time or Frequency	Frequency Base Date <sup>1</sup>	Min. Compliance Test Time	CMS <sup>2</sup>	See Permit Condition(s)
<b>Visible Emissions</b> Steady State Soot Blowing or Load Changing	F.O.	DEP Method 9	Annual	#1-within 60 days of Jul. 28 #2-within 60 days of Aug. 24	1 hour	NA	A.16, A.17 A.16, A.17
	F.O.	DEP Method 9	Annual		1 hour		
<b>Particulate Matter</b> Steady State Soot Blowing or Load Changing	F.O.	EPA Methods 17 <sup>3</sup> , 5, 5B, 5F	Annual	#1-within 60 days of Jul. 28 #2-within 60 days of Aug. 24	3 hour	NA	A.18 A.18
	F.O.		Annual				
<b>Sulfur Dioxide</b>	F.O.	Fuel sampling and analysis	Each Delivery	Each delivery	NA	NA	A.14, A.19, A.20
Arsenic, Cadmium, Chromium, Lead, Total Halogens, Flash Point, PCB	OSUO <sup>4</sup>	SW 846 <sup>5</sup>	Each Delivery	Each Delivery	NA	NA	A.32

1 - Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.

2 - Continuous Monitoring System.

3 - EPA Method 17 may be used only if the stack gas exit temperature is less than 375 degrees F.

4 - On-Specification Used Oil.

5 - EPA Publication, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods.

**Appendix I-1. List of Insignificant Emissions Units and/or Activities.**

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62.210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

1	Lube Oil System Vents
2	Lube Oil Reservoir Tank
3	Parts Washers/Degreasers
4	Waste Oil Storage Tanks
5	Portable Unleaded Gasoline Tank
6	Evaporation of non-hazardous boiler cleaning chemical
7	No. 2 Diesel Fuel Tank

**Appendix U-1. List of Unregulated Emissions Units and/or Activities.**

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘insignificant emissions units’.

<b>Emissions Unit</b>	<b>Description</b>
-xxx	Surface Coating and Solvent Cleaning
-xxx	General Purpose Engines
-xxx	Fuel Storage Tanks
-xxx	Helper Cooling Towers
-xxx	Emergency Generators

## Appendix H-1, Permit History/ID Number Changes

Florida Power Corporation  
Anclote

Permit No.: 1010017-003-AV  
Facility ID No.: 1010017

---

**Permit History (for tracking purposes):**

E.U.

<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u>	<u>Revised Date(s)</u>
-001	Steam Turbine Generator	AO51-254492	03/7/1995	03/6/1999		
		AO51-254492A	1/31/1996	03/6/2000		
-002	Oil Fired Steam Generator	AO51-169340	12/21/1989	12/18/1994	08/14/1996	01/31/1996
		1010017-001-AO	01/31/1996			

---

**(if applicable) ID Number Changes (for tracking purposes):**

From: **Facility ID No.:** 40TPA510017

To: **Facility ID No.:** 1010017

---

## Appendix SS-1, Stack Sampling Facilities



Florida Power Corporation  
Anclote Power Plant  
Page 36 of 36

**Revised DRAFT Permit No.: 1010017-003-AV**

## Appendix TV-1, Title V Conditions

**Section IV. This section is the Acid Rain Part.**

Acid Rain Part, Phase II

**Operated by: Florida Power Corporation**

**ORIS code: 8048**

**Effective:**

The emissions units listed below are regulated under Acid Rain Part, Phase II.

**E.U.**

**ID No. Description**

- 01 Boiler
- 02 Boiler

1. The Acid Rain Part application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these acid rain units must comply with the standard requirements and special provisions set forth in the application listed below:

- a. DEP Form No. 62-210.900(1)(a), dated 07/01/95.

[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

2. Sulfur dioxide (SO<sub>2</sub>) allowance allocations and nitrogen oxide (NO<sub>x</sub>) requirements for each Acid Rain unit:

	<b>Year</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>
<b>ID No. 01</b> <b>1</b>	SO <sub>2</sub> allowances, under Table 2, 3, or 4 of 40 CFR 73	12931*	12931*		
	NO <sub>x</sub> limit	**	**		
<b>ID No. 02</b> <b>2</b>	SO <sub>2</sub> allowances, under Table 2, 3, or 4 of 40 CFR 73	12853*	12853*		
	NO <sub>x</sub> limit	**	**		

\*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2, 3, or 4 of 40 CFR 73.

\*\*By January 1, 1999, this Part will be reopened to add NO<sub>x</sub> requirements in accordance with the regulations implementing section 407 of the Clean Air Act.

3. Comments, notes, and justifications: None.

---

**Section V. Attachments and relevant documents.**

Acid Rain Application/Compliance Plan received 12/22/95.

# Phase II Permit Application

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

This submission is:  New  Revised

**STEP 1**

Identify the source by plant name, State, and ORIS code from NADB

<i>Anclote Power Plant, FL, 8048</i>
--------------------------------------

Compliance Plan



**STEP 2**

Enter the boiler ID# from NADB for each affected unit, and indicate whether a repowering plan is being submitted for the unit by entering "yes" or "no" at column c. For new units, enter the requested information in columns d and e

a Boiler ID#	b Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)		c Repowering Plan	d New Units Commence Operation Date	e New Units Monitor Certification Deadline
••1	Yes	No			
••2	Yes	No			
	Yes				
	Yes				
	Yes				
	Yes				
	Yes				
	Yes				
	Yes				
	Yes				
	Yes				
	Yes				

For each unit that will be repowered, the Repowering Extension Plan form is included and the Repowering Technology Petition form has been submitted or will be submitted by June 1, 1997.

**STEP 3**

Check the box if the response in column c of Step 2 is "Yes" for any unit

Plant Name (from Step 1)  
*Anclole Power Plant*

**STEP 4**  
 Read the standard requirements and certification, enter the name of the designated representative, and sign and date

**Standard Requirements**

Permit 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, 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 permitting authority determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain permit;
- (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 permitting authority; 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.

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)) 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)(i) 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 permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 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 Administrator or permitting authority:
  - (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;
  - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,

Plant Name (from Step 1)  
*Anclote Power Plant*

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 a written 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 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, 75, 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 a written exemption under 40 CFR 72.7 or 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;

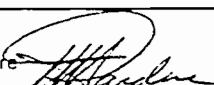
(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;

(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.

Certification

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 <i>W. Jeffrey Pardue, C.E.P., Director, Environmental Services Dept.</i>	
Signature 	Date <i>12/14/95</i>

**STEP 5 (optional)**  
Enter the source AIRS  
and FINDS identification  
numbers, if known

AIRS
FINDS

*Scott Sheplak*



**RECEIVED**

OCT 14 1997

BUREAU OF  
AIR REGULATION

October 13, 1997

Mr. Scott M. Sheplak, P.E.  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

*v. Charles*

Re: Florida Power Corporation, Anclote Power Plant  
DRAFT Title V Permit No. 1010017-003-AV;  
Need to Address Common Issues within Permits

Dear Mr. Sheplak:

We appreciated the opportunity to meet with you and other representatives from the Department on September 24, 1997 regarding the issues associated with Florida Power Corporation's (FPC) Petition for Administrative Hearing on the Draft Title V Permit for the Anclote Power Plant. FPC believes that substantial progress was made towards resolving the primary issues contained in the Petition. For example, FPC understands that the Department intends to revise the draft Title V permit for the Anclote facility to allow the burning of used oil in the same manner as currently allowed under its existing air operating permit.

Several other miscellaneous issues associated with the draft Title V permit were included in FPC's Petition for Administrative Hearing. Due to the 14-day time limit for filing the Petition, FPC indicated that it may have additional comments after further review of the draft permit. Accordingly, attached for your consideration are several supplemental comments regarding the draft Title V permit for the Anclote Power Plant.

Further, several of the issues FPC has identified regarding its draft Title V permits for each of its Title V sources are very similar and at times identical. FPC has, in several instances already, had to resolve these common issues during separate discussions with different DEP personnel (there are 6 separate DEP permit writers working on 10 FPC Title V permits), which has at times resulted in significantly different approaches and permit language. It is to everyone's advantage to have a single resolution of common issues, and consistent permit language, for facilities that have essentially identical emissions units. In the interest of efficiency, FPC would like to have a single meeting to address such common permit issues.



Mr. Sheplak  
October 13, 1997  
Page 2

Accordingly, FPC requests an opportunity to meet with you as soon as possible to discuss any draft revisions to the draft Title V permit for the Anclote facility, as well as address the common issues associated with the other FPC facilities. In this regard, I will be calling within the next few days to confirm your receipt of this letter and to set up such a meeting. Again, FPC appreciates the Department's attention and cooperation in processing the Title V Permit for the Anclote Power Plant.

If you have any questions in the meantime, please call me at (813) 866-5158.

Sincerely,



Scott H. Osbourn,  
Senior Environmental Engineer

cc: Douglas Beason, DEP  
Clair Fancy, P.E., DEP  
Ken Kosky, P.E., Golder Associates  
Robert Manning, HGS&S

FLORIDA POWER CORPORATION  
SUPPLEMENTAL COMMENTS ON DRAFT TITLE V PERMIT  
ANCLOTE POWER PLANT

we say  
Applied on  
June 12<sup>th</sup> and  
received  
June 14<sup>th</sup>

General Comments

✓ 1. In the Intent to Issue Title V Air Operation Permit, as well as in certain places in the draft permit, DEP incorrectly states that FPC's Title V application was submitted on June 12, 1997. The correct application submittal date, which DEP also states in the draft permit, is June 14, 1997.

✓ 2. Because FPC is ultimately responsible for ensuring the publication of the Public Notice of Intent to Issue Title V Air Operation Permit in the manner prescribed by rule, as well as being affected by the content of such notice, FPC requests that DEP provide a copy of the notice that DEP intends to publish, and also provide proof of such publication within a reasonable time after publication occurs.

Section II. Facility-wide Conditions

✓ 1. Condition 1. FPC understands that DEP is continuing to revise Appendix TV-1, Title V Conditions, and therefore requests that its final Title V permit incorporate the most up-to-date version of this Appendix.

✓ *revised* 2. Condition 3. FPC requests the following revision to the last sentence in this Condition because the specified test method does not apply to every unit at the facility, and because Chapter 62-297 does not provide the authority for this method: "For purposes of this Condition. EPA Method 9 is the method of compliance. ~~pursuant to Chapter 62-297, F.A.C.~~"

✓ *changed* 3. Condition 7. FPC requests that this Condition be edited as follows: "The permittee shall ~~not allow no person to~~ store, pump, . . . ." The language utilized by DEP is not the explicit language in Rule 62-296.320(1)(a), F.A.C. Further, this condition should be identified as Not Federally Enforceable", to be consistent with other draft Title V permits previously issued.

Section III. Subsection A.

✓ 1. Condition A.3. In paragraph a. and b., there appears to be a typographical error in the first line: "new #6 or higher grades of fuel oils." The appropriate terminology is "lighter," rather than "higher."

✓ 2. Condition A.9. Because this unit is only authorized to burn oil, this condition should be edited as follows: "~~When burning liquid fuel,~~ Sulfur dioxide emissions...." Also, for clarification, this condition should specify that the sulfur shall be measured in accordance with Condition A.19., instead of "by applicable compliance methods."

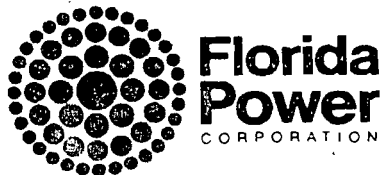
✓ *with new sulfur limit 2.5%* 2. Condition A.10. This Condition should be deleted because there is no regulatory authority for its inclusion. FPC does not believe that it requested this limit in its Title V application, as stated by DEP in the draft permit. Table 1-1, Summary of Air Pollutant Standards and Terms should be revised accordingly.

**Appendix E-1, List of Exempt Emissions Units and/or Activities.**

✓ 1. Because the following units have trivial, if any, emissions, FPC requests that they be deleted from Appendix E-1: (a) Oil Water Separators, (b) Hazardous Waste Building, and (c) Lube Oil Storage Building (FPC's Anclote Plant does not contain a lube oil storage building).

✓ **Table 2-1, Summary of Compliance Requirements.**

1. Footnote 1 to this Table references a DEP "guidance document." FPC requests that this reference include a complete title, including the date, for this document.



September 17, 1997

RECEIVED

SEP

BUREAU OF  
AIR REGULATION

Mr. Clair Fancy  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399

Dear Mr. Fancy:

Re: Petition for Administrative Hearing

As you know, Florida Power Corporation (FPC) has filed a petition for administrative hearing on the draft Title V permit for its Anclote facility. The primary issue raised in the petition is DEP's proposal to limit emissions of lead from the burning of used oil to 1200 pounds/year. This proposed condition, which includes a quarterly lead emissions reporting requirement, is new and it represents a tightening of the emission standards that currently apply to the facility. FPC previously applied for, and received, approval from the DEP to burn used oil at the Anclote plant through proper public notice permitting. Title V operating permits are intended to include all existing air regulatory requirements; I have not understood the Title V permitting process as an occasion to develop new, more stringent emission limits. Retroactively applying the PSD significance threshold as the emission limit is unwarranted, especially for a facility that the DEP considers "capable of accommodating" the fuel.

It is FPC's position that the burning of used oil is the most beneficial alternative to disposing of the oil. In terms of total management of the ecosystem, burning used oil has the least overall impact to the environment. FPC has approval to burn used oil at four of its facilities, and has applied for approval at two others. I understand that the draft Title V permits for these facilities may contain similar conditions regarding used oil burning. If so, and if FPC and the DEP are unable to agree on an appropriate permit condition, FPC will file similar petitions for administrative hearing and will seek to consolidate them into a single case.

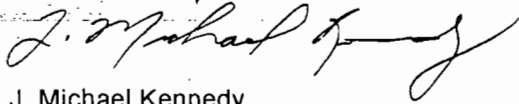
The Anclote permit has, and the other draft permits most likely will have, other more "mundane" issues that FPC and the DEP should be able to settle without taking them to administrative hearing. FPC will request that the DEP grant an appropriate extension of time in which to file for administrative hearing when these issues arise so that only the most serious issues, such as used oil, are raised in an administrative proceeding. In fact, FPC would prefer not to take the used oil issue to hearing, but to reach an agreement with the DEP outside of the hearing process.

We would like to meet with you to discuss this issue at your earliest convenience. By meeting and discussing the used oil issue, perhaps we can reach a solution without having to complete the time-consuming and costly administrative hearing process.

Mr. Clair Fancy  
September 17, 1997  
Page Two

Please contact me at (813) 866-4344 if you have any questions or comments.

Sincerely,



J. Michael Kennedy  
Manager, Air Programs

cc: James Alves, Esq., HGSS

**RECEIVED**

SEP 22 1997

BUREAU OF  
AIR REGULATION

HOPPING GREEN SAMS & SMITH  
PROFESSIONAL ASSOCIATION

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(850) 222-7500

FAX (850) 224-8551

FAX (850) 425-3415

GARY K. HUNTER, JR.  
JONATHAN T. JOHNSON  
ROBERT A. MANNING  
ANGELA R. MORRISON  
GARY V. PERKO  
KAREN M. PETERSON  
R. SCOTT RUTH  
W. STEVE SYKES  
T. KENT WETHERELL, II

OF COUNSEL  
W. ROBERT FOKES

JAMES S. ALVES  
BRIAN H. BIBEAU  
KATHLEEN BLIZZARD  
ELIZABETH C. BOWMAN  
RICHARD S. BRIGHTMAN  
PETER C. CUNNINGHAM  
RALPH A. DEMEO  
THOMAS M. DEROSE  
WILLIAM H. GREEN  
WADE L. HOPPING  
FRANK E. MATTHEWS  
RICHARD D. MELSON  
MICHAEL P. PETROVICH  
DAVID L. POWELL  
WILLIAM D. PRESTON  
CAROLYN S. RAEPPLE  
DOUGLAS S. ROBERTS  
GARY P. SAMS  
ROBERT P. SMITH  
CHERYL G. STUART

Writer's Direct Dial No.  
(850) 425-2263

February 2, 1998

**RECEIVED**

FEB 02 1998

BUREAU OF  
AIR REGULATION

HAND-DELIVERY

Doug Beason, Esq.  
Department of Environmental Protection  
Office of General Counsel  
Room 669  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Resolution of Petition on Anclote Draft Title V Permit

Dear Mr. Beason:

On behalf of Florida Power Corporation (FPC), we appreciate the Department's continued cooperation and assistance in resolving the fundamental issues that are the subject of the Petition for Administrative Hearing on the Anclote Draft Title V Permit. This letter is written to convey our understanding of the status and to provide a recommendation as to the resolution of this matter. First, based on a conversation with Jeff Brown in your office, FPC filed a Status Report and Request for Extension of Additional Time until March 2, 1998 to the Administrative Law Judge. This request is based on our understanding that agreement has been reached on the fundamental issues involved in the Petition. Once FPC receives confirmation of this agreement in writing from the Department, we intend to attach this agreement to a motion to relinquish DOAH's jurisdiction pursuant to Rule 60Q-2.033, F.A.C. Once DOAH relinquishes jurisdiction, the Department will be able to proceed with the issuance of the Anclote Title V permit.

Second, FPC understands that the Department believes that it is necessary to provide an additional public notice on a Revised Draft Title V permit for the Anclote facility, triggering an additional 30-day public comment period. FPC disagrees that re-publication of the public notice

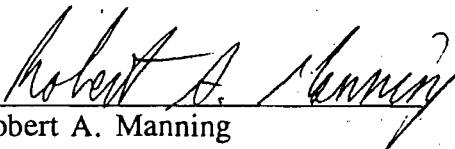
Doug Beason, Esq.  
February 2, 1998  
Page 2

is appropriate in this case, and believes that it will unnecessarily delay the issuance of the permit. FPC's disagreement on this matter is based on the fact that the Department is not creating or changing any authority for the Anclote facility to utilize used oil, it is simply reflecting existing practice by the facility already authorized by EPA and DEP guidance, and reflected in the Anclote facility's existing air permit conditions. Further, the public was provided adequate notice via the initial publication, which appeared on August 25, 1997, by the language indicating that the final permit may contain conditions different than what is included in the draft permit. Also, pursuant to Section 120.569, Florida Statutes, until DOAH relinquishes jurisdiction of this matter, the Department does not have the authority to take any further action on the permit (e.g., publishing a notice of Revised Draft Permit). Finally, if the Department continues to insist on an additional public notice of a revised draft permit, the Department should bear the cost of such publication.

If you have any questions or comments regarding this information, please contact me at your earliest convenience at the number or e-mail address listed above. We look forward to the resolution of this matter.

Sincerely,

HOPPING GREEN SAMS & SMITH, P.A.

By:   
Robert A. Manning

ATTORNEYS FOR FLORIDA POWER  
CORPORATION

RAM/clh  
cc: Scott Sheplak  
Clair Fancy  
Charles Logan

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

3. \_\_\_\_\_

1. Mike Halpin

4. \_\_\_\_\_

2. \_\_\_\_\_

5. \_\_\_\_\_

PLEASE PREPARE REPLY FOR:

SECRETARY'S SIGNATURE

DIV/DIST DIR SIGNATURE

MY SIGNATURE

YOUR SIGNATURE

DUE DATE \_\_\_\_\_

COMMENTS:

ACTION/DISPOSITION

DISCUSS WITH ME

COMMENTS/ADVISE

REVIEW AND RETURN

SET UP MEETING

FOR YOUR INFORMATION

HANDLE APPROPRIATELY

INITIAL AND FORWARD

SHARE WITH STAFF

FOR YOUR FILES

FROM: Clair Fancy

DATE: 11-30-99

PHONE: 921-9503





Jeb Bush  
Governor

# Department of Environmental Protection

Marjory Stoneman Douglas Building  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

David B. Struhs  
Secretary

November 24, 1999

Mr. Winston A. Smith, Director  
Air, Pesticides and Toxics Management Division  
United States Environmental Protection Agency  
Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-8909

Re: Proposed Changes to the PROPOSED Title V Permit for the Florida Power Corporation Anclote Plant to Satisfy EPA Objections  
Title V Permit No.: 1010017-003-AV

Dear Mr. Smith:

This letter is to document changes that the Department proposes to satisfy EPA Region 4's objections to Florida's PROPOSED Title V Permit for the Florida Power Corporation Anclote Plant. The objections were detailed in a letter from EPA Region 4 dated July 12, 1999. The changes proposed in this letter result primarily from a letter received from Mr. W. Jeffrey Pardue on November 9, 1999, via the Fax, to Mr. Scott Sheplak.

Please review the following proposed changes to the referenced permit. If you concur with our changes, we will issue the FINAL Permit with these changes.

1. Applicable Requirements: Since Anclote Unit 2 is not subject to 40 CFR 60, Subpart D, no changes to the Proposed Permit are required.
2. Appropriate Averaging Times: The inclusion of a permitting note is made to Specific Conditions A.7. and A.8. as follows:

**A.7. Particulate Matter**. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods. See specific condition A.18. {Permitting note: The averaging time for the particulate matter standard corresponds to the cumulative sampling time of the specified test method.}  
[Rule 62-296.405(1)(b), F.A.C.]

**A.8. Particulate Matter - Soot Blowing and Load Change**. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change. {Permitting note: The averaging time for the particulate matter standard corresponds to the cumulative sampling time of the specified test method.}  
[Rule 62-210.700(3), F.A.C.]

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

3. Federal Enforceability: Since the basis for the requirements in Specific Condition A.33. are based upon federal regulations and for reasonable assurance purposes (Rules 62-4.070(3) and 62-213.440, F.A.C.) the qualifier “**Not Federally Enforceable**” will be deleted.

4. Acid Rain Requirements: A new condition will be added as follows:

**Section IV, Subsection A:**

6. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be incorporated into the permit and shall be enforceable by the Administrator.

[40 CFR 70.6(a)(4)(i); and, Rule 62-210.200, Definitions - Applicable Requirements, F.A.C.]

5. Applicable Requirements: Based upon the information supplied by FPC, no changes to the Proposed Permit are required.

6. Statement of Basis: The Statement of Basis will be revised to reflect the allowance of annual particulate testing with a 40 percent VE in accordance with the SIP.

7. Placard Page: TV-3 will be incorporated as an attachment instead of TV-1.

8. Methods of Operation: Condition **A.3.a.** will be modified as follows:

**A.3. Methods of Operation. Fuel(s).**

a. Startup: The only fuels allowed to be burned are new #6 or lighter grades of fuel oils. On-specification used oil shall only be burned if the PCB's are less than 2 ppm and may be blended with new #6 or lighter grades of fuel oil. *Blending as means of achieving the 2-ppm PCB level shall not be allowed.* The maximum sulfur content is 2.5 percent, by weight.

b. Normal: The only fuels allowed to be burned are new #6 or lighter grades of fuel oils and on-specification used oil. The maximum sulfur content is 2.5 percent, by weight.

c. **Not federally enforceable.** The maximum amount of on-specification used oil, whether generated on or off-site, that can be burned facility-wide shall not exceed 10 percent of the heat input (monthly) or 30 million gallons per year cumulatively.

[Rule 62-213.410, F.A.C.; and, AO 51-254492A & 1010017-001-AO]

9. Minimum Sample Volume for Particulate Testing: Condition **A.24(b)** will be modified as follows:

(b) Minimum Sample Volume. The minimum sample volume per run shall be 30 dry standard cubic feet.

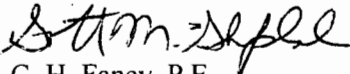
10. Record Keeping: The Statement of Basis will be revised to clarify that the relocatable generators are covered under the other five facility's permits. Additionally, a new condition will be added as follows:

**B.23.** Although these emission units are relocatable, each facility is required to maintain all appropriate records at each site.

[Rules 62-4.070(3), F.A.C.]

All parties involved have been expeditiously seeking resolution of these issues. We feel that EPA's concerns have been adequately addressed and we look forward to issuing the FINAL Title V permit. Please advise as soon as possible if you concur with the specific changes detailed above. Please call me at 850/921-9503 if you have any questions. You may also contact Mr. Scott M. Sheplak, P.E., at 850/921-9532, if you need any additional information.

Sincerely,

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

Attachment

CF/bm

cc: Howard L. Rhodes  
Scott M. Sheplak  
Mike Halpin  
Pat Comer, Esq.  
Gregg Worley, EPA  
Scott Osbourn, FPC  
Robert Manning, Esq., HGSS

*Mike Halperin*

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
**NOTICE OF FINAL PERMIT**

In the Matter of an  
Application for Permit by:

Mr. W. Jeffrey Pardue, C.E.P.  
Director of Environmental Services  
Florida Power Corporation  
3201 34<sup>th</sup> Street South  
St. Petersburg, Florida 33711

FINAL Permit No.: 1010017-003-AV  
Florida Power Corporation  
Anclote Power Plant

Enclosed is FINAL Permit Number 1010017-003-AV for the operation of the Anclote Power Plant located at 1729 Baileys Bluff Road, Holiday, Pasco County, issued pursuant to Chapter 403, Florida Statutes (F.S.).

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 permitting authority 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 permitting authority.

Executed in Tallahassee, Florida.

*C. H. Fancy*

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 12/29/99 to the person(s) listed or as otherwise noted:

- Mr. Jeffrey W. Pardue, Florida Power Corporation
- Mr. Kennard F. Kosky, P.E., Golder Associates, Inc.
- Mr. Bill Thomas, DEP/SWD
- Ms. Elizabeth Bartlett, USEPA, Region 4 (INTERNET E-mail Memorandum)
- Ms. Gracy R. Danois, USEPA, Region 4 (INTERNET E-mail Memorandum)

*Mike, 12/29/99  
Please e-mail  
final documents  
for posting  
on web site  
Bob*

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.

*Barbara J. Portwell* 12/29/99  
\_\_\_\_\_  
(Clerk) (Date)

Mtk. FYI.

We teleconferenced  
today on this w/ SAH  
9/13



RECEIVED

SEP 02 1999

BUREAU OF AIR REGULATION

EPA & FPC

are stuck on  
averaging times. EPA  
to send letter on the matter.

August 27, 1999

Mr. Scott Sheplak, P.E.  
Florida Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, Florida 32399-2400

Dear Mr. Sheplak:

Re: Florida Power Corporation's Anclote Facility  
EPA Objection to Proposed Title V Permit No. 1010017-003-AV

Florida Power Corporation (FPC) is in receipt of a letter from the U.S. EPA, Region IV, dated July 16, 1999, objecting to the issuance of the above-referenced permit. The EPA has objected based on their belief that the proposed permit does not fully meet periodic monitoring requirements, contains conditions which are mislabeled as "Not Federally Enforceable" and is missing some Acid Rain requirements. This letter serves to provide responses to the EPA's objections in the order they were listed.

**EPA Objection Issues**

- 1. Applicable Requirements- Based on available information it appears that Anclote Unit 2 may be subject to 40 CFR 60, Subpart D- Standards of Performance for Fossil Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971. According to the application, initial start-up of this unit was October 31, 1978. Please provide verification that construction of Unit 2 commenced prior to August 17, 1971.

Response- Documentation that Unit 2 is not subject to the above-referenced requirement is provided in Attachment 1 to this letter.

- 2. Appropriate Averaging Times- In order for the emission standard for particulate matter to be practicably enforceable, an appropriate averaging time must be associated with the emission limit and specified in the permit. For example, Specific Condition 2 in Permit No. AO51-169340 for Anclote Unit 2, located in Attachment AN-EU2-L12 of the permit application appropriately states that "the maximum particulate emission rate for this source shall be 0.1 lb/MMBtu heat input over a two hour average." An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission limits are tied to or based on the run time of the test method(s) used for determining compliance, unless otherwise specified.

Response- The "applicable requirement" which provides the basis for Condition A.7 (particulate matter limit) is Florida's Rule 62-296.405(1)(b), F.A.C., which does not specify an averaging time directly. Permit No. AO51-169340 is not an "applicable requirement"; the reference to the two-hour averaging time in Specific Condition 2 of this permit is in error – it has no logical or legal basis. Moreover, neither the existing periodic monitoring rule, the Credible Evidence Rule, nor EPA's policy on practical enforceability provide the authority to impose an averaging time in a Title V permit where none exists in the underlying requirement. Therefore, an averaging time has appropriately not been included in Condition A.7 in the Draft or Proposed Title V permits for FPC's Anclote facility.

FPC had previously discussed this objection issue with the DEP and the EPA, and was willing to accept language regarding the use of appropriate reference test methods that are intended to make this permit condition practically enforceable. EPA was reluctant to accept any permit language short of "the averaging times for all specified emission limits are tied to or based on the run time of the test method(s) used for determining compliance." FPC is unwilling to accept this language in general and, particularly in the case of a particulate matter standard. The reference test methods used for particulate compliance (i.e., Methods 5 or 17) do not have a set run time; the sampling time may vary from one to four hours per run. The run times of the test methods are dependent on other relevant criteria, including the sampling of a minimum of 30 dry standard cubic feet (dscf) and the collection of a filter sample adequate for a representative analysis. Accordingly, EPA's suggested language is not appropriate or acceptable for a particulate limit that is compliance-tested using Methods 5 or 17. Further, the language suggested by the EPA is overly broad in that it applies to all emission limits, whereas the comment is limited solely to the particulate limit imposed by Condition A.7.

If EPA is unclear about the enforceability of Condition A.7, FPC suggests referencing the following conditions in Condition A.7: Condition A.18 (which specifies the test method and is already referenced), A.21 (which specifies the number of sampling runs), A.23 (which specifies how to calculate the actual emission rate), and A.24 (which specifies the sampling time, volume and flow rate). These conditions clearly provide how FPC's compliance with the particulate limit is completely enforceable.

3. *Federal Enforceability- Condition A.33 contains certain extra limitations and record keeping requirements related to the firing of used oil, and is labeled as not federally enforceable. However, the condition contains documentation, record keeping, and notification requirements for used oil that originate as 40 CFR 279 and 761. Since those conditions are federal requirements, they are automatically federally enforceable. Therefore, the individual requirements of this condition should be broken down into federally enforceable and not federally enforceable conditions.*

Response- FPC is in agreement with this comment and has reviewed the applicable rules in an effort to determine which of the requirements in Condition A.33 are federally enforceable and which are not. FPC has determined that all of the requirements are federally enforceable, except for the following:

**Not Federally Enforceable:**

- A.33(a)- the requirement for a maximum sulfur content of 2.5 percent;
- A.33(a)(5)- total halogens shall not exceed 1,000 ppm;
- A.33(b)- the maximum amount of on-spec used oil that can be burned;
- A.33(f)- the testing for percent sulfur, ash, and Btu value;
- A.33(g)(1) and (2)- the record keeping regarding the amounts of on-spec used oil burned per month and per year, respectively; and
- A.33(h)- the AOR reporting requirements.

OK (4) Acid Rain Requirements- Language from 40 CFR 70.6(a)(1)(ii) is not addressed in the Acid Rain part of the permit and does not appear to be included elsewhere in the body of the proposed permit. This condition must be added to the Proposed Title V permit for this source.

Response- FPC has no objection to the inclusion of the proposed language.

OK (5) Applicable Requirements- Appendix U-1 lists "Surface Coating and Solvent Cleaning" and "Helper Cooling Towers" as unregulated emission units. 40 CFR 63, Subpart T- National Emission Standards for Halogenated Solvent Cleaning applies to this unit if the owner or operator uses a solvent in the machine that contains (in total 5 percent by weight of the following regulated solvents: carbon tetrachloride, chloroform, perchloroethylene, 1,1,1-trichloroethane, trichloroethylene, or methylene chloride. 40 CFR 63, Subpart O - National Emission Standards for Hazardous Air Pollutants for Industrial Cooling Towers applies to this unit if the industrial cooling tower is operated with chromium based water treatment chemicals on or after September 8, 1994. Please provide additional information to confirm that these units are not subject to MACT standards for these sources.

Response- In response to the above concerns raised by the EPA, FPC plant staff have checked current and past purchase records and MSDS sheets for cleaning solutions and solvent use at the site. This review has confirmed that none of the above-regulated solvents are in use or are intended to be used. Regarding the cooling towers, FPC has been using water treatment chemicals referred to as TowerBrom and Chlorkill, and prior to that, gaseous chlorine. These products do not contain chromium-based chemicals, and have been in use since at least the September 8, 1994 applicability date.

OK 6. Statement of Basis- The first paragraph on page 2 provides justification for annual testing of particulate based on five years of data showing emissions at less than half of the allowable limit. Review of the permit application indicates that FPC petitioned for annual particulate testing in accordance with the provisions of 62-296.405(1)(a) F.A.C. so that they would be allowed a visible emissions limit of 40 percent with annual rather than quarterly particulate testing. The statement of basis should be modified to reflect the allowance of annual particulate testing with a 40 percent VE in accordance with the SIP.

Response- FPC is in agreement that the proposed change to the statement of basis should be made.

- ok
7. Placard Page- Attachment TV-1 has been superceded by TV-3. Please incorporate this attachment instead of Attachment TV-1. This is necessary in order to ensure that language from TV-3, item 51 on compliance certifications, is present in the permit or its attachments as required under 40 CFR 70.6(c)(5)(iii).

Response- The above change proposed by the EPA would be consistent with other recently issued Title V permits.

- ok
8. Methods of Operation- Condition A.3.a is unclear with regard to allowance of blending on-specification used oil for use during startup and the relationship to the 2 ppm PCB requirement. Blending used oil with detectable concentrations of PCBs with fuel to reduce PCBs to levels below detection is not appropriate. It is appropriate, however, for FPC to blend fuel and used oil to adjust sulfur content. This permit condition should be re-worded to ensure that FPC does not blend used oil containing PCBs to achieve non-detect levels for firing during startup or shut down.

Response- FPC has always understood that blending of fuel oils to reduce PCB levels for purposes of testing is inappropriate. Therefore, any language that makes this more clear is not objectionable to FPC.

- ok
9. Minimum Sample Volume for Particulate Testing- Condition A.18 specifies a minimum sample volume of 30 dry standard cubic feet (dscf) for particulate testing, in accordance with 62-296.405(e)(2), F.A.C. of the SIP. Condition A.24(b) specifies a minimum sample volume of 25 dscf, or other volume as required by rule. Since these permit conditions are contradictory, a permitting note should be added to Condition A.24(b) to clarify that the required sample volume is 30 dscf.

Response- FPC's initial comment is that the correct citation for the rule referenced above is 62-296.405(1)(e)(2). FPC further researched the State of Florida provisions under "General Compliance Test Requirements", specifically 62-297.310(4)(a)(1) and .310(4)(c). These provisions require a minimum sampling time of one hour and a minimum required flow rate of 0.5 cubic feet per minute, respectively. Effectively, these two provisions result in a minimum sample volume of 30 dscf. Therefore, FPC agrees with the change proposed by the EPA.

10. Record Keeping- Conditions B.21 and B.22 address record keeping for the relocatable diesel generators. The permit states that this generator will be operated at six different facilities, five of which are not covered under this permit. This emission unit should also be included in the permits for the other five facilities. Please clarify in the statement of basis whether or not this is the case. The above referenced permit conditions require the source to keep records for the hours of operation, as well as the fuel oil sulfur content, in order to demonstrate compliance with operational and emission limitations. However, the permit does not indicate whether the records will be transferred with the emission unit when it is



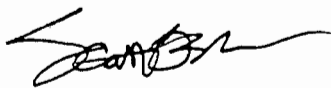
*moved to another facility, or if each facility will be responsible for maintaining their own records. The permit should specify how these records will be maintained and if record-keeping activities must be coordinated among the facilities.*

OK

Response- The relocatable diesel generators are proposed to be operated at six different facilities, five of which are not covered by this permit. As correctly noted above, identical permit language has been placed in the permits for these other five facilities. The current language in each of these permits is very specific in terms of the records that must be maintained. FPC's preference is that the records be maintained at each individual site. FPC's corporate environmental services department is responsible for agency notifications and reporting and is functionally structured to provide coordination among the facilities.

If you should have any questions concerning the above, please do not hesitate to contact me at (727) 826-4258.

Sincerely,



Scott H. Osbourn  
Senior Environmental Engineer

cc: Clair Fancy, DEP Tallahassee  
Doug Neeley, EPA Region IV  
Robert Manning, HGS&S

## ATTACHMENT



STATE OF FLORIDA  
DEPARTMENT OF POLLUTION CONTROL  
2562 EXECUTIVE CENTER CIRCLE, EAST  
MONTGOMERY BUILDING, TALLAHASSEE, FLORIDA 32301

PETER P. BALJET  
EXECUTIVE DIRECTOR

January 22, 1974

DAVID H. LEVIN  
CHAIRMAN

Mr. R. E. Parnelle, Jr.  
Florida Power Corporation  
P. O. Box 14042  
St. Petersburg, Florida 33733

Dear Mr. Parnelle:

In response to your recent request, Florida Power Corporation's Anclote Power Plant, Units 1 and 2 were issued a permit to construct in June, 1971. By definition of these units qualify as an "Existing Source" according to Chapter 17-2, F.A.C. As an existing source these units will be regulated by Section 17-2.04(6)(e) 2. Under this regulation you are expected to comply with the SO<sub>2</sub> emission regulations as expeditiously as possible, but no later than July 1, 1975.

Sincerely yours,

*Hamilton S. Owen, Jr.*  
Hamilton S. Owen, Jr.  
Deputy Executive Director

HSOJr/wb

cc: Mr. W. E. Linne

JOHN R. MIDDLEMAS  
BOARD MEMBER

GEORGE RUPPEL  
BOARD MEMBER

ALICE C. WAINWRIGHT  
BOARD MEMBER

W. D. FREDERICK, JR.  
BOARD MEMBER

ANCLOTE UNIT 2 CONSTRUCTION PROGRESSDATES OF IMPORTANCE

1. 3/27/72 Waterproofing and foundation forming of B/H
2. 5/8/72 Forms & rebar placement T/G mat
3. 5/17/72 Commence forming west wall B/H
4. 7/17/72 Pour T/G mat
5. 10/30/72 Install B/H column base plates
6. 11/6/72 Erection structural steel B/H
7. 12/4/72 Final T/H Foundation pour
8. 1/1/73 Completed all main building foundation pours
9. 2/12/73 Placed first roof girder
10. 4/13/73 Forming turbine pedestal legs & beams
11. 6/11/73 Forming turbine pedestal superstructure
12. 6/11/73 Install C.W. outlet pipe
13. 6/18/73 Pre-fab Air Duct
14. 7/9/73 Erecting downcomers & buckstrap
15. 8/6/73 Install air duct in B/H
16. 8/13/73 Raised first water wall panel
17. 9/3/73 Commenced air heater construction
18. 9/17/73 Hand riser tubes
19. 11/12/73 Erecting B/H siding
20. 12/31/73 Install air heater basket
21. 4/1/74 Generator stator arrived
22. 7/22/74 Mothballing of boiler
23. 10/28/74 Finalized temporary closure of Unit 2 Building
24. 10/13/75 Install tubes in condenser
25. 1/12/76 Continue boiler assembly - 80% of supply tubes in place & 1st pair welded out

Page 2  
Anclote Unit 2 Construction Progress

26. 2/9/76 Hung steam chest
27. 3/8/76 3rd burner assembly installed
28. 1/24/77 Erect breeching to stack
29. 5/30/77 Completed hydro test (6/1/77)
30. 7/25/77 Furnace air test completed (7/29/77)
31. 8/22/77 Wind box air test completed (8/25/77)
32. 2/13/78 1st fire in boiler (Postpone 2/17/78)
33. 2/13/78 1st light oil fire in boiler (2/18/78)
34. 2/27/78 Completed alkaline boil out & boiler acid cleaning 3/2/78
35. 3/20/78 Steam blowing completed - discontinue starting activities 'til 6/1/78. Problems with operating permit - start mothballing
36. 8/28/78 Received work 9/1/78 to restore, start-up & test unit
37. 9/18/78 Light off on light oil
38. 9/23/78 Turbine 1st rolled
39. 9/27/78 Synchronize to line
40. 10/31/78 Declared Commercial

BEST AVAILABLE COPY

*L. Bartlett*

*Mike fyi*

*I'll let you know the resolution. Scott 10/13*



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
 REGION 4  
 ATLANTA FEDERAL CENTER  
 61 FORSYTH STREET  
 ATLANTA, GEORGIA 30303-8960

OCT - 8 1999

4APT-ARB

Howard L. Rhodes, Director  
 Department of Environmental Protection  
 Division of Air Resources Management  
 Mail Station 5500  
 2600 Blair Stone Road  
 Tallahassee, Florida 32399-2400

OPTIONAL FORM 99 (7-90)

**FAX TRANSMITTAL**

# of pages = 5

To <i>Scott Sheplak</i>	From <i>Eliz. Bartlett</i>
Dept./Agency <i>FDEP</i>	Phone # <i>(404) 562-9122</i>
Fax # <i>(850) 922-6979</i>	Fax # <i>(404) 562-9095</i>
<small>NSN 7540-01-317-7388</small>	<small>5099-101 GENERAL SERVICES ADMINISTRATION</small>

SUBJ: EPA's Objection to Proposed Title V Permits for Florida Power Corporation  
 Suwannee Power Plant - Permit No. 1210003-001-AV  
 Anclote Power Plant - Permit No. 1010017-003-AV

Dear Mr. Rhodes:

This letter is being provided to follow up on a conference call held between Florida Department of Environmental Protection (FDEP) Bureau of Air Regulation staff, representatives of Florida Power Corporation (FPC), and U.S. Environmental Protection Agency (EPA) Region 4 staff on September 13, 1999. This call discussed EPA's objections to the FPC Suwannee and Anclote plant operating permits under title V of the Clean Air Act (CAA), in letters dated July 12, and July 16, 1999, respectively. It appears that all objection items in our letters were resolved, pending permit revisions, except for Objection Item 2 in both letters. This objection item requires that appropriate averaging times be specified in the title V permits to assure compliance with particulate matter emission limits drawn from the Florida state implementation plan (SIP). To address FPC's August 27, 1999, response to EPA's objections, this letter will discuss the legal authority for specifying averaging times in title V permits and provide options for establishing averaging times for particulate matter emission limits.

I. Legal Authority for Specifying Averaging Times for SIP Emission Limits in Title V Permits

According to 40 C.F.R. § 70.6(a)(1), each title V permit shall include "emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance." See also F.A.C. 62-213.440(1). Section 504(a) of the Clean Air Act similarly requires permits to include "enforceable emission limitations and standards. . . and such other conditions as are necessary to assure compliance with applicable requirements of [title V], including the requirements of the applicable implementation plan." In order to assure compliance with the particulate matter emission limits in the Suwannee and Anclote plant permits in a manner that is practically enforceable, the permits must include appropriate averaging times for these limits.

## BEST AVAILABLE COPY

2

EPA's views on this issue have been clear and consistent since the 1991 part 70 proposal. That proposal recognized that some SIP emission limits would be ambiguous because they contained gaps as to test methods or averaging times. 56 FR 21712, 21738 (May 10, 1991). EPA made clear that operating permits should fill those gaps (e.g., in averaging times) in order to make permits enforceable and approvable, and made equally clear that the Agency could object to permits that failed to do so:

SIP Ambiguity. Some SIP requirements will be vague as to a significant provision (e.g., averaging time, monitoring, and/or reporting requirements), requiring considerable time during the permitting process to make the operating permit enforceable. In such cases, the SIP will be ambiguous when applied to a particular source, and the State must judge how to define the enforceable permit conditions. Where the State's interpretation of a requirement is both inconsistent with the State's demonstration of attainment and maintenance of the NAAQS and undermines the level of emissions reduction EPA anticipated the rule would achieve, EPA will object to the permit. In making this decision, EPA will look to the available record, including the assumptions the State made in the SIP.

....  
The permit requires certain information to make it enforceable. There are situations in which a SIP, standing alone, is an inadequate basis on which to issue an approvable (i.e., enforceable) permit. For example, the SIP may contain gaps as to test methods or averaging times. The operating permit process should, at least temporarily, fill these gaps to the extent required by title V. However, this does not relieve the State of any obligation it might have to revise the applicable SIP in response to an EPA SIP call. 56 FR at 21738.

The 1992 final part 70 regulations adopted this view that operating permits should fill gaps in the SIP, in order for permits to assure compliance with SIP requirements by ensuring that such requirements were practically enforceable. First, as noted above, § 70.6(a)(1) of the final regulations followed the proposal in requiring permits to include "emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance." See 40 C.F.R. § 70.6(a)(1); 56 FR at 21774 (proposed § 70.6(a)(1)).

Moreover, in response to comments from industry claiming that title V operating permits cannot or should not be used to fill gaps in existing SIPs, including gaps in averaging time as noted in the proposal, EPA clearly rejected these views in promulgating the final regulations. See generally "Technical Support Document for Title V Operating Permit Program," 6-45 to 6-46 (May, 1992). EPA's response reiterated the position set forth in the proposal that permits must be enforceable in order to meet CAA section 504(c)'s requirement that permits "shall include enforceable emission limitations and standards . . . as necessary to assure compliance with the applicable requirements of the Act." *Id.* at 6-46. EPA concluded that "a permitting authority [could] fill the gap either by placing the missing requirement in the permit, or by revising the SIP

## BEST AVAILABLE COPY

3

before issuing the permit, but the permitting authority could not issue a permit that is unenforceable." Id.

Clearly defined averaging times are an important element of practically enforceable emission limits.<sup>1</sup> They are necessary in operating permits in order to assure compliance with applicable requirements for purposes of a source's compliance certification obligations, deviation reporting, and government agency and citizen enforcement. In order to use stack test results or any other source of credible evidence to determine whether a source is in compliance with an applicable standard, it is necessary to know the averaging time for the standard. Even if a permit identifies the applicable reference test method that is used for demonstrating compliance, it is necessary to know the averaging time of the standard in order to ensure that an adequate amount of data is collected when a compliance test is conducted. For example, a typical particulate stack test consists of three one-hour runs, and this amount of data would be adequate for demonstrating compliance if the averaging time of the standard were three hours. If the actual averaging time of the standard was something other than three hours (e.g., 24 hours), however, three one-hour samples would not suffice for determining compliance. This is because evidence that the average emission rate from a source exceeded the applicable standard over a three-hour period does not necessarily mean that the emission rate from the source would have exceeded the standard over a longer period of time corresponding to the averaging time of the standard.

As specified in Florida's SIP, the particulate matter emission limit in question for "Fossil Fuel Steam Generators with more than 250 million Btu per Hour Heat Input" is "0.1 pound per million Btu heat input, as measured by applicable compliance methods." See F.A.C. 62-295.405(1)(b). The particulate matter test method is specified in F.A.C. 62-296.405(1)(e)2., as EPA Methods 17, 5, 5B, or 5F. Since the SIP specifies that compliance with this emission limit is "as measured by applicable compliance methods," an averaging time corresponding to the stack test method is implied. However, without an explicit averaging time for comparison with the national ambient air quality standard for particulate matter, the particulate matter emission limit in the Florida SIP, on its own, is not practically enforceable.

## II Options for Establishing Averaging Times in the Permit for the Particulate Matter Emission Limit

---

<sup>1</sup> EPA has long viewed specification of averaging times as a necessary element of practical enforceability with respect to SIP emission limits. "SIP rules should describe explicitly the compliance time frame associated with each emission limit (e.g. instantaneous, stack test, 3 hour average or daily)." Memorandum from Michael S. Alushin, Alan W. Eckert & John S. Seitz, "Review of State Implementation Plans and Revisions for Enforceability and Legal Sufficiency," (Sept. 23, 1987) at 3. "Each compliance provision must list how compliance is to be determined and the appropriate test method to be used. The allowable averaging times should be explicit. Both the test method and averaging times employed must be sufficient to protect the ambient standard involved." Id. at 4. Following promulgation of the final part 70 regulations, as noted above, operating permits are to specify averaging times for SIP emission limits where there are gaps in such requirements. EPA may still pursue SIP calls to address deficiencies with SIP emission limits, and states should make such regulatory fixes as appropriate.



## BEST AVAILABLE COPY

4

Each permit must be revised to establish an averaging time for the particulate matter emission limit. In our objection letters, we suggested that one possible way to address the lack of averaging times for the particulate matter emission standards in the Suwannee and Anclote permits would be to include language in each permit indicating that the averaging time of the standard is based upon the run time of the test method(s) used for determining compliance. In its August 27 response to EPA's objections, FPC contended that such language would not resolve our objection since the duration of each of the three particulate sampling runs that are conducted during a test could vary between one and four hours under the terms of the Suwannee and Anclote permits.

Since FPC has asserted that a statement linking the averaging time to the duration of the applicable reference test method will not work at Suwannee and/or Anclote, one option for addressing the title V requirement to specify averaging times in permits would be to explicitly state the averaging time along with the numerical emission standard in Condition A.7. If this option is used, it is our opinion that the averaging time referenced in Condition A.7 should be three hours, because the majority of reference tests conducted to measure particulate emissions consist of three one-hour runs. If FPC believes that the averaging time should be set at something other than three hours, however, the company should submit any information that it considered in reaching its conclusion. We will review any such submittal as expeditiously as possible, and if the company has a valid justification for a different set averaging time, this value can be added to Condition A.7 in the Suwannee/Anclote permits.

Since both the Suwannee and Anclote plants co-fire, or plan to co-fire, oil and natural gas fuels, it is possible that a set averaging time of three hours may not be appropriate for particulate matter emissions at these sites. To accommodate the potential for changes in fuel usage at these facilities over their permit terms, another option would be to add language to Condition A.7 of the permits stating that the averaging time for particulate matter emission limits is based on or tied to the run time of the *most recently* conducted test for each unit, using the applicable reference test method. As a result, the averaging time would evolve with operating practices, yet be fixed and practically enforceable between tests. This should be sufficient since the testing frequency is set on a site-specific basis to be representative of operations for that period and to ensure compliance with the emission limits.

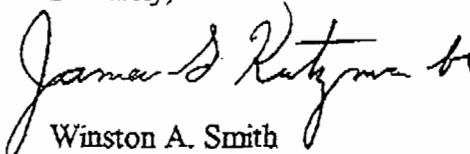
EPA will consider all objection items to be resolved upon receipt of verbal or written confirmation that some form of averaging time will be added to the particulate matter emission standard in Condition A.7 of the Suwannee/Anclote permits. Further discussion on selection of averaging times would then occur through finalization of the permits for these facilities.

## BEST AVAILABLE COPY

5

If you have any questions or wish to discuss this further, please contact Mr. Gregg Worley, Chief, Operating Source Section at (404) 562-9141. Should your staff need additional information they may contact Ms. Elizabeth Bartlett, Florida Title V Contact, at (404) 562-9122, Mr. David McNeal, Regional Expert for Stack Testing and CEMS, at (404) 562-9102, or Ms. Angelia Souder-Blackwell, Associate Regional Counsel, at (404) 562-9527.

Sincerely,



Winston A. Smith  
Director  
Air, Pesticides & Toxics  
Management Division

cc: Mr. Scott H. Osbourn, FPC

Copy to:

Bruce ✓ Mike



November 8, 1999

Mr. Scott Sheplak, P.E.  
Florida Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, Florida 32399-2400

Re: Florida Power Corporation's Anclote and Suwannee Facilities  
EPA Objection to Proposed Title V Permit Nos. 1210003-001-AV and 1010017-003-AV

Dear Mr. Sheplak:

FPC appreciates DEP's and EPA's cooperation thus far in resolving the majority of the issues contained in EPA's objection letters to the above-referenced permits, dated July 12, 1999 and July 16, 1999.

FPC understands that the only remaining issue is EPA's position that the particulate matter emission limits contained in the above-referenced proposed permits are not "practicably enforceable" unless "some form of averaging time" is added. FPC disagrees. These conditions are completely enforceable in their current form; adding an averaging time is simply unnecessary.

However, in an effort to move the Title V permitting process to conclusion, FPC is willing to accept the inclusion of a "permitting note" following Conditions A.7 and A.8, as follows:

*The averaging time for the particulate matter standard corresponds to the cumulative sampling time of the specified test method.*

FPC's suggested resolution of this matter does not constitute or imply concurrence with EPA's position. The Title V process is intended to consolidate existing applicable requirements for each Title V permit on a case-by-case basis, and FPC's suggested resolution applies only to the Anclote and Suwannee Title V facilities/permits. Moreover, the language suggested above is applicable only to the existing particulate matter limit and only for the existing compliance determination method for this limit.

Mr. Sheplak, P.E.  
November 8, 1999  
Page 2

Thank you for your attention to this important matter. If you have any questions regarding FPC's response or wish to discuss this matter further, please contact Scott Osbourn at (727) 826-4258 or me at (727) 826-4301.

Sincerely,



W. Jeffrey Pardue, C.E.P.  
Director, FPC Environmental Services Department  
Responsible Official for Anclote and Suwannee Title V permits

cc: Howard Rhodes, DEP  
Clair Fancy, DEP  
Winston A. Smith, EPA  
Greg Worley, EPA  
Elizabeth Bartlett, EPA  
Robert Manning, HGSS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

JUL 12 1999

0A490 = 10/a/aa

Claim from: HCF 7/12

4APT-ARB

Howard L. Rhodes, Director  
Air Resources Management Division  
Florida Department of Environmental Protection  
Mail Station 5500  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

SUBJ: EPA's Review of Proposed Title V Permit  
Florida Power Corporation  
Suwannee River Facility  
Permit No. 1210003-001-AV

RECEIVED

JUL 13 1999

BUREAU OF AIR REGULATION

OPTIONAL FORM 100 (7-90)

**FAX TRANSMITTAL**

To: Howard Rhodes  
Date Delivered: FDEP

From: Greary Davis  
Project: 404 562-9119

Fax # 850 922-6979  
Fax # 404 562-9095

NSN 7540-01-317-7988 6039-101 GENERAL SERVICES ADMINISTRATION

# of pages: 4

Dear Mr. Rhodes:

The purpose of this letter is to provide comments to the Florida Department of Environmental Protection (DEP) on the proposed title V operating permit for Florida Power Corporation, Suwannee River Facility, which was posted on DEP's web site on May 26, 1999. Based on the Environmental Protection Agency's (EPA's) review of the proposed permit and the supporting information for this facility, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. § 70.8(c) (see also Florida Regulation 62-213.450), to the issuance of the title V permit for this facility. The basis of EPA's objection is that the permit does not fully meet the periodic monitoring requirements of 40 C.F.R. § 70.6(a)(3)(i), contains conditions which are unclear as to what the source must demonstrate compliance with, and is missing some requirements related to the Acid Rain conditions contained in the permit.

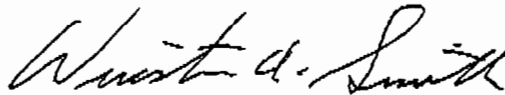
Section 70.8(c) requires EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information) if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 C.F.R. Part 70. Section 70.8(c)(4) and Section 505(c) of the Act further provide that if the State fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA and EPA will act accordingly. Because the objection issues must be fully addressed within the 90 days, we suggest that the revised permit be submitted in advance in order that any outstanding issues may be addressed prior to the expiration of the 90-day period.

2

Pursuant to 40 C.F.R. § 70.8(c), this letter and its enclosure contain a detailed explanation of the objection issues and the changes necessary to make the permit consistent with the requirements of 40 C.F.R. Part 70. The enclosure also contains general comments applicable to the permit.

If you have any questions or wish to discuss this further, please contact Mr. Gregg Worley, Chief, Operating Source Section at (404) 562-9141. Should your staff need additional information they may contact Ms. Gracy R. Danois, Florida Title V Contact, at (404) 562-9119, or Ms. Angelia Souder-Blackwell, Associate Regional Counsel, at (404) 562-9527.

Sincerely,



Winston A. Smith  
Director  
Air, Pesticides & Toxics  
Management Division

Enclosure

cc: Mr. W. Jeffrey Pardue, Director  
Environmental Services Dept.  
Florida Power Corporation

Mr. Scott Osbourn Sr.  
Environmental Engineer  
Florida Power Corporation

Mike,

Here's the EPA  
veto on Suwannee.

I e-mailed a  
draft resolution  
letter on Suwannee.

Scott

Enclosure

U.S. EPA Region 4 Objection  
Proposed Part 70 Operating Permit  
Florida Power Corporation  
Suwannee River Facility  
Permit no. 1210003-001-AV

DAY 90 = 10/9/99

Scott Osbourn indicated  
that KPC will not agree  
to I.2. He indicated that  
the national utility lobby  
has told him  
not to  
accept.

Scott  
8/24

I. EPA Objection Issues

1. Periodic Monitoring: The permit is not clear about the frequency of testing that the facility must follow to assure compliance with the particulate matter limit. Condition A.5 of the permit requires the facility to conduct annual particulate matter testing. However, conditions A.27 and A.29 establish that the facility will conduct testing once a year if fuel oil is burned for more than 400 hours, and that no testing is required otherwise. The permit must be clear about which one of these conditions the facility must follow to demonstrate compliance with the particulate matter limit.

→ 2.

Appropriate Averaging Times: In order for the emissions standard for particulate matter to be practicably enforceable, the appropriate averaging time must be specified in the permit. An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission standards are tied to or based on the run time of the test method(s) used for determining compliance.

3. Periodic Monitoring: Condition A.34 has been identified as "not-Federally enforceable." However, the condition contains documentation, record keeping, and notification requirements for used oil which originate from 40 C.F.R. Parts 279 and 761. Since those conditions are federal requirements, they are automatically federally enforceable. Additionally, conditions A.11, A.30, and A.35 contain operational limitations for using used oil and reporting requirements that are identified as federally enforceable. Since the permit contains a federally enforceable limit and reporting requirement for the use of used oil, the method of establishing compliance with the limit and reporting requirement must also be federally enforceable. Therefore, the recordkeeping required by condition A.34 is federally enforceable.

4. Periodic Monitoring: Condition B.6 limits the operation of the units to 1500 hours per year per unit. The permit must specify that the facility is required to maintain records of the hours of operation of the units.

5. Emission Limits: Conditions B.7, B.8, B.10, and B.12 contain equivalent emissions for the NO<sub>x</sub>, SO<sub>2</sub>, and PM limits. It is not clear whether the facility is

required to demonstrate compliance with these equivalent emissions and what the basis for these limits are. For example, we were only able to locate PSD permit modification FL-014(A), which modified the limit for SO<sub>2</sub> and it does not include the equivalent emissions for SO<sub>2</sub> that are listed in the permit. Please clarify these conditions of the permit.

⑥

Acid Rain: The following language regarding Acid Rain Program requirements in title V is not addressed in the Acid Rain Part of the permit and does not appear to be included elsewhere in the body of the proposed permit: sections 70.6(a)(1)(ii) and 70.6(a)(4)(i). These conditions must be added to the proposed title V permit for this source.

## II. General Comments

⑦

Section II, condition 1: Please make sure that Appendix TV-2 reflects the updated version of condition 51, as it is contained in Appendix TV-3.

⑧

Section II, condition 10: Please correct the telephone and fax number for the Air Enforcement Section. The correct telephone and fax numbers are 404/562-9155 and 404/562-9163, respectively.



DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

1. Bruce Mitchell

3. \_\_\_\_\_  
4. \_\_\_\_\_  
5. \_\_\_\_\_

PLEASE PREPARE REPLY FOR:

- SECRETARY'S SIGNATURE
- DIV/DIST DIR SIGNATURE
- MY SIGNATURE
- YOUR SIGNATURE
- DUE DATE \_\_\_\_\_

COMMENTS:

ACTION/DISPOSITION

- DISCUSS WITH ME
- COMMENTS/ADVISE
- REVIEW AND RETURN
- SET UP MEETING
- FOR YOUR INFORMATION
- HANDLE APPROPRIATELY
- INITIAL AND FORWARD
- SHARE WITH STAFF
- FOR YOUR FILES

FROM:

C. H. Jancy

DATE:

3/2/99

PHONE:

\_\_\_\_\_



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

March 1, 1999

Mr. Winston A. Smith, Director  
Air, Pesticides and Toxics Management Division  
United States Environmental Protection Agency  
Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-8909

Re: Proposed Changes to the PROPOSED Title V Permit for the Florida Power Corporation Turner Power Plant to Satisfy EPA Objections  
Title V Permit No.: 1270020-001-AV

Dear Mr. Smith:

This letter is to document changes that the Department proposes to satisfy EPA Region 4's objections to Florida's PROPOSED Title V Permit for the Florida Power Corporation Turner Power Plant. The objection was detailed in a letter from EPA Region 4 dated December 8, 1998, in which EPA indicated the primary basis for the objection was that the permit does not meet the periodic monitoring requirements of 40 CFR 70.6(a)(3)(i). Also, the objection letter requested a change in the EPA Region 4 address and to correct the Acid Rain ORIS code identification number.

The change proposed in this letter results primarily from a February 18, 1999 letter sent to Mr. Scott M. Sheplak from Mr. Scott Osbourn with Florida Power Corporation and a phone discussion with Ms. Gracy R. Danois of your staff. The letter provided the highest individual unit's historical annual hours of operation and the visible emissions test results while firing fuel oil since 1992 in order to help us respond to and resolve the objection; and, the phone conversation enabled us to identify the changes that could be made to the Statement of Basis and the permit that would allow Florida to issue the FINAL Title V Permit for this plant.

Please review the following proposed changes to the Statement of Basis and the referenced permit. If you concur with our changes, we will issue the FINAL Permit with these changes. The following items and changes are presented in the same order as listed in the December 8, 1998 letter cited above.

- I. EPA Objection Issue
1. Periodic Monitoring.

We will add the following proposed paragraph to the Statement of Basis to show that the highest individual emissions unit's historical annual hours of operation and the visible emissions test results while firing fuel oil provide justification for retaining the existing appropriate visible emissions testing frequency, which is required when an individual emissions unit exceeds 400 hours per federal fiscal year of operation while firing fuel oil, and to consider this approach as satisfying periodic monitoring.

Mr. Winston A. Smith  
Response Letter to EPA Region 4 Objection Letter on a PROPOSED Title V Permit  
Florida Power Corporation: Turner Power Plant  
Title V Permit No.: 1270020-001-AV  
Page 2 of 2

The Department has determined that the appropriate visible emissions (VE) testing frequency for the four combustion turbines is a VE test upon exceeding 400 hours of operation on fuel oil in any given federal fiscal year (October 1 through September 30). This frequency is justified by the low historical operational use of fuel oil for these units and the previous VE tests which documented compliance while firing fuel oil. The maximum hours of operation on fuel oil for any single combustion turbine at the Turner facility were 208 hours in 1992, 124 hours in 1993, 161 hours in 1994, 203 hours in 1995, 190 hours in 1996, 126 hours in 1997, and 573 in 1998. Moreover, no Method 9 tests since 1992 on these four units have resulted in an opacity measurement greater than 6%, about 25% of the applicable standard.

II. General Comments

1. Section II, Facility-wide Condition No. 11.:

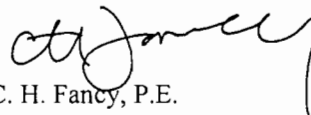
We will replace "Operating Source Section" with "Air & EPCRA Enforcement Branch, Air Compliance Section".

2. Section IV.

We will change the Acid Rain ORIS Code from "8049" to "629".

All parties involved have been expeditiously seeking resolution of these issues. We feel that EPA's concerns have been adequately addressed and we look forward to issuing the FINAL Title V permit. Please advise as soon as possible if you concur with the specific changes detailed above. Please call me at 850/921-9503 if you have any questions. You may also contact Mr. Scott M. Sheplak, P.E., at 850/921-9532, if you need any additional information.

Sincerely,



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

Attachment

CF/bm

cc: Howard L. Rhodes  
Scott M. Sheplak  
Bruce Mitchell  
Pat Comer, Esq.  
Gracy R. Danois, EPA  
Scott Osbourn, FPC  
Robert Manning, Esq., HGSS

# INTEROFFICE MEMORANDUM

**Date:** 04-Nov-1999 09:03am  
**From:** J-Michael.Kennedy  
J-Michael.Kennedy@fpc.com  
**Dept:**  
**Tel No:**

*Copied  
Brouer,  
Mike*

**To:** Scott.Sheplak ( Scott.Sheplak@dep.state.fl.us )  
**CC:** Osbourn\_Scott\_H/goc\_openmail ( Osbourn\_Scott\_H/goc\_openmail@sv003.fpc.com )  
**CC:** robertm ( robertm@hgss.com )

**Subject:** Anclote and Suwannee Resolution

Scott,

As we discussed yesterday, FPC will agree to the following Title V permit language, to be included in the Anclote and Suwannee permits, regarding particulate limit averaging time in order to resolve the disagreement with EPA:

The averaging time for the particulate matter standard corresponds to the cumulative sampling time of the specified test method.

We will follow-up with a brief letter confirming this resolution. Thank you for your assistance.

Mike Kennedy  
(727) 826-4334

# DEP MEDIA HOT SHEET

---

**EMAIL TO:**

**TO: KRISTINE ROSELIUS, OFFICE OF COMMUNICATIONS  
HOWARD L. RHODES, DIRECTOR, DARM  
THE APPROPRIATE BUREAU CHIEF OR OPAPM/OAPCO ADMINISTRATOR IN DARM**

**FAX: 850/921-6227 OR SC 291-6227 (COMMUNICATION OFFICE)**

---

**TOPIC:** Oleander Power Plant

**DATE:**            **REPORTERS NAME:**            Jeff Schweers

**FROM:**            Florida Today (Newspaper)            **TELEPHONE:**            Failed to obtain  
(Newspaper, TV Station, Radio, etc.)

**PERSON INTERVIEWED:** M. P. Halpin    **TELEPHONE:**            850/921-9530

**DIVISION/BUREAU/OFFICE:**            DARM/BAR/NSR

**DATE OF INTERVIEW:**            11/18/99            **ACTION TIME NEEDED:**            N/A

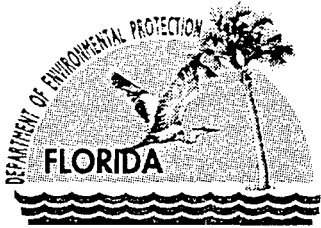
**QUESTIONS ASKED:**

A number of questions were asked, which were aimed at a general understanding of the terms and conditions by which the Oleander Power Plant (in Brevard County) would be permitted. These questions included such things as fuel types and quantities allowed, operating hour limitations and emission limitations. After answering these questions, I was asked if there were any limitations that the general public might have a specific interest in. I noted that the requirement which limits the plant to firing no more than 50% of their fuel as #2 oil (on a heat value basis) was one which should interest them, as this was a condition which was drafted based upon local resident concerns.

**FOLLOW-UP NEEDED?**            I don't believe so. Mr. Schweers seemed satisfied with my responses.

**DEADLINE:** N/A

**SUMMARY OF CONVERSATION (Use additional pages if necessary) - See above.**



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

*Mike*

July 20, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. W. Jeffrey Pardue, Director  
Environmental Services Department  
Florida Power Corporation  
Post Office Box 14042  
Saint Petersburg, Florida 33711

Re: EPA Objection to PROPOSED Title V Permit No. 1010017-003-AV  
Facility Name: Anclote Power Plant

Dear Mr. Pardue:

On July 16, 1999, the Department received a timely written objection from the United States Environmental Protection Agency to the referenced proposed permit. A copy of EPA's objection is attached.

In accordance with Section 403.0872(8), Florida Statutes (F.S.), the Department must not issue a final permit until the objection is resolved or withdrawn. Pursuant to Section 403.0872(8), F.S., the applicant may file a written reply to the objection within 45 days after the date on which the Department serves the applicant with a copy of the objection. The written reply must include any supporting materials that the applicant desires to include in the record relevant to the issues raised by the objection. The written reply must be considered by the Department in issuing a final permit to resolve the objection of EPA. Please submit any written comments you wish to have considered concerning the objection to Mr. Scott M. Sheplak, P.E., at the above letterhead address.

Pursuant to 40 CFR 70.8(c)(4) the Department will have to resolve the objection by issuing a permit that satisfies EPA within 90 days of the objection, or EPA will assume authority for the permit.

If you should have any other questions, please contact Mr. Scott M. Sheplak, P.E., at 850/921-9532.

Sincerely,

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

CHF/sms/k

Enclosure

cc: Pat Comer, Esquire, OGC w/enclosure  
Douglas Neeley, USEPA w/o enclosure  
Gregg Worley, USEPA w/o enclosure

"Protect, Conserve and Manage Florida's Environment and Natural Resources"



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION 4  
 ATLANTA FEDERAL CENTER  
 61 FORSYTH STREET  
 ATLANTA, GEORGIA 30303-8960

JUL 18 1999

*scott*  
~~*clair*~~  
~~*Howard*~~  
 7/19

4APT-ARB

Howard L. Rhodes, Director  
 Division of Air Resources Management  
 Department of Environmental Protection  
 Mail Station 5500  
 2600 Blair Stone Road  
 Tallahassee, Florida 32399-2400

RECEIVED

JUL 19 1999

BUREAU OF AIR REGULATION

SUBJ: ~~EPA's Review of Proposed Title V Permit~~  
~~Florida Power Corporation~~  
~~Anclote Power Plant~~  
 Permit No. 1010017-003-AV

Dear Mr. Rhodes:

The purpose of this letter is to provide comments to the Florida Department of Environmental Protection (DEP) on the proposed title V operating permit for Florida Power Corporation, Anclote Power Plant, which was posted on DEP's web site on June 2, 1999. Based on the Environmental Protection Agency's (EPA's) review of the proposed permit and the supporting information for this facility, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. § 70.8(c) (see also Florida Regulation 62-213.450), to the issuance of the title V permit for this facility. The basis of EPA's objection is that the permit does not fully meet the periodic monitoring requirements of 40 C.F.R. § 70.6(a)(3)(i), contains conditions which are mislabeled as "Not Federally Enforceable," and is missing some Acid Rain requirements.

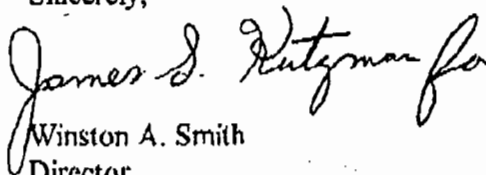
Section 70.8(c) requires EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information), if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 C.F.R. Part 70. Section 70.8(c)(4) and Section 505(c) of the Act further provide that if the State fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA and EPA will act accordingly. Because the objection issues must be fully addressed within the 90 days, we suggest that the revised permit be submitted in advance in order that any outstanding issues may be addressed prior to the expiration of the 90-day period.

2

Pursuant to 40 C.F.R. § 70.8(c), this letter and its enclosure contain a detailed explanation of the objection issues and the changes necessary to make the permit consistent with the requirements of 40 C.F.R. Part 70. The enclosure also contains general comments applicable to the permit.

If you have any questions or wish to discuss this further, please contact Mr. Gregg Worley, Chief, Operating Source Section at (404) 562-9141. Should your staff need additional information they may contact Ms. Elizabeth Bartlett, Florida Title V Contact, at (404) 562-9122, or Ms. Angela Souder-Blackwell, Associate Regional Counsel, at (404) 562-9527.

Sincerely,



Winston A. Smith  
Director  
Air, Pesticides and Toxics  
Management Division

Enclosure

cc: Mr. W. Jeffrey Pardue, Director  
Environmental Services Dept.  
Florida Power Corporation



**Enclosure**

**U.S. EPA Region 4 Objection  
Proposed Part 70 Operating Permit  
Florida Power Corporation  
Anclote Power Plant  
Permit no. 1010017-003-AV**

**I. EPA Objection Issues**

1. Applicable Requirements - Based on available information, it appears that Anclote Unit 2 may be subject to 40 C.F.R. 60 Subpart D - *Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971*. According to the application, initial startup for this unit was October 31, 1978. Please provide verification that construction of Unit 2 commenced prior to August 17, 1971.
2. Appropriate Averaging Times: In order for the emissions standard for particulate matter to be practicably enforceable, an appropriate averaging time must be associated with the emission limit and specified in the permit. For example, specific condition 2. in Permit No. AO51-169340 for Anclote Unit 2, located in Attachment AN-EU2-L12 of the permit application appropriately states that "the maximum particulate emission rate from this source shall be 0.1 pounds per MMBTU heat input over a two hour average." An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission limits are tied to or based on the run time of the test method(s) used for determining compliance, unless otherwise specified.
3. Federal Enforceability - Condition A.33 contains certain extra limitations and record keeping requirements related to the firing of used oil, and is labeled as not federally enforceable. However, the condition contains documentation, record keeping, and notification requirements for used oil which originate as 40 C.F.R. 279 and 761. Since those conditions are federal requirements, they are automatically federally enforceable. Therefore the individual requirements of this condition should be broken down into federally enforceable and not federally enforceable conditions.
4. Acid Rain Requirements - Language from 40 C.F.R. 70.6(a)(1)(ii) is not addressed in the Acid Rain Part of the permit and does not appear to be included elsewhere in the body of the proposed permit. This condition must be added to the proposed title V permit for this source.

5. Applicable Requirements - Appendix U-1 lists "Surface Coating and Solvent Cleaning" and "Helper Cooling Towers" as unregulated emission units. 40 C.F.R. 63 Subpart T - National Emission Standards for Halogenated Solvent Cleaning applies to this unit if the owner or operator uses a solvent in the machine that contains (in total) 5 percent by weight of the following regulated solvents: carbon tetrachloride, chloroform, perchloroethylene, 1,1,1-trichloroethane, trichloroethylene, or methylene chloride. 40 C.F.R. 63 Subpart O - National Emission Standards for Hazardous Air Pollutants for Industrial Cooling Towers applies to this unit if the industrial cooling tower is operated with chromium based water treatment chemicals on or after September 8, 1994. Please provide additional information to confirm that these units are not subject to MACT standards for these sources.

## II. General Comments

6. Statement of Basis - The first paragraph on page 2 provides justification for annual testing of particulate based on five years of data showing emissions at less than half of the allowable limit. Review of the permit application indicates that FPC petitioned for annual particulate testing in accordance with the provisions of 62-296.405(1)(a) F.A.C. so that they would be allowed a visible emissions limit of 40 percent with annual rather than quarterly particulate testing. The statement of basis should be modified to reflect the allowance of annual particulate testing with a 40 percent VE in accordance with the SIP.
7. Placard Page - Attachment TV-1 has been superseded by TV-3. Please incorporate this attachment instead of Attachment TV-1. This is necessary to ensure that language from TV-3, item 51 on compliance certifications, is present in the permit or its attachments as required under 40 C.F.R. 70.6(c)(5)(iii).
8. Methods of Operation - Condition A.3.a. is unclear with regard to allowance of blending on-specification used oil for use during startup and the relationship to the 2 ppm PCB requirement. Blending used oil with detectable concentrations of PCB's with fuel to reduce PCBs to levels below detection is not appropriate. It is appropriate, however for FPC to blend fuel and used oil to adjust sulfur content. This permit condition should be reworded to ensure that FPC does not blend used oil containing PCBs to achieve non-detect levels for firing during startup or shut down.
9. Minimum Sample Volume for Particulate Testing - Condition A.18. specifies a minimum sample volume of 30 dry standard cubic feet for particulate testing, in accordance with 62-296.405(e)2, F.A.C. of the SIP. Condition A.24.(b) specifies a minimum sample volume of 25 dscf, or other volume as required by rule. Since these permit conditions are contradictory, a permitting note should be added to Conditions A.24.(b) to clarify that the required sample volume is 30 dry standard cubic feet.

10. Record keeping - Conditions B.21 and B.22 address record keeping for the relocatable generators. The permit states that this generator will be operated at six different facilities, five of which are not covered under this permit. This emission unit should also be included in the permits for the other five facilities. Please clarify in the statement of basis whether or not this is the case. The above referenced permit conditions require the source to keep records for the hours of operation as well as the fuel oil sulfur content in order to demonstrate compliance with operational and emission limitations. However, the permit does not indicate whether the records will be transferred with the emission unit when it is moved to another facility, or if each facility will be responsible for maintaining their own records. The permit should specify how these records will be maintained and if record keeping activities must be coordinated among the facilities.

OPTIONAL FORM 99 (7-90)

**FAX TRANSMITTAL**

# of pages > 6

To	Howard Rhodes	From	Bridgette Baron
Dept./Agency	Florida Dept. Environ	Phone #	(404) 562-9094
Fax #	(850) 922-6979	Fax #	(404) 562-9066

NSN 7540-01-317-7386

5099 101

GENERAL SERVICES ADMINISTRATION



Florida Power CORPORATION

copy to:

Ed  
original to Mike

# FAX Transmittal Sheet

FAX #: (727) 826-4216

DATE: 1/22/99

TO: Scott Shogatz (851) 922-6979

COMPANY: EPER - Air Program

FROM: Scott Osborne

(Phone: (727) 826-4258)

# OF PAGES 4

Please notify \_\_\_\_\_ at (727) 826-\_\_\_\_\_ for any problems concerning the receipt of this FAX.

### COMMENTS:

As we discussed

Scott

Bartow most concerned 2/1/99 DOAH date KPC needs

to show progress. Would like Bartow draft next week.

Scott will be here next Tuesday.



cc: D. T. Buell  
 W. B. Hicks  
 M. E. Meeks  
 J. M. Kennedy  
 S. H. Osbourn  
 J. L. Tillman  
 J. A. Gridley  
 R. A. Glenn

File: Air Corresp for AN/BA/DEP/CR  
 k:\users\osbourn\1998\livresl.doc  
 927-616000-AIRST/AIRCT

October 12, 1998

Mr. Scott Sheplak, P.E.  
 Bureau of Air Regulation  
 Florida Department of Environmental Protection  
 2600 Blair Stone Rd.  
 Tallahassee, Florida 32399-2400

Dear Mr. Sheplak:

Re: Status of Title V Permits

As you know, a meeting was held on August 28, 1998 between the Department and Mr. Scott Osbourn of my staff. The purpose of the meeting was to resolve several pending Title V issues in order to advance these permits to the "proposed" stage as expeditiously as possible. Based upon the meeting, the following is a brief summary of FPC's understanding and position regarding the status of several of FPC's Title V permits.

1. Bartow facility (DRAFT Title V Permit No. 1030011-002-AV)

FPC received the Intent to Issue Title V Air Operation Permit and draft Title V permit for the Bartow facility on October 6, 1997. Following several extensions of time and discussions with the Department, FPC filed a Petition for Administrative Hearing on April 30, 1998 (Petition). The primary issue involved in this Petition is whether FPC is required to retain an electrostatic precipitator (ESP) associated with Unit 1, although there are numerous other less contentious permit issues that also require resolution.

As detailed in FPC's November 11, 1997 comment letter and FPC's Petition filed April 30, 1998, FPC maintains that there is no factual or legal basis to require FPC to retain and operate the electrostatic precipitator (ESP) associated with Bartow Unit 1. However, in an effort to move the Title V permitting process forward, FPC is willing to accept a permit that requires that the ESP be retained and used. In exchange for accepting such a requirement, FPC requests the inclusion of additional permit language to clarify this unique situation. Specifically, the ESP utilized at the Bartow facility was not designed to be operated during fuel oil firing (i.e., the ESP was designed based on the use of a coal/oil mixture (COM) fuel). The ESP is also reaching the end of its anticipated design life. Therefore, significant capital investment will be required to continue its operation. Also, because this unit is oil-fired, the ESP is not needed to assure compliance with the applicable particulate matter limits. FPC requests that the statement of basis for the Bartow Title V

FPC Comments  
October 13, 1998  
Page 2

permit recognize these facts, in order to ensure that the Credible Evidence rule and the Compliance Assurance Monitoring (CAM) rule, to the extent they may be triggered for Unit 1, are appropriately implemented. Specifically, the final CAM rule (40 CFR Part 64.2(b)(ii), Control Devices Criterion) applies only to pollutant-specific emissions units that rely on a control device to achieve compliance. In this regard, FPC requests that the description/statement of basis for Unit 1 be revised as follows:

Unit 1 is a . . . . Particulate matter emissions are controlled by a General Electric Services, Inc. Model 1-BAB1.2X37(9)36.0-434-4.3P electrostatic precipitator (ESP) consisting of five fields in depth. This ESP was designed to operate when utilizing a coal/oil mixture, which is no longer burned by FPC. Moreover, because Unit 1 is oil-fired, this unit is capable of meeting the applicable particulate matter and opacity limits in Conditions A.7 and A.8 without the use of the ESP and, therefore, the provisions of 40 CFR Part 64 do not apply.

In addition, FPC submitted an application to the Department requesting a permit amendment for modification of the fly ash collection system associated with the ESP. The Department has responded that this request is acceptable and that operating permits AO52-233149 and -232464 (for Unit 1 and the fly ash system, respectively) will be amended. Therefore, several Title V conditions relating to operation of the fly ash system will need to be revised. The current request for an extension of time in which to file a petition for an administrative hearing expires on October 15, 1998. In order to properly address the above issues, FPC has requested a further extension until November 15, 1998.

✓2. **Anclote facility** (Draft Title V Permit No. 1010017-003-AV)

Although there are several issues involved with this permit, the provision regarding used oil appears to be the primary issue. This permit is under Petition for Administrative Hearing with DOAH, to which we currently have an extension of time until December 1, 1998. In order to withdraw its Petition for Administrative Hearing, FPC needs to receive a document from DEP reflecting revised language to which both parties agree.

In this regard, FPC has provided DEP with additional data regarding how other states have authorized facilities to utilize on-specification used oil. None of the examples found thus far have expressed any concern regarding lead emissions; in fact, the lead criteria for "on-specification" used oil was established at a level expressly designed to protect the National Ambient Air Quality Standard for lead.

✓3. **DeBary facility** (Draft Title V permit No. 1270028-001-AV)

FPC understands that the issues involved with this permit were resolved at our August 28, 1998 meeting. As requested by the Department during our meeting, attached is a summary of combustion turbine operating hours for 1997 and 1998. We appreciate the Department's efforts to reach this agreement and look forward to withdrawing our Petition for Administrative Hearing after receiving a document from the Department reflecting the revised conditions.

FPC Comments  
October 13, 1998  
Page 3

4. **Crystal River facility** (Draft Title V Permit No. 1270020-001-AV)

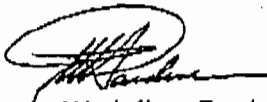
FPC received a revised draft permit from the Department on October 5, 1998, and the issues involved with this permit have largely been resolved. The *Notice of Intent to Issue Title V Permit* was published on October 12, 1998. In order to properly review the revised draft permit, FPC has requested an extension of time in which to file a petition for an administrative hearing until November 12, 1998.

5. **Periodic Monitoring**

By letter dated August 27, 1998 (attached), FPC requested specific language to be added to FPC's permits regarding heat input. FPC specifically reiterates this request for the four permits discussed above. FPC has still not finalized its position on other periodic monitoring issues.

Thank you for your attention and cooperation in issuing Title V permits to FPC's facilities. If the above information is not consistent with your understanding, or we need to discuss any of these issues or deadlines further, please contact either Mr. Scott Osbourn at (727) 826-4258 or me at (727) 826-4301 at your earliest convenience. Again, it is FPC's desire to advance these Title V permits to the "final" stage as expeditiously as possible.

Sincerely,



W. Jeffrey Pardue, C.E.P.  
Director, Environmental Services  
FPC Responsible Official

Attachments

cc: Clair Fancy, DEP BAR  
Robert Manning, Esq., HGS&S  
Ken Kosky, P.E., Golder Associates



~~Scott~~  
Mike Halpin

THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Florida Power Corporation  
(Anclote Power Plant)

OGC CASE NO. 98-3107

vs.

State of Florida Department  
of Environmental Protection,

**RECEIVED**

MAR 25 1999

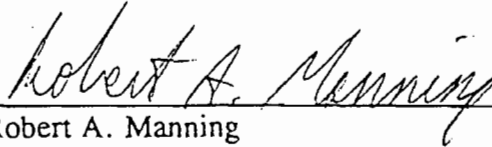
BUREAU OF  
AIR REGULATION

WITHDRAWAL OF REQUEST FOR EXTENSION OF TIME

The Florida Power Corporation (FPC), by and through undersigned counsel, hereby withdraws its Request for Extension of Time to file a petition for formal administrative proceedings in accordance with Chapter 120, Florida Statutes. FPC filed its last Request for Extension of Time until April 1, 1999, in response to the "Intent to Issue Title V Air Operation Permit" (Permit No. 1010017-003-AV) for the Anclote Plant located in Pasco County, Florida, to negotiate certain changes in the draft Title V permit with the Department of Environmental Protection (Department). FPC and the Department have now come to an agreement on the issues involved in the above-referenced draft Title V permit. This agreement is contained in the preliminary proposed Title V permit, a copy of which is attached to this Withdrawal. In addition, FPC and the Department have agreed that Condition B.4. will be changed to read as follows: "Methods of Operation - Fuels. Only new low sulfur No. 2 fuel oil shall be fired in the diesel generator(s)." Therefore, FPC hereby withdraws its Request for Extension of Time, conditioned upon the Department's issuance of the Proposed Permit in accordance with the Department's agreement with FPC.

Respectfully submitted this 24 day of March, 1999.

HOPPING GREEN SAMS & SMITH, P.A.

A handwritten signature in cursive script that reads "Robert A. Manning". The signature is written in dark ink and is positioned above a horizontal line.

Robert A. Manning

Fla. Bar No. 0035173

123 South Calhoun Street

Post Office Box 6526

Tallahassee, FL 32314

(850) 222-7500

Attorney for Florida Power Corporation

CERTIFICATE OF SERVICE

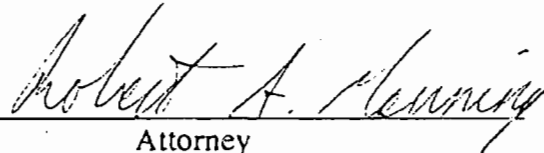
I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by

U.S. Mail on this 24 day of March, 1999.

Clair H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2600

Doug Beason  
Office of General Counsel  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2600

Ed Svec  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2600

  
\_\_\_\_\_  
Attorney



Jeb Bush  
Governor

Mike Halperin

# Department of Environmental Protection

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

David B. Struhs  
Secretary

## PROPOSED Permit Electronic Posting Courtesy Notification

Florida Power Corporation  
Anclote Power Plant  
**Facility ID No.:** 1010017  
Pasco County

Initial Title V Air Operation Permit  
**PROPOSED Permit No.:** 1010017-003-AV

The electronic version of the PROPOSED permit was posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review on June 2, 1999.

USEPA's review period ends on the 45th day after the permit posting date. Day 45 is July 17, 1999. If an objection (veto) is received from USEPA, the permitting authority will provide a copy of the objection to the applicant.

Provided an objection is not received from USEPA, the PROPOSED permit will become a FINAL permit by operation of law on the 55th day after the permit posting date. Day 55 is July 27, 1999.

The web site address is <http://www2.dep.state.fl.us/air>.

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 01-Jun-1999 09:47am

**From:** Scott Sheplak TAL  
SHEPLAK\_S

**Dept:** Air Resources Management

**Tel No:** 850/488-1344

**To:** Mary Fillingim TAL ( FILLINGIM\_M )  
**To:** Barbara Boutwell TAL ( BOUTWELL\_B )  
**To:** Mike Halpin TAL ( HALPIN\_M )

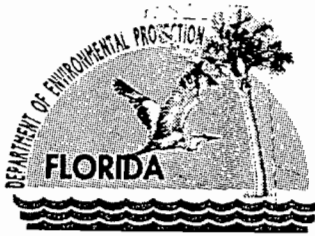
**Subject:** posting

*Mr. W. F. I. Scott*

Re: FPC-Anclote  
Proposed permit

Please post the electronic documents onto the web site. The attachments show the location of the files.

Thank you



# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

April 6, 1999

Mr. W. Jeffrey Pardue, C.E.P.  
Director of Environmental Services  
Florida Power Corporation  
3201 34<sup>th</sup> Street South  
St. Petersburg, Florida 33711

Re: PROPOSED Title V Permit No.: 1010017-003-AV  
Anclote Power Plant

Dear Mr. Pardue:

One copy of the "PROPOSED PERMIT DETERMINATION" for the Anclote Power Plant located at 1729 Baileys Bluff Road, Holiday, Pasco County, is enclosed. This letter is only a courtesy to inform you that the DRAFT permit has become a PROPOSED permit.

An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is <http://www2.dep.state.fl.us/air>.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED permit is made by the USEPA within 45 days, the PROPOSED permit will become a FINAL permit no later than 55 days after the date on which the PROPOSED permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED permit, the FINAL permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Michael P. Halpin, P.E. at 850/921-9530.

Sincerely,

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

CHF/h

Enclosures

copy furnished to:  
Mr. Kennard F. Kosky, P.E., Golder Associates, Inc.  
Mr. Bill Thomas, SWD  
Ms. Gracy R. Danois, USEPA, Region 4 (INTERNET E-mail Memorandum)  
Ms. Carla E. Pierce, USEPA, Region 4 (INTERNET E-mail Memorandum)

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

## PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 1010017-003-AV

Page 1 of 3

### **I. Public Notice.**

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" to Florida Power Corporation for the Anclote Power Plant located at 1729 Baileys Bluff Road, Holiday, Pasco County was clerked on November 25, 1998. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in the Pasco Times on December 7, 1998. The Revised DRAFT Title V Air Operation Permit was available for public inspection at the permitting authority's office in Tampa. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on December 9, 1998.

### **II. Public Comment(s).**

The only comments received were from Florida Power Corporation via a letter dated February 11, 1999. This letter was signed by Mr. Scott H. Osbourn, Senior Environmental Engineer and was received within the time frame allotted by OGC's Orders for Extension of Time. The comments and responses are itemized below:

#### **1. Comment on Table of Contents:**

As a result of this comment, the Table of Contents is changed as follows:

**From:** Diesel Fired Generators ( 3 - 820 Kilowatt each)

**To:** Diesel Fired Generators

#### **2. Comment on Page 1 (Statement of Basis):**

As a result of this comment, the Statement of Basis is changed to incorporate comments and is attached.

#### **3. Comment on Page 7, permitting note under Condition A.1.:**

As a result of this comment, the permitting note under Condition A.1. is hereby changed:

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

[Rule 62-4.160(2), and Rule 62-297.310(2), F.A.C.]

**To:** {Permitting note: 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. Regular record keeping is not required for heat input. Instead the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.}

## PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 1010017-003-AV

Page 2 of 3

[Rule 62-4.160(2), and Rule 62-297.310(2), F.A.C.]

### **4. Comment on Condition A.33.(g. and h.):**

As a result of this comment, Condition A.33.(g. and h.) are hereby changed:

#### **From:**

g. Special Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil: [40 CFR 761.20(e)]

- (1) The gallons of on-specification used oil received and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (3) The name and address of all marketers delivering used oil to the facility.
- (4) Copies of the marketer certifications, if obtained, and any supporting information.
- (5) Documentation that the used oil contains less than 2 ppm PCBs, if claimed, including the name and address of the person making the claim.
- (6) Results of the analyses required above.
- (7) A copy of the notice to EPA and a copy of the one-time written notice provided to each marketer.

The records shall be retained in a form suitable for inspection at the facility by the Department, and shall be retained for 5 years.

h. Reporting Required: The owner or operator shall submit, with the Annual Operation Report (AOR) form, the total amount of on-specification used oil received, and the total amount of on-specification used oil burned during the previous calendar year to the Southwest District Office. The AOR shall include the total amount of lead emitted as a result of burning on-specification used oil during the calendar year on a monthly basis.

[Rules 62-4.070(3), 62-212.400(2)(f)1. and 62-213.440, F.A.C.; and, AO 51-254492A & 1010017-001-AO]

#### **To:**

g. Special Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil: [40 CFR 761.20(e)]

- (1) The gallons of on-specification used oil received and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (2) The total gallons of on-specification used oil burned in the preceding calendar year.
- (3) The name and address of all marketers delivering used oil to the facility.
- (4) Copies of the marketer certifications, if obtained, and any supporting information.
- (5) Documentation that the used oil contains less than 2 ppm PCBs, if claimed, including the name and address of the person making the claim.
- (6) Results of the analyses required above.



## PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 1010017-003-AV

Page 3 of 3

(7) A copy of the notice to EPA and a copy of the one-time written notice provided to each marketer.

The records shall be retained in a form suitable for inspection at the facility by the Department, and shall be retained for 5 years.

h. Reporting Required: The owner or operator shall submit, with the Annual Operation Report (AOR) form, the total amount of on-specification used oil burned during the previous calendar year to the Southwest District Office.

[Rules 62-4.070(3), 62-212.400(2)(f)1. and 62-213.440, F.A.C.; and, AO 51-254492A & 1010017-001-AO]

### **5. Comment on Section III, Subsection B.:**

As a result of this comment, Subsection B has been revised to be similar to the Higgins Facility. It will not be shown here as it is changed throughout.

### **6. Comment on Table 1-1:**

As a result of this comment, Table 1-1 is hereby changed as follows:

**From:**

Sulfur content limit of fuel oil at 2.50%

**To:**

Sulfur content limit of fuel oil at 2.5%

### **7. COMS for Periodic Monitoring:**

A new condition (A.32.) was inserted in the Record Keeping and Reporting Requirements as has been done for similar fossil fuel steam generators in Florida.

## **III. Conclusion.**

The permitting authority hereby issues the PROPOSED Permit No.: 1010017-003-AV, with changes noted above.

## **STATEMENT OF BASIS**

Florida Power Corporation  
Anclote Power Plant  
Facility ID No.: 1010017  
Pasco County  
Initial Title V Air Operation Permit  
**PROPOSED Permit No.: 1010017-003-AV**

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This facility consists of two fuel oil fired steam electric generating stations, E.U. ID No. -001 (Unit No. 1) and -002 (Unit No. 2). Unit No. 1 and No. 2 power turbines which drive generators with nameplate ratings of 535(summer)/540(winter) megawatt and 525(summer)/ 530(winter) megawatt, respectively. Units No. 1 and No. 2 share a common stack. Relocatable diesel fired generator(s) with a maximum heat input of 25.74 MMBtu/hour and a maximum rating of 2460 Kilowatts are permitted to be located at the facility.

Fossil fuel fired steam generator # 1 is a nominal 535(summer)/540(winter) megawatt (electric) steam generator designated as Anclote Unit # 1. The emission unit is fired on No. 6 or lighter grades of fuel oil and on-specification used oil , with a maximum heat input of 4964.4 MMBtu per hour. Fossil fuel fired steam generator # 2 is a nominal 525(summer)/ 530(winter) megawatt (electric) steam generator designated as Anclote Unit # 2. The emission unit is fired on No. 6 or lighter grades of fuel oil and on-specification used oil, as permitted herein, with a maximum heat input of 4850 MMBtu per hour. Each boiler/steam generator, units #1 and #2, drives a turbine generator and both units share a common 499-foot exhaust stack. Emissions from these units are uncontrolled. The emissions units are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input. Fossil fuel fired steam generator # 1 began commercial operation on October 16, 1974; and, fossil fuel fired steam generator # 2 began commercial operation on October 31, 1978.

{Permitting note: 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. Regular record keeping is not required for heat input. Instead the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.}

[Rule 62-4.160(2), and Rule 62-297.310(2), F.A.C.]

The Department has determined that the appropriate particulate matter testing frequency for the fossil fuel steam generators is annually whenever fuel oil is used for more than 400 hours in the preceding year. This frequency is justified by the low emission rate documented in previous emissions tests while firing fuel oil. These units are subject to a steady-state PM emission limit of 0.1 lb/MMBtu, which is effectively equivalent to 0.149 lb/MMBtu because of rounding, and 0.3 lb/MMBtu for soot blowing, which is equivalent to 0.349 lb/MMBtu. The applicant has presented historical PM test results which show that the steady-state and soot blowing average results are less than half the applicable effective standards. The Department has determined that sources with emissions less than half of the effective standard shall test annually. A five-year average of results of particulate matter emission testing in lb/MMBtu for Unit 1 is 0.041 (steady state) and 0.056 (soot blowing). For Unit 2 the five-year averages are 0.033 (steady state) and 0.066 (soot blowing).

The relocatable diesel generator(s) have a maximum heat input of 25.74 million Btu per hour (MMBtu/hour) while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum rating of 2460 kilowatts. Emissions from the generators are uncontrolled. These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. The generators may be relocated at any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Higgins Plant, Shore Drive, Oldsmar, Pinellas County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. Hines Energy Complex, County Road 555, 1 mi. southwest of Homeland, Polk County.

Also included in this permit are miscellaneous unregulated and insignificant emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

Florida Power Corporation  
Anclote Power Plant

Facility ID No.: 1010017  
Pasco County

Initial Title V Air Operation Permit  
**PROPOSED Permit No.:** 1010017-003-AV

Permitting Authority:

State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
Title V Section

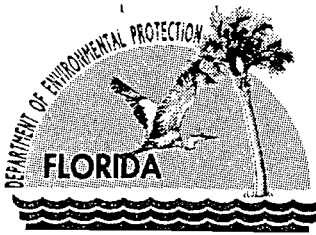
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Telephone: 850/488-1344  
Fax: 850/922-6979

Initial Title V Air Operation Permit  
PROPOSED Permit No.: 1010017-003-AV

Table of Contents

<u>Section</u>	<u>Page Number</u>
Placard Page .....	1
I. Facility Information .....	2 - 3
A. Facility Description.	
B. Summary of Emissions Unit ID Nos. and Brief Descriptions.	
C. Relevant Documents.	
II. Facility-wide Conditions .....	4 - 5
III. Emissions Unit(s) and Conditions	
A. Fuel Oil Fired Steam Generators (E.U. ID Nos. -001 and -002).....	6 - 17
B. Diesel Fired Generators.....	18 - 23
IV. Acid Rain Part	
A. Acid Rain, Phase II .....	24 - 25
V. Attachments	
Table 1-1, Summary of Air Pollutant Standards and Terms	
Table 1-2, Summary of Air Pollutant Standards and Terms (Additional Standards for On-Specification Used Oil (OSUO))	
Table 2-1, Summary of Compliance Requirements	
Appendix I-1. List of Insignificant Emissions Units and/or Activities	
Appendix U-1. List of Unregulated Emissions Units and/or Activities	
Appendix H-1. Permit History/ID Number Changes	
Appendix SS-1, Stack Sampling Facilities	
Appendix TV-1, Title V Conditions	



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

**Permittee:**  
**Florida Power Corporation**  
**Anclote Power Plant**

**PROPOSED Permit No.:** 1010017-003-AV  
**Facility ID No.:** 1010017  
**SIC Nos.:** 4911  
**Project:** Initial Title V Air Operation Permit

This permit is for the operation of the Anclote Power Plant. This facility is located at 1729 Baileys Bluff Road, Holiday, Pasco County; UTM Coordinates: Zone 17, 324.4 km East and 3118.7 km North; Latitude: 28° 48' 17" North and Longitude: 82° 47' 08" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

**Referenced attachments made a part of this permit:**

Appendix U-1, List of Unregulated Emissions Units and/or Activities  
Appendix I-1, List of Insignificant Emissions Units and/or Activities  
APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97)  
APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)  
Phase II Acid Rain Application/Compliance Plan received December 14, 1995

**Effective Date:** January 1, 2000  
**Renewal Application Due Date:** July 5, 2004  
**Expiration Date:** December 31, 2004

---

Howard L. Rhodes, Director  
Division of Air Resource  
Management

HLR/sms/mph

**Section I. Facility Information.**

**Subsection A. Facility Description.**

This facility consists of two fuel oil fired steam electric generating stations, E.U. ID No. -001 (Unit No. 1) and -002 (Unit No. 2). Unit No. 1 consists of a Combustion Engineering, Inc., Type CCRR boiler/steam generator and steam turbine which drives a generator with a nameplate rating of 535(summer)/540(winter) Megawatts. Unit No. 2 consists of a Combustion Engineering, Inc., Type CCRR boiler/steam generator and steam turbine which drives a generator with a nameplate rating of 525(summer)/530(winter) Megawatts. Units No. 1 and No. 2 share a common stack. Also included in this permit are miscellaneous unregulated and insignificant emissions units and/or activities. Relocatable diesel fired generator(s) with a maximum heat input of 25.74 MMBtu/hour and a maximum rating of 2460 Kilowatts are permitted to be located at this facility and may be relocated to other FPC facilities.

Based on the initial Title V permit application received on June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

**Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).**

<b>E.U. ID No.</b>	<b>Brief Description</b>
-001	Fuel Oil Fired Steam Electric Generator No. 1
-002	Fuel Oil Fired Steam Electric Generator No. 2
-7775047 -001	Relocatable Diesel Generator(s)

Unregulated Emissions Units and/or Activities

- xxx Surface Coating and Solvent Cleaning
- xxx Fuel Storage Tanks
- xxx Emergency Generators
- xxx General Purpose Engines
- xxx Helper Cooling Towers

*Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.*

**Subsection C. Relevant Documents.**

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms  
Table 1-2, Summary of Air Pollutant Standards and Terms  
Table 2-1, Summary of Compliance Requirements  
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers  
Appendix H-1, Permit History/ID Number Changes

These documents are on file with the permitting authority:

Initial Title V Permit Application received June 14, 1996.  
Letter from Mr. Scott H. Osbourn dated and received by fax on October 13, 1997.  
Phase II Acid Rain Application submitted on December 14, 1995.  
Petition for Formal Administrative Hearing received September 4, 1997.  
Notice of Withdrawal of Petition for Formal Administrative Hearing received December 15, 1998.  
Letter from Mr. Scott H. Osbourn dated February 11, 1999.



## Section II. Facility-wide Conditions.

### The following conditions apply facility-wide:

1. APPENDIX TV-1, TITLE V CONDITIONS is a part of this permit.  
{Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}
2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.  
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard.  
Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.  
[Rule 62-296.320(4)(b)1. & 4., F.A.C.]
4. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:
  - a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and
  - b. certification forms and/or RMPs according to the promulgated rule schedule.[40 CFR 68]
5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.  
[Rule 62-213.440(1), F.A.C.]
6. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.  
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]
7. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall not store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.  
[Rule 62-296.320(1)(a), F.A.C.]

**8. Not federally enforceable.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include:

- a. Maintenance of paved areas as needed,
- b. Regular mowing of grass and care of vegetation, and
- c. Limiting access to plant property by unnecessary vehicles.

[Rule 62-296.320(4)(c)2., F.A.C.; Proposed by applicant in the initial Title V permit application received June 14, 1996]

**9.** When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

**10.** 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

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

United States Environmental Protection Agency  
Region 4  
Air, Pesticides & Toxics Management Division  
Air and EPCRA Enforcement Branch, Air Compliance Section  
61 Forsyth Street  
Atlanta, Georgia 32303  
Telephone: 404/562-9099  
Fax: 404/562-9095

**12. Statement of Compliance.** The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within sixty (60) days after the end of the calendar year.

{See condition No. 52., Appendix TV-1, Title V Conditions}

[Rule 62-214.420(11), F.A.C.]

**Section III. Emissions Unit(s) and Conditions.**

**Subsection A. This section addresses the following emissions units.**

<b>E.U. ID No.</b>	<b>Brief Description</b>
-001	Fossil Fuel Fired Steam Generator # 1
-002	Fossil Fuel Fired Steam Generator # 2

Fossil fuel fired steam generator # 1 is a nominal 535(summer)/540(winter) megawatt (electric) steam generator designated as Anclote Unit # 1. The emission unit is fired on new No. 6 or lighter grades of fuel oil and on-specification used oil, as permitted herein, with a maximum heat input of 4964 MMBtu per hour.

Fossil fuel fired steam generator # 2 is a nominal 525(summer)/530(winter) megawatt (electric) steam generator designated as Anclote Unit # 2. The emission unit is fired on new No. 6 or lighter grades of fuel oil and on-specification used oil, as permitted herein, with a maximum heat input of 4850 MMBtu per hour. Each boiler/steam generator, units #1 and #2, drives a turbine generator and both units share a common 499 foot exhaust stack. Emissions from these units are uncontrolled.

{Permitting note(s): The emissions units are regulated under the Federal Acid Rain Program, and Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input. Fossil fuel fired steam generator # 1 began commercial operation on October 16, 1974; and, fossil fuel fired steam generator # 2 began commercial operation on October 31, 1978.}

**The following specific conditions apply to the emissions units listed above:**

**Essential Potential to Emit (PTE) Parameters**

**A.1. Permitted Capacity.** The maximum operation heat input rates are as follows:

<b>Unit No.</b>	<b>MMBtu/hr Heat Input</b>	<b>Fuel Type</b>
1	4964	No. 1, 2, 3, 4, 5 or 6 Fuel Oil & On-Specification Used Oil
2	4850	No. 1, 2, 3, 4, 5, or 6 Fuel Oil & On-specification Used Oil

\* The on-specification used oil burned at this facility may be generated on or off-site.

[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.405, F.A.C.]

{Permitting note: 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. Regular record keeping is not required for heat input. Instead the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.}

[Rule 62-4.160(2), and Rule 62-297.310(2), F.A.C.]

**A.2. Emissions Unit Operating Rate Limitation After Testing.** See specific condition **A.22.**  
[Rule 62-297.310(2), F.A.C.]

**A.3. Methods of Operation. Fuel(s).**

a. Startup: The only fuels allowed to be burned are new #6 or lighter grades of fuel oils. On-specification used oil shall only be burned if the PCB's are less than 2 ppm and may be blended with new #6 or lighter grades of fuel oil. The maximum sulfur content is 2.5 percent, by weight.

b. Normal: The only fuels allowed to be burned are new #6 or lighter grades of fuel oils and on-specification used oil. The maximum sulfur content is 2.5 percent, by weight.

c. **Not federally enforceable.** The maximum amount of on-specification used oil, whether generated on or off-site, that can be burned facility-wide shall not exceed 10 percent of the heat input (monthly) or 30 million gallons per year cumulatively.

[Rule 62-213.410, F.A.C.; and, AO 51-254492A & 1010017-001-AO]

**A.4. Hours of Operation.** These emissions units may operate continuously, i.e., 8,760 hours/year.  
[Rule 62-210.200(PTE), F.A.C.]

### **Emission Limitations and Standards**

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**A.5. Visible Emissions.** Visible emissions shall not exceed 40 percent opacity. Emissions units governed by this visible emissions standard shall conduct a compliance test for particulate matter emissions annually. Failure of the facility to demonstrate compliance with the particulate matter allowable in specific condition **A.7.** or the opacity standard of this condition shall constitute grounds for revocation of this condition.  
[Rule 62-296.405(1)(a), F.A.C.; and, OGC File Nos. 86-1574 and 86-1575/Orders dated December 11, 1986.]

**A.6. Visible Emissions - Soot Blowing and Load Change.** Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change. A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.  
[Rule 62-210.700(3), F.A.C.]

**A.7. Particulate Matter.** Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods. See specific condition **A.18.**  
[Rule 62-296.405(1)(b), F.A.C.]

**A.8. Particulate Matter - Soot Blowing and Load Change.** Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.  
[Rule 62-210.700(3), F.A.C.]

**A.9. Sulfur Dioxide.** When burning fuel oils, sulfur dioxide emissions shall not exceed 2.75 pounds per million Btu heat input, as measured by applicable compliance methods. See specific conditions **A.19.** and **A.20.**

[Rule 62-296.405(1)(c)1.j., F.A.C.]

**A.10. Sulfur Dioxide - Sulfur Content.** The sulfur content of fuel oils, on-specification used oil, or any combination of the two burned in these units, shall not exceed 2.5 percent, by weight. See specific condition **A.20.**

[Rule 62-296.405(1)(e)3., F.A.C.; and, requested by the applicant in Title V Application dated June 12, 1996.]

#### Excess Emissions

**A.11.** Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

**A.12.** Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.

[Rule 62-210.700(2), F.A.C.]

**A.13.** 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.

[Rule 62-210.700(4), F.A.C.]

#### Monitoring of Operations

**A.14. Sulfur Dioxide.** **The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor or permittee upon each fuel delivery.** This protocol is allowed because the emissions units do not have an operating flue gas desulfurization device. See specific conditions **A.10.**, **A.19.** and **A.20.**

[Rule 62-296.405(1)(f)1.b., F.A.C.]

**A.15. Determination of Process Variables.**

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

### **Test Methods and Procedures**

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**A.16. Visible emissions.** The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. See specific condition **A.17.**

[Rule 62-296.405(1)(e)1., F.A.C.]

**A.17. DEP Method 9.** The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.

2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.

b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.]

**A.18. Particulate Matter.** The test methods for particulate emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17.

[Rules 62-296.405(1)(e)2. and 62-297.401, F.A.C.]

**A.19. Sulfur Dioxide.** The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedances of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. **The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, as an alternate sampling procedure authorized by permit, the permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery.** See specific conditions A.9., A.10. and A.20.

[Rules 62-213.440, 62-296.405(1)(e)3. and 62-297.401, F.A.C.; and, Permits 1010017-001-AO and AO 51-254492A.]

**A.20. Sulfur Content of Liquid Fuel.** The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s).

[Rules 62-213.440, 62-296.405(1)(e)3, 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

**A.21. Required Number of Test Runs.** For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

**A.22. Operating Rate During Testing.** Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

**A.23. Calculation of Emission Rate.** The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

**A.24. Applicable Test Procedures.**

**(a) Required Sampling Time.**

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. The required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

[Rule 62-297.310(4), F.A.C.]

**A.25. Required Stack Sampling Facilities.** When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

**A.26. Frequency of Compliance Tests.** The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

**(a) General Compliance Testing.**

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid for more than 400 hours other than during startup.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate; or

b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.



TABLE 297.310-1  
 CALIBRATION SCHEDULE

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/-0.001" mean of at least three readings Max. deviation between readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually 3. Check after each test series	Spirometer or calibrated wet test or dry gas test meter	2%
		Comparison check	5%

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;
- b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; or 100 tons per year or more of any other regulated air pollutant.

5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; SIP approved]

**A.27. Compliance Testing for Visible Emissions**. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning only liquid fuel(s) for less than 400 hours per year.

[Rule 62-297.310(7)(a)4., F.A.C.]

**A.28. Compliance Testing for PM**. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.]

### **Record keeping and Reporting Requirements**

**A.29. Excess Emissions Notification**. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department's Southwest District Office in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department's Southwest District Office.

[Rule 62-210.700(6), F.A.C.]

**A.30.** Submit to the Department's Southwest District Office a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years. [Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

**A.31. Test Reports.**

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department's Southwest District Office on the results of each such test.
- (b) The required test report shall be filed with the Department's Southwest District Office as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department's Southwest District Office to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
1. The type, location, and designation of the emissions unit tested.
  2. The facility at which the emissions unit is located.
  3. The owner or operator of the emissions unit.
  4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
  5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
  6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
  7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
  8. The date, starting time and duration of each sampling run.
  9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
  10. The number of points sampled and configuration and location of the sampling plane.
  11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
  12. The type, manufacturer and configuration of the sampling equipment used.
  13. Data related to the required calibration of the test equipment.
  14. Data on the identification, processing and weights of all filters used.
  15. Data on the types and amounts of any chemical solutions used.
  16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
  17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
  18. All measured and calculated data required to be determined by each applicable test procedure for each run.
  19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
  20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.

21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

**A.32. COMS for Periodic Monitoring.** The owner or operator is required to install continuous opacity monitoring systems (COMS) pursuant to 40 CFR Part 75. The owner or operator shall maintain and operate COMS and shall make and maintain records of opacity measured by the COMS, for purposes of periodic monitoring.

[Rule 62-213.440, F.A.C.]

#### **Addition limitations for On-Specification Used Oil**

**A.33. Not federally enforceable.** On-specification used oil generated at this facility or off-site may only be burned in these emissions units if compliance with all the conditions of this permit and the following additional conditions are demonstrated:

a. On-specification Used Oil Allowed as Fuel: This permit allows the burning of used fuel oil meeting EPA "on-specification" used oil specifications, with a maximum sulfur content of 2.5 percent, by weight, and a PCB concentration of less than 50 ppm. On-specification used oil shall meet the following specifications [40 CFR 279, Subpart B.]

1. Arsenic shall not exceed 5.0 ppm;
2. Cadmium shall not exceed 2.0 ppm;
3. Chromium shall not exceed 10.0 ppm;
4. Lead shall not exceed 100.0 ppm;
5. Total halogens shall not exceed 1000 ppm;
6. Flash point shall not be less than 100 degrees F.

Used oil that does not meet the specifications for on-specification used oil shall not be burned at this facility.

b. Quantity Limited: The maximum amount of on-specification used oil, whether generated on or off-site, that can be burned facility-wide shall not exceed 10 percent of the heat input (monthly) or 30 million gallons per year cumulatively.

c. Used Oil Containing PCBs  $\geq$  50 ppm Not Allowed: Used oil containing a PCB concentration of 50 ppm or greater shall not be burned at this facility. Used oil shall not be blended to meet this requirement or any part of this condition.

d. PCB Concentration of 2 to 50 ppm: On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall be burned only at normal source operating temperatures. On specification used oil with a PCB concentration of 2 to less than 50 ppm shall not be burned during periods of startup or shutdown.

Before accepting from each marketer the first shipment of on-specification used oil with a PCB concentration of 2 to less than 50 ppm, the owner or operator shall provide each marketer with a one-time written and signed notice certifying that the owner or operator will burn the used oil in a qualified combustion device. The notice must state that EPA or a RCRA-delegated state agency has been given a description of the used oil management activities at the facility and that an industrial boiler or furnace will be used to burn the used oil with a PCB concentration of 2 to less than 50 ppm. The description of the used oil management activities shall be submitted to the Administrator, Hazardous Waste Regulation Section, Florida Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. [40 CFR 279 and 761.20(e)]

- e. Certification Required: The owner or operator shall receive from the marketer, for each load of used oil received, a certification that the used oil meets the specifications for on-specification used oil and contains a PCB concentration of less than 50 ppm. This certification shall also describe the basis for the certification, such as analytical results. Note that a claim that used oil does not contain quantifiable levels of PCBs (that is, that the used oil contains less than 2 ppm of PCBs) must be documented by testing or other information. The first person making the claim that the used oil does not contain PCBs is responsible for furnishing the documentation. The documentation can be tests, personal or special knowledge of the source and composition of the used oil, or a certification from the person generating the used oil claiming that the used oil contains no detectable PCBs.
- f. Testing Required: If the owner or operator does not receive certification from the marketer as described above, the owner or operator shall properly sample and test each load of used oil received for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point, PCBs\*, and percent sulfur content by weight, ash, and BTU value (BTU per gallon).

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

\* Testing for PCB's is not necessary if quantifiable levels are less than 2 ppm (Refer to specific condition **A.33.e.** above)

If the owner or operator relies on certification from the marketer, the owner or operator shall be responsible for ensuring that the certification complies with all the requirements of this condition and all conditions of this permit.

If the analytical results show that the used oil does not meet the specification for on-specification used oil, or that it contains a PCB concentration greater than or equal to 50 ppm, the owner or operator shall immediately notify and provide the analytical results to the Department's Southwest District Office. The owner or operator shall immediately cease burning of the used oil.

g. Special Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil: [40 CFR 761.20(e)]

- (1) The gallons of on-specification used oil received and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (2) The total gallons of on-specification used oil burned in the preceding calendar year.
- (3) The name and address of all marketers delivering used oil to the facility.
- (4) Copies of the marketer certifications, if obtained, and any supporting information.
- (5) Documentation that the used oil contains less than 2 ppm PCBs, if claimed, including the name and address of the person making the claim.
- (6) Results of the analyses required above.
- (7) A copy of the notice to EPA and a copy of the one-time written notice provided to each marketer.

The records shall be retained in a form suitable for inspection at the facility by the Department, and shall be retained for 5 years.

h. Reporting Required: The owner or operator shall submit, with the Annual Operation Report (AOR) form, the total amount of on-specification used oil burned during the previous calendar year to the Southwest District Office.

[Rules 62-4.070(3), 62-212.400(2)(f)1. and 62-213.440, F.A.C.; and, AO 51-254492A & 1010017-001-AO]

**Section III. Emissions Units and Conditions.**

**Subsection B. This section addresses the following emissions units.**

<b>E.U. ID No.</b>	<b>Brief Description</b>
-7775047 -001	Relocatable Diesel Fired Generator(s)

The relocatable diesel generator(s) will have a maximum (combined) heat input of 25.74 MMBtu/hour while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum (combined) rating of 2460 kilowatts. Emissions from the generator(s) are uncontrolled. These conditions were requested in the Initial Title V Permit Application for the Anclote Power Plant received June 14, 1996. The generator(s) may be relocated at this facility and any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Anclote Power Plant, 1729 Baileys Bluff Road, Holliday, Pasco County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. Hines Energy Complex, County Road 555, 1 mi. southwest of Homeland, Polk County.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. Each generator has its own stack.}

**The following specific conditions apply to the emissions units listed above regardless of location:**

**Essential Potential to Emit (PTE) Parameters**

**B.1.** These conditions become active and enforceable once FPC has given notification to the SWD of the Department of Environmental Protection, if appropriate, that these units will be relocated to this facility.

[Rule 62-4.070(3), F.A.C.; Anclote Power Plant Permit AC 09-202080; and, Initial Title V Permit Application for the Anclote Power Plant received June 14, 1996.]

**B.2. Permitted Capacity.** The maximum operation heat input rates are as follows:

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

<b>Unit No.</b>	<b>MMBtu/hr/generator(s) Heat Input</b>	<b>Fuel Type</b>
-7775047 -001	25.74	New Low Sulfur No. 2 Fuel Oil

### Monitoring of Operations

**B.10.** The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor or permittee upon each fuel delivery. See specific condition **B.13.** [Rule 62-213.440, F.A.C.]

**B.11.** Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. [Rule 62-297.310(5), F.A.C.]

### Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**B.12.** The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

**B.13.** The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s). [Rules 62-213.440 and 62-297.440, F.A.C.]

**B.14.** Operating Rate During Testing. Testing of emissions shall be conducted with the generator(s) operating at 90 to 100 percent of the maximum fuel firing rate of 186.3 gallons per hour. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operations may be limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance



testing to regain the authority to operate at the permitted capacity. Failure to submit the actual operating rate may invalidate the test.

[Rules 62-297.310(2), F.A.C.; and, Anclote Power Plant Permit AO 09-205952.]

**B.15. Applicable Test Procedures.**

(a) Required Sampling Time.

2. Opacity Compliance Tests. The required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

- c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2.c., F.A.C.]

**B.16. Frequency of Compliance Tests.** The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
- b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;

8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.

9. The owner or operator shall notify the Southwest District Office at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department of Environmental Protection, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the appropriate D.E.P. office.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; SIP approved; and, Anclote Power Plant Permit AO 09-205952.]

**B.17. Visible Emissions Testing - Annual**. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning liquid fuels for less than 400 hours per year.

[Rules 62-297.310(7)(a)4. & 8., F.A.C.]

**B.18.** After each relocation, each generator shall be tested within 30 days of startup for opacity and the fuel shall be analyzed for the sulfur content. See specific conditions **B.6.**, **B.7.**, **B.10.**, **B.13.**, and **B.14.**

[Rules 62-4.070(3) and 62-297.310(7)(b), F.A.C.; and, Anclote Power Plant Permit AO 09-205952.]

### **Recordkeeping and Reporting Requirements**

**B.19. Malfunction Reporting**. In the case of excess emissions resulting from malfunctions, the owner or operator shall notify the Southwest District Office of the Department of Environmental Protection in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested.

[Rule 62-210.700(6), F.A.C.]

**B.20. Test Reports.**

- (a) Each generator shall be tested on an annual basis within 30 days of the date October 25.
- (b) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Southwest District Office on the results of each such test.
- (c) The required test report shall be filed with the Southwest District Office as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (d) The test reports for a unit that has been relocated shall be submitted to the Department office that will handle compliance issues for the new location within 45 days of testing.

[Rule 62-297.310(8), F.A.C.; and, Anclote Power Plant Permit AO 09-25952.]

**B.21.** To demonstrate compliance with specific condition **B.5.**, records shall indicate the daily hours of operation for each diesel generator, the daily hours of operation expressed as “engine- hours”, and a cumulative total hours of operation expressed as “engine hours” for each month. The records shall be maintained for a minimum of 5 years and made available to the Southwest District Office upon request.

[Rules 62-213.440 and 62-297.310(8), F.A.C.; and, Anclote Power Plant Permit AO 09-205952.]

**B.22.** To demonstrate compliance with specific condition **B.7.**, records of the sulfur content, in percent by weight, of all the fuel burned shall be kept based on either vendor provided as-delivered or as-received fuel sample analysis. The records shall be maintained for a minimum of 5 years and made available to the Southwest District Office upon request.

[Rule 62-297.310(8), F.A.C.; and, AO 09-205952.]

**Section IV. This section is the Acid Rain Part.**

Operated by: Florida Power Corporation  
 ORIS code: 8048

**Subsection A. This subsection addresses Acid Rain, Phase II.**

The emissions units listed below are regulated under Acid Rain Part, Phase II.

<b>E.U. ID No.</b>	<b>Description</b>
-001	Fossil Fuel Fired Steam Generator No. 1
-002	Fossil Fuel Fired Steam Generator No. 2

1. The Phase II permit application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these acid rain units must comply with the standard requirements and special provisions set forth in the application listed below:

a. DEP Form No. 62-210.900(1)(a), dated 07/01/95.

[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

2. Sulfur dioxide (SO<sub>2</sub>) allowance allocations for each Acid Rain unit:

<b>E.U. ID No.</b>	<b>EPA ID.</b>	<b>Year</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>
-001	1	SO <sub>2</sub> allowances, under Table 2, 3, or 4 of 40 CFR 73	12931*	12931*	12931*	12931*	12931*
-002	2	SO <sub>2</sub> allowances, under Table 2, 3, or 4 of 40 CFR 73	12853*	12853*	12853*	12853*	12853*

\*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2, 3, or 4 of 40 CFR 73.

3. Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.440(3), F.A.C.
- b. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain program.
- c. Allowances shall be accounted for under the Federal Acid Rain Program.

[Rule 62-213.440(1)(c), F.A.C.]

4. Fast-Track Revisions of Acid Rain Parts. Those Acid Rain sources making a change described in Rule 62-214.370(4), F.A.C., may request such changes as provided in Rule 62-213.413, Fast-Track Revisions of Acid Rain Parts.

[Rules 62-213.413 and 62-214.370(4), F.A.C.]

5. Comments, notes, and justifications: None.

**B.3. Emissions Unit Operating Rate Limitation After Testing.** See specific condition **B.14.**  
[Rule 62-297.310(2), F.A.C.]

**B.4. Methods of Operation - Fuels.** Only new low sulfur No. 2 fuel oil shall be fired in the diesel generator(s).  
[Rule 62-213.410, F.A.C.]

**B.5. Hours of Operation.** The hours of operation expressed as “engine-hours” shall not exceed 2970 hours in any consecutive 12 month period. The total hours of operation expressed as “engine-hours” shall be the summation of the individual hours of operation of each generator.  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, Anclote Power Plant Permit AO 09-205952.]

#### **Emission Limitations and Standards**

{Permitting Note: The attached Table 1-4, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**B.6. Visible Emissions.** Visible emissions from each generator shall not be equal to or greater than 20 percent opacity.  
[Rule 62-296.320(4)(b)1., F.A.C.; and, Anclote Power Plant Permit AO 09-205952.]

**B.7. Sulfur Dioxide - Sulfur Content.** The sulfur content of the new No. 2 fuel oil shall not exceed 0.50 percent, by weight.  
[Requested in initial Title V permit application dated June 14, 1996; and, Anclote Power Plant Permit AC 09-202080.]

#### **Excess Emissions**

**B.8.** Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.  
[Rule 62-210.700(1), F.A.C.]

**B.9.** 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.  
[Rule 62-210.700(4), F.A.C.]

**Appendix U-1. List of Unregulated Emissions Units and/or Activities.**

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘insignificant emissions units’.

<b>Emissions Unit</b>	<b>Description</b>
-xxx	Surface Coating and Solvent Cleaning
-xxx	General Purpose Engines
-xxx	Fuel Storage Tanks
-xxx	Helper Cooling Towers
-xxx	Emergency Generators

**Appendix I-1. List of Insignificant Emissions Units and/or Activities.**

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62.210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

1	Lube Oil System Vents
2	Lube Oil Reservoir Tank
3	Parts Washers/Degreasers
4	Waste Oil Storage Tanks
5	Portable Unleaded Gasoline Tank
6	Evaporation of non-hazardous boiler cleaning chemical
7	No. 2 Diesel Fuel Tank



**Table 1-1, Summary of Air Pollutant Standards and Terms**

Florida Power Corporation  
Anclote Power Plant

PROPOSED Permit No.: 1010017-003-AV  
Facility ID No.: 1010017

**E.U. ID Nos.            Brief Description**

-001		Fossil Fuel Fired Steam Generator #1				Allowable Emissions		Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
Pollutant Name	Fuel(s) *	Hours/ Year *	Standards	lb/ hour	TPY	lb/hour **	TPY **				
Visible Emissions	F.O.	8760	40% Opacity					Rule 62-296.405(1) (a), F.A.C. Rule 62.210.700(3), F.A.C. Order No. 1574	A.5. A.6.		
Steady state	F.O.		60% Opacity								
Soot Blowing or Load Changing	F.O.										
PM Emissions	F.O.	8760	0.1 lb/MMBtu			496	2,174	Rule 62.296.405(1) (b), F.A.C. Rule 62.210.700(3), F.A.C.	A.7. A.8.		
Steady State	F.O.		0.3 lb/MMBtu			1,489					
Soot Blowing or Load Changing	F.O.										
Sulfur Dioxide	F.O.	8760	2.75 lb/MMBtu			13,652	59,796	Rules 62-213.440, 62-296.405(1) (e)3., 62-296.40591) (c)1.i., F.A.C.	A.9. A.10.		
	F.O.	8760	2.5% by wt.								

-002		Fossil Fuel Fired Steam Generator #2				Allowable Emissions		Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
Pollutant Name	Fuel(s) *	Hours/ Year *	Standards	lb/ hour	TPY	lb/hour **	TPY **				
Visible Emissions	F.O.	8760	40% Opacity					Rule 62-296.405(1) (a), F.A.C. Rule 62.210.700(3), F.A.C. Order No. 1574	A.5. A.6.		
Steady state	F.O.		60% Opacity								
Soot Blowing or Load Changing	F.O.										
PM Emissions	F.O.	8760	0.1 lb/MMBtu			485	2,124	Rule 62.296.405(1) (b), F.A.C. Rule 62.210.700(3), F.A.C.	A.7. A.8.		
Steady State	F.O.		0.3 lb/MMBtu			1,455					
Soot Blowing or Load Changing	F.O.										
Sulfur Dioxide	F.O.	8760	2.75 lb/MMBtu			13,652	59,796	Rules 62-213.440, 62-296.405(1) (e)3., 62-296.40591) (c)1.i.,	A.9. A.10.		
	F.O.	8760	2.5% by wt.								

-7775047-001		Relocatable Generator(s)				Allowable Emissions		Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
Pollutant Name	Fuel(s) *	Hours/ Year *	Standards	lb/ hour	TPY	lb/hour **	TPY **				
Visible Emissions	#2 F.O.	2970	20% Opacity					Rule 62-296.320(4) (b)1., F.A.C.	B.6.		
Sulfur Dioxide	#2 F.O.	2970	0.50% by wt.					Rule 62-296.320(4) (b)1., F.A.C.	B.7.		

\* No. 1, 2, 3, 4, 5, & 6 fuel oil and on-specification used oil. Maximum amount of used oil burned shall not exceed 10 percent of the total heat input (monthly) per emissions unit, or 30 million gallons per year cumulatively at the site.

\*\* The "Equivalent Emissions" listed are for informational purposes only.

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**Table 1-2, Summary of Air Pollutant Standards and Terms**

Florida Power Corporation  
Anclote Power Plant

PROPOSED Permit No.: 1010017-003-AV  
Facility ID No.: 1010017

**Additional Standards for On-Specification Used Oil (OSUO)**

**E.U. ID Nos.            Brief Description**

-001		Fossil Fuel Fired Steam Generator #1							
Pollutant Name	Fuel(s)	Hours/Year*	Allowable Emissions			Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
			Standards	lbs./hour	TPY	lbs./hour	TPY		
Arsenic	OSUO		5.0 ppm						
Cadmium	OSUO		2.0 ppm						
Chromium	OSUO		10.0 ppm						
Lead	OSUO		100.0 ppm						
Total Halogens	OSUO		1000 ppm						
Flash Point	OSUO		≥ 100 degrees F						
PCB	OSUO		≤ 49 ppm						
SO <sub>2</sub>			2.5 % by weight						

-002		Fossil Fuel Fired Steam Generator #2							
Pollutant Name	Fuel(s)	Hours/Year*	Allowable Emissions			Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
			Standards	lbs./hour	TPY	lbs./hour	TPY		
Arsenic	OSUO		5.0 ppm						
Cadmium	OSUO		2.0 ppm						
Chromium	OSUO		10.0 ppm						
Lead	OSUO		100.0 ppm						
Total Halogens	OSUO		1000 ppm						
Flash Point	OSUO		≥ 100 degrees F						
PCB	OSUO		≤ 49 ppm						
SO <sub>2</sub>			2.5 % by weight						

\* The maximum quantity of used oil that may be burned in each emissions unit shall not exceed 10 percent of the total heat input (monthly) per emissions unit, or 30 million gallons per year cumulatively at the site.

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**Table 2-1, Summary of Compliance Requirements**

Florida Power Corporation  
Anclote Power Plant

**PROPOSED Permit No.: 1010017-003-AV**  
**Facility ID No.: 1010017**

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U.#-001 & -002	Fossil Fuel Fired Steam Generators #1 & #2
------------------	--

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time or Frequency	Frequency Base Date <sup>1</sup>	Min. Compliance Test Time	CMS <sup>2</sup>	See Permit Condition(s)
Visible Emissions Steady State Soot Blowing or Load Changing	F.O. F.O.	DEP Method 9 DEP Method 9	Annual Annual	#1-within 60 days of Jul. 28 #2-within 60 days of Aug. 24	1 hour 1 hour	NA	A.16., A.17. A.16., A.17.
Particulate Matter Steady State Soot Blowing or Load Changing	F.O. F.O.	EPA Methods 17 <sup>3</sup> , 5, 5B, 5F	Annual Annual	#1-within 60 days of Jul. 28 #2-within 60 days of Aug. 24	3 hour	NA	A.18. A.18.
Sulfur Dioxide	F.O.	Fuel sampling and analysis	Each Delivery	Each delivery	NA	NA	A.14., A.19., A.20.
Arsenic, Cadmium, Chromium, Lead, Total Halogens, Flash Point, PCB	OSUO <sup>4</sup>	SW 846 <sup>5</sup>	Each Delivery	Each Delivery	NA	NA	A.32.

- 1 - Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.
- 2 - Continuous Monitoring System.
- 3 - EPA Method 17 may be used only if the stack gas exit temperature is less than 375 degrees F.
- 4 - On-Specification Used Oil.
- 5 - EPA Publication, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods.

**Appendix H-1, Permit History/ID Number Changes**

Florida Power Corporation  
Anclote

**PROPOSED Permit No.:** 1010017-003-AV  
**Facility ID No.:** 1010017

---

**Permit History (for tracking purposes):**

<u>E.U. ID No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u>	<u>Revised Date(s)</u>
-001	Steam Turbine Generator	AO51-254492	03/7/1995	03/6/1999		
		AO51-254492A	1/31/1996	03/6/2000		
-002	Oil Fired Steam Generator	AO51-169340	12/21/1989	12/18/1994	08/14/1996	01/31/1996
		1010017-001-AO	01/31/1996			

---

**(if applicable) ID Number Changes (for tracking purposes):**

From: **Facility ID No.:** 40TPA510017

To: **Facility ID No.:** 1010017

---

THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Florida Power Corporation  
(Anclote Power Plant)

OGC CASE NO. 98-3107

**RECEIVED**

MAR 25 1999

BUREAU OF  
AIR REGULATION

vs.

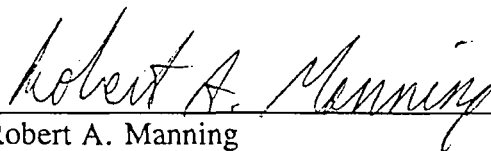
State of Florida Department  
of Environmental Protection,  
\_\_\_\_\_ /

WITHDRAWAL OF REQUEST FOR EXTENSION OF TIME

The Florida Power Corporation (FPC), by and through undersigned counsel, hereby withdraws its Request for Extension of Time to file a petition for formal administrative proceedings in accordance with Chapter 120, Florida Statutes. FPC filed its last Request for Extension of Time until April 1, 1999, in response to the "Intent to Issue Title V Air Operation Permit" (Permit No. 1010017-003-AV) for the Anclote Plant located in Pasco County, Florida, to negotiate certain changes in the draft Title V permit with the Department of Environmental Protection (Department). FPC and the Department have now come to an agreement on the issues involved in the above-referenced draft Title V permit. This agreement is contained in the preliminary proposed Title V permit, a copy of which is attached to this Withdrawal. In addition, FPC and the Department have agreed that Condition B.4. will be changed to read as follows: "Methods of Operation - Fuels. Only new low sulfur No. 2 fuel oil shall be fired in the diesel generator(s)." Therefore, FPC hereby withdraws its Request for Extension of Time, conditioned upon the Department's issuance of the Proposed Permit in accordance with the Department's agreement with FPC.

Respectfully submitted this 24 day of March, 1999.

HOPPING GREEN SAMS & SMITH, P.A.

A handwritten signature in cursive script that reads "Robert A. Manning". The signature is written in black ink and is positioned above a horizontal line.

Robert A. Manning  
Fla. Bar No. 0035173  
123 South Calhoun Street  
Post Office Box 6526  
Tallahassee, FL 32314  
(850) 222-7500

Attorney for Florida Power Corporation

CERTIFICATE OF SERVICE

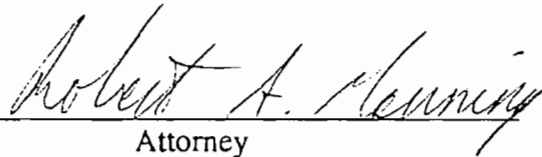
I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by

U.S. Mail on this 24 day of March, 1999.

Clair H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2600

Doug Beason  
Office of General Counsel  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2600

Ed Svec  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2600

  
\_\_\_\_\_  
Attorney

## Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers (version dated 02/05/97)

---

### Abbreviations and Acronyms:

°F: Degrees Fahrenheit  
BACT: Best Available Control Technology  
CFR: Code of Federal Regulations  
DEP: State of Florida, Department of Environmental Protection  
DARM: Division of Air Resource Management  
EPA: United States Environmental Protection Agency  
F.A.C.: Florida Administrative Code  
F.S.: Florida Statute  
ISO: International Standards Organization  
LAT: Latitude  
LONG: Longitude  
MMBtu: million British thermal units  
MW: Megawatt  
ORIS: Office of Regulatory Information Systems  
SOA: Specific Operating Agreement  
UTM: Universal Transverse Mercator

---

### Citations:

*The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, permit numbers, and ID numbers.*

#### Code of Federal Regulations:

*Example:* [40 CFR 60.334]

Where:	40	reference to	Title 40
	CFR	reference to	Code of Federal Regulations
	60	reference to	Part 60
	60.334	reference to	Regulation 60.334

#### Florida Administrative Code (F.A.C.) Rules:

*Example:* [Rule 62-213, F.A.C.]

Where:	62	reference to	Title 62
	62-213	reference to	Chapter 62-213
	62-213.205	reference to	Rule 62-213.205, F.A.C.

ISO: International Standards Organization refers to those conditions at 288 degrees K, 60 percent relative humidity, and 101.3 kilopascals pressure.



Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers  
(version dated 02/05/97) (continued)

---

**Identification Numbers:**

Facility Identification (ID) Number:

*Example:* Facility ID No.: 1050221

*Where:*

105 = 3-digit number code identifying the facility is located in Polk County  
0221 = 4-digit number assigned by state database.

Permit Numbers:

*Example:* 1050221-002-AV, or  
1050221-001-AC

*Where:*

AC = Air Construction Permit  
AV = Air Operation Permit (Title V Source)  
105 = 3-digit number code identifying the facility is located in Polk County  
0221 = 4-digit number assigned by permit tracking database  
001 or 002 = 3-digit sequential project number assigned by permit tracking database

*Example:* PSD-FL-185  
PA95-01  
AC53-208321

*Where:*

PSD = Prevention of Significant Deterioration Permit  
PA = Power Plant Siting Act Permit  
AC = old Air Construction Permit numbering

## APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97)

[Note: This attachment includes "canned conditions" developed from the "Title V Core List."]

{Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}

### Chapter 62-4. F.A.C.

1. **Not federally enforceable. General Prohibition.** Any stationary installation which will reasonably be expected to be a source of pollution shall not be operated, maintained, or modified without the appropriate and valid permits issued by the Department, unless the source is exempted by Department rule. The Department may issue a permit only after it receives reasonable assurance that the installation will not cause pollution in violation of any of the provisions of Chapter 403, F.S., or the rules promulgated thereunder. A permitted installation may only be operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms of the permit.

[Rule 62-4.030, Florida Administrative Code (F.A.C.); Section 403.087, Florida Statute (F.S.)]

2. **Not federally enforceable. Procedure to Obtain Permits: Application.**

(1) Any person desiring to obtain a permit from the Department shall apply on forms prescribed by the Department and shall submit such additional information as the Department by law may require.

(2) All applications and supporting documents shall be filed in quadruplicate with the Department.

(3) To ensure protection of public health, safety, and welfare, any construction, modification, or operation of an installation which may be a source of pollution shall be in accordance with sound professional engineering practices pursuant to Chapter 471, F.S. All applications for a Department permit shall be certified by a professional engineer registered in the State of Florida except when the application is for renewal of an air pollution operation permit at a minor facility as defined in Rule 62-210.200, F.A.C., or where professional engineering is not required by Chapter 471, F.S. Where required by Chapter 471 or 492, F.S., applicable portions of permit applications and supporting documents which are submitted to the Department for public record shall be signed and sealed by the professional(s) who prepared or approved them.

(4) Processing fees for air construction permits shall be in accordance with Rule 62-4.050(4), F.A.C.

(5)(a) To be considered by the Department, each application must be accompanied by the proper processing fee. The fee shall be paid by check, payable to the Department of Environmental Protection. The fee is non-refundable except as provided in Section 120.60, F.S., and in this section.

(c) Upon receipt of the proper application fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin.

(d) If the applicant does not submit the required fee within ten days of receipt of written notification, the Department shall either return the unprocessed application or arrange with the applicant for the pick up of the application.

(e) If an applicant submits an application fee in excess of the required fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin upon receipt, and the Department shall refund to the applicant the amount received in excess of the required fee.

(6) Any substantial modification to a complete application shall require an additional processing fee determined pursuant to the schedule set forth in Rule 62-4.050, F.A.C., and shall restart the time requirements of Sections 120.60 and 403.0876, F.S. For purposes of this Subsection, the term "substantial modification" shall mean a modification which is reasonably expected to lead to substantially different environmental impacts which require a detailed review.

(7) Modifications to existing permits proposed by the permittee which require substantial changes in the existing permit or require substantial evaluation by the Department of potential impacts of the proposed modifications shall require the same fee as a new application.

[Rule 62-4.050, F.A.C.]

3. **Standards for Issuing or Denying Permits.** Except as provided at Rule 62-213.460, F.A.C., the issuance of a permit does not relieve any person from complying with the requirements of Chapter 403, F.S., or Department rules.

[Rule 62-4.070(7), F.A.C.]

4. Modification of Permit Conditions.

(1) For good cause and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions and on application of the permittee the Department may grant additional time. For the purpose of this section, good cause shall include, but not be limited to, any of the following:

- (a) A showing that an improvement in effluent or emission quality or quantity can be accomplished because of technological advances without unreasonable hardship.
- (b) A showing that a higher degree of treatment is necessary to effect the intent and purpose of Chapter 403, F.S.
- (c) A showing of any change in the environment or surrounding conditions that requires a modification to conform to applicable air or water quality standards.
- (e) Adoption or revision of Florida Statutes, rules, or standards which require the modification of a permit condition for compliance.

(2) A permittee may request a modification of a permit by applying to the Department.

(3) A permittee may request that a permit be extended as a modification of the permit. Such a request must be submitted to the Department in writing before the expiration of the permit. Upon timely submittal of a request for extension, unless the permit automatically expires by statute or rule, the permit will remain in effect until final agency action is taken on the request. For construction permits, an extension shall be granted if the applicant can demonstrate reasonable assurances that, upon completion, the extended permit will comply with the standards and conditions required by applicable regulation. For all other permits, an extension shall be granted if the applicant can demonstrate reasonable assurances that the extended permit will comply with the standards and conditions applicable to the original permit. A permit for which the permit application fee was prorated in accordance with Rule 62-4.050(4)(1), F.A.C., shall not be extended. In no event shall a permit be extended or remain in effect longer than the time limits established by statute or rule.

[Rule 62-4.080, F.A.C.]

5. Renewals. Prior to one hundred eighty (180) days before the expiration of a permit issued pursuant to Chapter 62-213, F.A.C., the permittee shall apply for a renewal of a permit using forms incorporated by reference in the specific rule chapter for that kind of permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 180 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department or, if there is court review of the Department's final agency action, until a later date is required by Section 120.60, F.S., provided that, for renewal of a permit issued pursuant to Chapter 62-213, F.A.C., the applicant complies with the requirements of Rules 62-213.420(1)(b)3. and 4., F.A.C.

[Rule 62-4.090(1), F.A.C.]

6. Suspension and Revocation.

(1) Permits shall be effective until suspended, revoked, surrendered, or expired and shall be subject to the provisions of Chapter 403, F.S., and rules of the Department.

(2) Failure to comply with pollution control laws and rules shall be grounds for suspension or revocation.

(3) A permit issued pursuant to Chapter 62-4, F.A.C., shall not become a vested property right in the permittee. The Department may revoke any permit issued by it if it finds that the permit holder or the permit holder's agent:

- (a) Submitted false or inaccurate information in application or operational reports.
- (b) Has violated law, Department orders, rules or permit conditions.
- (c) Has failed to submit operational reports or other information required by Department rules.
- (d) Has refused lawful inspection under Section 403.091, F.S.

[Rule 62-4.100, F.A.C.]

7. Not federally enforceable. Financial Responsibility. The Department may require an applicant to submit proof of financial responsibility and may require the applicant to post an appropriate bond to guarantee compliance with the law and Department rules.

[Rule 62-4.110, F.A.C.]

8. Transfer of Permits.

- (1) Within 30 days after the sale or legal transfer of a permitted facility, an "Application for Transfer of Permit" (DEP Form 62-1.201(1)) must be submitted to the Department. This form must be completed with the notarized signatures of both the permittee and the proposed new permittee.
  - (2) The Department shall approve the transfer of a permit unless it determines that the proposed new permittee cannot provide reasonable assurances that conditions of the permit will be met. The determination shall be limited solely to the ability of the new permittee to comply with the conditions of the existing permit, and it shall not concern the adequacy of these permit conditions. If the Department proposes to deny the transfer, it shall provide both the permittee and the proposed new permittee a written objection to such transfer together with notice of a right to request a Chapter 120, F.S., proceeding on such determination.
  - (3) Within 30 days of receiving a properly completed Application for Transfer of Permit form, the Department shall issue a final determination. The Department may toll the time for making a determination on the transfer by notifying both the permittee and the proposed new permittee that additional information is required to adequately review the transfer request. Such notification shall be served within 30 days of receipt of an Application for Transfer of Permit form, completed pursuant to Rule 62-4.120(1), F.A.C. If the Department fails to take action to approve or deny the transfer within 30 days of receipt of the completed Application for Transfer of Permit form, or within 30 days of receipt of the last item of timely requested additional information, the transfer shall be deemed approved.
  - (4) The permittee is encouraged to apply for a permit transfer prior to the sale or legal transfer of a permitted facility. However, the transfer shall not be effective prior to the sale or legal transfer.
  - (5) Until this transfer is approved by the Department, the permittee and any other person constructing, operating, or maintaining the permitted facility shall be liable for compliance with the terms of the permit. The permittee transferring the permit shall remain liable for corrective actions that may be required as a result of any violations occurring prior to the sale or legal transfer of the facility.
- [Rule 62-4.120, F.A.C.]

9. Plant Operation-Problems. If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its 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 Department rules.
- [Rule 62-4.130, F.A.C.]

10. For purposes of notification to the Department pursuant to Rule 62-4.130, F.A.C., Plant Operation-Problems, "immediately" shall mean the same day, if during a workday (i.e., 8:00 a.m. - 5:00 p.m.), or the first business day after the incident, excluding weekends and holidays.
- [40 CFR 70.6(a)(3)(iii)(B)]

11. Not federally enforceable. Review. Failure to request a hearing within 14 days of receipt of notice of proposed or final agency action on a permit application or as otherwise required in Chapter 62-103, F.A.C., shall be deemed a waiver of the right to an administrative hearing.
- [Rule 62-4.150, F.A.C.]

12. Permit Conditions. All permits issued by the Department shall include the following general conditions:

- (1) The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- (2) This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- (3) As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.

- (4) This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- (5) This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.
- (6) The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- (7) The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
- (a) Have access to and copy any records that must be kept under conditions of the permit;
  - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
  - (c) Sample or monitor any substances or parameters at any location reasonable necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.
- (8) If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of noncompliance; and,
  - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
- (9) In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the F.S. or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- (10) The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.
- (11) This permit is transferable only upon Department approval in accordance with Rule 62-4.120, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- (12) This permit or a copy thereof shall be kept at the work site of the permitted activity.
- (14) The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five (5) years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - (c) Records of monitoring information shall include:
    - 1. the date, exact place, and time of sampling or measurements;
    - 2. the person responsible for performing the sampling or measurements;
    - 3. the dates analyses were performed;
    - 4. the person responsible for performing the analyses;
    - 5. the analytical techniques or methods used; and,
    - 6. the results of such analyses.
- (15) When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

[Rules 62-4.160 and 62-213.440(1)(b), F.A.C.]

13. Construction Permits.

(1) No person shall construct any installation or facility which will reasonably be expected to be a source of air or water pollution without first applying for and receiving a construction permit from the Department unless exempted by statute or Department rule. In addition to the requirements of Chapter 62-4, F.A.C., applicants for a Department Construction Permit shall submit the following as applicable:

(a) A completed application on forms furnished by the Department.

(b) An engineering report covering:

1. plant description and operations,
2. types and quantities of all waste material to be generated whether liquid, gaseous or solid,
3. proposed waste control facilities,
4. the treatment objectives,
5. the design criteria on which the control facilities are based, and,
6. other information deemed relevant.

Design criteria submitted pursuant to Rule 62-4.210(1)(b)5., F.A.C., shall be based on the results of laboratory and pilot-plant scale studies whenever such studies are warranted. The design efficiencies of the proposed waste treatment facilities and the quantities and types of pollutants in the treated effluents or emissions shall be indicated. Work of this nature shall be subject to the requirements of Chapter 471, F.S. Where confidential records are involved, certain information may be kept confidential pursuant to Section 403.111, F.S.

(c) The owners' written guarantee to meet the design criteria as accepted by the Department and to abide by Chapter 403, F.S. and the rules of the Department as to the quantities and types of materials to be discharged from the installation. The owner may be required to post an appropriate bond or other equivalent evidence of financial responsibility to guarantee compliance with such conditions in instances where the owner's financial resources are inadequate or proposed control facilities are experimental in nature.

(2) The construction permit may contain conditions and an expiration date as determined by the Secretary or the Secretary's designee.

(3) When the Department issues a permit to construct, the permittee shall be allowed a period of time, specified in the permit, to construct, and to operate and test to determine compliance with Chapter 403, F.S., and the rules of the Department and, where applicable, to apply for and receive an operation permit. The Department may require tests and evaluations of the treatment facilities by the permittee at his/her expense.

[Rule 62-4.210, F.A.C.]

14. Not federally enforceable. Operation Permit for New Sources. To properly apply for an operation permit for new sources, the applicant shall submit certification that construction was completed noting any deviations from the conditions in the construction permit and test results where appropriate.

[Rule 62-4.220, F.A.C.]

Chapter 62-103, F.A.C.

15. Public Notice, Public Participation, and Proposed Agency Action. The permittee shall comply with all of the requirements for public notice, public participation, and proposed agency action pursuant to Rule 62-103.150 and Rule 62-210.350, F.A.C.

[Rules 62-103.150, 62-210.350 and 62-213.430(1)(b), F.A.C.]

16. Administrative Hearing. The permittee shall comply with all of the requirements for a petition for administrative hearing or waiver of right to administrative proceeding pursuant to Rule 61-103.155, F.A.C.

[Rule 62-103.155, F.A.C.]

Chapter 62-204, F.A.C.

17. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source.

[40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

Chapter 62-210. F.A.C.

18. Permits Required. The owner or operator of any emissions unit which emits or can reasonably be expected to emit any air pollutant shall obtain an appropriate permit from the Department prior to beginning construction, modification, or initial or continued operation of the emissions unit unless exempted pursuant to Department rule or statute. All emissions limitations, controls, and other requirements imposed by such permits shall be at least as stringent as any applicable limitations and requirements contained in or enforceable under the State Implementation Plan (SIP) or that are otherwise federally enforceable. Except as provided at Rule 62-213.460, F.A.C., issuance of a permit does not relieve the owner or operator of an emissions unit from complying with any applicable requirements, any emission limiting standards or other requirements of the air pollution rules of the Department or any other such requirements under federal, state, or local law.

(1) Air Construction Permits. An air construction permit shall be obtained by the owner or operator of any proposed new or modified facility or emissions unit prior to the beginning of construction or modification, in accordance with all applicable provisions of Chapters 62-210, 62-212 and 62-4, F.A.C. The construction permit shall be issued for a period of time sufficient to allow construction or modification of the facility or emissions unit and operation while the new or modified facility or emissions unit is conducting tests or otherwise demonstrating initial compliance with the conditions of the construction permit.

(2) Air Operation Permits. Upon expiration of the air operation permit for any existing facility or emissions unit, subsequent to construction or modification and demonstration of initial compliance with the conditions of the construction permit for any new or modified facility or emissions unit, or as otherwise provided in Chapter 62-210 or Chapter 62-213, the owner or operator of such facility or emissions unit shall obtain a renewal air operation permit, an initial air operation permit, or an administrative correction or revision of an existing air operation permit, whichever is appropriate, in accordance with all applicable provisions of Chapter 62-210, Chapter 62-213, and Chapter 62-4, F.A.C.

(a) Minimum Requirements for All Air Operation Permits. At a minimum, a permit issued pursuant to this subsection shall:

1. Specify the manner, nature, volume and frequency of the emissions permitted, and the applicable emission limiting standards or performance standards, if any;
2. Require proper operation and maintenance of any pollution control equipment by qualified personnel, where applicable in accordance with the provisions of any operation and maintenance plan required by the air pollution rules of the Department.
3. Contain an effective date stated in the permit which shall not be earlier than the date final action is taken on the application and be issued for a period, beginning on the effective date, as provided below.
  - a. The operation permit for an emissions unit which is in compliance with all applicable rules and in operational condition, and which the owner or operator intends to continue operating, shall be issued or renewed for a five-year period, except that, for Title V sources subject to Rule 62-213.420(1)(a)1., F.A.C., operation permits shall be extended until 60 days after the due date for submittal of the facility's Title V permit application as specified in Rule 62-213.420(1)(a)1., F.A.C.
  - b. Except as provided in Rule 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit which has been shut down for six months or more prior to the expiration date of the current operation permit, shall be renewed for a period not to exceed five years from the date of shutdown, even if the emissions unit is not maintained in operational condition, provided:
    - (i) the owner or operator of the emissions unit demonstrates to the Department that the emissions unit may need to be reactivated and used, or that it is the owner's or operator's intent to apply to the Department for a permit to construct a new emissions unit at the facility before the end of the extension period; and,
    - (ii) the owner or operator of the emissions unit agrees to and is legally prohibited from providing the allowable emission permitted by the renewed permit as an emissions offset to any other person under Rule 62-212.500, F.A.C.; and,
    - (iii) the emissions unit was operating in compliance with all applicable rules as of the time the source was shut down.
  - c. Except as provided in Rule 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit which has been shut down for five years or more prior to the expiration date of the current operation permit shall be renewed for a maximum period not to exceed ten years from the date of shutdown, even if the emissions unit is not maintained in operational condition, provided the conditions given in Rule 62-210.300(2)(a)3.b., F.A.C., are met and the owner or operator demonstrates to the Department that failure to renew the permit would constitute a hardship, which may include economic hardship.

d. The operation permit for an electric utility generating unit on cold standby or long-term reserve shutdown shall be renewed for a five-year period, and additional five-year periods, even if the unit is not maintained in operational condition, provided the conditions given in Rules 62-210.300(2)(a)3.b.(i) through (iii), F.A.C., are met.

4. In the case of an emissions unit permitted pursuant to Rules 62-210.300(2)(a)3.b., c., and d., F.A.C., include reasonable notification and compliance testing requirements for reactivation of such emissions unit and provide that the owner or operator demonstrate to the Department prior to reactivation that such reactivation would not constitute reconstruction pursuant to Rule 62-204.800(7), F.A.C.

[Rules 62-210.300(1) & (2), F.A.C.]

19. Not federally enforceable. Notification of Startup. The owner or operator of any emissions unit or facility which has a valid air operation permit and which has been shut down more than one (1) year, shall notify the Department in writing of the intent to start up such emissions unit or facility, a minimum of sixty (60) days prior to the intended startup date.

(a) The notification shall include the planned startup date, anticipated emission rates or pollutants released, changes to processes or control devices which will result in changes to emission rates, and any other conditions which may differ from the valid outstanding operation permit.

(b) If, due to an emergency, a startup date is not known 60 days prior thereto, the owner shall notify the Department as soon as possible after the date of such startup is ascertained.

[Rule 62-210.300(5), F.A.C.]

20. Emissions Unit Reclassification.

(a) Any emissions unit whose operation permit has been revoked as provided for in Chapter 62-4, F.A.C., shall be deemed permanently shut down for purposes of Rule 62-212.500, F.A.C. Any emissions unit whose permit to operate has expired without timely renewal or transfer may be deemed permanently shut down, provided, however, that no such emissions unit shall be deemed permanently shut down if, within 20 days after receipt of written notice from the Department, the emissions unit owner or operator demonstrates that the permit expiration resulted from inadvertent failure to comply with the requirements of Rule 62-4.090, F.A.C., and that the owner or operator intends to continue the emissions unit in operation, and either submits an application for an air operation permit or complies with permit transfer requirements, if applicable.

(b) If the owner or operator of an emissions unit which is so permanently shut down, applies to the Department for a permit to reactivate or operate such emissions unit, the emissions unit will be reviewed and permitted as a new emissions unit.

[Rule 62-210.300(6), F.A.C.]

21. Public Notice and Comment.

(1) Public Notice of Proposed Agency Action.

(a) Notwithstanding any discretionary public notice requirements contained in Rule 62-103.150(2)(a), F.A.C., a notice of proposed agency action on permit application, where the proposed agency action is to issue the permit, shall be published by any applicant for:

1. An air construction permit;
2. An air operation permit, permit renewal or permit revision subject to Rule 62-210.300(2)(b), F.A.C., (i.e., a FESOP), except as provided in Rule 62-210.300(2)(b)1.b., F.A.C.; or
3. An air operation permit, permit renewal, or permit revision subject to Chapter 62-213, F.A.C., except those permit revisions meeting the requirements of Rule 62-213.412(1), F.A.C.

(b) The notice required by Rule 62-210.350(1)(a), F.A.C., shall be published in accordance with all otherwise applicable provisions of Rule 62-103.150, F.A.C.

(2) Additional Public Notice Requirements for Emissions Units Subject to Prevention of Significant Deterioration or Nonattainment-Area Preconstruction Review.

(a) Before taking final agency action on a construction permit application for any proposed new or modified facility or emissions unit subject to the preconstruction review requirements of Rule 62-212.400 or 62-212.500, F.A.C., the Department shall comply with all applicable provisions of Rule 62-103.150, F.A.C., and provide an opportunity for public comment which shall include as a minimum the following:

1. A complete file available for public inspection in at least one location in the district affected which includes the information submitted by the owner or operator, exclusive of confidential records under Section 403.111, F.S., and the Department's analysis of the effect of the proposed construction or modification on ambient air quality, including the Department's preliminary determination of whether the permit should be approved or disapproved;
2. A 30-day period for submittal of public comments; and,



3. A notice, by advertisement in a newspaper of general circulation in the county affected, specifying the nature and location of the proposed facility or emissions unit, whether BACT or LAER has been determined, the degree of PSD increment consumption expected, if applicable, and the location of the information specified in paragraph 1. above; and notifying the public of the opportunity for submitting comments and requesting a public hearing.
    - (b) The notice provided for in Rule 62-210.350(2)(a)3., F.A.C., shall be prepared by the Department and published by the applicant in accordance with all applicable provisions of Rule 62-103.150, F.A.C., except that the applicant shall cause the notice to be published no later than thirty (30) days prior to final agency action.
    - (c) A copy of the notice provided for in Rule 62-210.350(2)(a)3., F.A.C., shall also be sent by the Department to the Regional Office of the U. S. Environmental Protection Agency and to all other state and local officials or agencies having cognizance over the location of such new or modified facility or emissions unit, including local air pollution control agencies, chief executives of city or county government, regional land use planning agencies, and any other state, Federal Land Manager, or Indian Governing Body whose lands may be affected by emissions from the new or modified facility or emissions unit.
    - (d) A copy of the notice provided for in Rule 62-210.350(2)(a)3., F.A.C., shall be displayed in the appropriate district, branch and local program offices.
    - (e) An opportunity for public hearing shall be provided in accordance with Chapter 120, F.S., and Rule 62-103.150, F.A.C.
    - (f) Any public comments received shall be made available for public inspection in the location where the information specified in Rule 62-210.350(2)(a)1., F.A.C., is available and shall be considered by the Department in making a final determination to approve or deny the permit.
    - (g) The final determination shall be made available for public inspection at the same location where the information specified in Rule 62-210.350(2)(a)1., F.A.C., was made available.
    - (h) For a proposed new or modified emissions unit which would be located within 100 kilometers of any Federal Class I area or whose emissions may affect any Federal Class I area, and which would be subject to the preconstruction review requirements of Rule 62-212.400, F.A.C., or Rule 62-212.500, F.A.C.:
      1. The Department shall mail or transmit to the Administrator a copy of the initial application for an air construction permit and notice of every action related to the consideration of the permit application.
      2. The Department shall mail or transmit to the Federal Land Manager of each affected Class I area a copy of any written notice of intent to apply for an air construction permit; the initial application for an air construction permit, including all required analyses and demonstrations; any subsequently submitted information related to the application; the preliminary determination and notice of proposed agency action on the permit application; and any petition for an administrative hearing regarding the application or the Department's proposed action. Each such document shall be mailed or transmitted to the Federal Land Manager within fourteen (14) days after its receipt by the Department.
- (3) Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
- (a) Before taking final agency action to issue a new, renewed, or revised air operation permit subject to Chapter 62-213, F.A.C., the Department shall comply with all applicable provisions of Rule 62-103.150, F.A.C., and provide an opportunity for public comment which shall include as a minimum the following:
    1. A complete file available for public inspection in at least one location in the district affected which includes the information submitted by the owner or operator, exclusive of confidential records under Section 403.111, F.S.; and,
    2. A 30-day period for submittal of public comments.
  - (b) The notice provided for in Rule 62-210.350(3)(a), F.A.C., shall be prepared by the Department and published by the applicant in accordance with all applicable provisions of Rule 62-103.150, F.A.C., except that the applicant shall cause the notice to be published no later than thirty (30) days prior to final agency action.
  - (c) The notice shall identify:
    1. The facility;
    2. The name and address of the office at which processing of the permit occurs;
    3. The activity or activities involved in the permit action;
    4. The emissions change involved in any permit revision;
    5. The name, address, and telephone number of a Department representative from whom interested persons may obtain additional information, including copies of the permit draft, the application, and all relevant supporting materials, including any permit application, compliance plan, permit, monitoring report, and compliance statement required pursuant to Chapter 62-213, F.A.C. (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), and all other materials available to the Department that are relevant to the permit decision;
    6. A brief description of the comment procedures required by Rules 62-103.150 and 62-210.350(3), F.A.C.;
    7. The time and place of any hearing that may be held, including a statement of procedure to request a hearing (unless a hearing has already been scheduled); and,

APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97) (continued)

8. The procedures by which persons may petition the Administrator to object to the issuance of the proposed permit after expiration of the Administrator's 45-day review period.

[Rule 62-210.350, F.A.C.]

22. Administrative Permit Corrections.

(1) A facility owner shall notify the Department by letter of minor corrections to information contained in a permit. Such notifications shall include:

- (a) Typographical errors noted in the permit;
- (b) Name, address or phone number change from that in the permit;
- (c) Any other similar minor administrative change at the source; and,
- (d) A change requiring more frequent monitoring or reporting by the permittee.
- (e) Changes listed at 40 CFR 72.83(a)(1), (2), (6), (9) and (10), hereby adopted and incorporated by reference, to Title V sources subject to emissions limitations or reductions pursuant to 42 USC ss. 7651-7651o;
- (f) Changes listed at 40 CFR 72.83(a)(11), hereby adopted and incorporated by reference, to Title V sources subject to emissions limitations or reductions pursuant to 42 USC ss. 7651-7651o, provided the notification is accompanied by a copy of any EPA determination concerning the similarity of the change to those listed at Rule 17-210.360(1)(e).

(2) Upon receipt of such notifications the Department shall within 60 days correct the permit and provide a corrected copy to the owner.

(3) For facilities subject to Chapter 62-213, F.A.C., a copy shall be provided to EPA and any approved local air program in the county where the facility or any part of the facility is located.

(4) The Department shall incorporate requirements resulting from issuance of new or revised construction permits into existing operation permits issued pursuant to Chapter 62-213, F.A.C., if the construction permit revisions incorporate requirements of federally enforceable preconstruction review and if the applicant requests at the time of application that all of the requirements of Rule 62-213.430(1), F.A.C., be complied with in conjunction with the processing of the construction permit application.

[Rule 62-210.360, F.A.C.]

23. Reports.

(3) Annual Operating Report for Air Pollutant Emitting Facility.

(a) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year.

(c) The annual operating report shall be submitted to the appropriate Department District or Department approved local air pollution control program office by March 1 of the following year unless otherwise indicated by permit condition or Department request.

[Rule 62-210.370(3), F.A.C.]

24. Circumvention. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.

[Rule 62-210.650, F.A.C.]

25. Forms and Instructions. The forms used by the Department in the stationary source control program are adopted and incorporated by reference in this section. The forms are listed by rule number, which is also the form number, with the subject, title and effective date. Copies of forms may be obtained by writing to the Department of Environmental Protection, Division of Air Resources Management, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

(1) Application for Air Permit - Long Form, Form and Instructions.

- (a) Acid Rain Part (Phase II), Form and Instructions.
  1. Repowering Extension Plan, Form and Instructions.
  2. New Unit Exemption, Form and Instructions.
  3. Retired Unit Exemption, Form and Instructions.

(b) Reserved.

(5) Annual Operating Report (AOR) for Air Pollutant Emitting Facility, Form and Instructions.

[Rule 62-210.900, F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97) (continued)

---

Chapter 62-213, F.A.C.

26. Annual Emissions Fee. Each Title V source permitted to operate in Florida must pay between January 15 and March 1 of each year, upon written notice from the Department, an annual emissions fee in accordance with Rule 62-213.205, F.A.C., and the appropriate form and associated instructions.

[Rules 62-213.205 and 62-213.900(1), F.A.C.]

27. Annual Emissions Fee. Failure to pay timely any required annual emissions fee, penalty, or interest constitutes grounds for permit revocation pursuant to Rule 62-4.100, F.A.C.

[Rule 62-213.205(1)(g), F.A.C.]

28. Annual Emissions Fee. Any documentation of actual hours of operation, actual material or heat input, actual production amount, or actual emissions used to calculate the annual emissions fee shall be retained by the owner for a minimum of five (5) years and shall be made available to the Department upon request.

[Rule 62-213.205(1)(j), F.A.C.]

29. Annual Emissions Fee. DEP Form 62-213.900(1), F.A.C., "Major Air Pollution Source Annual Emissions Fee Form", must be completed by the permittee and submitted with the annual emissions fee.

[Rule 62-213.205(4), F.A.C.]

30. Air Operation Permit Fees. After December 31, 1992, no permit application processing fee, renewal fee, modification fee or amendment fee is required for an operation permit for a Title V source.

[Rule 62-213.205(5), F.A.C.]

31. Permits and Permit Revisions Required. All Title V sources are subject to the permit requirements of Chapter 62-213, F.A.C.

[Rule 62-213.400, F.A.C.]

32. No Title V source may operate except in compliance with Chapter 62-213, F.A.C.

[Rule 62-213.400(1), F.A.C.]

33. Changes Without Permit Revision. Title V sources having a valid permit issued pursuant to Chapter 62-213, F.A.C., may make the following changes without permit revision, provided that sources shall maintain source logs or records to verify periods of operation in each alternative method of operation:

(1) Permitted sources may change among those alternative methods of operation allowed by the source's permit as provided by the terms of the permit;

(2) Permitted sources may implement the terms or conditions of a new or revised construction permit if;

(a) The application for construction permit complied with the requirements of Rule 62-213.420(3) and (4), F.A.C.;

(b) The terms or conditions were subject to federally enforceable preconstruction review pursuant to Chapter 62-212, F.A.C.;

and,

(c) The new or revised construction permit was issued after the Department and the applicant complied with all the requirements of Rule 62-213.430(1), F.A.C.;

(3) A permitted source may implement operating changes after the source submits any forms required by any applicable requirement and provides the Department and EPA with at least 7 days written notice prior to implementation. The source and the Department shall attach each notice to the relevant permit;

(a) The written notice shall include the date on which the change will occur, and a description of the change within the permitted source, the pollutants emitted and any change in emissions, and any term or condition becoming applicable or no longer applicable as a result of the change;

(b) The permit shield described in Rule 62-213.460, F.A.C., shall not apply to such changes;

(4) Permitted sources may implement changes involving modes of operation only in accordance with Rule 62-213.415, F.A.C.

[Rule 62-213.410, F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97) (continued)

34. Immediate Implementation Pending Revision Process.

(1) Those permitted Title V sources making any change that constitutes a modification pursuant to paragraph (a) of the definition of modification at Rule 62-210.200, F.A.C., but which would not constitute a modification pursuant to paragraph (b) of the same definition, may implement such change prior to final issuance of a permit revision in accordance with Rule 62-213.412, F.A.C., provided the change:

- (a) Does not violate any applicable requirement;
- (b) Does not contravene any permit term or condition for monitoring, testing, recordkeeping or reporting, or any compliance certification requirement;
- (c) Does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis under the provisions of Chapter 62-212 or 62-296, F.A.C.;
- (d) Does not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject including any federally enforceable emissions cap or federally enforceable alternative emissions limit.

(2) A Title V source may immediately implement such changes after they have been incorporated into the terms and conditions of a new or revised construction permit issued pursuant to Chapter 62-212, F.A.C., and after the source provides to EPA, the Department, each affected state and any approved local air program having geographic jurisdiction over the source, a copy of the source's application for operation permit revision. The Title V source may conform its application for construction permit to include all information required by Rule 62-213.420, F.A.C., in lieu of submitting separate application forms.

(3) The Department shall process the application for operation permit revision in accordance with the provisions of Chapter 62-213, F.A.C., except that the Department shall issue a draft permit revision or a determination to deny the revision within 60 days of receipt of a complete application for operation permit revision or, if the Title V source has submitted a construction permit application conforming to the requirements of Rule 62-213.420, F.A.C., the Department shall issue a draft permit or a determination to deny the revision at the same time the Department issues its determination on issuance or denial of the construction permit application. The Department shall not take final action until all the requirements of Rule 62-213.430(1)(a), (c), (d), and (e), F.A.C., have been complied with.

(4) Pending final action on the operation permit revision application, the source shall implement the changes in accordance with the terms and conditions of the source's new or revised construction permit.

(5) The permit shield described in Rule 62-213.460, F.A.C., shall not apply to such changes until after the Department takes final action to issue the operation permit revision.

(6) If the Department denies the source's application for operation permit revision, the source shall cease implementation of the proposed changes.

[Rule 62-213.412, F.A.C.]

35. Permit Applications.

(1) Duty to Apply. For each Title V source, the owner or operator shall submit a timely and complete permit application in compliance with the requirements of Rules 62-213.420, 62-4.050(1) & (2), and 62-210.900, F.A.C.

(a) Timely Application.

3. For purposes of permit renewal, a timely application is one that is submitted in accordance with Rule 62-4.090, F.A.C.

(b) Complete Application.

1. Any applicant for a Title V permit, permit revision or permit renewal must submit an application on DEP Form No. 62-210.900(1), which must include all the information specified by Rule 62-213.420(3), F.A.C., except that an application for permit revision must contain only that information related to the proposed change. The applicant shall include information concerning fugitive emissions and stack emissions in the application. Each application for permit, permit revision or permit renewal shall be certified by a responsible official in accordance with Rule 62-213.420(4), F.A.C.

2. For those applicants submitting initial permit applications pursuant to Rule 62-213.420(1)(a)1., F.A.C., a complete application shall be an application that substantially addresses all the information required by the application form number 62-210.900(1), and such applications shall be deemed complete within sixty days of receipt of a signed and certified application unless the Department notifies the applicant of incompleteness within that time. For all other applicants, the applications shall be deemed complete sixty days after receipt, unless the Department, within sixty days after receipt of a signed application for permit, permit revision or permit renewal, requests additional documentation or information needed to process the application. An applicant making timely and complete application for permit, or timely application for permit renewal as described by Rule 62-4.090(1), F.A.C., shall continue to operate the source

under the authority and provisions of any existing valid permit or Florida Electrical Power Plant Siting Certification, provided the applicant complies with all the provisions of Rules 62-213.420(1)(b)3. and 4. F.A.C. Failure of the Department to request additional information within sixty days of receipt of a properly signed application shall not impair the Department's ability to request additional information pursuant to Rules 62-213.420(1)(b)3. and 4., F.A.C.

3. For those permit applications submitted pursuant to the provisions of Rule 62-213.420(1)(a)1., F.A.C., the Department shall notify the applicant if the Department becomes aware at any time during processing of the application that the application contains incorrect or incomplete information. The applicant shall submit the corrected or supplementary information to the Department within ninety days unless the applicant has requested and been granted additional time to submit the information. Failure of an applicant to submit corrected or supplementary information requested by the Department within ninety days or such additional time as requested and granted shall render the application incomplete.

4. For all applications other than those addressed at Rule 62-213.420(1)(b)3., F.A.C., should the Department become aware, during processing of any application that the application contains incorrect information, or should the Department become aware, as a result of comment from an affected State, an approved local air program, EPA, or the public that additional information is needed to evaluate the application, the Department shall notify the applicant within 30 days. When an applicant becomes aware that an application contains incorrect or incomplete information, the applicant shall submit the corrected or supplementary information to the Department. If the Department notifies an applicant that corrected or supplementary information is necessary to process the permit, and requests a response, the applicant shall provide the information to the Department within ninety days of the Department request unless the applicant has requested and been granted additional time to submit the information or, the applicant shall, within ninety days, submit a written request that the Department process the application without the information. Failure of an applicant to submit corrected or supplementary information requested by the Department within ninety days, or such additional time as requested and granted, or to demand in writing within ninety days that the application be processed without the information shall render the application incomplete. Nothing in this section shall limit any other remedies available to the Department.

[Rules 62-213.420(1)(a)3. and 62-213.420(1)(b)1., 2., 3. & 4., F.A.C.]

36. Confidential Information. Whenever an applicant submits information under a claim of confidentiality pursuant to Section 403.111, F.S., the applicant shall also submit a copy of all such information and claim directly to EPA.

[Rule 62-213.420(2), F.A.C.]

37. Standard Application Form and Required Information. Applications shall be submitted under Chapter 62-213, F.A.C., on forms provided by the Department and adopted by reference in Rule 62-210.900(1), F.A.C. The information as described in Rule 62-210.900(1), F.A.C., shall be included for the Title V source and each emissions unit. An application must include information sufficient to determine all applicable requirements for the Title V source and each emissions unit and to evaluate a fee amount pursuant to Rule 62-213.205, F.A.C.

[Rule 62-213.420(3), F.A.C.]

38. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[Rule 62-213.420(4), F.A.C.]

39. a. Permit Renewal and Expiration. Permits being renewed are subject to the same requirements that apply to permit issuance at the time of application for renewal. Permit renewal applications shall contain that information identified in Rules 62-210.900(1) and 62-213.420(3), F.A.C. Unless a Title V source submits a timely application for permit renewal in accordance with the requirements of Rule 62-4.090(1), F.A.C., the existing permit shall expire and the source's right to operate shall terminate.

b. Permit Revision Procedures. Permit revisions shall meet all requirements of Chapter 62-213, F.A.C., including those for content of applications, public participation, review by approved local programs and affected states, and review by EPA, as they apply to permit issuance and renewal, except that permit revisions for those activities implemented pursuant to Rule 62-213.412, F.A.C., need not meet the requirements of Rule 62-213.450(1)(b), F.A.C. The Department shall require permit revision in accordance with the provisions of Rule 62-4.080, F.A.C., and 40 CFR 70.7(f), whenever any source becomes

APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97) (continued)

subject to any condition listed at 40 CFR 70.7(f)(1), hereby adopted and incorporated by reference. The below requirements from 40 CFR 70.7(f) are adopted and incorporated by reference in Rule 62-213.430(4), F.A.C.:

o 40 CFR 70.7(f): Reopening for Cause.

(1) This section contains provisions from 40 CFR 70.7(f) that specify the conditions under which a Title V permit shall be reopened prior to the expiration of the permit. A Title V permit shall be reopened and revised under any of the following circumstances:

(i) Additional applicable requirements under the Act become applicable to a major Part 70 source with a remaining permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii).

(ii) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approved by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

(iii) The permitting authority or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

(iv) The Administrator or the permitting authority determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(2) Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

(3) Reopenings under 40 CFR 70.7(f)(1) shall not be initiated before a notice of such intent is provided to the Part 70 source by the permitting authority at least 30 days in advance of the date that the permit is to be reopened, except that the permitting authority may provide a shorter time period in the case of an emergency.

[Rules 62-213.430(3) & (4), F.A.C.; and, 40 CFR 70.7(f)]

40. Insignificant Emissions Units or Pollutant-Emitting Activities.

(a) All requests for determination of insignificant emissions units or activities made pursuant to Rule 62-213.420(3)(m), F.A.C., shall be processed in conjunction with the permit, permit renewal or permit revision application submitted pursuant to Chapter 62-213, F.A.C. Insignificant emissions units or activities shall be approved by the Department consistent with the provisions of Rule 62-4.040(1)(b), F.A.C. Emissions units or activities which are added to a Title V source after issuance of a permit under Chapter 62-213, F.A.C., shall be incorporated into the permit at its next renewal, provided such emissions units or activities have been exempted from the requirement to obtain an air construction permit and also qualify as insignificant pursuant to Rule 62-213.430(6), F.A.C.

(b) An emissions unit or activity shall be considered insignificant if:

1. Such unit or activity would be subject to no unit-specific applicable requirement;
2. Such unit or activity, in combination with other units or activities proposed as insignificant, would not cause the facility to exceed any major source threshold(s) as defined in Rule 62-213.420(3)(c)1., F.A.C., unless it is acknowledged in the permit application that such units or activities would cause the facility to exceed such threshold(s); and
3. Such unit or activity would not emit or have the potential to emit:
  - a. 500 pounds per year or more of lead and lead compounds expressed as lead;
  - b. 1,000 pounds per year or more of any hazardous air pollutant;
  - c. 2,500 pounds per year or more of total hazardous air pollutants; or
  - d. 5.0 tons per year or more of any other regulated pollutant.

[Rule 62-213.430(6), F.A.C.]

41. Permit Duration. Operation permits for Title V sources may not be extended as provided in Rule 62-4.080(3), F.A.C., if such extension will result in a permit term greater than five (5) years.

[Rule 62-213.440(1)(a), F.A.C.]

42. Monitoring Information. All records of monitoring information shall specify the date, place, and time of sampling or measurement and the operating conditions at the time of sampling or measurement, the date(s) analyses were performed, the company or entity that performed the analyses, the analytical techniques or methods used, and the results of such analyses.

[Rule 62-213.440(1)(b)2.a., F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97) (continued)

---

43. Retention of Records. Retention of records of all monitoring data and support information shall be for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

[Rule 62-213.440(1)(b)2.b., F.A.C.]

44. Monitoring Reports. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports.

[Rule 62-213.440(1)(b)3.a., F.A.C.]

45. Deviation from Permit Requirements Reports. The permittee shall report in accordance with the requirements of Rules 62-210.700(6) and 62-4.130, F.A.C., any deviations from permit requirements, including those attributable to upset conditions as defined in the permit. Reports shall include the probable cause of such deviations, and any corrective actions or preventive measures taken.

[Rule 62-213.440(1)(b)3.b., F.A.C.]

46. Reports. All reports shall be accompanied by a certification by a responsible official, pursuant to Rule 62-213.420(4), F.A.C.

[Rule 62-213.440(1)(b)3.c., F.A.C.]

47. If any portion of the final permit is invalidated, the remainder of the permit shall remain in effect.

[Rule 62-213.440(1)(d)1., F.A.C.]

48. It shall not be a defense for a permittee in an enforcement action that maintaining compliance with any permit condition would necessitate halting of or reduction of the source activity.

[Rule 62-213.440(1)(d)3., F.A.C.]

49. A Title V source shall comply with all the terms and conditions of the existing permit until the Department has taken final action on any permit renewal or any requested permit revision, except as provided at Rule 62-213.412(2), F.A.C.

[Rule 62-213.440(1)(d)4., F.A.C.]

50. A situation arising from sudden and unforeseeable events beyond the control of the source which causes an exceedance of a technology-based emissions limitation because of unavoidable increases in emissions attributable to the situation and which requires immediate corrective action to restore normal operation, shall be an affirmative defense to an enforcement action in accordance with the provisions and requirements of 40 CFR 70.6(g)(2) and (3), hereby adopted and incorporated by reference.

[Rule 62-213.440(1)(d)5., F.A.C.]

51. Confidentiality Claims. Any permittee may claim confidentiality of any data or other information by complying with Rule 62-213.420(2), F.A.C.

[Rule 62-213.440(1)(d)6., F.A.C.]

52. Statement of Compliance. The permittee shall submit a statement of compliance with all terms and conditions of the permit. Such statement shall be submitted to the Department and EPA annually, or more frequently if specified by Rule 62-213.440(2), F.A.C., or by any other applicable requirement. The statement of compliance shall include the identity of each term or condition of the permit for which each unit has remained in compliance during the period covered by the statement. The statement shall include identification of all methods used to demonstrate compliance and identification of each term or condition of the permit for which any unit has not remained in compliance during the period covered by the statement. For each term or condition for which the source has not remained in compliance during the period covered by the statement, the statement shall also identify each unit not in compliance and each term and condition with which the unit was not in compliance and state the inclusive dates that the source was not in compliance, the actions taken to achieve compliance and the method used to demonstrate compliance. Such statement shall be accompanied by a certification by a responsible official, in accordance with Rule 62-213.420(4), F.A.C.

[Rule 62-213.440(3), F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97) (continued)

---

53. Permit Shield. Except as provided in Chapter 62-213, F.A.C., compliance with the terms and conditions of a permit issued pursuant to Chapter 62-213, F.A.C., shall be deemed compliance with any applicable requirements in effect as of the date of permit issuance, provided that the source included such applicable requirements in the permit application. Nothing in Rule 62-213.460, F.A.C., or in any permit shall alter or affect the ability of EPA or the Department to deal with an emergency, the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance, or the requirements of the Federal Acid Rain Program.

[Rule 62-213.460, F.A.C.]

54. Forms and Instructions. The forms used by the Department in the Title V source operation program are adopted and incorporated by reference in Rule 62-213.900, F.A.C. The form is listed by rule number, which is also the form number, and with the subject, title, and effective date. Copies of forms may be obtained by writing to the Department of Environmental Protection, Division of Air Resources Management, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, or by contacting the appropriate permitting authority.

(1) Major Air Pollution Source Annual Emissions Fee (AEF) Form.

[Rule 62-213.900(1), F.A.C.]

Chapter 62-256, F.A.C.

55. Not federally enforceable. Open Burning. This permit does not authorize any open burning nor does it constitute any waiver of the requirements of Chapter 62-256, F.A.C. Source shall comply with Chapter 62-256, F.A.C., for any open burning at the source.

[Chapter 62-256, F.A.C.]

Chapter 62-281, F.A.C.

56. Refrigerant Requirements. Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed at 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or Class II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts B and F, and with Rule 62-281.100, F.A.C. Those requirements include the following restrictions:

- (1) Any facility having any refrigeration equipment normally containing 50 (fifty) pounds of refrigerant, or more, must keep servicing records documenting the date and type of all service and the quantity of any refrigerant added pursuant to 40 CFR 82.166;
- (2) No person repairing or servicing a motor vehicle may perform any service on a motor vehicle air conditioner (MVAC) involving the refrigerant for such air conditioner unless the person has been properly trained and certified as provided at 40 CFR 82.34 and 40 CFR 82.40, and properly uses equipment approved pursuant to 40 CFR 82.36 and 40 CFR 82.38, and complies with 40 CFR 82.42;
- (3) No person may sell or distribute, or offer for sale or distribution, any substance listed as a Class I or Class II substance at 40 CFR 82, Subpart A, Appendices A and B, except in compliance with Rule 62-281.100, F.A.C., and 40 CFR 82.34(b), 40 CFR 82.42, and/or 40 CFR 82.166;
- (4) No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release into the atmosphere any Class I or Class II substance used as a refrigerant in such equipment and no other person may open appliances (except MVACs as defined at 40 CFR 82.152) for service, maintenance or repair unless the person has been properly trained and certified pursuant to 40 CFR 82.161 and unless the person uses equipment certified for that type of appliance pursuant to 40 CFR 82.158 and unless the person observes the practices set forth at 40 CFR 82.156 and 40 CFR 82.166;
- (5) No person may dispose of appliances (except small appliances, as defined at 40 CFR 82.152) without using equipment certified for that type of appliance pursuant to 40 CFR 82.158 and without observing the practices set forth at 40 CFR 82.156 and 40 CFR 82.166;
- (6) No person may recover refrigerant from small appliances, MVACs and MVAC-like appliances (as defined at 40 CFR 82.152), except in compliance with the requirements of 40 CFR 82, Subpart F.

[40 CFR 82; and, Chapter 62-281, F.A.C. (Chapter 62-281, F.A.C., is not federally enforceable)]



Chapter 62-296, F.A.C.

57. Not federally enforceable until SIP approved. Industrial, Commercial, and Municipal Open Burning Prohibited. Open burning in connection with industrial, commercial, or municipal operations is prohibited, except when:

- (a) Open burning is determined by the Department to be the only feasible method of operation and is authorized by an air permit issued pursuant to Chapter 62-210 or 62-213, F.A.C.; or
- (b) An emergency exists which requires immediate action to protect human health and safety; or
- (c) A county or municipality would use a portable air curtain incinerator to burn yard trash generated by a hurricane, tornado, fire or other disaster and the air curtain incinerator would otherwise be operated in accordance with the permitting exemption criteria of Rule 62-210.300(3), F.A.C.

[Rule 62-296.320(3), F.A.C.]

58. Unconfined Emissions of Particulate Matter.

(4)(c)1. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any emissions unit whatsoever, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrially related activities such as loading, unloading, storing or handling, without taking reasonable precautions to prevent such emission.

3. Reasonable precautions may include, but shall not be limited to the following:

- a. Paving and maintenance of roads, parking areas and yards.
- b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar emissions units.
- d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the emissions unit to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- e. Landscaping or planting of vegetation.
- f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- g. Confining abrasive blasting where possible.
- h. Enclosure or covering of conveyor systems.

4. In determining what constitutes reasonable precautions for a particular facility, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

[Rules 62-296.320(4)(c)1., 3., & 4. F.A.C.]

[electronic file name: tv-1.doc]

## APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)

---

Stack Sampling Facilities Provided by the Owner of an Emissions Unit. This section describes the minimum requirements for stack sampling facilities that are necessary to sample point emissions units. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. Emissions units must provide these facilities at their expense. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.

(a) Permanent Test Facilities. The owner or operator of an emissions unit for which a compliance test, other than a visible emissions test, is required on at least an annual basis, shall install and maintain permanent stack sampling facilities.

(b) Temporary Test Facilities. The owner or operator of an emissions unit that is not required to conduct a compliance test on at least an annual basis may use permanent or temporary stack sampling facilities. If the owner chooses to use temporary sampling facilities on an emissions unit, and the Department elects to test the unit, such temporary facilities shall be installed on the emissions unit within 5 days of a request by the Department and remain on the emissions unit until the test is completed.

(c) Sampling Ports.

1. All sampling ports shall have a minimum inside diameter of 3 inches.
2. The ports shall be capable of being sealed when not in use.
3. The sampling ports shall be located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.
4. For emissions units for which a complete application to construct has been filed prior to December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 15 feet or less. For stacks with a larger diameter, four sampling ports, each 90 degrees apart, shall be installed. For emissions units for which a complete application to construct is filed on or after December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 10 feet or less. For stacks with larger diameters, four sampling ports, each 90 degrees apart, shall be installed. On horizontal circular ducts, the ports shall be located so that the probe can enter the stack vertically, horizontally or at a 45 degree angle.
5. On rectangular ducts, the cross sectional area shall be divided into the number of equal areas in accordance with EPA Method 1. Sampling ports shall be provided which allow access to each sampling point. The ports shall be located so that the probe can be inserted perpendicular to the gas flow.

(d) Work Platforms.

1. Minimum size of the working platform shall be 24 square feet in area. Platforms shall be at least 3 feet wide.
2. On circular stacks with 2 sampling ports, the platform shall extend at least 110 degrees around the stack.
3. On circular stacks with more than two sampling ports, the work platform shall extend 360 degrees around the stack.
4. All platforms shall be equipped with an adequate safety rail (ropes are not acceptable), toeboard, and hinged floor-opening cover if ladder access is used to reach the platform. The safety rail directly in line with the sampling ports shall be removable so that no obstruction exists in an area 14 inches below each sample port and 6 inches on either side of the sampling port.

(e) Access to Work Platform.

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)  
(continued)

---

1. Ladders to the work platform exceeding 15 feet in length shall have safety cages or fall arresters with a minimum of 3 compatible safety belts available for use by sampling personnel.

2. Walkways over free-fall areas shall be equipped with safety rails and toeboards.

(f) Electrical Power.

1. A minimum of two 120-volt AC, 20-amp outlets shall be provided at the sampling platform within 20 feet of each sampling port.

2. If extension cords are used to provide the electrical power, they shall be kept on the plant's property and be available immediately upon request by sampling personnel.

(g) Sampling Equipment Support.

1. A three-quarter inch eyebolt and an angle bracket shall be attached directly above each port on vertical stacks and above each row of sampling ports on the sides of horizontal ducts.

a. The bracket shall be a standard 3 inch x 3 inch x one-quarter inch equal-legs bracket which is 1 and one-half inches wide. A hole that is one-half inch in diameter shall be drilled through the exact center of the horizontal portion of the bracket. The horizontal portion of the bracket shall be located 14 inches above the centerline of the sampling port.

b. A three-eighth inch bolt which protrudes 2 inches from the stack may be substituted for the required bracket. The bolt shall be located 15 and one-half inches above the centerline of the sampling port.

c. The three-quarter inch eyebolt shall be capable of supporting a 500 pound working load. For stacks that are less than 12 feet in diameter, the eyebolt shall be located 48 inches above the horizontal portion of the angle bracket. For stacks that are greater than or equal to 12 feet in diameter, the eyebolt shall be located 60 inches above the horizontal portion of the angle bracket. If the eyebolt is more than 120 inches above the platform, a length of chain shall be attached to it to bring the free end of the chain to within safe reach from the platform.

2. A complete monorail or dualrail arrangement may be substituted for the eyebolt and bracket.

3. When the sample ports are located in the top of a horizontal duct, a frame shall be provided above the port to allow the sample probe to be secured during the test.

[Rule 62-297.310(6), F.A.C.]

TABLE 297.310-1  
CALIBRATION SCHEDULE

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/-0.001" mean of at least three readings Max. deviation between readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually 3. Check after each test series	Spirometer or calibrated wet test or dry gas test meter	2%
		Comparison check	5%

I N T E R O F F I C E M E M O R A N D U M

Sensitivity: COMPANY CONFIDENTIAL

Date: 21-Nov-1996 09:40am EST  
From: Robert Soich TPA  
SOICH\_R@A1@TPA1  
Dept: Southwest District Office  
Tel No: 813/744-6100 Ext. 485  
SUNCOM:

TO: Scott Sheplak TAL

( SHEPLAK\_S@A1@DER )

Subject: FPC Anclote Power Plant

In response to your November 14, 1996 letter regarding the compliance status of the FPC Anclote Power Plant there are no pending enforcement actions at this time. Tom Ellison checked ARMs in order to verify this.

As you know in the past this facility had problems with fallout. Large oily soot droplets were impacting citizens within a mile radius of the facility. The district investigated complaints of fallout. Determined that fallout was coming from the Anclote Plant and through a compliance meeting required FPC to eliminate the fallout problem or the Department would pursue enforcement action under 403, FAC health, welfare and damage to property and vegetation. All during this time, Anclote showed continued compliance with the following data: stack tests, ambient monitoring and continuous monitoring on their stack. As of June of this year FMC had installed air tempering coils in response to citizen complaints and the departments investigation. This has eliminated the oily soot fallout problem.

Since the installation of these coils, a detached condensed plume appears under certain weather and load conditions. FPC currently has unit #2 down in order to change the burners. They think this will alleviate the plume visibility problem. The unit will not be back on line until December.

This is an ongoing compliance investigation in case fallout reappears. Currently the detached condensed plume has not been associated with problems concerning fallout or compliance with permit conditions.

The completeness review has not yet been completed by our permitting section.



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

**PERMITTEE:**

Florida Power Corporation  
Post Office Box 14042  
St. Petersburg, FL 33733

**PERMIT/PROJECT:**

Permit No. A051-254492A  
County: Pasco  
Expiration Date: 03/06/2000  
Project: Anclote Power Plant  
Steam Unit No. 1

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-200 through 62-297 and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of an oil fired steam generator, Combustion Engineering, Inc., Type CCRR, Model No. 21097, designated as Anclote Unit No. 1. This unit is fired primarily on No. 6 fuel oil with a maximum heat input of 4,964.4 MMBTU/hour. The unit has a rated electrical output of 535 MW (summer) and 540 MW (winter) dependent upon condenser cooling water intake temperature. This unit has no pollution control equipment. Unit No. 1 and No. 2 exhaust through one common stack.

This permit also allows firing with higher grades of fuel oil and on-specification used oil as specified within.

**Location:** Anclote Road, west of Alternate 19, Tarpon Springs

**UTM:** 17-334.4E 3204.5N

**FACILITY ID:** 1010017

**EMISSIONS UNIT NO.:** 001

**Replaces Permit No.:** A051-160331

PERMITTEE:  
Florida Power Corporation

PERMIT/PROJECT:  
Permit No. AO51-254492A  
Project: Anclote Power Plant  
Steam Unit No. 1

SPECIFIC CONDITIONS:

1. As part of this permit is the attached 15 General Conditions.  
[Rule 62-4.160, F.A.C.]
2. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Rule 62-200 through 62-297, F.A.C., or any other requirements under federal, state or local law.  
[Rule 62-210.300, F.A.C.]
3. The maximum allowable particulate emission rate from this source shall be 0.1 pounds per MMBTU heat input, except for any 3 hours during a 24 hour period in which the boiler is being cleaned by soot blowing or experiencing a load change. Under these operating conditions the maximum allowable particulate emission rate shall be 0.3 pounds per MMBTU heat input providing best operational practices to minimize emissions are adhered to and the duration of excess emissions are minimized.  
[Rules 62-296.405 and 62-210.700, F.A.C.]
4. The maximum opacity from this source shall not exceed 40% as specified in the Order Granting Petition for Reduced Frequency of Particulate Testing (OGC File No.: 82-0514) dated November 7, 1982, except for: any 3 hours during a 24 hour period of excess emissions in which the boiler is being cleaned or experiencing a load change the opacity shall not exceed 60%, and allowing four (4) six minute periods during the 3 hour period of unlimited opacity providing best operational practices to minimize emissions are adhered to and the duration of excess emissions are minimized. [Rule 62-210.700, F.A.C.]
5. The maximum allowable SO<sub>2</sub> emission rate from this unit shall not exceed 2.75 lbs. SO<sub>2</sub>/MMBTU heat input.  
[Rule 62-296.405(1)(c)1.j., F.A.C.]
6. This source is permitted to burn new No. 2, 3, 4, 5, and 6 fuel oil, as long as the emissions limitations of Specific Conditions Nos. 3, 4, and 5 are met. This source is also allowed to burn on-specification used (waste) oil. The following additional restrictions/limitations apply:

PERMITTEE:  
Florida Power Corporation

PERMIT/PROJECT:  
Permit No. AO51-254492A  
Project: Anclote Power Plant  
Steam Unit No. 1

SPECIFIC CONDITIONS:

6. (continued)

- A. On-specification used oil generated by Florida Power Corporation at the Anclote facility, as well as on-specification used oil generated off-site may be burned in this source. The maximum annual amount of on-specification used oil burned in this source shall not exceed 10% of the total heat input to the source.
- B. In order to be considered on-specification, the used oil shall meet the following specifications [40 CFR 279, Subpart B]:
1. Arsenic shall not exceed 5.0 ppm;
  2. Cadmium shall not exceed 2.0 ppm;
  3. Chromium shall not exceed 10.0 ppm;
  4. Lead shall not exceed 100.0 ppm;
  5. Total halogens shall not exceed 1,000 ppm;
  6. Flash point shall not be less than 100.0 degrees F

Off-site generated used oil shall meet the above specifications prior to delivery to the facility.

- C. Used oil containing a PCB concentration of 50 or more ppm shall not be burned in this source. Used oil shall not be blended to meet this requirement. On-specification used oil with a PCB concentration of 2 to 49 ppm shall be burned only at normal source operating temperatures; it shall not be burned during periods of startup or shutdown.

Prior to burning used oil with a PCB concentration of 2 to 49 ppm, provide the marketer with a one time written notice certifying that the used oil will be burned in a qualified combustion device (40 CFR 279.61 and 40 CFR 260.10).

[40 CFR 761 Subparts A, B, and D]

7. In order to document compliance with the requirements of Specific Condition No. 6:



PERMITTEE:  
Florida Power Corporation

PERMIT/PROJECT:  
Permit No. AO51-254492A  
Project: Anclote Power Plant  
Steam Unit No. 1

SPECIFIC CONDITIONS:

7. (continued)

- A. Each batch of used oil to be burned shall be sampled and analyzed for arsenic, cadmium, chromium, lead, total halogens, flash point, and PCBs\* using EPA/DEP or ASTM approved methods.

\*A claim that used oil does not contain quantifiable levels (2 ppm or greater) of PCBs must be documented by analysis or other information. The first person making the claim that the used oil does not contain PCBs is responsible for furnishing the documentation. The documentation can be tests, personal or special knowledge of the source and composition of the used oil, or a certification from the person generating the used oil claiming that the oil contains no detectable PCBs.

- B. Records of the following shall be kept:

1. Results of the analyses in 7.A. above;
2. The source of each batch of on-specification used oil to be burned.
3. Gallons of on-specification used oil burned, including monthly and year to date totals.
4. Gallons of Nos. 2, 3, 4, 5, or 6 fuel oil burned, including monthly and year to date totals.
5. Documentation that the used oil contains less than 2 ppm PCBs, if claimed, including the name and title of person making the claim.

The above records shall be recorded in a permanent form suitable for inspection at the plant by the Department upon request, and shall be retained for at least a three (3) year period.

[Rule 62-4.070(3), F.A.C.]

PERMITTEE:  
Florida Power Corporation

PERMIT/PROJECT:  
Permit No. AO51-254492A  
Project: Anclote Power Plant  
Steam Unit No. 1

SPECIFIC CONDITIONS:

8. This source is allowed to operate a maximum of 8,760 hours per year. [Application dated July 13, 1994]

9. Test the emissions for the following pollutant(s) annually within 60 days prior to the date of June 28th. Submit a copy of the test data to the Air Section of the Department's Southwest District Office within 45 days of such testing:

[Rules 62-297.340 and 62-297.570(2), F.A.C.]

<input checked="" type="checkbox"/> Particulates**	<input checked="" type="checkbox"/> Sulfur Oxides* **
<input checked="" type="checkbox"/> Opacity**	<input type="checkbox"/> Nitrogen oxides
<input type="checkbox"/> Hydrocarbons	<input type="checkbox"/> Fluorides
<input type="checkbox"/> Total Reduced Sulfur	

\* A fuel analysis of a representative fuel sample and a calculation of the sulfur dioxide emission rate based on the fuel analysis and consumption may be submitted in lieu of the required sulfur oxides emission test.

\*\* stack test for particulate matter, visible emissions, and sulfur dioxide under soot blowing and non-soot blowing operating conditions while firing No. 6 fuel oil or No. 6 fuel oil/on-specification used oil.

10. Compliance with the emission limitations of Specific Condition Nos. 3, 4, and 5 shall be determined using EPA Methods 1, 2, 3, 4, 5 or 17, 6 (see Specific Condition No. 9), and 9, as contained in 40 CFR 60, Appendix A and adopted by reference in Section 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting shall be in accordance with Section 62-297, F.A.C. and 40 CFR 60, Appendix A. The visible emissions test shall be conducted simultaneously with the particulate test by a certified observer and be a minimum of sixty (60) minutes in duration.

11. The permittee shall notify the Southwest District Office of the Department at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted.  
[Rule 62-297.340(1)(i), F.A.C.]

PERMITTEE:  
Florida Power Corporation

PERMIT/PROJECT:  
Permit No. A051-254492A  
Project: Anclote Power Plant  
Steam Unit No. 1

SPECIFIC CONDITIONS:

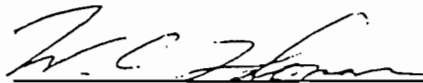
12. Testing of emissions must be conducted within 90-100% of the maximum permitted capacity of 4,964.4 MMBTU/hour or the applicable rated electrical output listed on page one of this permit. A compliance test submitted at a rate less than 90% of the maximum permitted rate will automatically constitute an amended permit rate at that lesser rate plus 10%. Within 30 days of that lower amended permitted rate being exceeded by more than 10%, a new compliance test shall be conducted at the higher rate. The test results shall be submitted to the Southwest District Office of the Department within 45 days of testing. Acceptance of the test by the Department will automatically constitute an amended permit at the higher tested rate plus 10%, but in no case shall the maximum permitted rate of 4,964.4 MMBTU/hour be exceeded. Failure to submit the applicable operating parameters, including the percentage of used oil burned, and production rate with the test report may invalidate the tests and fail to provide reasonable assurance of compliance.

[Rule 62-4.070(3), F.A.C.]

13. Submit to this office for this source, each calendar year and on or before March 1, an emission report [DEP Form 62-210.900(5)] for the preceding calendar year pursuant to Rule 62-210.370(3), F.A.C.

14. Four applications for a Title V permit shall be submitted to the Tallahassee Office of the Department in accordance with the provisions of Rule 62-213.420, F.A.C.

STATE OF FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION



W. C. Thomas, P.E.  
District Air Administrator  
Southwest District



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

RECEIVED

FEB 01 1996

Environmental Svcs  
Department  
Virginia B. Wecherell  
Secretary

## NOTICE OF PERMIT AMENDMENT

### CERTIFIED MAIL

Mr. W. Jeffrey Pardue, C.E.P.  
Manager - Environmental Programs  
Florida Power Corporation  
Post Office Box 14042  
St. Petersburg, FL 33733

RECEIVED

1996

Environmental Svcs  
Department

Dear Mr. Pardue:

Re: Air Pollution Permit Amendment Request (dated  
November 3, 1995): Allow the Firing of On-  
Specification Used Oil in Anclote Unit No. 2

Permit No.: A051-169340  
ARMS Ref. No.: 1010017-001-AO

On November 7, 1995, the Department received the above referenced request. The request is approved and permit A051-169340 is amended as follows:

### **CHANGE DESCRIPTION (page 1, paragraph 2) FROM:**

For the operation of the 525 MW Anclote Plant Fossil Fuel Steam Generator Unit No. 2. This unit is fired on No. 6 fuel oil with a maximum heat input of 4850 MMBtu/hour.

### **TO:**

For the operation of the 525 MW Anclote Plant Fossil Fuel Steam Generator, designated as Anclote Unit No. 2. This unit is fired primarily on No. 6 fuel oil with a maximum heat input of 4,850 MMBTU/hour. This unit has no pollution control equipment. Unit No. 1 and No. 2 exhaust through one common stack.

This permit also allows firing with higher grades of fuel oil and on-specification used oil. Anclote Unit Nos. 1 and 2 share the main fuel tank. Therefore, compliance with the on-specification used oil limitations, restrictions and recordkeeping requirements contained in the specific conditions of Permit No. A051-254492A for Unit No. 1 indicates compliance with these conditions for Unit No. 2.

**CHANGE SPECIFIC CONDITION NO. 6 FROM:**

Test the emissions for the following pollutant(s) at intervals of 12 months from the date of August 24, 1989 and submit a copy of test data to the Air Section of the Department of Environmental Regulation, Southwest District within forty-five days of such testing (Section 17-2.700(2), Florida Administrative Code (F.A.C.)).

(X) Particulates      (X) Opacity      (X) Sulfur Oxides\*

\* Fuel analysis may be submitted in lieu of the required sulfur dioxide stack test.

**TO:**

6. Test the emissions for the following pollutant(s) annually within 60 days prior to the date of **June 28th**. Submit a copy of the test data to the Air Section of the Department's Southwest District Office within 45 days of such testing:  
[Rules 62-297.340 and 62-297.570(2), F.A.C.]

(X) Particulates\*\*                      (X) Sulfur Oxides\* \*\*  
(X) Opacity\*\*                            ( ) Nitrogen oxides  
( ) Hydrocarbons                        ( ) Fluorides  
( ) Total Reduced Sulfur

\* A fuel analysis of a representative fuel sample and a calculation of the sulfur dioxide emission rate based on the fuel analysis and consumption may be submitted in lieu of the required sulfur oxides emission test.

\*\* stack test for particulate matter, visible emissions, and sulfur dioxide under soot blowing and non-soot blowing operating conditions while firing No. 6 fuel oil or No. 6 fuel oil/on-specification used oil.

A person whose substantial interests are affected by this permit amendment may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of receipt of this permit amendment. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This permit amendment is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit amendment will not be effective until further Order of the Department.





# Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

Dr. Richard Garrity, Deputy Assistant Secretary

## PERMITTEE:

Florida Power Corporation  
Post Office Box 14042  
St. Petersburg, Florida 33733

## PERMIT/CERTIFICATION

Permit No.: A051-169340  
County: Pasco  
Expiration Date: 12-18-94  
Project: Anclote Plant  
Fossil Fuel Steam  
Generator Unit No. 2

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 & 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of the 525 MW Anclote Plant Fossil Fuel Steam Generator Unit No. 2. This unit is fired on No. 6 fuel oil with a maximum heat input of 4850 MMBTU/hour.

Location: Anclote Road, West of Alt. 19, Tarpon Springs, Pasco County

UTM: 17-324.4 E 3187.5 N NEDS NO: 0017 Point ID: 02

Replaces Permit No.: A051-94924



PERMITTEE:  
Florida Power Corporation

Permit/Certification No.: A051-169340  
Project: Anclote Plant Fossil Fuel  
Steam Generator Unit No. 2

SPECIFIC CONDITIONS:

1. A part of this permit is the attached 15 General Conditions.
2. The maximum particulate emission rate from this source shall be 0.1 pounds per MMBTU heat input over a two hour average (Section 17-2.600(5), F.A.C.), except for and 3 hours during a 24 hour period in which the boiler is being cleaned by soot blowing or experiencing a load change. Under these operating conditions the maximum allowable particulate emission rate shall be 0.3 pounds per MMBTU heat input providing best operational practices to minimize emissions are adhered to and the duration of excess emissions are minimized (Section 17-2.250(3), F.A.C.).
3. The maximum opacity from this source shall not exceed 40% as specified in the Order Granting Petition for Reduced Frequency of Particulate Testing (OGC File No.: 86-1575) dated December 11, 1986, except for: any 3 hours during a 24 hour period of excess emissions in which the boiler is being cleaned or experiencing a load change the opacity shall not exceed 60%, and allowing for (4) six minute periods during the 3 hour period of unlimited opacity providing best operational practices to minimize emissions are adhered to and the duration of excess emissions are minimized (Section 17-2.250(3), F.A.C.).
4. The Maximum allowable SO<sub>2</sub> emission rate from this unit shall not exceed 2.75 lbs. SO<sub>2</sub>/MMBTU heat input.
5. Compliance with the emission limitations of Specific Conditions Nos. 2 and 3 shall be determined using EPA Methods 1,2,3,9 and 17 contained in 40 CFR 60, Appendix A and adopted by reference in Section 17-2.700, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Section 17-2.700, F.A.C. and 40 CFR 60, Appendix A.
6. Test the emissions for the following pollutant(s) at intervals of 12 months from the date August 24, 1989 and submit a copy of test data to the Air Section of the Department of Environmental Regulation, Southwest District within forty-five days of such testing (Section 17-2.700 (2), Florida Administrative Code (F.A.C.)).

(X) Particulates    (X) Opacity    (X) Sulfur Oxides\*

\* Fuel analysis may be submitted in lieu of the required sulfur dioxide stack test.

PERMITTEE:  
Florida Power Corporation

Permit/Certification No.: A051-169340  
Project: Anclote Plant Fossil Fuel  
Steam Generator Unit No. 2

SPECIFIC CONDITIONS (con't):

7. A fuel analysis of a representative fuel oil sample taken during the particulate stack test is acceptable in lieu of stack testing for  $SO_2$ . The fuel analysis and the other information necessary to determine compliance with the  $SO_2$  standard and to calculate  $SO_2$  emission rate in pounds per MMBTU heat input shall be included in the particulate stack test report.

8. Approved compliance stack testing of emissions must be conducted within approximately +10% of the permitted capacity of 525 MW. A compliance test submitted at operating levels less than 90% of the permitted capacity will automatically constitute an amended permit at the lesser rate plus 10% until another stack test (showing compliance) at 90% of a higher capacity is submitted. Failure to submit the input rates and actual operating conditions may invalidate the test data (Subsection 17-4.070, F.A.C.).

9. The Southwest District Office of the Department of Environmental Regulation shall be notified in writing at least 15 days prior to any compliance testing.

10. Submit for this facility, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following:

- (A) Annual amount of materials and/or fuels utilized.
- (B) Annual emissions (provide a copy of the calculation sheet(s) and basis for calculations).
- (C) Any changes in the information contained in the permit application.

11. A report shall be submitted to the Department of Environmental Regulation within 30 days following each calendar quarter detailing any excess opacity readings recorded during the three month period. For six minute averages of opacity greater than 40%, except as specified in Specific Condition No. 3. The information supplied in this report shall be consistent with the reporting requirements of 40 CFR 51, Appendix P (Section 17-2.710(1), F.A.C.).

12. In the event the Permittee is temporarily unable to comply with the conditions of this permit, the Permittee shall immediately notify the Department stating the cause, period of non-compliance, and steps taken for corrective action and prevention of recurrence. In the event of excess emissions a report of excess emissions shall be sent to the Department by 45 days after the end of the quarter.

PERMITTEE:  
Florida Power Corporation

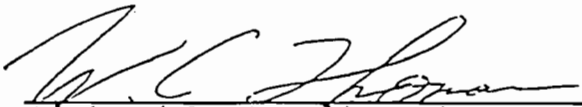
Permit/Certification No.: A009-169340  
Project: Anclote Plant Fossil Fuel  
Steam Generator Unit No. 2

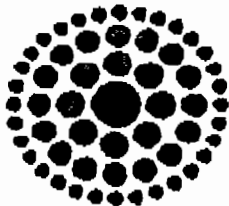
SPECIFIC CONDITIONS (con't):

13. Four applications to renew this operating permit shall be submitted to the Department sixty (60) days prior to the expiration date of this permit.

Issued this 21 day of Dec.  
19 89

STATE OF FLORIDA DEPARTMENT OF  
ENVIRONMENTAL REGULATION

  
For Richard D. Garrity, Ph.D.  
Deputy Assistant Secretary  
Southwest District



**Florida  
Power**  
CORPORATION

*Copied:  
Scott  
al  
5/20*



## *Environmental Services Department*

# FAX COVER SHEET

DATE: 5/19/98

TO: Clair Fancy

FAX # (850) 922-6779

COMPANY: \_\_\_\_\_

FROM: Mike Kennedy

PHONE # (913) 866-4344

FAX # \_\_\_\_\_

NUMBER OF PAGES TRANSMITTED 4

Please call number listed above for any transmission problems.

### COMMENTS:

Detailed agenda for our meeting on Friday.  
Please copy as needed for other DEP  
attendees. Thanks.



**FPC MEETING WITH THE DEP BUREAU OF AIR REGULATION****Title V Permit Issues: DeBary, Anclole and Bartow Plants****May 22, 1998 at 10 AM****AGENDA & BACKGROUND**

**DeBary Facility Draft Title V Permit:** It is FPC's understanding that the majority of issues regarding the DeBary Draft Title V Permit have been resolved, in accordance with FPC's comment letter dated August 20, 1997, and DEP's responses dated October 2, 1997 and October 21, 1997. The remaining contested issues, as detailed in the Petition for Administrative Hearing, are summarized below. These same issues were addressed satisfactorily in FPC's Intercession City Title V permit. As a procedural note, it is FPC's understanding that its Petition on this permit, filed November 4, 1997, has not yet been forwarded to DOAH.

- **Condition B.5** For Units 7 - 10, the unit-specific hours-of-operation limits are inappropriate and should be deleted. These units are regulated collectively and should have an aggregate hour total.
- **Condition B.7 through B.12.** The unit-specific tons per year limitations are inappropriate and should be deleted. These units are regulated collectively and should have aggregate ton per year limits per pollutant..

**Anclole Facility Draft Title V Permit:** The primary issue on the Anclole Draft Title V Permit relates to the use of used oil at this facility, although there are other minor issues detailed in the Petition for Administrative Hearing. Procedurally, FPC and DEP currently have a third joint Motion for Extension of Time pending before DOAH on this matter until May 31, 1998. By letter dated February 2, 1998, FPC stated that it intends to motion for DOAH to relinquish jurisdiction, as soon as it receives confirmation in writing from DEP of the resolution of all of the issues, so that DEP can issue this permit in Proposed and Final form. Finally, as detailed in the February 2 letter, FPC does not believe that it is appropriate to require an additional public notice on this permit.

**Bartow Draft Title V Permit:** Following is a brief summary of the primary issues involved in the Petition for Administrative Hearing on the Bartow Draft Title V permit. Please refer to FPC's Petition dated April 30, 1998, FPC's comment letter dated November 11, 1997, and DEP's response dated March 27, 1998, for a complete description of the issues.

- **ESP** - There is no applicable requirement, nor underlying permitting rationale, for retaining and utilizing the ESP for Unit No. 1. FPC's 1982 State Air Construction Permit required the use of the ESP only when burning a coal/oil mixture. FPC has not burned this fuel for 11 years, nor is it intended to be burned in the future. Therefore, the inclusion of the requirement in the Title V permit to maintain and utilize the ESP is in error.
- **Condition A.7.** (Same comment for Condition A.9.) Regarding specifying the conditions which indicate the applicable compliance determination methods, other "final" Title V permits issued by DEP include such clarifications (e.g., FPC's Higgins Final Title V Permit).

Regarding the clarification that the PM emission limit applies only during steady state operations, FPC believes that this is a reasonable request. Further the allowable TPY figures should be revised to reflect the higher PM emissions allowed during soot blowing and load changing. At a minimum, Condition A.7. should reference the excess emissions provisions under Condition A.6., A.14. - A.16.

- Condition A.19. There is no need to require the test method for VE for Emission Unit 1 to be based on COMs; the COMs are required by Part 75 only; DEP Method 9 is the appropriate test method for DEP's opacity limit.
- Condition A.28. Specifying the pollutants for which annual compliance tests are required is consistent with other DEP Title V permits. For example, FPC's Intercession City permit and the City of Vero Beach's final Title V permit contain such clarification.
- Condition A.32(c) It is unnecessary to require the highest concentration of each constituent of the used oil as determined by any analysis to be assumed to be the concentration of the constituent of blended used oil.
- Condition A.39. and C.19 It is inappropriate to specify the emission factors for calculating annual emissions because of the continually changing nature of emission factors.
- Condition A.40. The "process parameters" provisions in this condition should be deleted because they are redundant with other conditions in this Title V permit. Also the last sentence of this condition should be clarified to state who can request to inspect the records.
- Condition A.41. This condition contains an O&M plan for the ESP. Since the ESP should not be required, the O&M plan is obsolete and should be deleted.
- Condition B.18. and B.20. Paragraphs a.2, a.4.(b), a.4.(c), a.5. and all of Condition B.20. should be deleted because they relate to PM testing for a unit that is subject only to a visible emission and fuel sulfur content limit.
- Condition C:1 It seems unnecessary to identify the heat input of 714 mmbtu/hr eight separate times. It should be simplified as a single heat input for all fuel types. Also, a permitting note should be included indicating that the maximum heat input will vary in accordance with the inlet air temperature (e.g., FPC's Higgins Final Title V permit).
- Condition C.10. This "process variable" condition should be deleted because there are no standards for which process variables are required to be determined.
- Condition C.13. The operating rate during testing should reflect DEP's latest guidance regarding the use of heat input curves for capacity determination purposes during testing.
- Condition D.3. The hourly limit on the transfer of fly ash is inappropriate and should be deleted because the 5% opacity standard provides sufficient reasonable assurance that the hourly PM limit is being attained. Moreover, because the use of the ESP should no longer be required, use of the fly ash system will be unnecessary.

- Condition D.4. For clarification, this condition specifying a PM limit should contain a cross-reference to condition D.7 which states that the testing requirement for the PM limit is waived because the permittee has accepted a 5% opacity limit.
- Condition D.6. This "process variable" condition should be deleted because there are no standards for which process variables are required to be determined.
- Condition D.11 - D.14. Paragraphs (c),(d) and (e) of Condition D.11, all of condition D. 12, paragraphs A.4(b) and (c), B.13(c), and D.14(c), should all be deleted because they refer to specific testing requirements, whereas this unit is only subject to a VE limit.
- Condition A.4 (Under the Acid Rain Part). The Department has agreed in other Title V permits to move this facility-wide condition to the facility-wide section of the Title V permit.
- Appendix U-1. Several of the tanks listed in this appendix for unregulated activities are duplicated and should be corrected.

## TITLE V STATUS SUMMARY

May 14, 1998

Plant Site	Action	Date Draft Received (14 day period)	Extension Request Expires	Public Notice Published	Date Proposed	Date Final
Anclote-TV	Petition for Hearing filed 9/4/97. FPC letter to DEP re: Resolution of Petition sent 2/2/98.	8/21/97 (9/4/97)	1/30/98 (for Joint Response per ALJ); requested extensions until 3/31; 5/31	DEP		
Bartow-TV	FPC comments filed 11/11/97. DEP response to comments received 3/27/98; Petition for Hearing filed 4/30/98	10/6/97 (10/20/97)	10/20; 11/6; 12/8; 1/30; 2/27; 3/31; 4/30	DEP		
Crystal River-TV	FPC comments filed 11/12/97. DEP response to comments received 1/13/98. FPC comments filed 2/10/98. DEP response received 3/4/98. FPC comments filed 4/14/98.	9/26/97 (10/10/97)	10/10; 11/6; 12/8; 1/30; 2/27; 3/31; 4/30; 6/1	10/13/97		
DeBary-TV	FPC comments filed 8/25/97. Petition for hearing filed 11/4/97.	7/28/97 (8/11/97)	8/11; 8/25; 9/5; 9/19; 10/3; 10/10; 10/24; 10/31; 11/4	8/20/97		
Higgins-TV	FPC comments filed 10/27/97.	9/11/97 (9/25/97)	9/25; 10/22; 11/6; 11/24	DEP	11/20/97	1/8/98
Intercession City-TV	FPC comments filed 9/17/97; Notice of Withdrawal of Ext. 10/10/97.	8/22/97 (9/5/97)	9/5; 9/19; 10/3; 10/10	DEP	10/21/97	1/7/98
Suwannee-TV	FPC comments filed 11/5/97. Additional info submitted 1/8/98 re: Unit 3 high sulfur/ used oil modeling.	9/12/97 (9/26/97)	9/26; 10/24; 11/7; 12/8; 1/30; 2/27; 3/31; 6/1	DEP		
Tiger Bay-TV	SW District has forwarded to Tallahassee. No draft permit issued yet.					
Turner-TV	FPC comments filed 9/25/97.	8/27/97 (9/10/97)	9/10; 9/26; 10/10; 10/24; 11/7; 11/24; 1/30; 2/27; 3/31; 4/30; 6/1	DEP		
Avon Park-TV	FPC comments filed 5/29/97.	5/1/97 (5/15/97)	5/15/97	5/7/97	6/26/97	1/8/98
Rio Pinar-TV	FPC comments filed 8/29/97.	7/18/97 (8/1/97)	8/1/97	8/15/97	9/15/97	12/1/97
Bayboro-TV	SW District has not yet issued draft.					
UF-Cogen-TV	FPC comments filed 8/8/97.	6/27/97 (7/11/97)	7/11; 8/12; 8/29; 9/12; 9/26; 10/10; 10/24; 11/7; 12/1; 1/30; 3/31; 6/1	7/24/97		
UF-Cogen-PSD	FPC accepted new language 9/12/97.	6/27/97 (7/11/97)	5/20; 7/30; 9/2; 9/12	-----	-----	9/12/97
Hines Energy-PSD	Permit issued 2/25/94. FPC submittals to DEP on 6/27/96; 9/9/96; 2/18/96; 4/14/98					
Hines Energy-TV	Applications due w/in 180 days after commencement of operation (12/23/98).					





Spec #	Plant	Date	Used Amount/ BBLs	Total Amount/ BBLs	Grade	BTU	Lead PB PPM	% Sulfur	% Ash	Supplier
21	Suwannee 1	Dec-96	600	1,200	50/50 Used Oil Blend*	6,139,602 Total Blend		1.15 Total Blend	0.76 Total Blend	TEXPAR
22	Suwannee 1	Dec-96	2,500	5,000	50/50 Used Oil Blend*	6,139,602 Total Blend		1.15 Total Blend	0.76 Total Blend	TEXPAR
23	Suwannee 1	12/96-2/97	2,500	5,000	50/50 Used Oil Blend*	6,139,602 Total Blend		1.15 Total Blend	0.76 Total Blend	TEXPAR
24	Suwannee 2	12/96-3/97	8,196  1,832	27321 1-3/97  6105 12/96	70/30 Used Oil Blend*	6,685,644 Total Blend		2.9 Total Blend	0.063 Total Blend	TEXPAR
25	Anclote	6/20/97	18,000	112,657	16% Used Oil Blend*	6,545,529 Total Blend		.98 Total Blend	.11 Total Blend	RIO
26	Suwannee 2	6/97	1,013	1,013	Used Oil	5,816,951	25.7	0.45	0.69	4 WAY
27	Anclote	6/97	10,094	10,094	Used Oil	6,000,000	36.9	0.49	0.956	IPC
28	Suwannee 2	6/97-7/97	2,940	2,940	70/30 Blend*	6,423,570		0.18	0.5	TEXPAR
29	Suwannee 2	7/97	3,054	3,054	Used Oil	6,041,874	22.8	0.42	0.48	4 WAY
30	Anclote	7/97-9/97	3,570	3,570	Used Oil					GEOTECH
31	Anclote	7/97	15,000	15,000	Used Oil	6,000,000	42.7	0.47	0.75	IPC
32	Suwannee 2	7/97-8/97	3,000	10,000	70/30 Blend*	6,400,000		1.93	0.19	TEXPAR
33	Anclote	7/97	642	642	Used Oil	5,922,000	38	0.49	0.46	HOWCO
34	Suwannee 2	8/97	2,814	2,814	Used Oil	6,119,326	22.1	0.48	0.47	4 WAY
35	Anclote	8/97	2,145	2,145	Used Oil	5,994,744	41	0.39	0.693	MFM
36	Suwannee 2	8/97	3,324	3,324	Used Oil	6,000,000	62	0.50	0.4	SELLERS
37	Suwannee 2	8/97	747	747	Used Oil	6,000,000	59	0.50	0.4	SELLERS

Spec #	Plant	Date	Used Amount/ BBLs	Total Amount/ BBLs	Grade	BTU	Lead PB PPM	% Sulfur	% Ash	Supplier
38	Anclote	9/97	2,929	2,929	Used Oil	5,921,622	31.8	0.32	0.5	MFM
39	Suwannee 2	9/97	2,860	2,860	Used Oil	5,765,424	20.6	0.47	0.61	4 WAY
40	Suwannee 2	9/11/97	900	3,000	70/30 Blend*	6,400,000		1.93	0.19	TEXPAR
41	Anclote	10/97 - 11/97	4,169	4,169	Used Oil	6,000,000	11.3	0.47	0.4	GEOTECH
42	Suwannee 2	10/97	3,900	13,000	70/30 Blend* Est	6,435,408		1.80	0.217	TEXPAR
43	Suwannee 2	10/13/97	833	833	Used Oil	5,926,998	24.2	0.55	0.72	4 WAY
44	Anclote	10/7/97	4,991	4,991	Used Oil	6,000,000	23.2	0.489	0.96	IPC
45	Anclote	10/15/97	9,963	9,963	Used Oil	6,000,000	23.2	0.49	0.96	IPC
46	Anclote	10/30/97	2,860	2,860	Used Oil	5,910,366	44.9	0.464	0.45	MFM
47	Anclote	10/29/97	5,092	5,092	Used Oil	6,000,000	23.2	0.49	0.96	IPC
48	Anclote	11/20/97	5,000	5,000	Used Oil	6,000,000	44.7	0.74	0.953	IPC
49	Anclote	12/1/97	5,500	5,500	Used Oil	6,153,000	10	0.33	0.475	GEOTECH
50	Anclote	12/1/97	3,100	3,100	Used Oil	5,973,240	23.14	0.64	0.599	CLIFF BERRY
51	Suwannee	1/5/98	1,000	5,000	80/20 Blend	6,500,000		2.50	0.2	TEXPAR
52	Suwannee	1/5/98	1,600	1,600	Used	5,982,372	9.3	0.67	0.83	4 WAY
53	Anclote	12/28/97	3,000	3,000	Used	5,910,366	44.9	0.464	0.45	MFM
54	Anclote	2/5/98	1,240	1,240	Used	5,880,000	52	0.46	0.4	HOWCO
55	Suwannee	2/10/98	5,000	1,000	80/20 Blend					TEXPAR

\* Blended quantities are estimates of used oil portion





# Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE

TO	_____	DATE	_____
TO	_____	DATE	_____
TO	_____	DATE	_____
TO	_____	DATE	_____

TO: Bill Thomas  
FROM: Clair Fancy *(Signature)*  
DATE: June 9, 1987  
SUBJ: Florida Power Corporation (FPC)  
Bartow Unit No. 1, AC 52-63210  
36102

The construction permit issued to FPC Bartow Unit No. 1, AC 52-63210, dated March 18, 1981, allows for the burning of 100% fuel oil without requiring an ESP on line, and also allows for visible emissions up to 40% opacity. Since the unit can comply with the applicable permitted emission limitations while burning 100% fuel oil and without ESP control, the operating permit may be amended to allow such operation.

However, if FPC intends to dismantle (permanently remove) the ESP, the Department would require a construction permit be issued. This would make compliance federally enforceable. It is understood that burning of coal-oil mix fuel by Bartow Unit No. 1 will no longer be permitted.

PR/ks

I N T E R O F F I C E M E M O R A N D U M

Sensitivity: COMPANY CONFIDENTIAL

Date: 21-Nov-1996 09:40am EST  
From: Robert Soich TPA  
SOICH\_R@A1@TPA1  
Dept: Southwest District Office  
Tel No: 813/744-6100 Ext. 485  
SUNCOM:

TO: Scott Sheplak TAL

( SHEPLAK\_S@A1@DER )

Subject: FPC Anclote Power Plant

In response to your November 14, 1996 letter regarding the compliance status of the FPC Anclote Power Plant there are no pending enforcement actions at this time. Tom Ellison checked ARMs in order to verify this.

As you know in the past this facility had problems with fallout. Large oily soot droplets were impacting citizens within a mile radius of the facility. The district investigated complaints of fallout. Determined that fallout was coming from the Anclote Plant and through a compliance meeting required FPC to eliminate the fallout problem or the Department would pursue enforcement action under 403, FAC health, welfare and damage to property and vegetation. All during this time, Anclote showed continued compliance with the following data: stack tests, ambient monitoring and continuous monitoring on their stack. As of June of this year FMC had installed air tempering coils in response to citizen complaints and the departments investigation. This has eliminated the oily soot fallout problem.

Since the installation of these coils, a detached condensed plume appears under certain weather and load conditions. FPC currently has unit #2 down in order to change the burners. They think this will alleviate the plume visibility problem. The unit will not be back on line until December.

This is an ongoing compliance investigation in case fallout reappears. Currently the detached condensed plume has not been associated with problems concerning fallout or compliance with permit conditions.

The completeness review has not yet been completed by our permitting section.

I N T E R O F F I C E M E M O R A N D U M

Sensitivity: COMPANY CONFIDENTIAL

Date: 22-Nov-1996 08:12am EST  
From: Scott Sheplak TAL  
SHEPLAK\_S  
Dept: Air Resources Management  
Tel No: 904/488-1344  
SUNCOM:

TO: Charles Logan TAL

( LOGAN\_C )

CC: Robert Soich TPA

( SOICH\_R @ A1 @ TPA1 )

Subject: FWD: FPC Anclote Power Plant

For your consideration.

10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

**Addition limitations for On-Specification Used Oil**

A.32. **Not federally enforceable.** On-specification used oil generated at this facility or off-site may only be burned in these emissions units if compliance with all the conditions of this permit and the following additional conditions are demonstrated:

- a. On-specification Used Oil Allowed as Fuel: This permit allows the burning of used fuel oil meeting EPA "on-specification" used oil specifications, with a maximum sulfur content of 2.5 percent, by weight, and a PCB concentration of less than 50 ppm.

US.  
USED OIL  
FUEL

On-specification used oil shall meet the following specifications: [40 CFR 279, Subpart B.]

1. Arsenic shall not exceed 5.0 ppm;
2. Cadmium shall not exceed 2.0 ppm;



3. Chromium shall not exceed 10.0 ppm;
4. Lead shall not exceed 100.0 ppm;
5. Total halogens shall not exceed 1000 ppm;
6. Flash point shall not be less than 100 degrees F.

Used oil that does not meet the specifications for on-specification used oil shall not be burned at this facility.

- b. Quantity Limited: The maximum cumulative amount of on-specification used oil, whether generated on or off-site, that can be burned shall not exceed 10 percent of the total permitted heat input for emissions units #1 and #2.
- c. Used Oil Containing PCBs  $\geq$  50 ppm Not Allowed: Used oil containing a PCB concentration of 50 ppm or greater shall not be burned at this facility. Used oil shall not be blended to meet this requirement or any part of this condition .
- d. PCB Concentration of 2 to 50 ppm: On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall be burned only at normal source operating temperatures. On specification used oil with a PCB concentration of 2 to less than 50 ppm shall not be burned during periods of startup or shutdown.

*No Compliance  
Determination*

Before accepting from each marketer the first shipment of on-specification used oil with a PCB concentration of 2 to less than 50 ppm, the owner or operator shall provide each marketer with a one-time written and signed notice certifying that the owner or operator will burn the used oil in a qualified combustion device. The notice must state that EPA or a RCRA-delegated state agency has been given a description of the used oil management activities at the facility and that an industrial boiler or furnace will be used to burn the used oil with a PCB concentration of 2 to less than 50 ppm. The description of the used oil management activities shall be submitted to the Administrator, Hazardous Waste Regulation Section, Florida Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. [40 CFR 279 and 761.20(e)]

- e. Certification Required: The owner or operator shall receive from the marketer, for each load of used oil received, a certification that the used oil meets the specifications for on-specification used oil and contains a PCB concentration of less than 50 ppm. This certification shall also describe the basis for the certification, such as analytical results. Note that a claim that used oil does not contain quantifiable levels of PCBs (that is, that the used oil contains less than 2 ppm of PCBs) must be documented by testing or other information. The first person making the claim that the used oil does not contain PCBs is responsible for furnishing the documentation. The documentation can be tests, personal

or special knowledge of the source and composition of the used oil, or a certification from the person generating the used oil claiming that the used oil contains no detectable PCBs.

- f. Testing Required: If the owner or operator does not receive certification from the marketer as described above, the owner or operator shall properly sample and test each load of used oil received for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point, PCBs\*, and percent sulfur content by weight, ash, and BTU value (BTU per gallon).

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

\* Testing for PCB's is not necessary if quantifiable levels are less than 2 ppm (ref. to specific condition A.32.e., above)

If the owner or operator relies on certification from the marketer, the owner or operator shall be responsible for ensuring that the certification complies with all the requirements of this condition and all conditions of this permit.

If the analytical results show that the used oil does not meet the specification for on-specification used oil, or that it contains a PCB concentration greater than or equal to 50 ppm, the owner or operator shall immediately notify and provide the analytical results to the Department's Southwest District Office. The owner or operator shall immediately cease burning of the used oil.

- g. Special Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil: [40 CFR 761.20(e)]

- (1) The gallons of on-specification used oil received and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (3) The name and address of all marketers delivering used oil to the facility.
- (4) Copies of the marketer certifications, if obtained, and any supporting information.
- (5) Documentation that the used oil contains less than 2 ppm PCBs, if claimed, including the name and address of the person making the claim.
- (6) Results of the analyses required above.

- (7) A copy of the notice to EPA and a copy of the one-time written notice provided to each marketer.

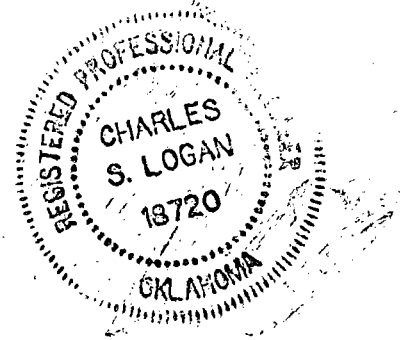
The records shall be retained in a form suitable for inspection at the facility by the Department, and shall be retained for 5 years.

- h. Reporting Required: The owner or operator shall submit, with the Annual Operation Report (AOR) form, the total amount of on-specification used oil received, and the total amount of on-specification used oil burned during the previous calendar year to the Southwest District Office. The AOR shall include the total amount of lead emitted as a result of burning on-specification used oil during the calendar year on a monthly basis.

[Rules 62-4.070(3), 62-212.400(2)(f)1. and 62-213.440, F.A.C.; and, AO 51-254492A & 1010017-001-AO]



(x) RECORD OPERATING MODE/CONDITION OF EACH  
WHILE FIRING USED OIL FUEL & NOTE  
DATES / TIMES USED OIL IS FIRED.



10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

#### **Addition limitations for On-Specification Used Oil**

A.32. **On-Specification Used Oil (Not federally enforceable)**. On-specification used oil generated at this facility or off-site may only be burned in these emissions units if compliance with all the conditions of this permit and the following additional conditions are demonstrated:

- a. **On-specification Used Oil Allowed as Fuel**: This permit allows the burning of used fuel oil meeting EPA "on-specification" used oil specifications, with a maximum sulfur content of 2.5 percent, by weight, and a PCB concentration of less than 50 ppm.

On-specification used oil shall meet the following specifications: [40 CFR 279, Subpart B.]

1. Arsenic shall not exceed 5.0 ppm;
2. Cadmium shall not exceed 2.0 ppm;

## STATEMENT OF BASIS

Florida Power Corporation  
Anclote Power Plant  
Facility ID No.: 1010017  
Pasco County  
Initial Title V Air Operation Permit  
**PROPOSED Permit No.: 1010017-003-AV**

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This facility consists of two fuel oil fired steam electric generating stations, E.U. ID No. -001 (Unit No. 1) and -002 (Unit No. 2). Unit No. 1 and No. 2 power turbines which drive generators with a nameplate ratings of 535(summer)/540(winter) megawatt and 525(summer)/ 530(winter) megawatt, respectively. Units No. 1 and No. 2 share a common stack. Relocatable diesel fired generator(s) with a maximum heat input of 25.74 MMBtu/hour and a maximum rating of 2460 Kilowatts are located at the facility.

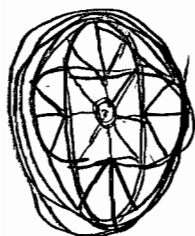
Fossil fuel fired steam generator # 1 is a nominal 535(summer)/540(winter) megawatt (electric) steam generator designated as Anclote Unit # 1. The emission unit is fired on No. 6 or lighter grades of fuel oil and on-specification used oil , with a maximum heat input of 4964.4 MMBtu per hour. Fossil fuel fired steam generator # 2 is a nominal 525(summer)/ 530(winter) megawatt (electric) steam generator designated as Anclote Unit # 2. The emission unit is fired on No. 6 or lighter grades of fuel oil and on-specification used oil, as permitted herein, with a maximum heat input of 4850 MMBtu per hour. Each boiler/steam generator, units #1 and #2, drives a turbine generator and both units share a common 499 foot exhaust stack. Emissions from these units are uncontrolled. The emissions units are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input. Fossil fuel fired steam generator # 1 began commercial operation on October 16, 1974; and, fossil fuel fired steam generator # 2 began commercial operation on October 31, 1978.

The relocatable diesel generator(s) have a maximum heat input of 25.74 million Btu per hour (MMBtu/hour) while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum rating of 2460 kilowatts. Emissions from the generators are uncontrolled. These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. The generators may be relocated at any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Higgins Plant, Shore Drive, Oldsmar, Pinellas County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. The future FPC Polk County Site, County Road 555, 1 mi. southwest of Homeland, Polk County.

Also included in this permit are miscellaneous unregulated and insignificant emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).



## **STATEMENT OF BASIS**

Florida Power Corporation  
Anclote Power Plant  
Facility ID No.: 1010017  
Pasco County  
Initial Title V Air Operation Permit  
**PROPOSED Permit No.: 1010017-003-AV**

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This facility consists of two fuel oil fired steam electric generating stations, E.U. ID No. -001 (Unit No. 1) and -002 (Unit No. 2). Unit No. 1 and No. 2 power turbines which drive generators with a nameplate ratings of 535(summer)/540(winter) megawatt and 525(summer)/ 530(winter) megawatt, respectively. Units No. 1 and No. 2 share a common stack. Relocatable diesel fired generator(s) with a maximum heat input of 25.74 MMBtu/hour and a maximum rating of 2460 Kilowatts are located at the facility.

Fossil fuel fired steam generator # 1 is a nominal 535(summer)/540(winter) megawatt (electric) steam generator designated as Anclote Unit # 1. The emission unit is fired on No. 6 or lighter grades of fuel oil and on-specification used oil , with a maximum heat input of 4964.4 MMBtu per hour. Fossil fuel fired steam generator # 2 is a nominal 525(summer)/ 530(winter) megawatt (electric) steam generator designated as Anclote Unit # 2. The emission unit is fired on No. 6 or lighter grades of fuel oil and on-specification used oil, as permitted herein, with a maximum heat input of 4850 MMBtu per hour. Each boiler/steam generator, units #1 and #2, drives a turbine generator and both units share a common 499 foot exhaust stack. Emissions from these units are uncontrolled. The emissions units are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input. Fossil fuel fired steam generator # 1 began commercial operation on October 16, 1974; and, fossil fuel fired steam generator # 2 began commercial operation on October 31, 1978.

The relocatable diesel generator(s) have a maximum heat input of 25.74 million Btu per hour (MMBtu/hour) while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum rating of 2460 kilowatts. Emissions from the generators are uncontrolled. These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. The generators may be relocated at any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Higgins Plant, Shore Drive, Oldsmar, Pinellas County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. The future FPC Polk County Site, County Road 555, 1 mi. southwest of Homeland, Polk County.

Also included in this permit are miscellaneous unregulated and insignificant emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

3. \_\_\_\_\_

1. *Charles Sogam*

2. \_\_\_\_\_

5. \_\_\_\_\_

PLEASE PREPARE REPLY FOR:

- SECRETARY'S SIGNATURE
- DIV/DIST DIR SIGNATURE
- MY SIGNATURE
- YOUR SIGNATURE
- DUE DATE \_\_\_\_\_

COMMENTS:

*Your Copy!*

ACTION/DISPOSITION

- DISCUSS WITH ME
- COMMENTS/ADVISE
- REVIEW AND RETURN
- SET UP MEETING
- FOR YOUR INFORMATION
- HANDLE APPROPRIATELY
- INITIAL AND FORWARD
- SHARE WITH STAFF
- FOR YOUR FILES

FROM: \_\_\_\_\_

*[Signature]*

DATE: \_\_\_\_\_

*8/19/97*

PHONE: \_\_\_\_\_



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wecherell  
Secretary

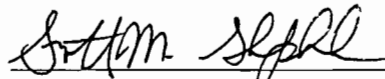
## P.E. Certification Statement

**Permittee:**  
Florida Power Corporation  
Anclote Power Plant

**DRAFT Permit No.:** 1010017-003-AV  
**Facility ID No.:** 1010017

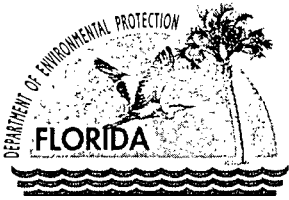
**Project type:** Initial Title V Air Operation Permit

*I HEREBY CERTIFY that the 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, and geological features).*

  
\_\_\_\_\_  
Scott M. Sheplak, V.E.                      08/06/97                      date  
Registration Number: 0048866

Permitting Authority:  
Department of Environmental Protection  
Bureau of Air Regulation  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 904/488-1344  
Fax: 904/922-6979





# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

August 13, 1997

Mr. W. Jeffrey Pardue, C.E.P.  
Director of Environmental Services  
Florida Power Corporation  
3201 34th Street South  
St. Petersburg, Florida 33711

Re: DRAFT Title V Permit No.: 1010017-003-AV  
Anclote Power Plant


Dear Mr. Pardue:

One copy of the DRAFT Title V Air Operation Permit for the Anclote Power Plant located at 1729 Baileys Bluff Road, Holiday, Pasco County, is enclosed. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" is also included.

The Department will publish the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" as soon as possible. This issue is important in order for you to receive your Title IV Acid Rain permit by January 1, 1998, pursuant to the Clean Air Act and Section 403.0872, Florida Statutes.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Scott M. Sheplak, P.E., at the above letterhead address. If you have any other questions, please contact Charles S. Logan at 850/488-1344.

Sincerely,

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

CHF/I

Enclosures

cc: Ms. Carla E. Pierce, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)  
Ms. Yolanda Adams, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

*Printed on recycled paper.*

In the Matter of an  
Application for Permit by:

Florida Power Corporation  
3201 34th Street South  
St. Petersburg, Florida 33711

---

DRAFT Permit No.: 1010017-003-AV  
Anclote Power Plant  
Pasco County

**INTENT TO ISSUE TITLE V AIR OPERATION PERMIT**

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit (copy of DRAFT Permit enclosed) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Florida Power Corporation, applied on June 12, 1996, to the permitting authority for a Title V air operation permit for the Anclote Power Plant located at 1729 Baileys Bluff Road, Holiday, Pasco County.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit is required to commence or continue operations at the described facility.

The permitting authority intends to issue this Title V air operation permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.0872, F.S., and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." However, the Department will publish the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" as soon as possible. This issue is important in order for you to receive your Title IV Acid Rain permit by January 1, 1998, pursuant to the Clean Air Act and Section 403.0872, F.S.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the enclosed Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision 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 (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any other person must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. A petitioner must 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207, F.A.C.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

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 notice of intent. 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.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state

rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

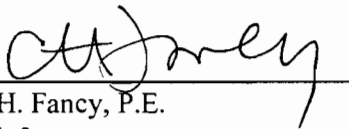
Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

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 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the 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 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 410 M. Street, SW, Washington, D.C. 20460.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION**

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

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the DRAFT permit) and all copies were sent by certified mail before the close of business on 8/19/97 to the person(s) listed:

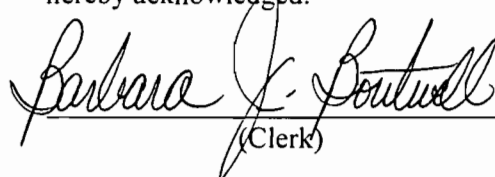
Mr. W. Jeffrey Pardue, C.E.P., Florida Power Corporation

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the DRAFT permit) were sent by U.S. mail on the same date to the person(s) listed:

Mr. Kennard F. Kosky, P.E., Golder Associates, Inc.  
Mr. Bill Thomas, SWD

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) 8/19/97  
(Date)

Florida Power Corporation  
Anclote Power Plant

Facility ID No.: 1010017  
Pasco County

Initial Title V Air Operation Permit  
**DRAFT Permit No.:** 1010017-003-AV

Permitting Authority:

State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
Title V Section

Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Telephone: 850/488-1344  
Fax: 850/922-6979

August 13, 1997

Initial Title V Air Operation Permit  
**DRAFT Permit No.:1010017-003-AV**

**Table of Contents**

<u>Section</u>	<u>Page Number</u>
Placard Page .....	1
I. Facility Information .....	2 - 3
A. Facility Description.	
B. Summary of Emissions Unit ID Nos. and Brief Descriptions.	
C. Relevant Documents.	
II. Facility-wide Conditions .....	4 - 5
III. Emissions Unit(s) and Conditions	
A. Fuel Oil Fuel Fired Steam Generators (E.U. ID Nos. -001 and -002).....	6 - 19
B. Diesel Fired Generators ( 3 - 820 Kilowatt each).....	20 - 25
IV. Acid Rain Part	
A. Acid Rain, Phase II .....	26 - 27
Table 1-1, Summary of Air Pollutant Standards and Terms.....	28
Table 1-2, Summary of Air Pollutant Standards and Terms (Additional Standards for On-Specification Used Oil (OSUO)).....	29
Table 2-1, Summary of Compliance Requirements.....	30
Appendix E-1. List of Exempt Emissions Units and/or Activities.....	31
Appendix U-1. List of Unregulated Emissions Units and/or Activities.....	32
Appendix H-1. Permit History/ID Number Changes.....	33
Appendix SS-1, Stack Sampling Facilities.....	34
Appendix TV-1, Title V Conditions.....	35



# 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**

**DRAFT Permit No.:** 1010017-003-AV  
**Facility ID No.:** 1010017  
**SIC Nos.:** 4911  
**Project:** Initial Title V Air Operation Permit

This permit is for the operation of the Anclote Power Plant. This facility is located at 1729 Baileys Bluff Road, Holliday, Pasco County; UTM Coordinates: Zone 17, 324.4 km East and 3118.7 km North; Latitude: 28° 48' 17" North and Longitude: 82° 47' 08" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

**Referenced attachments made a part of this permit:**

Appendix U-1, List of Unregulated Emissions Units and/or Activities  
Appendix E-1, List of Exempt Emissions Units and/or Activities  
APPENDIX TV-1, TITLE V CONDITIONS (version dated 08/11/97)  
APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)  
Phase II Acid Rain Application/Compliance Plan received December 14, 1995.

**Effective Date:** January 1, 1998  
**Renewal Application Due Date:** July 5, 2002  
**Expiration Date:** December 31, 2002

---

Howard L. Rhodes, Director  
Division of Air Resources  
Management

HLR/sms/csl



**Section I. Facility Information.**

**Subsection A. Facility Description.**

This facility consists of two fuel oil fired steam electric generating stations, E.U. ID No. -001 (Unit No. 1) and -002 (Unit No. 2). Unit No. 1 consists of a Combustion Engineering, Inc., Type CCRR boiler/steam generator and steam turbine which drives a generator with a nameplate rating of 540 Megawatts. Unit No. 2 consists of a Combustion Engineering, Inc., Type CCRR boiler/steam generator and steam turbine which drives a generator with a nameplate rating of 525 Megawatts. Units No. 1 and No. 2 share a common stack. Also included in this permit are miscellaneous unregulated emissions units and/or activities. Relocatable diesel fired generator(s) with a maximum heat input of 25.74 MMBtu/hour and a maximum rating of 2460 Kilowatts are located at the facility but may be relocated to other FPC facilities.

Based on the initial Title V permit application received on June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

**Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).**

<u>E.U. ID No.</u>	<u>Brief Description</u>
-001	Fuel Oil Fired Steam Electric Generator No. 1
-002	Fuel Oil Fired Steam Electric Generator No. 2
-xxx	Relocatable Diesel Generator(s)

**Unregulated Emissions Units and/or Activities**

- xxx Surface Coating and Solvent Cleaning
- xxx Fuel Storage Tanks
- xxx Emergency Generators
- xxx General Purpose Engines
- xxx Helper Cooling Towers

*Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.*

**Subsection C. Relevant Documents.**

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/ID Number Changes

These documents are on file with the permitting authority:

Initial Title V Permit Application received June 14, 1996.

## Section II. Facility-wide Conditions.

### The following conditions apply facility-wide:

1. APPENDIX TV-1, TITLE V CONDITIONS is a part of this permit.  
{Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}
2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.  
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.  
[Rule 62-296.320(4)(b)1. & 4., F.A.C.]
4. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:
  - a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and
  - b. certification forms and/or RMPs according to the promulgated rule schedule.[40 CFR 68]
5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.  
[Rule 62-213.440(1), F.A.C.]
6. Exempt Emissions Units and/or Activities. Appendix E-1, List of Exempt Emissions Units and/or Activities, is a part of this permit.  
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]

**7. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions.** The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.  
[Rule 62-296.320(1)(a), F.A.C.]

**8. Not federally enforceable.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include:

- Maintenance of paved areas as needed,
- Regular mowing of grass and care of vegetation, and
- Limiting access to plant property by unnecessary vehicles.

[Rule 62-296.320(4)(c)2., F.A.C.; Proposed by applicant in the initial Title V permit application received June 14, 1996]

**9.** When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.  
[Rule 62-213.440, F.A.C.]

**10.** 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

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

United States 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

**Section III. Emissions Unit(s) and Conditions.**

**Subsection A. This section addresses the following emissions units.**

<u>E.U. ID No.</u>	<u>Brief Description</u>
-001	Fossil Fuel Fired Steam Generator # 1
-002	Fossil Fuel Fired Steam Generator # 2

Fossil fuel fired steam generator # 1 is a nominal 535(summer)/540(winter) megawatt (electric) steam generator designated as Anclote Unit # 1. The emission unit is fired on No. 6 or higher grades of fuel oil and on-specification used oil, as permitted herein, with a maximum heat input of 4964.4 MMBtu per hour.

Fossil fuel fired steam generator # 2 is a nominal 525(summer)/530(winter) megawatt (electric) steam generator designated as Anclote Unit # 2. The emission unit is fired on No. 6 or higher grades of fuel oil and on-specification used oil, as permitted herein, with a maximum heat input of 4850 MMBtu per hour.

Each boiler/steam generator, units #1 and #2, drives a turbine generator and both units share a common 499 foot exhaust stack. Emissions from these units are uncontrolled.

{Permitting note(s): The emissions units are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input. Fossil fuel fired steam generator # 1 began commercial operation on October 16, 1974; and, fossil fuel fired steam generator # 2 began commercial operation on October 31, 1978.}

**The following specific conditions apply to the emissions units listed above:**

**Essential Potential to Emit (PTE) Parameters**

A.1. Permitted Capacity. The maximum operation heat input rates are as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
1	4964.4	No. 1, 2, 3, 4, 5 or 6 Fuel Oil & On-Specification Used Oil*
2	4850.0	No. 1, 2, 3, 4, 5, or 6 Fuel Oil & On-specification Used Oil

\* The on-specification used oil burned at this facility may be generated on or off-site.  
 [Rules 62-4.160(2), 62-210.200(PTE) and 62-296.405, F.A.C.]

A.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition A.22.  
 [Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation. Fuel(s).

- a. Startup: The only fuels allowed to be burned are new #6 or higher grades of fuel oils. On-specification used oil shall only be burned if the PCB's are less than 2 ppm and blended with new #2 fuel oil. The maximum sulfur content is 2.5 percent, by weight.
- b. Normal: The only fuels allowed to be burned are new #6 or higher grades of fuel oils and on-specification used oil. The maximum sulfur content is 2.5 percent, by weight.
- c. The maximum amount of on-specification used oil, whether generated on or off-site, that can be burned in each emissions unit shall not exceed 10 percent of the total permitted heat input per emissions unit.

[Rule 62-213.410, F.A.C.; and, AO 51-254492A & 1010017-001-AO]

A.4. Hours of Operation. These emissions units may operate continuously, i.e., 8,760 hours/year.

[Rule 62-210.200(PTE), F.A.C.]

**Emission Limitations and Standards**

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.5. Visible Emissions. Visible emissions shall not exceed 40 percent opacity. Emissions units governed by this visible emissions standard shall conduct a compliance test for particulate matter emissions annually. Failure of the facility to demonstrate compliance with the particulate matter allowable in specific condition A.7 or the opacity standard of this condition shall constitute grounds for revocation of this condition.

[Rule 62-296.405(1)(a), F.A.C.; and, OGC File Nos. 86-1574 and 86-1575/Orders dated December 11, 1986.]

A.6. Visible Emissions - Soot Blowing and Load Change. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

[Rule 62-210.700(3), F.A.C.]

A.7. Particulate Matter. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods.

[Rule 62-296.405(1)(b), F.A.C.]

A.8. Particulate Matter - Soot Blowing and Load Change. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour

period of excess emissions allowed for boiler cleaning (soot blowing) and load change.  
[Rule 62-210.700(3), F.A.C.]

A.9. Sulfur Dioxide. When burning liquid fuel, sulfur dioxide emissions shall not exceed 2.75 pounds per million Btu heat input, as measured by applicable compliance methods.  
[Rule 62-296.405(1)(c)1.j., F.A.C.]

A.10. Sulfur Dioxide - Sulfur Content. The sulfur content of fuel oils, on-specification used oil, or any combination of the two burned in these units, shall not exceed 2.5 percent, by weight. See specific condition A.20.  
[Rule 62-296.405(1)(e)3., F.A.C.; and, requested by the applicant in Title V Application dated June 12, 1996.]

#### Excess Emissions

A.11. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.  
[Rule 62-210.700(1), F.A.C.]

A.12. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.  
[Rule 62-210.700(2), F.A.C.]

A.13. 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.  
[Rule 62-210.700(4), F.A.C.]

#### Monitoring of Operations

A.14. Sulfur Dioxide. **The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor or permittee upon each fuel delivery.** This protocol is allowed because the emissions units do not have an operating flue gas desulfurization device. See specific conditions A.10., A.19. and A.20.  
[Rule 62-296.405(1)(f)1.b., F.A.C.]

A.15. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in

conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

### Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.16. Visible emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. See specific condition A.17.

[Rule 62-296.405(1)(e)1., F.A.C.]

A.17. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
  - a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
  - b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of



missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.]

A.18. Particulate Matter. The test methods for particulate emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17.

[Rules 62-296.405(1)(e)2. and 62-297.401, F.A.C.]

A.19. Sulfur Dioxide. The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedences of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. **The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, as an alternate sampling procedure authorized by permit, the permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery.** See specific conditions A.9., A.10. and A.20.

[Rules 62-213.440, 62-296.405(1)(e)3. and 62-297.401, F.A.C.; and, Permits 1010017-001-AO and AO 51-254492A.]

A.20. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s).

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

A.21. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's

emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

A.22. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

A.23. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

A.24. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube. [Rule 62-297.310(4), F.A.C.]

A.25. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

A.26. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid for more than 400 hours other than during startup.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate; or

b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

TABLE 297.310-1  
 CALIBRATION SCHEDULE

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/-0.001" mean of at least three readings Max. deviation between readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually 3. Check after each test series	Spirometer or calibrated wet test or dry gas test meter	2%
		Comparison check	5%

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;
- b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
- c. Each NESHAP pollutant, if there is an applicable emission standard.

5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; SIP approved]

A.27. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning only liquid fuel(s) for less than 400 hours per year.

[Rule 62-297.310(7)(a)4., F.A.C.]

A.28. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.]

**Record keeping and Reporting Requirements**

A.29. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department's Southwest District Office in accordance with Rule 62-4.130, F.A.C. --A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department's Southwest District Office.

[Rule 62-210.700(6), F.A.C.]

A.30. Submit to the Department's Southwest District Office a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years.

[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

A.31. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department's Southwest District Office on the results of each such test.

(b) The required test report shall be filed with the Department's Southwest District Office as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department's Southwest District Office to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.

10. The number of points sampled and configuration and location of the sampling plane.
  11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
  12. The type, manufacturer and configuration of the sampling equipment used.
  13. Data related to the required calibration of the test equipment.
  14. Data on the identification, processing and weights of all filters used.
  15. Data on the types and amounts of any chemical solutions used.
  16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
  17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
  18. All measured and calculated data required to be determined by each applicable test procedure for each run.
  19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
  20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
  21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.
- [Rules 62-213.440 and 62-297.310(8), F.A.C.]

**Addition limitations for On-Specification Used Oil**

A.32. On-Specification Used Oil. On-specification used oil generated at this facility or off-site may only be burned in these emissions units if compliance with all the conditions of this permit and the following additional conditions are demonstrated:

- a. On-specification Used Oil Allowed as Fuel: This permit allows the burning of used fuel oil meeting EPA "on-specification" used oil specifications, with a maximum sulfur content of 2.5 percent, by weight, and a PCB concentration of no greater than 49 ppm.

On-specification used oil shall meet the following specifications: [40 CFR 279, Subpart B.]

1. Arsenic shall not exceed 5.0 ppm;
2. Cadmium shall not exceed 2.0 ppm;

3. Chromium shall not exceed 10.0 ppm;
4. Lead shall not exceed 100.0 ppm;
5. Total halogens shall not exceed 1000 ppm;
6. Flash point shall not be less than 100 degrees F.

Used oil that does not meet the specifications for on-specification used oil shall not be burned at this facility.

- b. Quantity Limited: The maximum amount of on-specification used oil, whether generated on or off-site, that can be burned in each emissions unit shall not exceed 10 percent of the total permitted heat input per emissions unit.
- c. Used Oil Containing PCBs Not Allowed: Used oil containing a PCB concentration of 50 or more ppm shall not be burned at this facility. Used oil shall not be blended to meet this requirement or any part of this condition.
- d. PCB Concentration of 2 to 49 ppm: On-specification used oil with a PCB concentration of 2 to 49 ppm shall be burned only at normal source operating temperatures. On specification used oil with a PCB concentration of 2 to 49 ppm shall not be burned during periods of startup or shutdown.

Before accepting from each marketer the first shipment of on-specification used oil with a PCB concentration of 2 to 49 ppm, the owner or operator shall provide each marketer with a one-time written and signed notice certifying that the owner or operator will burn the used oil in a qualified combustion device. The notice must state that EPA or a RCRA -delegated state agency has been given a description of the used oil management activities at the facility and that an industrial boiler or furnace will be used to burn the used oil with a PCB concentration of 2 to 49 ppm. The description of the used oil management activities shall be submitted to the Administrator of EPA or Administrator, Hazardous Waste Regulation Section, Florida Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. [40 CFR 279.61 and 761.20(e)]

- e. Certification Required: The owner or operator shall receive from the marketer, for each load of used oil received, a certification that the used oil meets the specifications for on-specification used oil and contains a PCB concentration of no greater than 49 ppm. This certification shall also describe the basis for the certification, such as analytical results. Note that a claim that used oil does not contain quantifiable levels of PCBs (that is, that the used oil contains less than 2 ppm of PCBs) must be documented by testing or other information. The first person making the claim that the used oil does not contain PCBs is responsible for furnishing the documentation. The documentation can be tests, personal



or special knowledge of the source and composition of the used oil, or a certification from the person generating the used oil claiming that the used oil contains no detectable PCBs.

- f. **Testing Required:** If the owner or operator does not receive certification from the marketer as described above, the owner or operator shall properly sample and test each load of used oil received for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point, PCBs\*, and percent sulfur content by weight, ash, and BTU value (BTU per gallon).

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

\* Testing for PCB's is not necessary if quantifiable levels are less than 2 ppm (ref. to specific condition A.32.e., above)

If the owner or operator relies on certification from the marketer as described above, the owner or operator shall, at a minimum, each calendar quarter, sample one load of used oil received, selected at random by the owner or operator, and analyze the sample for the above parameters.

If the analytical results show that the used oil does not meet the specification for on-specification used oil, or that it contains a PCB concentration of 50 ppm or greater, the owner or operator shall immediately notify and provide the analytical results to the Department's Southwest District Office and management. The owner or operator shall immediately cease burning of the used oil.

- g. **Special Record Keeping Requirements:** The owner or operator shall obtain, make, and keep the following records related to the use of used oil: [40 CFR 761.20(e)]

- (1) The gallons of on-specification used oil received and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (3) The name and address of all marketers delivering used oil to the facility.
- (4) Copies of the marketer certifications, if obtained, and any supporting information.
- (5) Documentation that the used oil contains less than 2 ppm PCBs, if claimed, including the name and address of the person making the claim.
- (6) Results of the analyses required above.

- (7) A copy of the notice to EPA and a copy of the one-time written notice provided to each marketer.
- (8) Total lead emissions as a result of burning on-specification used oil on a monthly basis.

The records shall be retained in a form suitable for inspection at the facility by the Department, and shall be retained for 5 years.

- h. Lead Emissions Limited: The maximum quantity of lead emissions that may be emitted as a result of burning on-specification used oil shall be less than 1200 pounds in any calendar year. Lead emissions shall be quantified on a monthly basis.
- i. Quarterly Reporting Required: The owner or operator shall submit to the Southwest District Office, within thirty days of the end of each calendar quarter, a copy of the quarterly analyses and the total amount of on-specification used oil received and burned during the quarter. The report shall include the total amount of lead emitted as a result of burning on-specification used oil during the quarter.

The owner or operator shall submit, with the Annual Operation Report (AOR) form, the analytical results and the amount of on-specification used oil burned during the previous calendar year. The AOR shall include the total amount of lead emitted as a result of burning on-specification used oil during the calendar year on a monthly basis.

[Rules 62-4.070(3), 62-212.400(2)(f)1. and 62-213.440, F.A.C.; and, AO 51-254492A & 1010017-001-AO]

**Section III. Emissions Units and Conditions.**

**Subsection B. This section addresses the following emissions units.**

<u>E.U. ID No.</u>	<u>Brief Description</u>
-xxx	Relocatable Diesel Fired Generator(s)

These relocatable emissions units are Caterpillar Model 3508-DITA 820 kilowatt diesel generators. The maximum heat input is 25.74 million Btu per hour (MMBtu/hour) while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum rating of 2460 kilowatts. Emissions from the generators are uncontrolled. The generators may be relocated at any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Higgins Plant, Shore Drive, Oldsmar, Pinellas County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. The future FPC Polk County Site, County Road 555, 1 mi. southwest of Homeland, Polk County.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. Each generator has its own stack.}

**The following specific conditions apply to the emissions units listed above regardless of location:**

**Essential Potential to Emit (PTE) Parameters**

B.1. Permitted Capacity. The maximum operation heat input rates are as follows:  
 [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

<u>Unit No.</u>	<u>MMBtu/hr/generator(s) Heat Input</u>	<u>Fuel Type</u>
-xxx	25.74	New Low Sulfur No. 2 Fuel Oil

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition B.13.  
 [Rule 62-297.310(2), F.A.C.]

B.3. Methods of Operation - Fuels. Only new low sulfur No. 2 fuel oil shall be fired in the combustion turbine(s).  
[Rule 62-213.410, F.A.C.]

B.4. Hours of Operation. The hours of operation expressed as “engine-hours” shall not exceed 2970 hours in any consecutive 12 month period. The total hours of operation expressed as “engine-hours” shall be the summation of the individual hours of operation of each generator.  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, AO 09-205952.]

#### **Emission Limitations and Standards**

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.5. Visible Emissions. Visible emissions from each generator shall not be equal to or greater than 20 percent opacity.  
[Rule 62-296.320(4)(b)1., F.A.C.; and, AO 09-205952.]

B.6. Sulfur Dioxide - Sulfur Content. The sulfur content of the new No. 2 fuel oil shall not exceed 0.50 percent, by weight.  
[Requested in initial Title V permit application dated June 12, 1996; and, AC 09-202080.]

#### **Excess Emissions**

B.7. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.  
[Rule 62-210.700(1), F.A.C.]

B.8. 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.  
[Rule 62-210.700(4), F.A.C.]

#### **Monitoring of Operations**

B.9. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor or permittee upon each fuel delivery. See specific condition B.12.  
[Rule 62-213.440, F.A.C.]

**B.10. Determination of Process Variables.**

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

**Test Methods and Procedures**

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.11. The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C.

[Rules 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

B.12. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s).

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

B.13. **Operating Rate During Testing.** Testing of emissions shall be conducted with the generator(s) operating at 90 to 100 percent of the maximum fuel firing rate of 186.3 gallons per hour. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operations may be limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Failure to submit the actual operating rate may invalidate the test.

[Rules 62-297.310(2), F.A.C.; and, Permit AO 09-205952.]

**B.14. Applicable Test Procedures.**

(a) **Required Sampling Time.**

2. **Opacity Compliance Tests.** When either EPA Method 9 or DEP Method 9 is specified as

the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

- c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2.c., F.A.C.]

**B.15. Frequency of Compliance Tests.** The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

**(a) General Compliance Testing.**

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
- b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;

8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. For each generator located in Pinellas County, FPC shall provide the same notification to the Air Quality Division of the Pinellas County Department of Environmental Management.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.  
[Rule 62-297.310(7), F.A.C.; SIP approved; and, AO 09-205952.]

B.16. Visible Emissions Testing - Annual. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning liquid fuels for less than 400 hours per year.  
[Rules 62-297.310(7)(a)4. & 8., F.A.C.]

B.17. After each relocation, each generator shall be tested within 30 days of startup for opacity and the fuel shall be analyzed for the sulfur content. See specific conditions B.6, B.9, and B.12.  
[Rules 62-4.070(3) and 62-297.310(7)(b), F.A.C.; and, AO 09-205952.]

#### **Recordkeeping and Reporting Requirements**

B.18. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, the owner or operator shall notify the Department's Southwest District Office, if a generator is located in Pasco County, in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.  
[Rule 62-210.700(6), F.A.C.]

B.19. Test Reports.

- (a) Each generator shall be tested on an annual basis within 30 days of the date October 25.
- (b) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(c) The required test report shall be filed with the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management, if a generator is located in Pinellas County, as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(d) The test reports for a unit that has been relocated shall be submitted to the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management, if a generator is located in Pinellas County, within 45 days of testing.  
[Rule 62-297.310(8), F.A.C.; and, AO 09-25952.]

B.20. To demonstrate compliance with specific condition B.4, records shall indicate the daily hours of operation for each of the generators, the daily hours of operation expressed as “engine-hours” for each month. The records shall be maintained for a minimum of 5 years and made available to the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management upon request.  
[Rules 62-213.440 and 62-297.310(8), F.A.C.; and, AO 09-205952.]

B.21. To demonstrate compliance with specific condition B.6, records of the sulfur content, in percent by weight, of all the fuel burned shall be kept based on either vendor provided as-delivered or as-received fuel sample analysis. The records shall be maintained for a minimum of 5 years and made available to the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management upon request.  
[Rule 62-297.310(8), F.A.C.; and, AO 09-205952.]

#### Source Obligation

B.22. Specific conditions in construction permit AC 09-202080, limiting the “engine hours”, were accepted by the applicant to escape Prevention of Significant Deterioration review. If Florida Power Corporation requests a relaxation of any of the federally enforceable emission limits in this permit, the relaxation of limits may be subject to the preconstruction review requirements of Rule 62-212.400(5), F.A.C., as though construction had not yet begun.  
[Rule 62-212.400(2)(g), F.A.C.; and, AC 09-202080 and AO 09-205952.]

B.23. Florida Power Corporation shall notify the Department’s Southwest District Office, in writing, at least 15 days prior to the date on which any diesel generator is to be relocated. The notification shall specify the following;

- a. which generator, by serial number, is being relocated,
- b. which location the generator is being relocated from and which location it is being relocated to, and
- c. the approximate startup date at the new location.

If a diesel generator is to be relocated within Pinellas County, then Florida Power Corporation shall provide the same notification to the Air Quality Division of the Pinellas County Department of Environmental Management.

[Rule 62-4.070(3), F.A.C.; and, AC 09-202080]



**Section IV. This section is the Acid Rain Part.**

**Operated by: Florida Power Corporation**  
**ORIS code: 8048**

**Subsection A. This subsection addresses Acid Rain, Phase II.**

The emissions units listed below are regulated under Acid Rain Part, Phase II.

<u>E.U. ID No.</u>	<u>Description</u>
-001	Fossil Fuel Fired Steam Generator No. 1
-002	Fossil Fuel Fired Steam Generator No. 2

1. The Acid Rain Part application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these acid rain units must comply with the standard requirements and special provisions set forth in the application listed below:

- a. DEP Form No. 62-210.900(1)(a), dated 07/01/95.  
 [Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

2. Sulfur dioxide (SO<sub>2</sub>) allowance allocations and nitrogen oxide (NO<sub>x</sub>) requirements for each Acid Rain unit:

E.U. ID No.	EPA I.D.	Year	2000	2001	2002	2003
-001	1	SO <sub>2</sub> allowances, under Table 2, 3, or 4 of 40 CFR 73	12931*	12931*		
-002	2	SO <sub>2</sub> allowances, under Table 2, 3, or 4 of 40 CFR 73	12853*	12853*		

\*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2, 3, or 4 of 40 CFR 73.

3. Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

a. No permit revision shall be required for increases in emissions that are authorized by allowances

acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a

permit revision pursuant to Rule 62-213.440(3), F.A.C.

b. No limit shall be placed on the number of allowances held by the source under the Federal Acid

Rain program.

c. Allowances shall be accounted for under the Federal Acid Rain Program.

[Rule 62-213.440(1)(c), F.A.C.]

4. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within sixty (60) days after the end of the calendar year.

{See condition No. 51., Appendix TV-1, Title V Conditions}

[Rule 62-214.420(11), F.A.C.]

5. Comments, notes, and justifications: None.

**Table 1-1, Summary of Air Pollutant Standards and Terms**

Florida Power Corporation  
Anclote Power Plant

DRAFT Permit No.: 1010017-003-AV  
Facility ID No.: 1010017

**E.U. ID Nos.      Brief Description**

-001		Fossil Fuel Fired Steam Generator #1				Allowable Emissions		Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
Pollutant Name	Fuel(s) *	Hours/ Year *	Standards	lb/ hour	TPY	lb/hour **	TPY **				
Visible Emissions Steady state	F.O.	8760	40% Opacity					Rule 62-296.405(1)(a), F.A.C. Rule 62.210.700(3), F.A.C. Order No. 1574	A.5		
Soot Blowing or Load Changing	F.O.		60% Opacity						A.6		
PM Emissions Steady State	F.O.	8760	0.1 lb/MMBtu			496.44		Rule 62.296.405(1)(b), F.A.C. Rule 62.210.700(3), F.A.C.	A.7		
Soot Blowing or Load Changing	F.O.		0.3 lb/MMBtu			1,489.32	2,174.41		A.8		
Sulfur Dioxide	F.O.	8760	2.75 lb/MMBtu			13,652.10	59,796.20	Rules 62-213.440, 62-296.405(1)(e)3., 62-296.40591)(c)1.i., F.A.C.	A.9		
	F.O.	8760	2.50% by wt.						A.10		

-002		Fossil Fuel Fired Steam Generator #2				Allowable Emissions		Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
Pollutant Name	Fuel(s) *	Hours/ Year *	Standards	lb/ hour	TPY	lb/hour **	TPY **				
Visible Emissions Steady state	F.O.	8760	40% Opacity					Rule 62-296.405(1)(a), F.A.C. Rule 62.210.700(3), F.A.C. Order No. 1574	A.5		
Soot Blowing or Load Changing	F.O.		60% Opacity						A.6		
PM Emissions Steady State	F.O.	8760	0.1 lb/MMBtu			485.00		Rule 62.296.405(1)(b), F.A.C. Rule 62.210.700(3), F.A.C.	A.7		
Soot Blowing or Load Changing	F.O.		0.3 lb/MMBtu			1,455.00	2,124.30		A.8		
Sulfur Dioxide	F.O.	8760	2.75 lb/MMBtu	159.90		13,652.10	59,796.20	Rules 62-213.440, 62-296.405(1)(e)3., 62-296.40591)(c)1.i.,	A.9		
	F.O.	8760	2.50% by wt.						A.10		

-XXX		Relocatable Generator(s)				Allowable Emissions		Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
Pollutant Name	Fuel(s) *	Hours/ Year *	Standards	lb/ hour	TPY	lb/hour **	TPY **				
Visible Emissions	#2 F.O.	8760	20% Opacity					Rule 62-296.320(4)(b)1., F.A.C.	B.5		
Sulfur Dioxide	#2 F.O.	8760	0.50% by wt.					Rule 62-296.320(4)(b)1., F.A.C.	B.6		

\* No. 1, 2, 3, 4, 5, & 6 fuel oil and on-specification used oil. Maximum amount of used oil burned in each emissions unit shall not exceed 10 percent of the total heat input per unit.

\*\* The "Equivalent Emissions" listed are for informational purposes only.

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**Table 1-2, Summary of Air Pollutant Standards and Terms**

Florida Power Corporation  
Anclote Power Plant

DRAFT Permit No.: 1010017-003-AV  
Facility ID No.: 1010017

**Additional Standards for On-Specification Used Oil (OSUO)**

**E.U. ID Nos.      Brief Description**

-001		Fossil Fuel Fired Steam Generator #1				Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
		Allowable Emissions							
Pollutant Name	Fuel(s)	Hours/Year*	Standards	lbs./hour	TPY	lbs./hour	TPY		
Arsenic	OSUO		5.0 ppm						
Cadmium	OSUO		2.0 ppm						
Chromium	OSUO		10.0 ppm						
Lead	OSUO		100.0 ppm						
Total Halogens	OSUO		1000 ppm						
Flash Point	OSUO		≥ 100 degrees F						
PCB	OSUO		≤ 49 ppm						
SO <sub>2</sub>			2.5 % by weight						

-002		Fossil Fuel Fired Steam Generator #2				Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
		Allowable Emissions							
Pollutant Name	Fuel(s)	Hours/Year*	Standards	lbs./hour	TPY	lbs./hour	TPY		
Arsenic	OSUO		5.0 ppm						
Cadmium	OSUO		2.0 ppm						
Chromium	OSUO		10.0 ppm						
Lead	OSUO		100.0 ppm						
Total Halogens	OSUO		1000 ppm						
Flash Point	OSUO		≥ 100 degrees F						
PCB	OSUO		≤ 49 ppm						
SO <sub>2</sub>			2.5 % by weight						

\* The maximum quantity of used oil that may be burned in each emissions unit shall not exceed 10 percent of the total heat input per emissions unit. This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

## Table 2-1, Summary of Compliance Requirements

Florida Power Corporation  
Anclote Power Plant

**DRAFT Permit No.: 1010017-003-AV**  
**Facility ID No.: 1010017**

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. # -001 & -002		Fossil Fuel Fired Steam Generator #1 & #2					
Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time or Frequency	Frequency Base Date <sup>1</sup>	Min. Compliance Test Time	CMS <sup>2</sup>	See Permit Condition(s)
<b>Visible Emissions</b> Steady State Soot Blowing or Load Changing	F.O. F.O.	DEP Method 9 DEP Method 9	Annual Annual	#1-within 60 days of Jul. 28 #2-within 60 days of Aug. 24	1 hour 1 hour	NA	A.16, A.17 A.16, A.17
<b>Particulate Matter</b> Steady State Soot Blowing or Load Changing	F.O. F.O.	EPA Methods 17 <sup>3</sup> , 5, 5B, 5F	Annual Annual	#1-within 60 days of Jul. 28 #2-within 60 days of Aug. 24	3 hour	NA	A.18 A.18
<b>Sulfur Dioxide</b>	F.O.	Fuel sampling and analysis	Each Delivery	Each delivery	NA	NA	A.14, A.19, A.20
Arsenic, Cadmium, Chromium, Lead, Total Halogens, Flash Point, PCB	OSUO <sup>4</sup>	SW 846 <sup>5</sup>	Each Delivery	Each Delivery	NA	NA	A.32

1 - Frequency base date established for planning purposes only; see guidance memo and Rule 62-297.310, F.A.C.

2 - Continuous Monitoring System.

3 - EPA Method 17 may be used only if the stack gas exit temperature is less than 375 degrees F.

4 - On-Specification Used Oil.

5 - EPA Publication, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods.

**Appendix E-1. List of Exempt Emissions Units and/or Activities.**

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Full Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining whether a facility containing such emissions units or activities would be subject to any applicable requirements. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., are also exempt from the permitting requirements of Chapter 62-213, F.A.C., provided such emissions units and activities also meet the exemption criteria of Rule 62-213.430(6)(b), F.A.C. The below listed emissions units and/or activities are hereby exempt pursuant to Rule 62-213.430(6), F.A.C.

1	Lube Oil System Vents
2	Lube Oil Reservoir Tank
3	Oil Water Separators
4	Hazardous Waste Building
5	Parts Washers/Degreasers
6	Waste Oil Storage Tanks
7	Lube Oil Storage Building
8	Portable Unleaded Gasoline Tank
9	Evaporation of non-hazardous boiler cleaning chemical
10	No. 2 Diesel Fuel Tank

**Appendix U-1. List of Unregulated Emissions Units and/or Activities.**

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘exempt emissions units’.

<b>Emissions Unit</b>	<b>Description</b>
-xxx	Surface Coating and Solvent Cleaning
-xxx	General Purpose Engines
-xxx	Fuel Storage Tanks
-xxx	Helper Cooling Towers
-xxx	Emergency Generators

Appendix SS-1, Stack Sampling Facilities



Florida Power Corporation  
Anclote Power Plant  
Page 35 of 35

**DRAFT Permit No.: 1010017-003-AV**

Appendix TV-1, Title V Conditions

# Phase II Permit Application

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

This submission is:  New     Revised

**STEP 1**  
Identify the source by plant name, State, and ORIS code from NADB

Anclote Power Plant, FL, 8048
-------------------------------

**STEP 2**  
Enter the boiler ID# from NADB for each affected unit, and indicate whether a repowering plan is being submitted for the unit by entering "yes" or "no" at column c. For new units, enter the requested information in columns d and e

Compliance Plan				
a	b	c	d	e
Boiler ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)	Repowering Plan	New Units  Commence Operation Date	New Units  Monitor Certification Deadline
**1	Yes	No		
**2	Yes	No		
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			

**STEP 3**  
Check the box if the response in column c of Step 2 is "Yes" for any unit

For each unit that will be repowered, the Repowering Extension Plan form is included and the Repowering Technology Petition form has been submitted or will be submitted by June 1, 1997.

Plant Name (from Step 1)  
*Anclote Power Plant*

**STEP 4**  
 Read the standard requirements and certification, enter the name of the designated representative, and sign and date

**Standard Requirements**

Permit 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, 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 permitting authority determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain permit;
- (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 permitting authority; 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.

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)) 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)(i) 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 permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 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 Administrator or permitting authority:
  - (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;
  - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,

Plant Name (from Step 1)  
**Anclote Power Plant**

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.

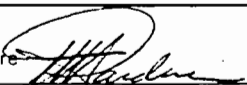
- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject 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 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, 75, 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 a written exemption under 40 CFR 72.7 or 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.

**Certification**

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 <i>W. Jeffrey Pardue, C.E.P., Director, Environmental Services Dept.</i>	
Signature 	Date <i>12/14/95</i>

**STEP 5 (optional)**  
Enter the source AIRS  
and FINDS identification  
numbers, if known

AIRS
FINDS

**HOPPING GREEN SAMS & SMITH**

PROFESSIONAL ASSOCIATION

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(850) 222-7500

FAX (850) 224-8551

FAX (850) 425-3415

JAMES S. ALVES  
BRIAN H. BIBEAU  
KATHLEEN BLIZZARD  
ELIZABETH C. BOWMAN  
RICHARD S. BRIGHTMAN  
PETER C. CUNNINGHAM  
RALPH A. DeMEO  
THOMAS M. DeROSE  
WILLIAM H. GREEN  
WADE L. HOPPING  
FRANK E. MATTHEWS  
RICHARD D. MELSON  
MICHAEL P. PETROVICH  
DAVID L. POWELL  
WILLIAM D. PRESTON  
CAROLYN S. RAEPPLE  
DOUGLAS S. ROBERTS  
GARY P. SAMS  
ROBERT P. SMITH  
CHERYL G. STUART

GARY K. HUNTER, JR.  
JONATHAN T. JOHNSON  
ROBERT A. MANNING  
ANGELA R. MORRISON  
GARY V. PERKO  
KAREN M. PETERSON  
R. SCOTT RUTH  
W. STEVE SYKES  
T. KENT WETHERELL, II  
OF COUNSEL  
W. ROBERT FOKES

Writer's Direct Dial No.  
(850) 425-2263

February 2, 1998

**RECEIVED**

FEB 12 1998

**BUREAU OF  
AIR REGULATION**

**HAND-DELIVERY**

Doug Beason, Esq.  
Department of Environmental Protection  
Office of General Counsel  
Room 669  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Resolution of Petition on Anclote Draft Title V Permit

Dear Mr. Beason:

On behalf of Florida Power Corporation (FPC), we appreciate the Department's continued cooperation and assistance in resolving the fundamental issues that are the subject of the Petition for Administrative Hearing on the Anclote Draft Title V Permit. This letter is written to convey our understanding of the status and to provide a recommendation as to the resolution of this matter. First, based on a conversation with Jeff Brown in your office, FPC filed a Status Report and Request for Extension of Additional Time until March 2, 1998 to the Administrative Law Judge. This request is based on our understanding that agreement has been reached on the fundamental issues involved in the Petition. Once FPC receives confirmation of this agreement in writing from the Department, we intend to attach this agreement to a motion to relinquish DOAH's jurisdiction pursuant to Rule 60Q-2.033, F.A.C. Once DOAH relinquishes jurisdiction, the Department will be able to proceed with the issuance of the Anclote Title V permit.

Second, FPC understands that the Department believes that it is necessary to provide an additional public notice on a Revised Draft Title V permit for the Anclote facility, triggering an additional 30-day public comment period. FPC disagrees that re-publication of the public notice

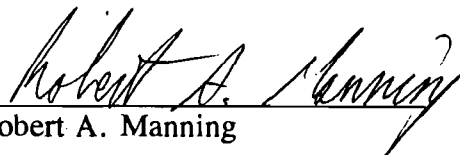
Doug Beason, Esq.  
February 2, 1998  
Page 2

is appropriate in this case, and believes that it will unnecessarily delay the issuance of the permit. FPC's disagreement on this matter is based on the fact that the Department is not creating or changing any authority for the Anclote facility to utilize used oil, it is simply reflecting existing practice by the facility already authorized by EPA and DEP guidance, and reflected in the Anclote facility's existing air permit conditions. Further, the public was provided adequate notice via the initial publication, which appeared on August 25, 1997, by the language indicating that the final permit may contain conditions different than what is included in the draft permit. Also, pursuant to Section 120.569, Florida Statutes, until DOAH relinquishes jurisdiction of this matter, the Department does not have the authority to take any further action on the permit (e.g., publishing a notice of Revised Draft Permit). Finally, if the Department continues to insist on an additional public notice of a revised draft permit, the Department should bear the cost of such publication.

If you have any questions or comments regarding this information, please contact me at your earliest convenience at the number or e-mail address listed above. We look forward to the resolution of this matter.

Sincerely,

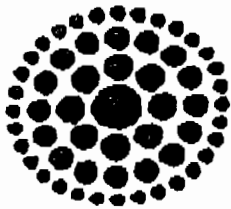
HOPPING GREEN SAMS & SMITH, P.A.

By:   
Robert A. Manning

ATTORNEYS FOR FLORIDA POWER  
CORPORATION

RAM/clh

cc: Scott Sheplak  
Clair Fancy  
Charles Logan



**Florida  
Power**  
CORPORATION



## Environmental Services Department

# FAX COVER SHEET

DATE: 1/23/98

TO: Charles Logan

FAX# (904) 922-6979

COMPANY: FDEP/Air Program

FROM: [Signature]

PHONE# \_\_\_\_\_

FAX# \_\_\_\_\_

NUMBER OF PAGES TRANSMITTED 16

Please call number listed above for any transmission problems.

COMMENTS:

As we discussed, attached are  
requested revisions to Hisopim and Andrite

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_





## Best Available Copy

Florida Power Corporation  
Anclote Power Plant  
Page 2 of 36

PROPOSED Permit No.: 1010017-003-AV

**Section I. Facility Information.**

**Subsection A. Facility Description.**

This facility consists of two fuel oil fired steam electric generating stations, E.U. ID No. -001 (Unit No. 1) and -002 (Unit No. 2). Unit No. 1 consists of a Combustion Engineering, Inc., Type CCRR boiler/steam generator and steam turbine which drives a generator with a nameplate rating of 540 Megawatts. Unit No. 2 consists of a Combustion Engineering, Inc., Type CCRR boiler/steam generator and steam turbine which drives a generator with a nameplate rating of 525 Megawatts. Units No. 1 and No. 2 share a common stack. Also included in this permit are miscellaneous unregulated and insignificant emissions units and/or activities. Relocatable diesel fired generator(s) with a maximum heat input of 25.74 MMBtu/hour and a maximum rating of 2460 Kilowatts are permitted to be located at this facility and may be relocated to other FPC facilities.

Based on the initial Title V permit application received on June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

**Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).**

<u>E.U. ID No.</u>	<u>Brief Description</u>
-001	Fuel Oil Fired Steam Electric Generator No. 1
-002	Fuel Oil Fired Steam Electric Generator No. 2
-7775047 -001	Relocatable Diesel Generator(s)

**Unregulated Emissions Units and/or Activities**

- xxx Surface Coating and Solvent Cleaning
- xxx Fuel Storage Tanks
- xxx Emergency Generators
- xxx General Purpose Engines
- xxx Helper Cooling Towers

*Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.*

**Best Available Copy****PROPOSED Permit No.: 1010017-003-AV**

Florida Power Corporation  
Anclote Power Plant  
Page 5 of 36

*Not fed. env.*

7. General Pollutant Emission Limiting Standards, Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall not store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

[Rule 62-296.320(1)(a), F.A.C.]

8. **Not federally enforceable.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include:

- a. Maintenance of paved areas as needed.
- b. Regular mowing of grass and care of vegetation, and
- c. Limiting access to plant property by unnecessary vehicles.

[Rule 62-296.320(4)(c)2., F.A.C.; Proposed by applicant in the initial Title V permit application received June 14, 1996]

9. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day ONE.

[Rule 62-213.440, F.A.C.]

10. 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

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

United States Environmental Protection Agency  
Region 4  
Air, Pesticides & Toxics Management Division  
Operating Permits Section  
61 Forsyth Street  
Atlanta, Georgia 30303  
Telephone: 404/562-9099  
Fax: 404/562-9095

## Best Available Copy

Florida Power Corporation  
Anclote Power Plant  
Page 9 of 36

PROPOSED Permit No.: 1010017-003-AV

period of excess emissions allowed for boiler cleaning (soot blowing) and load change.  
[Rule 62-210.700(3), F.A.C.]

A.9. Sulfur Dioxide. ~~When burning liquid fuel, sulfur dioxide emissions shall not exceed 2.75 pounds per million Btu heat input, as measured by applicable compliance methods. See specific conditions A.19 and A.20.~~ *fuel oils*  
[Rule 62-296.405(1)(c)1.j., F.A.C.] *in accordance with*

A.10. Sulfur Dioxide - Sulfur Content. The sulfur content of fuel oils, on-specification used oil, or any combination of the two burned in these units, shall not exceed 2.5 percent, by weight. See specific condition A.20.  
[Rule 62-296.405(1)(e)3., F.A.C.; and, requested by the applicant in Title V Application dated June 12, 1996.]

#### Excess Emissions

A.11. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.  
[Rule 62-210.700(1), F.A.C.]

A.12. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.  
[Rule 62-210.700(2), F.A.C.]

A.13. 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.  
[Rule 62-210.700(4), F.A.C.]

#### Monitoring of Operations

A.14. Sulfur Dioxide. The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor or permittee upon each fuel delivery. This protocol is allowed because the emissions units do not have an operating flue gas desulfurization device. See specific conditions A.10., A.19. and A.20.  
[Rule 62-296.405(1)(f)1.b., F.A.C.]

A.15. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine



## Best Available Copy

Florida Power Corporation  
Anclote Power Plant  
Page 12 of 36

PROPOSED Permit No.: 1010017-003-AV

compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

**A.22. Operating Rate During Testing.** Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

**A.23. Calculation of Emission Rate.** The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

**A.24. Applicable Test Procedures:**

(a) **Required Sampling Time.**

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. **Opacity Compliance Tests.** ~~When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:~~

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

OK  
see A.16

## Best Available Copy

Florida Power Corporation  
Anclote Power Plant  
Page 18 of 36

PROPOSED Permit No.: 1010017-003-AV

3. Chromium shall not exceed 10.0 ppm;
4. Lead shall not exceed 100.0 ppm;
5. Total halogens shall not exceed 1000 ppm;
6. Flash point shall not be less than 100 degrees F.

Used oil that does not meet the specifications for on-specification used oil shall not be burned at this facility.

b. Quantity Limited: The maximum amount of on-specification used oil, whether generated on or off-site, that can be burned in each emissions unit shall not exceed 10 percent of the total permitted heat input per emissions units #1 and #2 (see A.3)

c. Used Oil Containing PCBs Not Allowed: Used oil containing a PCB concentration of 50 or more ppm shall not be burned at this facility. Used oil shall not be blended to meet this requirement or any part of this condition.

d. PCB Concentration of 2 to 49 ppm: On-specification used oil with a PCB concentration of 2 to 49 ppm shall be burned only at normal source operating temperatures. On-specification used oil with a PCB concentration of 2 to 49 ppm shall not be burned during periods of startup or shutdown.

Before accepting from each marketer the first shipment of on-specification used oil with a PCB concentration of 2 to 49 ppm, the owner or operator shall provide each marketer with a one-time written and signed notice certifying that the owner or operator will burn the used oil in a qualified combustion device. The notice must state that EPA or a RCRA-delegated state agency has been given a description of the used oil management activities at the facility and that an industrial boiler or furnace will be used to burn the used oil with a PCB concentration of 2 to 49 ppm. The description of the used oil management activities shall be submitted to the Administrator, Hazardous Waste Regulation Section, Florida Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. [40 CFR 279.61 and 761.20(e)]

e. Certification Required: The owner or operator shall receive from the marketer, for each load of used oil received, a certification that the used oil meets the specifications for on-specification used oil and contains a PCB concentration of no greater than 49 ppm. This certification shall also describe the basis for the certification, such as analytical results. Note that a claim that used oil does not contain quantifiable levels of PCBs (that is, that the used oil contains less than 2 ppm of PCBs) must be documented by testing or other information. The first person making the claim that the used oil does not contain PCBs is responsible for furnishing the documentation. The documentation can be tests, personal

**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 20 of 36

**PROPOSED Permit No.: 1010017-003-AV**

- (7) A copy of the notice to EPA and a copy of the one-time written notice provided to each marketer.

The records shall be retained in a form suitable for inspection at the facility by the Department, and shall be retained for 5 years.

- h. Reporting Required: The owner or operator shall submit, with the Annual Operation Report (AOR) form, ~~all analytical results, Port Testing and/or certifications from the marketer,~~ the total amount of on-specification used oil received, and the total amount of on-specification used oil burned during the previous calendar year to the Southwest District Office. The AOR shall include the total amount of lead emitted as a result of burning on-specification used oil during the calendar year on a monthly basis.

[Rules 62-4.070(3), 62-212.400(2)(f)1. and 62-213.440, F.A.C.; and, AO 51-254492A & 1010017-001-AO]



## Best Available Copy

Florida Power Corporation  
Anclote Power Plant  
Page 23 of 36

PROPOSED Permit No.: 1010017-003-AV

**B.10. Determination of Process Variables.**

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

**Test Methods and Procedures**

(Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.)

B.11. The test method for visible emissions shall be <sup>DEP ?</sup> EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C.

[Rules 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

B.12. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s).

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

B.13. **Operating Rate During Testing.** Testing of emissions shall be conducted with the generator(s) operating at 90 to 100 percent of the maximum fuel firing rate of 186.3 gallons per hour. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operations may be limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Failure to submit the actual operating rate may invalidate the test.

[Rules 62-297.310(2), F.A.C.; and, Permit AO 09-205952.]

**B.14. Applicable Test Procedures.**

(a) **Required Sampling Time.**

2. **Opacity Compliance Tests.** ~~When either EPA Method 9 or DEP Method 9 is specified as~~

## Best Available Copy

Florida Power Corporation  
Anclote Power Plant  
Page 24 of 36

PROPOSED Permit No.: 1010017-003-AV

~~the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:~~

- c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2.c., F.A.C.]

**B.15. Frequency of Compliance Tests.** The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) **General Compliance Testing.**

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
- b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;

8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. For each generator located in Pinellas County, FPC shall provide the same notification to the Air Quality Division of the Pinellas County Department of Environmental Management.



**Table 1-1, Summary of Air Pollutant Standards and Terms**

Florida Power Corporation  
Anclote Power Plant

PROPOSED Permit No.: 1010017-003-AV  
Facility ID No.: 1010017

E.U. ID Nos.      Brief Description

E.U. ID Nos.		Brief Description				Allowable Emissions		Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
001		Fossil Fuel Fired Steam Generator #1				lb/hour	TPY	lb/hour	TPY		
Pollutant Name	Fuel (s)	Hours/Year	Standards	lb/hour	TPY	lb/hour	TPY	Regulatory Citation(s)	See Permit Condition(s)		
Visible Emissions								Rule 62-296.405(1)(a), F.A.C.			
Steady State	F.O.	8760	40% Opacity					Rule 62.210.700(3), F.A.C.	A.5		
Soot Blowing or Load Changing	F.O.		60% Opacity					Order No. 1574	A.5		
PM Emissions								Rule 62.296.405(1)(b), F.A.C.			
Steady State	F.O.	8760	0.1 lb/MMBtu			496		Rule 62.210.700(3), F.A.C.	A.7		
Soot Blowing or Load Changing	F.O.		0.3 lb/MMBtu			1,189	2,174		A.8		
Sulfur Dioxide	F.O.	8760	2.75 lb/MMBtu			13,452	59,796	Rules 62-213.440, 62-296.405(1)(c)3.,	A.9		
	F.O.	8760	2.50 by wt.					62-296.405(1)(c)1.i., F.A.C.	A.10		

E.U. ID Nos.		Brief Description				Allowable Emissions		Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
002		Fossil Fuel Fired Steam Generator #2				lb/hour	TPY	lb/hour	TPY		
Pollutant Name	Fuel (s)	Hours/Year	Standards	lb/hour	TPY	lb/hour	TPY	Regulatory Citation(s)	See Permit Condition(s)		
Visible Emissions								Rule 62-296.405(1)(a), F.A.C.			
Steady State	F.O.	8760	40% Opacity					Rule 62.210.700(3), F.A.C.	A.5		
Soot Blowing or Load Changing	F.O.		60% Opacity					Order No. 1574	A.6		
PM Emissions								Rule 62.296.405(1)(b), F.A.C.			
Steady State	F.O.	8760	0.1 lb/MMBtu			485	2,124	Rule 62.210.700(3), F.A.C.	A.7		
Soot Blowing or Load Changing	F.O.		0.3 lb/MMBtu			1,155			A.8		
Sulfur Dioxide	F.O.	8760	2.75 lb/MMBtu			13,452	59,796	Rules 62-213.440, 62-296.405(1)(c)3.,	A.9		
	F.O.	8760	2.50 by wt.					62-296.405(1)(c)1.i.,	A.10		

E.U. ID Nos.		Brief Description				Allowable Emissions		Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
2015047-001		Relocatable Generator #5				lb/hour	TPY	lb/hour	TPY		
Pollutant Name	Fuel (s)	Hours/Year	Standards	lb/hour	TPY	lb/hour	TPY	Regulatory Citation(s)	See Permit Condition(s)		
Visible Emissions	#2 F.O.	8760	10% Opacity					Rule 62-296.320(4)(b)1., F.A.C.	B.5		
Sulfur Dioxide	#2 F.O.	8760	0.50% by wt.					Rule 62-296.320(4)(b)1., F.A.C.	B.6		

\* No. 1, 2, 3, 4, 5, & 6 fuel oil and on-specification used oil. Maximum amount of used oil burned shall not exceed 10 percent of the total heat input for E.U. -001 & -002.

\*\* The "Equivalent Emissions" listed are for informational purposes only.

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

2970

JAN 23 1998 10:17AM FPC ENVIRONMENTAL 6979

JAN 15 1998 15:01

P.035110

**Best Available Copy**

Florida Power Corporation  
 Anclote Power Plant  
 Page 32 of 36

**PROPOSED Permit No.: 1010017-003-AV**

**Appendix I-1. List of Insignificant Emissions Units and/or Activities.**

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62-210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

1	Lube Oil System Vents
2	Lube Oil Reservoir Tank
3	Parts Washers/Degreasers
4	Waste Oil Storage Tanks
5	Portable Unleaded Gasoline Tank
6	Evaporation of non-hazardous boiler cleaning chemical
7	No. 2 Diesel Fuel Tank

**Appendix H-1, Permit History/ID Number Changes**

Florida Power Corporation  
Anclote

[DRAFT/PROPOSED/FINAL] Permit No.: 1010017-003-AV  
Facility ID No.: 1010017

**Permit History (for tracking purposes):**

E.U.

<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u>	<u>Revised Date(s)</u>
-001	<i>Oil-Fired Steam</i> <del>Steam Turbine</del> Generator	AO51-254492	3/7/95	3/6/99		
-002	Oil Fired Steam Generator	AO51-169340	12/21/89	12/18/94	8/14/96	1/31/96

**(if applicable) ID Number Changes (for tracking purposes):**

From: Facility ID No.: 40TPAS10017

To: Facility ID No.: 1010017

Higgins

Florida Power Corporation  
Higgins Power Plant  
Page 19 of 48

FINAL Permit No.: 1030012-003-AV

- $\geq 50 \text{ ppm}$
- c. Used Oil Containing PCBs Not Allowed: Used oil containing a PCB concentration of 50 or more ppm shall not be burned at this facility. Used oil shall not be blended to meet this requirement or any part of this condition.
- d. PCB Concentration of 2 to 49 ppm: On-specification used oil with a PCB concentration of 2 to 49 ppm shall be burned only at normal source operating temperatures. On specification used oil with a PCB concentration of 2 to 49 ppm shall not be burned during periods of startup or shutdown. Before accepting from each marketer the first shipment of on-specification used oil with a PCB concentration of 2 to 49 ppm, the owner or operator shall provide each marketer with a one-time written and signed notice certifying that the owner or operator will burn the used oil in a qualified combustion device. The notice must state that EPA or a RCRA-delegated state agency has been given a description of the used oil management activities at the facility and that an industrial boiler or furnace will be used to burn the used oil with a PCB concentration of 2 to 49 ppm. The description of the used oil management activities shall be submitted to the Administrator of EPA or Administrator, Hazardous Waste Regulation Section, Florida Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, FL 32399-2400.
- e. Certification Required: The owner or operator shall receive from the marketer, for each load of used oil received, a certification that the used oil meets the specifications for on-specification used oil and contains a PCB concentration of no greater than 49 ppm. This certification shall also describe the basis for the certification, such as analytical results.

Note that a claim that used oil does not contain quantifiable levels of PCBs (that is, that the used oil contains less than 2 ppm of PCBs) must be documented by testing or other information. The first person making the claim that the used oil does not contain PCBs is responsible for furnishing the documentation. The documentation can be tests, personal or special knowledge of the source and composition of the used oil, or a certification from the person generating the used oil claiming that the used oil contains no detectable PCBs.

- f. Testing Required: If the owner or operator does not receive certification from the marketer as described above, the owner or operator shall properly sample and test each load of used oil received for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point, PCBs\*,  
and percent sulfur content by weight, ash, and BTU value (BTU per gallon).  
Testing (sampling, extraction and analysis) shall be performed using

Florida Power Corporation  
Higgins Power Plant  
Page 20 of 48

**FINAL Permit No.: 1030012-003-AV**

approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

\* Testing for PCB's is not necessary if quantifiable levels are less than 2 ppm (ref. to specific condition A.34.e., above)

If the owner or operator relies on certification from the marketer as described above, the owner or operator shall, at a minimum, each calendar quarter, sample one load of used oil received, selected at random by the owner or operator, and analyze the sample for the above parameters. If the analytical results show that the used oil does not meet the specification for on-specification used oil, or that it contains a PCB concentration of 50 ppm or greater, the owner or operator shall immediately notify the Air Quality Division of the Pinellas County Department of Environmental Management and provide the analytical results to the Department. The owner or operator shall immediately cease burning of the used oil.

g. Special Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil:

- (1) The gallons of on-specification used oil received and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (3) The name and address of all marketers delivering used oil to the facility.
- (4) Copies of the marketer certifications, if obtained, and any supporting information.
- (5) Documentation that the used oil contains less than 2 ppm PCBs, if claimed, including the name and address of the person making the claim.
- (6) Results of the analyses required above.
- (7) A copy of the notice to EPA and a copy of the one-time written notice provided to each marketer.
- (8) The hourly usage if the on-specification used oil is burned exclusively (not blended).

The records shall be retained in a form suitable for inspection at the facility by the Department, and shall be retained for 5 years.

h. Quarterly Reporting Required: The owner or operator shall submit to the Air Quality Division of the Pinellas County Department of Environmental Management, within thirty days of the end of each calendar quarter, a summary of the quarterly analyses and the total amount of

Florida Power Corporation  
Higgins Power Plant  
Page 21 of 48

FINAL Permit No.: 1030012-003-AV

on-specification used oil received and burned during the quarter.

The owner or operator shall submit, with the Annual Operation Report form, the analytical results and the amount of on-specification used oil burned during the previous calendar year.

[40 CFR 279.61 and 761.20(e); Rules 62-4.070(3), 62-212.400(2)(f)1. and 62-213.440, F.A.C.; and, initial Title V Application received June 14, 1996.]

### Operation and Maintenance Plan

A.34. The following is the specified Operation and Maintenance Plan for Particulate Control as required by Rule.

#### A. Process Parameters

1. Heat Input Rate: SG 1 & SG 3 - 548 MMBtu/hr (Maximum)  
SG 2 - 523 MMBtu/hr (Maximum)
2. Fuel: No. 6 or lighter grades of fuel oil, on-specification used fuel oil and natural gas with a maximum sulfur content, by weight, of 2.50% and 2.50%, respectively, grain per 100 dry standard cubic feet, respectively.
3. Fuel Firing Rate: SG 1 & SG 3 - 3654 gal/hr for fuel oils. SG 2 - 3486 gal/hr for fuel oil. SG 1 and SG 3 - natural gas at 0.5 MMCF/hour and SG 2 - natural gas at 0.49 MMCF/hr.
4. Ash Content: as sampled.
5. Steam Temperature: 950 °F
6. Steam Pressure: 1315 psig
7. Steam Flow Rate: 450,000 lb/hr
8. Stack Height: 174 ft
9. Boiler Manufacture: Babcock and Wilcox
10. Burner Arrangement: Front Fired

#### B. Inspection and Maintenance Program

1. Scheduled during major outages: Boilers, controls, auxiliaries, burners and duct work are to be inspected and repaired as necessary. All parts are to be inspected, cleaned and replaced as necessary.
2. Scheduled during non-peak load periods in spring and fall: This schedule is affected by forced outage requirements.

Florida Power Corporation  
 Higgins Power Plant  
 Page 44 of 48

FINAL Permit No.: 1030012-001-AV

**Appendix I-1. List of Insignificant Emissions Units and/or Activities.**

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62-210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

1	Lube Oil System Vents
2	Lube Oil Reservoir Tank
3	Oil Water Separators
4	Hazardous Waste Building
5	Parts Washers/Degreasers
6	Waste Oil Storage Tanks
7	Lube Oil Storage Building
8	Portable Unleaded Gasoline Tank
9	Surface Coating and Solvent Cleaning
10	No. 2 Diesel Fuel Tank

*lube*

Steam Generating Units - SAG 2, SAG 3, & SAG 4

Evaporation of on-site generated boiler non-hazardous cleaning chemicals (citrosolv and ammonia). This activity occurs once every three to five years or longer.

TO: Scott M. Sheplak, P.E.

FROM: Charles S. Logan

DATE: January 15, 1998

Re: Intent package for **REVISED** DRAFT Permit No.: 1010017-003-AV  
Florida Power Corporation  
Anclote Power Plant

**Permit Clock:** NA

This permit is for the initial Title V air operation permit for the subject facility. This facility consists of two pre-NSPS fuel oil fired steam electric generating stations. Relocatable diesel fired generator(s) may be located at this facility and may be relocated to other facilities. Additional information was not requested. Comments were not received from the District office. Comments were received from the applicant. One of the comments resulted in a significant change to the DRAFT permit, which made it necessary to re-publish the permit. This facility reported that each emissions unit was in compliance at the time of the application

I recommend that this Intent to Issue be sent out as attached.

csl/





# Environmental Services Department

## FAX COVER SHEET

DATE: 10/13/97

TO: Charles Logan

FAX# (904) 922-6979

COMPANY: FDEP

FROM: Tom Bohan

PHONE # (813) 866-5158

FAX# \_\_\_\_\_

NUMBER OF PAGES TRANSMITTED 5

Please call number listed above for any transmission problems.

### COMMENTS:

As we discussed, attached are  
our comments re: Anclote.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_





October 13, 1997

Mr. Scott M. Sheplak, P.E.  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Florida Power Corporation, Anclote Power Plant  
DRAFT Title V Permit No. 1010017-003-AV;  
Need to Address Common Issues within Permits

Dear Mr. Sheplak:

We appreciated the opportunity to meet with you and other representatives from the Department on September 24, 1997 regarding the issues associated with Florida Power Corporation's (FPC) Petition for Administrative Hearing on the Draft Title V Permit for the Anclote Power Plant. FPC believes that substantial progress was made towards resolving the primary issues contained in the Petition. For example, FPC understands that the Department intends to revise the draft Title V permit for the Anclote facility to allow the burning of used oil in the same manner as currently allowed under its existing air operating permit.

Several other miscellaneous issues associated with the draft Title V permit were included in FPC's Petition for Administrative Hearing. Due to the 14-day time limit for filing the Petition, FPC indicated that it may have additional comments after further review of the draft permit. Accordingly, attached for your consideration are several supplemental comments regarding the draft Title V permit for the Anclote Power Plant.

Further, several of the issues FPC has identified regarding its draft Title V permits for each of its Title V sources are very similar and at times identical. FPC has, in several instances already, had to resolve these common issues during separate discussions with different DEP personnel (there are 6 separate DEP permit writers working on 10 FPC Title V permits), which has at times resulted in significantly different approaches and permit language. It is to everyone's advantage to have a single resolution of common issues, and consistent permit language, for facilities that have essentially identical emissions units. In the interest of efficiency, FPC would like to have a single meeting to address such common permit issues.

Mr. Sheplak  
October 13, 1997  
Page 2

Accordingly, FPC requests an opportunity to meet with you as soon as possible to discuss any draft revisions to the draft Title V permit for the Anclote facility, as well as address the common issues associated with the other FPC facilities. In this regard, I will be calling within the next few days to confirm your receipt of this letter and to set up such a meeting. Again, FPC appreciates the Department's attention and cooperation in processing the Title V Permit for the Anclote Power Plant.

If you have any questions in the meantime, please call me at (813) 866-5158.

Sincerely,



Scott H. Osborn,  
Senior Environmental Engineer

cc: Douglas Beason, DEP  
Clair Fancy, P.E., DEP  
Ken Kosky, P.E., Golder Associates  
Robert Manning, HGS&S

**FLORIDA POWER CORPORATION  
SUPPLEMENTAL COMMENTS ON DRAFT TITLE V PERMIT  
ANCLOTE POWER PLANT**

**General Comments**

1. In the Intent to Issue Title V Air Operation Permit, as well as in certain places in the draft permit, DEP incorrectly states that FPC's Title V application was submitted on June 12, 1997. The correct application submittal date, which DEP also states in the draft permit, is June 14, 1997.

2. Because FPC is ultimately responsible for ensuring the publication of the Public Notice of Intent to Issue Title V Air Operation Permit in the manner prescribed by rule, as well as being affected by the content of such notice, FPC requests that DEP provide a copy of the notice that DEP intends to publish, and also provide proof of such publication within a reasonable time after publication occurs.

**Section II. Facility-wide Conditions**

1. Condition 1. FPC understands that DEP is continuing to revise Appendix TV-1, Title V Conditions, and therefore requests that its final Title V permit incorporate the most up-to-date version of this Appendix.

2. Condition 3. FPC requests the following revision to the last sentence in this Condition because the specified test method does not apply to every unit at the facility, and because Chapter 62-297 does not provide the authority for this method: "For purposes of this Condition, EPA Method 9 is the method of compliance, pursuant to Chapter 62-297, F.A.C."

3. Condition 7. FPC requests that this Condition be edited as follows: "The permittee shall not allow ~~no person to store, pump, . . .~~" The language utilized by DEP is not the explicit language in Rule 62-296.320(1)(a), F.A.C. Further, this condition should be identified as Not Federally Enforceable", to be consistent with other draft Title V permits previously issued.

**Section III. Subsection A.**

1. Condition A.3. In paragraph a. and b., there appears to be a typographical error in the first line: "new #6 or higher grades of fuel oils." The appropriate terminology is "lighter," rather than "higher."

2. Condition A.9. Because this unit is only authorized to burn oil, this condition should be edited as follows: "~~When burning liquid fuel,~~ Sulfur dioxide emissions...." Also, for clarification, this condition should specify that the sulfur shall be measured in accordance with Condition A.19., instead of "by applicable compliance methods."

2. Condition A.10. This Condition should be deleted because there is no regulatory authority for its inclusion. FPC does not believe that it requested this limit in its Title V application, as stated by DEP in the draft permit. Table 1-1, Summary of Air Pollutant Standards and Terms should be revised accordingly.

**Anclote Supplemental Comments**

Page 2

**Appendix E-1, List of Exempt Emissions Units and/or Activities.**

1. Because the following units have trivial, if any, emissions, FPC requests that they be deleted from Appendix E-1: (a) Oil Water Separators, (b) Hazardous Waste Building, and (c) Lube Oil Storage Building (FPC's Anclote Plant does not contain a lube oil storage building).

**Table 2-1, Summary of Compliance Requirements.**

1. Footnote 1 to this Table references a DEP "guidance document." FPC requests that this reference include a complete title, including the date, for this document.

BEST AVAILABLE COPY

THE TAMPA TRIBUNE
Published Daily
Tampa, Hillsborough County, Florida

State of Florida
County of Hillsborough ) ss.

Before the undersigned authority personally appeared J. Rosenthal, who on oath says that she is Classified Billing Manager of The Tampa Tribune, a daily newspaper published at Tampa in Hillsborough County, Florida; that the attached copy of advertisement being a

LEGAL NOTICE

in the matter of

PUBLIC NOTICE OF INTENT

was published in said newspaper in the issues of
AUGUST 25, 1997

Affiant further says that the said The Tampa Tribune is a newspaper published at Tampa in said Hillsborough County, Florida, and that the said newspaper has heretofore been continuously published in said Hillsborough County, Florida, each day and has been entered as second class mail matter at the post office in Tampa, in said Hillsborough County, Florida for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, this advertisement for publication in the said newspaper.

J. Rosenthal
26

Sworn to and subscribed before me, this
AUGUST 26, A.D. 19 97
of

Personally Known or Product Identification
Type of Identification Produced

(SEAL)

Shirley Lee Slaton

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION Time V DRAFT Permit No: 181017-003-AV Andole Power Plant Pasco County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Time V air operation permit to Florida Power Corporation for the Andole Power Plant located at 1729 Balleys Bluff Road, Holiday, Pasco County. The applicant's name and address are: Florida Power Corporation, 2201 26th Street South, St. Petersburg, Florida 33711.

The permitting authority will issue the Time V PROPOSED permit, and subsequent Time V FINAL Permit, in accordance with the conditions of the Time V DRAFT permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Time V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2400 Blair Stone Road, Mail Station #3505, Tallahassee, Florida 32399-3400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and requires, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision 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 (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #335, Tallahassee, Florida 32399-3000 (Telephone 850 488-9730, Fax 850/487-6938). Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. A petitioner must 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 applicable 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 will be only at the approval of the presiding officer in compliance with Rule 28-5.207 of the Florida Administrative Code.

following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is located. (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action. (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action. (d) A statement of the material facts disputed by the petitioner, if any. (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action. (f) A statement identifying the rules, or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action. (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

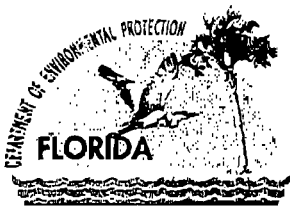
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the petitioner's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority to take with respect to the action or proposed action have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7641(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established by 42 U.S.C. Section 7641(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the 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 stop the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of the EPA must meet the requirements of 42 U.S.C. Section 7641(b)(2) and must be filed with the Administrator of the EPA at 410 M Street, SW, Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at: Permitting Authority: Department of Environmental Protection Bureau of Air Regulation 111 South Magnolia Drive, Suite 4 Tallahassee, Florida 32301 Telephone: 850/488-1344 Fax: 850/922-6979 Affected District: Department of Environmental Protection Southwest District Office 8407 Laurel Fork Circle Tampa, Florida 33619 Telephone: 813/744-6100 Fax: 813/744-6458

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Shevick, P.E., at the above address, or call 850/488-1344, for additional information. 8168 8/25/97

SUSIE LEE SLATON COMMISSION NUMBER CC639424 MY COMMISSION EXPIRES APRIL 16, 2001





Best Available Copy  
Department of  
Environmental Protection

-FPC comments-

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

October 15, 1997

Mr. W. Jeffrey Pardue, C.E.P.  
Director of Environmental Services  
Florida Power Corporation  
3201 34th Street South  
St. Petersburg, Florida 33711

Re: PROPOSED Title V Permit No.: 1010017-001-AV  
Anclote Power Plant

Dear Mr. Pardue:

One copy of the "PROPOSED PERMIT DETERMINATION" for the Anclote Power Plant located at 1729 Baileys Bluff Road, Holiday, Pasco County, is enclosed. This letter is only a courtesy to inform you that the DRAFT permit has become a PROPOSED permit.

An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is <http://www.dep.state.fl.us/air>.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED permit is made by the USEPA within 45 days, the PROPOSED permit will become a FINAL permit no later than 55 days after the date on which the PROPOSED permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED permit, the FINAL permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Mr. Charles S. Logan at 850/488-1344.

Sincerely,

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

/CSL

Enclosures

copy furnished to:  
Mr. Bill Thomas, FDEP/SWD  
Mr. W. Jeffery Pardue, C.E.P., Florida Power Corporation  
Mr. Kennard F. Kosky, P.E., Golder Associates, Inc.  
Ms. Carla E. Pierce, USEPA, Region 4 (INTERNET E-mail Memorandum)  
Ms. Yolanda Adams, USEPA, Region 4 (INTERNET E-mail Memorandum)

Scott,  
I gave this a cursory review (specifically 0/5) and didn't see any problems. You'll probably want to take a closer look. Mike

**Best Available Copy****STATEMENT OF BASIS**

Florida Power Corporation

Anclote Power Plant

Facility ID No.: 1010017

Pasco County

Initial Title V Air Operation Permit

**PROPOSED Permit No.: 1010017-003-AV**

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This facility consists of two fuel oil fired <sup>530</sup> steam electric generating stations, E.U. ID No. -001 (Unit No. 1) and -002 (Unit No. 2). Unit No. 1 and No. 2 power turbines which drive generators with a nameplate ratings of 540 Megawatts and 525 Megawatts, respectively. Units No. 1 and No. 2 share a common stack. Also included in this permit are miscellaneous unregulated emissions units and/or activities. Relocatable diesel fired generator(s) with a maximum heat input of 25.74 MMBtu/hour and a maximum rating of 2460 Kilowatts are located at the facility.

*not really*

Fossil fuel fired steam generator # 1 is a nominal 535 (summer)/540 (winter) megawatt (electric) steam generator designated as Anclote Unit # 1. The emission unit is fired on No. 6 or <sup>lighter</sup> higher grades of fuel oil and on-specification used oil, with a maximum heat input of 4964.4 MMBtu per hour. Fossil fuel fired steam generator # 2 is a nominal 525 (summer)/ 530 (winter) megawatt (electric) steam generator designated as Anclote Unit # 2. The emission unit is fired on No. 6 or higher grades of fuel oil and on-specification used oil, as permitted herein, with a maximum heat input of 4850 MMBtu per hour. Each boiler/steam generator, units #1 and #2, drives a turbine generator and both units share a common 499 foot exhaust stack. Emissions from these units are uncontrolled. The emissions units are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input. Fossil fuel fired steam generator # 1 began commercial operation on October 16, 1974; and, fossil fuel fired steam generator # 2 began commercial operation on October 31, 1978.

The relocatable diesel generator(s) have a maximum heat input of 25.74 million Btu per hour (MMBtu/hour) while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum rating of 2460 kilowatts. Emissions from the generators are uncontrolled. These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. The generators may be relocated at any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Higgins Plant, Shore Drive, Oldsmar, Pinellas County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. The future FPC Polk County Site, County Road 555, 1 mi. southwest of Homeland, Polk County.

Also included in this permit are miscellaneous unregulated and insignificant emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).



**Best Available Copy****PROPOSED PERMIT DETERMINATION**

Florida Power Corporation  
PROPOSED Permit No.: 1010017-001-AV  
Page 1 of

**I. Public Notice.**

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" to Florida Power Corporation for the Anclote Power, located at 1729 Baileys Bluff Road, Holiday, Pasco County was clerked on August 19, 1997. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in The Tampa Tribune on August 25, 1997. The DRAFT Title V Air Operation Permit was available for public inspection at the Southwest District Office in Tampa and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on August 28, 1997.

**II. Public Comment(s).**

Comments were received and the DRAFT Title V Operation Permit was changed. The comments were not considered significant enough to reissue the DRAFT Title V Permit and require another Public Notice. Comments were received from one respondent during the 30 (thirty) day public comment period. Listed below is each comment letter in the chronological order of receipt and a response to each comment in the order that the comment was received. The comment(s) will not be restated. Where duplicative comments exist, the original response is referenced.]

A. Letter from Mr. Scott H. Osbourn dated and received by fax on October 13, 1997 .

**General Comments:**

1. The correct date the Title V permit application was received is June 14, 1996.
2. FPC will be provided a copy of the Notice intended to be published and proof of publication.
- ✓ 3. Appendix E-1, List of Exempt Emissions Units and/or Activities has been replaced with I-1, List of Insignificant Emissions Units and/or Activities. When appropriate, all references to exempt emissions units has been changed to insignificant emissions units.

**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant, Facility ID No. 1010017  
Page 2 of 3

**Section II. Facility-wide Conditions****1. Condition 1, Page 4 of 35:**

The final permit will include the latest version of Appendix TV-1. Several changes were Proposed Permit Determination

made to Appendix TV-1 to reflect recent rule changes, and to properly identify conditions that are not federally enforceable.

- a. The following additional rules have been marked as "not federally enforceable":
  - 62-4.030, F.A.C., General Prohibition, (see condition number 1.)
  - 62-4.220, F.A.C., Operation Permit for New Sources, (see condition number 14.)
  - 62-210.300(5), F.A.C., Notification of Startup, (see condition number 19.)
- b. Appendix TV-1, now carries a version date of "12/02/97".

**2. Condition 3, Page 4 of 35:**

Reference to Chapter 62-297 is applicable. No change will be made.

**3. Condition 7, Page 5 of 35:**

The verbiage "allow no person to" will be replaced with "not". "Not Federally Enforceable" will be inserted at the beginning of this condition.

**Section III. Subsection A Conditions****1. Condition A.3, Page 7 of 35:**

The verbiage "higher grades" will be corrected to "lighter grades".

**2. Condition A.9, Page 8 of 35:**

This condition will be changed to read as follows:

**A.9. Sulfur Dioxide.** When burning liquid fuel, sulfur dioxide emissions shall not exceed 2.75 pounds per million Btu heat input, as measured by applicable compliance methods specified in conditions A.19 and A.20.

[Rule 62-296.405(1)(c)1.j., F.A.C.]

**3. Condition A.10, Page 8 of 35:**

The request to delete is withdrawn by the permittee. No change made.

*ready?*

?

**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant, Facility ID No. 1010017  
Page 3 of 3

**Appendix E-1, Page 31 of 35:**

1. Oil Water Separators, Hazardous Waste Building, and Lube Oil Storage Building will be deleted from this Appendix.

**Table 2-1, Page 30 of 35:**

1. Reference to a guidance memo in Footnote 1 will be deleted.

**III. Conclusion.**

The permitting authority will issue the PROPOSED Permit No.: 1030012-001-AV, with any changes noted above.

**Best Available Copy**

**Florida Power Corporation  
Anclote Power Plant**

**Facility ID No.: 1010017  
Pasco County**

**Initial Title V Air Operation Permit  
PROPOSED Permit No.: 1010017-003-AV**

**Permitting Authority:**

**State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
Title V Section**

**Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400**

**Telephone: 850/488-1344  
Fax: 850/922-6979**

**November 21, 1997**

**Best Available Copy****Initial Title V Air Operation Permit  
PROPOSED Permit No.: 1010017-003-AV****Table of Contents**

<b>Section</b>	<b>Page Number</b>
Placard Page .....	1
I. Facility Information .....	2 - 3
A. Facility Description.	
B. Summary of Emissions Unit ID Nos. and Brief Descriptions.	
C. Relevant Documents.	
II. Facility-wide Conditions .....	4 - 6
III. Emissions Unit(s) and Conditions	
A. Fuel Oil Fuel Fired Steam Generators (E.U. ID Nos. -001 and -002).....	7 - 20
B. Diesel Fired Generators ( 3 - 820 Kilowatt each).....	21 - 26
IV. Acid Rain Part	
A. Acid Rain, Phase II .....	27 - 28
Table 1-1, Summary of Air Pollutant Standards and Terms.....	29
Table 1-2, Summary of Air Pollutant Standards and Terms (Additional Standards for On-Specification Used Oil (OSUO)).....	30
Table 2-1, Summary of Compliance Requirements.....	31
Appendix I-1. List of Insignificant Emissions Units and/or Activities.....	32
Appendix U-1. List of Unregulated Emissions Units and/or Activities.....	33
Appendix H-1. Permit History/ID Number Changes.....	34
Appendix SS-1, Stack Sampling Facilities.....	35
Appendix TV-1, Title V Conditions.....	36

**Best Available Copy**

**Permittee:**  
**Florida Power Corporation**

**PROPOSED Permit No.:** 1010017-003-AV  
**Facility ID No.:** 1010017  
**SIC Nos.:** 4911  
**Project:** Initial Title V Air Operation Permit

This permit is for the operation of the Anclote Power Plant. This facility is located at 1729 Baileys Bluff Road, Holliday, Pasco County; UTM Coordinates: Zone 17, 324.4 km East and 3118.7 km North; Latitude: 28° 48' 17" North and Longitude: 82° 47' 08" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

**Referenced attachments made a part of this permit:**

Appendix U-1, List of Unregulated Emissions Units and/or Activities  
Appendix I-1, List of Insignificant Emissions Units and/or Activities  
APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97)  
APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)  
Phase II Acid Rain Application/Compliance Plan received December 14, 1995.

**Effective Date:** January 1, 1998  
**Renewal Application Due Date:** July 5, 2002  
**Expiration Date:** December 31, 2002

---

Howard L. Rhodes, Director  
Division of Air Resources  
Management

HLR/sms/csl

**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 2 of 36

**PROPOSED Permit No.:** 1010017-003-AV

**Section I. Facility Information.****Subsection A. Facility Description.**

This facility consists of two fuel oil fired steam electric generating stations, E.U. ID No. -001 (Unit No. 1) and -002 (Unit No. 2). Unit No. 1 consists of a Combustion Engineering, Inc., Type CCRR boiler/steam generator and steam turbine which drives a generator with a nameplate rating of 540 Megawatts. Unit No. 2 consists of a Combustion Engineering, Inc., Type CCRR boiler/steam generator and steam turbine which drives a generator with a nameplate rating of 525 <sup>530</sup> Megawatts. Units No. 1 and No. 2 share a common stack. Also included in this permit are miscellaneous unregulated and insignificant emissions units and/or activities. Relocatable diesel fired generator(s) with a maximum heat input of 25.74 MMBtu/hour and a maximum rating of 2460 Kilowatts are located at the facility but may be relocated to other FPC facilities.

Based on the initial Title V permit application received on June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

**Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).**

<u>E.U. ID No.</u>	<u>Brief Description</u>
-001	Fuel Oil Fired Steam Electric Generator No. 1
-002	Fuel Oil Fired Steam Electric Generator No. 2
-xxx	Relocatable Diesel Generator(s)

**Unregulated Emissions Units and/or Activities**

- xxx Surface Coating and Solvent Cleaning
- xxx Fuel Storage Tanks
- xxx Emergency Generators
- xxx General Purpose Engines
- xxx Helper Cooling Towers

*Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.*

**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 3 of 36

**PROPOSED Permit No.:** 1010017-003-AV

**Subsection C. Relevant Documents.**

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/ID Number Changes

These documents are on file with the permitting authority:

Initial Title V Permit Application received June 14, 1996.



**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 4 of 36

**PROPOSED Permit No.:** 1010017-003-AV

**Section II. Facility-wide Conditions.****The following conditions apply facility-wide:**

1. **APPENDIX TV-1, TITLE V CONDITIONS** is a part of this permit.  
{Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}
2. **Not federally enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited.** The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.  
[Rule 62-296.320(2), F.A.C.]
3. **General Particulate Emission Limiting Standards. General Visible Emissions Standard.** Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.  
[Rule 62-296.320(4)(b)1. & 4., F.A.C.]
4. **Prevention of Accidental Releases (Section 112(r) of CAA).** If required by 40 CFR 68, the permittee shall submit to the implementing agency:
  - a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and
  - b. certification forms and/or RMPs according to the promulgated rule schedule.[40 CFR 68]
5. **Unregulated Emissions Units and/or Activities.** Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.  
[Rule 62-213.440(1), F.A.C.]
6. **Insignificant Emissions Units and/or Activities.** Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.  
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]

**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 5 of 36

**PROPOSED Permit No.:** 1010017-003-AV

7. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1)(a), F.A.C.]

8. **Not federally enforceable.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include:

- a. Maintenance of paved areas as needed,
- b. Regular mowing of grass and care of vegetation, and
- c. Limiting access to plant property by unnecessary vehicles.

[Rule 62-296.320(4)(c)2., F.A.C.; Proposed by applicant in the initial Title V permit application received June 14, 1996]

9. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

10. 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

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

United States 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

**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 6 of 36

**PROPOSED Permit No.:** 1010017-003-AV

12. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within sixty (60) days after the end of the calendar year.

{See condition No. 52., Appendix TV-1, Title V Conditions}  
[Rule 62-214.420(11), F.A.C.]

**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 7 of 36

**PROPOSED Permit No.:** 1010017-003-AV

**Section III. Emissions Unit(s) and Conditions.**

**Subsection A. This section addresses the following emissions units.**

<u>E.U. ID No.</u>	<u>Brief Description</u>
-001	Fossil Fuel Fired Steam Generator # 1
-002	Fossil Fuel Fired Steam Generator # 2

Fossil fuel fired steam generator # 1 is a nominal 535(summer)/540(winter) megawatt (electric) steam generator designated as Anclote Unit # 1. The emission unit is fired on No. 6 or higher grades of fuel oil and on-specification used oil, as permitted herein, with a maximum heat input of 4964.4 MMBtu per hour.

Fossil fuel fired steam generator # 2 is a nominal 525(summer)/530(winter) megawatt (electric) steam generator designated as Anclote Unit # 2. The emission unit is fired on No. 6 or higher grades of fuel oil and on-specification used oil, as permitted herein, with a maximum heat input of 4850 MMBtu per hour.

Each boiler/steam generator, units #1 and #2, drives a turbine generator and both units share a common 499 foot exhaust stack. Emissions from these units are uncontrolled.

{Permitting note(s): The emissions units are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input. Fossil fuel fired steam generator # 1 began commercial operation on October 16, 1974; and, fossil fuel fired steam generator # 2 began commercial operation on October 31, 1978.}

**The following specific conditions apply to the emissions units listed above:**

**Essential Potential to Emit (PTE) Parameters**

A.1. Permitted Capacity. The maximum operation heat input rates are as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
1	4964.4	No. 1, 2, 3, 4, 5 or 6 Fuel Oil & On-Specification Used Oil
2	4850.0	No. 1, 2, 3, 4, 5, or 6 Fuel Oil & On-specification Used Oil

\* The on-specification used oil burned at this facility may be generated on or off-site.  
[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.405, F.A.C.]

A.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition A.22.  
[Rule 62-297.310(2), F.A.C.]

**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 8 of 36

**PROPOSED Permit No.: 1010017-003-AV**

**A.3. Methods of Operation. Fuel(s).**

- a. Startup: The only fuels allowed to be burned are new #6 or lighter grades of fuel oils. On-specification used oil shall only be burned if the PCB's are less than 2 ppm, ~~and blended with new #2 fuel oil.~~ The maximum sulfur content is 2.5 percent, by weight.
- b. Normal: The only fuels allowed to be burned are new #6 or higher grades of fuel oils and on-specification used oil. The maximum sulfur content is 2.5 percent, by weight.
- c. The maximum cumulative amount of on-specification used oil, whether generated on or off-site, that can be burned in each emissions unit shall not exceed 10 percent of the total permitted heat input for emissions units #1 and #2.

[Rule 62-213.410, F.A.C.; and, AO 51-254492A & 1010017-001-AO]

**A.4. Hours of Operation.** These emissions units may operate continuously, i.e., 8,760 hours/year.

[Rule 62-210.200(PTE), F.A.C.]

**Emission Limitations and Standards**

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**A.5. Visible Emissions.** Visible emissions shall not exceed 40 percent opacity. Emissions units governed by this visible emissions standard shall conduct a compliance test for particulate matter emissions annually. Failure of the facility to demonstrate compliance with the particulate matter allowable in specific condition A.7 or the opacity standard of this condition shall constitute grounds for revocation of this condition.

[Rule 62-296.405(1)(a), F.A.C.; and, OGC File Nos. 86-1574 and 86-1575/Orders dated December 11, 1986.]

**A.6. Visible Emissions - Soot Blowing and Load Change.** Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

[Rule 62-210.700(3), F.A.C.]

**A.7. Particulate Matter.** Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods.

[Rule 62-296.405(1)(b), F.A.C.]

**A.8. Particulate Matter - Soot Blowing and Load Change.** Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour

**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 9 of 36

**PROPOSED Permit No.:** 1010017-003-AV

period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

[Rule 62-210.700(3), F.A.C.]

A.9. Sulfur Dioxide. When burning liquid fuel, sulfur dioxide emissions shall not exceed 2.75 pounds per million Btu heat input, as measured by applicable compliance methods.

[Rule 62-296.405(1)(c)1.j., F.A.C.]

A.10. Sulfur Dioxide - Sulfur Content. The sulfur content of fuel oils, on-specification used oil, or any combination of the two burned in these units, shall not exceed 2.5 percent, by weight. See specific condition A.20.

[Rule 62-296.405(1)(e)3., F.A.C.; and, requested by the applicant in Title V Application dated June 12, 1996.]

**Excess Emissions**

A.11. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

A.12. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.

[Rule 62-210.700(2), F.A.C.]

A.13. 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.

[Rule 62-210.700(4), F.A.C.]

**Monitoring of Operations**

A.14. Sulfur Dioxide. The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor or permittee upon each fuel delivery. This protocol is allowed because the emissions units do not have an operating flue gas desulfurization device. See specific conditions A.10., A.19. and A.20.

[Rule 62-296.405(1)(f)1.b., F.A.C.]

A.15. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in

**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 10 of 36

**PROPOSED Permit No.:** 1010017-003-AV

conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

**Test Methods and Procedures**

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit. }

A.16. Visible emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. See specific condition A.17.  
[Rule 62-296.405(1)(e)1., F.A.C.]

A.17. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
  - a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
  - b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of

**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 11 of 36

**PROPOSED Permit No.: 1010017-003-AV**

missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.]

**A.18. Particulate Matter.** The test methods for particulate emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17.

[Rules 62-296.405(1)(e)2. and 62-297.401, F.A.C.]

**A.19. Sulfur Dioxide.** The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedences of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. **The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, as an alternate sampling procedure authorized by permit, the permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery.** See specific conditions A.9., A.10. and A.20.

[Rules 62-213.440, 62-296.405(1)(e)3. and 62-297.401, F.A.C.; and, Permits 1010017-001-AO and AO 51-254492A.]

**A.20.** The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s).

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

**A.21. Required Number of Test Runs.** For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's



**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 12 of 36

**PROPOSED Permit No.: 1010017-003-AV**

emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

**A.22. Operating Rate During Testing.** Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

**A.23. Calculation of Emission Rate.** The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

**A.24. Applicable Test Procedures.**

**(a) Required Sampling Time.**

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. **Opacity Compliance Tests.** When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

## Best Available Copy

Florida Power Corporation  
Anclote Power Plant  
Page 13 of 36

PROPOSED Permit No.: 1010017-003-AV

- (b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.
- (c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.
- (d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.
- (e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube. [Rule 62-297.310(4), F.A.C.]

A.25. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit. [Rule 62-297.310(6), F.A.C.]

A.26. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid for more than 400 hours other than during startup.
3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
  - a. Did not operate; or
  - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

Florida Power Corporation  
 Anclote Power Plant  
 Page 14 of 36

PROPOSED Permit No.: 1010017-003-AV

TABLE 297.310-1  
 CALIBRATION SCHEDULE

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/-0.001" mean of at least three readings Max. deviation between readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually 3. Check after each test series	Spirometer or calibrated wet test or dry gas test meter	2%
		Comparison check	5%

Florida Power Corporation  
Anclote Power Plant  
Page 15 of 36

PROPOSED Permit No.: 1010017-003-AV

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;
- b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
- c. Each NESHAP pollutant, if there is an applicable emission standard.

5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.  
[Rule 62-297.310(7), F.A.C.; SIP approved]

A.27. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning only liquid fuel(s) for less than 400 hours per year.  
[Rule 62-297.310(7)(a)4., F.A.C.]

A.28. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning only liquid fuel(s) for less than 400 hours per year.  
[Rules 62-297.310(7)(a)3. & 5., F.A.C.]

Florida Power Corporation  
Anclote Power Plant  
Page 16 of 36

PROPOSED Permit No.: 1010017-003-AV

**Record keeping and Reporting Requirements**

A.29. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department's Southwest District Office in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department's Southwest District Office.

[Rule 62-210.700(6), F.A.C.]

A.30. Submit to the Department's Southwest District Office a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years.

[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

**A.31. Test Reports.**

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department's Southwest District Office on the results of each such test.

(b) The required test report shall be filed with the Department's Southwest District Office as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department's Southwest District Office to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.

Florida Power Corporation  
Anclote Power Plant  
Page 17 of 36

PROPOSED Permit No.: 1010017-003-AV

10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

**Addition limitations for On-Specification Used Oil**

A.32. On-Specification Used Oil. On-specification used oil generated at this facility or off-site may only be burned in these emissions units if compliance with all the conditions of this permit and the following additional conditions are demonstrated:

- a. On-specification Used Oil Allowed as Fuel: This permit allows the burning of used fuel oil meeting EPA "on-specification" used oil specifications, with a maximum sulfur content of 2.5 percent, by weight, and a PCB concentration of no greater than 49 ppm.

On-specification used oil shall meet the following specifications: [40 CFR 279, Subpart B.]

1. Arsenic shall not exceed 5.0 ppm;
2. Cadmium shall not exceed 2.0 ppm;

Florida Power Corporation  
Anclote Power Plant  
Page 18 of 36

PROPOSED Permit No.: 1010017-003-AV

3. Chromium shall not exceed 10.0 ppm;
4. Lead shall not exceed 100.0 ppm;
5. Total halogens shall not exceed 1000 ppm;
6. Flash point shall not be less than 100 degrees F.

Used oil that does not meet the specifications for on-specification used oil shall not be burned at this facility.

- b. Quantity Limited: The maximum amount of on-specification used oil, whether generated on or off-site, that can be burned in each emissions unit shall not exceed 10 percent of the total permitted heat input per emissions unit.
- c. Used Oil Containing PCBs Not Allowed: Used oil containing a PCB concentration of 50 or more ppm shall not be burned at this facility. Used oil shall not be blended to meet this requirement or any part of this condition.
- d. PCB Concentration of 2 to 49 ppm: On-specification used oil with a PCB concentration of 2 to 49 ppm shall be burned only at normal source operating temperatures. On specification used oil with a PCB concentration of 2 to 49 ppm shall not be burned during periods of startup or shutdown.

Before accepting from each marketer the first shipment of on-specification used oil with a PCB concentration of 2 to 49 ppm, the owner or operator shall provide each marketer with a one-time written and signed notice certifying that the owner or operator will burn the used oil in a qualified combustion device. The notice must state that EPA or a RCRA -delegated state agency has been given a description of the used oil management activities at the facility and that an industrial boiler or furnace will be used to burn the used oil with a PCB concentration of 2 to 49 ppm. The description of the used oil management activities shall be submitted to the Administrator of EPA or Administrator, Hazardous Waste Regulation Section, Florida Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. [40 CFR 279.61 and 761.20(e)]

- e. Certification Required: The owner or operator shall receive from the marketer, for each load of used oil received, a certification that the used oil meets the specifications for on-specification used oil and contains a PCB concentration of no greater than 49 ppm. This certification shall also describe the basis for the certification, such as analytical results. Note that a claim that used oil does not contain quantifiable levels of PCBs (that is, that the used oil contains less than 2 ppm of PCBs) must be documented by testing or other information. The first person making the claim that the used oil does not contain PCBs is responsible for furnishing the documentation. The documentation can be tests, personal

or special knowledge of the source and composition of the used oil, or a certification from the person generating the used oil claiming that the used oil contains no detectable PCBs.

- f. Testing Required: If the owner or operator does not receive certification from the marketer as described above, the owner or operator shall properly sample and test each load of used oil received for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point, PCBs\*, and percent sulfur content by weight, ash, and BTU value (BTU per gallon).

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

\* Testing for PCB's is not necessary if quantifiable levels are less than 2 ppm (ref. to specific condition A.32.e., above)

*new?*

If the owner or operator relies on certification from the marketer, as described above, the owner or operator shall, at a minimum ~~each calendar quarter~~, sample one load of used oil received, selected at random by the owner or operator, and analyze the sample for the above parameters.

If the analytical results show that the used oil does not meet the specification for on-specification used oil, or that it contains a PCB concentration of 50 ppm or greater, the owner or operator shall immediately notify and provide the analytical results to the Department's Southwest District Office. The owner or operator shall immediately cease burning of the used oil.

- g. Special Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil: [40 CFR 761.20(e)]

- (1) The gallons of on-specification used oil received and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (3) The name and address of all marketers delivering used oil to the facility.
- (4) Copies of the marketer certifications, if obtained, and any supporting information.
- (5) Documentation that the used oil contains less than 2 ppm PCBs, if claimed, including the name and address of the person making the claim.
- (6) Results of the analyses required above.



- (7) A copy of the notice to EPA and a copy of the one-time written notice provided to each marketer.
- (8) Total lead emissions as a result of burning on-specification used oil on a monthly basis.

The records shall be retained in a form suitable for inspection at the facility by the Department, and shall be retained for 5 years.

new?

- h. Quarterly Reporting Required: The owner or operator shall submit to the Southwest District Office, within thirty days of the end of each calendar quarter, a copy of the quarterly analyses and the total amount of on-specification used oil received and burned during the quarter. The report shall include the total amount of lead emitted as a result of burning on-specification used oil during the quarter.

The owner or operator shall submit, with the Annual Operation Report (AOR) form, the analytical results and the amount of on-specification used oil burned during the previous calendar year. The AOR shall include the total amount of lead emitted as a result of burning on-specification used oil during the calendar year on a monthly basis.

[Rules 62-4.070(3), 62-212.400(2)(f)1. and 62-213.440, F.A.C., and, AO 51-254492A & 1010017-001-AO]

# Best Available Copy

Florida Power Corporation  
Anclote Power Plant  
Page 21 of 36

**PROPOSED Permit No.:** 1010017-003-AV

## Section III. Emissions Units and Conditions.

### Subsection B. This section addresses the following emissions units.

<u>E.U. ID No.</u>	<u>Brief Description</u>
-xxx	Relocatable Diesel Fired Generator(s)

These relocatable emissions units are Caterpillar Model 3508-DITA 820 kilowatt diesel generators. The maximum heat input is 25.74 million Btu per hour (MMBtu/hour) while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum rating of 2460 kilowatts. Emissions from the generators are uncontrolled. The generators may be relocated at any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Higgins Plant, Shore Drive, Oldsmar, Pinellas County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. The future FPC Polk County Site, County Road 555, 1 mi. southwest of Homeland, Polk County.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. Each generator has its own stack.}

The following specific conditions apply to the emissions units listed above regardless of location:

### Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum operation heat input rates are as follows:  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

<u>Unit No.</u>	<u>MMBtu/hr/generator(s) Heat Input</u>	<u>Fuel Type</u>
-xxx	25.74	New Low Sulfur No. 2 Fuel Oil

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition B.13.  
[Rule 62-297.310(2), F.A.C.]

## Best Available Copy

Florida Power Corporation  
Anclote Power Plant  
Page 22 of 36

**PROPOSED Permit No.:** 1010017-003-AV

**B.3. Methods of Operation - Fuels.** Only new low sulfur No. 2 fuel oil shall be fired in the combustion turbine(s).  
[Rule 62-213.410, F.A.C.]

**B.4. Hours of Operation.** The hours of operation expressed as "engine-hours" shall not exceed 2970 hours in any consecutive 12 month period. The total hours of operation expressed as "engine-hours" shall be the summation of the individual hours of operation of each generator.  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, AO 09-205952.]

### **Emission Limitations and Standards**

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**B.5. Visible Emissions.** Visible emissions from each generator shall not be equal to or greater than 20 percent opacity.  
[Rule 62-296.320(4)(b)1., F.A.C.; and, AO 09-205952.]

**B.6. Sulfur Dioxide - Sulfur Content.** The sulfur content of the new No. 2 fuel oil shall not exceed 0.50 percent, by weight.  
[Requested in initial Title V permit application dated June 12, 1996; and, AC 09-202080.]

### **Excess Emissions**

**B.7.** Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.  
[Rule 62-210.700(1), F.A.C.]

**B.8.** 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.  
[Rule 62-210.700(4), F.A.C.]

### **Monitoring of Operations**

**B.9.** The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor or permittee upon each fuel delivery. See specific condition B.12.  
[Rule 62-213.440, F.A.C.]

**B.10. Determination of Process Variables.**

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

**Test Methods and Procedures**

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit }

B.11. The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C.

[Rules 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

B.12. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s).

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

B.13. **Operating Rate During Testing.** Testing of emissions shall be conducted with the generator(s) operating at 90 to 100 percent of the maximum fuel firing rate of 186.3 gallons per hour. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operations may be limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Failure to submit the actual operating rate may invalidate the test.

[Rules 62-297.310(2), F.A.C.; and, Permit AO 09-205952.]

**B.14. Applicable Test Procedures.**

**(a) Required Sampling Time.**

2. **Opacity Compliance Tests.** When either EPA Method 9 or DEP Method 9 is specified as

**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 24 of 36

**PROPOSED Permit No.: 1010017-003-AV**

the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

- c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2.c., F.A.C.]

**B.15. Frequency of Compliance Tests.** The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

**(a) General Compliance Testing.**

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
  - a. Did not operate; or
  - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
  - a. Visible emissions, if there is an applicable standard;
8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.
9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. For each generator located in Pinellas County, FPC shall provide the same notification to the Air Quality Division of the Pinellas County Department of Environmental Management.

**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 25 of 36

**PROPOSED Permit No.:** 1010017-003-AV

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.  
[Rule 62-297.310(7), F.A.C.; SIP approved; and, AO 09-205952.]

B.16. Visible Emissions Testing - Annual. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning liquid fuels for less than 400 hours per year.  
[Rules 62-297.310(7)(a)4. & 8., F.A.C.]

B.17. After each relocation, each generator shall be tested within 30 days of startup for opacity and the fuel shall be analyzed for the sulfur content. See specific conditions B.6, B.9, and B.12.  
[Rules 62-4.070(3) and 62-297.310(7)(b), F.A.C.; and, AO 09-205952.]

**Recordkeeping and Reporting Requirements**

B.18. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, the owner or operator shall notify the Department's Southwest District Office, if a generator is located in Pasco County, in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.  
[Rule 62-210.700(6), F.A.C.]

B.19. Test Reports.

- (a) Each generator shall be tested on an annual basis within 30 days of the date October 25.
- (b) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 26 of 36

**PROPOSED Permit No.: 1010017-003-AV**

(c) The required test report shall be filed with the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management, if a generator is located in Pinellas County, as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(d) The test reports for a unit that has been relocated shall be submitted to the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management, if a generator is located in Pinellas County, within 45 days of testing.  
[Rule 62-297.310(8), F.A.C.; and, AO 09-25952.]

B.20. To demonstrate compliance with specific condition B.4, records shall indicate the daily hours of operation for each of the generators, the daily hours of operation expressed as "engine-hours" for each month. The records shall be maintained for a minimum of 5 years and made available to the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management upon request.  
[Rules 62-213.440 and 62-297.310(8), F.A.C.; and, AO 09-205952.]

B.21. To demonstrate compliance with specific condition B.6, records of the sulfur content, in percent by weight, of all the fuel burned shall be kept based on either vendor provided as-delivered or as-received fuel sample analysis. The records shall be maintained for a minimum of 5 years and made available to the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management upon request.  
[Rule 62-297.310(8), F.A.C.; and, AO 09-205952.]

**Source Obligation**

B.22. Specific conditions in construction permit AC 09-202080, limiting the "engine hours", were accepted by the applicant to escape Prevention of Significant Deterioration review. If Florida Power Corporation requests a relaxation of any of the federally enforceable emission limits in this permit, the relaxation of limits may be subject to the preconstruction review requirements of Rule 62-212.400(5), F.A.C., as though construction had not yet begun.  
[Rule 62-212.400(2)(g), F.A.C.; and, AC 09-202080 and AO 09-205952.]

B.23. Florida Power Corporation shall notify the Department's Southwest District Office, in writing, at least 15 days prior to the date on which any diesel generator is to be relocated. The notification shall specify the following:

- a. which generator, by serial number, is being relocated,
- b. which location the generator is being relocated from and which location it is being relocated to, and
- c. the approximate startup date at the new location.

If a diesel generator is to be relocated within Pinellas County, then Florida Power Corporation shall provide the same notification to the Air Quality Division of the Pinellas County Department of Environmental Management.

[Rule 62-4.070(3), F.A.C.; and, AC 09-202080]

**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 27 of 36

**PROPOSED Permit No.:** 1010017-003-AV

**Section IV. This section is the Acid Rain Part.**

**Operated by:** Florida Power Corporation  
**ORIS code:** 8048

**Subsection A. This subsection addresses Acid Rain, Phase II.**

The emissions units listed below are regulated under Acid Rain Part, Phase II.

<b>E.U. ID No.</b>	<b>Description</b>
-001	Fossil Fuel Fired Steam Generator No. 1
-002	Fossil Fuel Fired Steam Generator No. 2

1. The Acid Rain Part application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these acid rain units must comply with the standard requirements and special provisions set forth in the application listed below:

a. DEP Form No. 62-210.900(1)(a), dated 07/01/95.

[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

2. Sulfur dioxide (SO<sub>2</sub>) allowance allocations and nitrogen oxide (NO<sub>x</sub>) requirements for each Acid Rain unit:

<b>E.U. ID No.</b>	<b>EPA I.D.</b>	<b>Year</b>	<b>1990</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>
-001	1	SO <sub>2</sub> allowances, under Table 2, 3, or 4 of 40 CFR 73	12931*	12931*		
-002	2	SO <sub>2</sub> allowances, under Table 2, 3, or 4 of 40 CFR 73	12853*	12853*		

\*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2, 3, or 4 of 40 CFR 73.



**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 28 of 36

**PROPOSED Permit No.:** 1010017-003-AV

3. Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

a. No permit revision shall be required for increases in emissions that are authorized by allowances

acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a

permit revision pursuant to Rule 62-213.440(3), F.A.C.

b. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain program.

c. Allowances shall be accounted for under the Federal Acid Rain Program.  
[Rule 62-213.440(1)(c), F.A.C.]

5. Comments, notes, and justifications: None.

**Table 1-1, Summary of Air Pollutant Standards and Terms**

Florida Power Corporation  
Anclote Power Plant

PROPOSED Permit No.: 1010017-003-AV  
Facility ID No.: 1010017

**E.U. ID Nos.      Brief Description**

-001		Fossil Fuel Fired Steam Generator #1				Allowable Emissions		Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
Pollutant Name	Fuel(s) *	Hours/ Year *	Standards	lb/ hour	TPY	lb/hour **	TPY **				
Visible Emissions									Rule 62-296.405(1)(a), F.A.C. Rule 62.210.700(3), F.A.C. Order No. 1574	A.5 A.6	
Steady state	F.O.	8760	40% Opacity								
Soot Blowing or Load Changing	F.O.		60% Opacity								
PM Emissions									Rule 62.296.405(1)(b), F.A.C. Rule 62.210.700(3), F.A.C.	A.7 A.8	
Steady State	F.O.	8760	0.1 lb/MMBtu			496.44					
Soot Blowing or Load Changing	F.O.		0.3 lb/MMBtu			1,489.32	2,174.41				
Sulfur Dioxide									Rules 62-213.440, 62-296.405(1)(e)3., 62-296.40591)(c)1.i., F.A.C.	A.9 A.10	
	F.O.	8760	2.75 lb/MMBtu			11,652.10	59,796.20				
	F.O.	8760	2.50% by wt.								

-002		Fossil Fuel Fired Steam Generator #2				Allowable Emissions		Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
Pollutant Name	Fuel(s) *	Hours/ Year *	Standards	lb/ hour	TPY	lb/hour **	TPY **				
Visible Emissions									Rule 62-296.405(1)(a), F.A.C. Rule 62.210.700(3), F.A.C. Order No. 1574	A.5 A.6	
Steady state	F.O.	8760	40% Opacity								
Soot Blowing or Load Changing	F.O.		60% Opacity								
PM Emissions									Rule 62.296.405(1)(b), F.A.C. Rule 62.210.700(3), F.A.C.	A.7 A.8	
Steady State	F.O.	8760	0.1 lb/MMBtu			485.00	2,124.30				
Soot Blowing or Load Changing	F.O.		0.3 lb/MMBtu			1,455.00					
Sulfur Dioxide									Rules 62-213.440, 62-296.405(1)(e)3., 62-296.40591)(c)1.i.,	A.9 A.10	
	F.O.	8760	2.75 lb/MMBtu	159.90		11,652.10	59,796.20				
	F.O.	8760	2.50% by wt.								

XXX		Relocatable Generator(s)				Allowable Emissions		Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
Pollutant Name	Fuel(s) *	Hours/ Year *	Standards	lb/ hour	TPY	lb/hour **	TPY **				
Visible Emissions	#2 F.O.	8760	20% Opacity						Rule 62-296.320(4)(b)1., F.A.C.	B.5	
Sulfur Dioxide	#2 F.O.	8760	0.50% by wt.						Rule 62-296.320(4)(b)1., F.A.C.	B.6	

\* No. 1, 2, 3, 4, 5, & 6 fuel oil and on-specification used oil. Maximum amount of used oil burned in each emissions unit shall not exceed 10 percent of the total heat input per unit.

\*\* The "Equivalent Emissions" listed are for informational purposes only.

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**Table 1-2, Summary of Air Pollutant Standards and Terms**

Florida Power Corporation  
Anclote Power Plant

PROPOSED Permit No.: 1010017-003-AV  
Facility ID No.: 1010017

**Additional Standards for On-Specification Used Oil (OSUO)**

E.U. ID Nos.      Brief Description

001		Fossil Fuel Fired Steam Generator #1				Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
Pollutant Name	Fuel(s)	Hours/Year*	Standards	lbs./hour	TPY	lbs./hour	TPY		
Arsenic	OSUO		5.0 ppm						
Cadmium	OSUO		2.0 ppm						
Chromium	OSUO		10.0 ppm						
Lead	OSUO		100.0 ppm						
Total Halogens	OSUO		1000 ppm						
Flash Point	OSUO		≥ 100 degrees F						
PCB	OSUC		≤ 49 ppm						
SO <sub>2</sub>			2.5 % by weight						

002		Fossil Fuel Fired Steam Generator #2				Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
Pollutant Name	Fuel(s)	Hours/Year*	Standards	lbs./hour	TPY	lbs./hour	TPY		
Arsenic	OSUO		5.0 ppm						
Cadmium	OSUO		2.0 ppm						
Chromium	OSUO		10.0 ppm						
Lead	OSUO		100.0 ppm						
Total Halogens	OSUO		1000 ppm						
Flash Point	OSUO		≥ 100 degrees F						
PCB	OSUO		≤ 49 ppm						
SO <sub>2</sub>			2.5 % by weight						

\* The maximum quantity of used oil that may be burned in each emissions unit shall not exceed 10 percent of the total heat input per emissions unit. This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**Table 2-1, Summary of Compliance Requirements**

Florida Power Corporation  
Anclote Power Plant

PROPOSED Permit No.: 1010017-003-AV  
Facility ID No.: 1010017

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. # -001 & -002		Fossil Fuel Fired Steam Generator #1 & #2					
Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time or Frequency	Frequency Base Date <sup>1</sup>	Min. Compliance Test Time	CMS <sup>2</sup>	See Permit Condition(s)
Visible Emissions Steady State Soot Blowing or Load Changing	F.O.	DEP Method 9	Annual	#1-within 60 days of Jul. 28 #2-within 60 days of Aug. 24	1 hour	NA	A.16, A.17 A.16, A.17
	F.O.	DEP Method 9	Annual		1 hour		
Particulate Matter Steady State Soot Blowing or Load Changing	F.O.	EPA Methods 17 <sup>3</sup> , 5, 5B, 5F	Annual	#1-within 60 days of Jul. 28 #2-within 60 days of Aug. 24	3 hour	NA	A.18 A.18
	F.O.		Annual		3 hour		
Sulfur Dioxide	F.O.	Fuel sampling and analysis	Each Delivery	Each delivery	NA	NA	A.14, A.19, A.20
Arsenic, Cadmium, Chromium, Lead, Total Halogens, Flash Point, PCB	OSUO <sup>4</sup>	SW 846 <sup>5</sup>	Each Delivery	Each Delivery	NA	NA	A.32

- 1 - Frequency base date established for planning purposes only; see guidance memo and Rule 62-297.310, F.A.C.
- 2 - Continuous Monitoring System.
- 3 - EPA Method 17 may be used only if the stack gas exit temperature is less than 375 degrees F.
- 4 - On-Specification Used Oil.
- 5 - EPA Publication, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods.

## Best Available Copy

Florida Power Corporation  
Anclote Power Plant  
Page 32 of 36

PROPOSED Permit No.: 1010017-003-AV

**Appendix I-1. List of Insignificant Emissions Units and/or Activities.**

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62.210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

1	Lube Oil System Vents
2	Lube Oil Reservoir Tank
3	Oil Water Separators
4	Hazardous Waste Building
5	Parts Washers/Degreasers
6	Waste Oil Storage Tanks
7	Lube Oil Storage Building
8	Portable Unleaded Gasoline Tank
9	Evaporation of non-hazardous boiler cleaning chemical
10	No. 2 Diesel Fuel Tank

**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 33 of 36

**PROPOSED Permit No.: 1010017-003-AV**

**Appendix U-1. List of Unregulated Emissions Units and/or Activities.**

Unregulated Emissions Units and/or Activities. An emissions unit which emits no "emissions-limited pollutant" and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither 'regulated emissions units' nor 'exempt emissions units'.

<b>Emissions Unit</b>	<b>Description</b>
-xxx	Surface Coating and Solvent Cleaning
-xxx	General Purpose Engines
-xxx	Fuel Storage Tanks
-xxx	Helper Cooling Towers
-xxx	Emergency Generators

**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 35 of 36

**PROPOSED Permit No.: 1010017-003-AV**

**Appendix SS-1, Stack Sampling Facilities**

**Best Available Copy**

Florida Power Corporation  
Anclote Power Plant  
Page 36 of 36

**PROPOSED Permit No.: 1010017-003-AV**

**Appendix TV-1, Title V Conditions**



## PROPOSED PERMIT DETERMINATION

Florida Power Corporation  
PROPOSED Permit No.: 1010017-001-AV  
Page 1 of

Post-it® Fax Note	7671	Date 11-24	# of pages 3
To	Scott "D"	From	H. Logan
Co./Dept.		Co.	
Phone #		Phone #	
Fax #		Fax #	

### **I. Public Notice.**

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" to Florida Power Corporation for the Anclote Power located at 1729 Baileys Bluff Road, Holiday, Pasco County was clerked on August 19, 1997. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in The Tampa Tribune on August 25, 1997. The DRAFT Title V Air Operation Permit was available for public inspection at the Southwest District Office in Tampa and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on August 28, 1997.

### **II. Public Comment(s).**

Comments were received and the DRAFT Title V Operation Permit was changed. The comments were not considered significant enough to reissue the DRAFT Title V Permit and require another Public Notice. Comments were received from one respondent during the 30 (thirty) day public comment period. Listed below is each comment letter in the chronological order of receipt and a response to each comment in the order that the comment was received. The comment(s) will not be restated. Where duplicative comments exist, the original response is referenced.]

A. Letter from Mr. Scott H. Osbourn dated and received by fax on October 13, 1997 .

#### **General Comments:**

1. The correct date the Title V permit application was received is June 14, 1996.
2. FPC will be provided a copy of the Notice intended to be published and proof of publication.

#### **Section II. Facility-wide Conditions**

##### **1. Condition 1, Page 4 of 35:**

The final permit will include the latest version of Appendix TV-1.

Proposed Permit Determination  
Florida Power Corporation  
Anclote Power Plant, Facility ID No. 1010017  
Page 2 of 7

**2. Condition 3, Page 4 of 35:**

Reference to Chapter 62-297 is applicable. No change will be made.

**3. Condition 7, Page 5 of 35:**

The verbiage “allow no person to” will be replaced with “not”. “Not Federally Enforceable” will be inserted at the beginning of this condition.

**Section III. Subsection A Conditions**

**1. Condition A.3, Page 7 of 35:**

The verbiage “higher grades” will be corrected to “lighter grades”.

**2. Condition A.9, Page 8 of 35:**

This condition will be changed to read as follows:

**A.9. Sulfur Dioxide.** When burning liquid fuel, sulfur dioxide emissions shall not exceed 2.75 pounds per million Btu heat input, as measured by applicable compliance methods specified in conditions A.19 and A.20.

[Rule 62-296.405(1)(c)1.j., F.A.C.]

**3. Condition A.10, Page 8 of 35:**

The request to delete is withdrawn by the permittee. No change made.

**Appendix E-1, Page 31 of 35:**

1. Oil Water Separators, Hazardous Waste Building, and Lube Oil Storage Building will be deleted from this Appendix.

**Table 2-1, Page 30 of 35:**

1. Reference to a guidance memo in Footnote 1 will be deleted.

**III. Conclusion.**

The permitting authority will issue the PROPOSED Permit No.: 1030012-001-AV, with any changes noted above.



# Environmental Services Department

## FAX COVER SHEET

DATE: 7/2/97

TO: Charles Logan

FAX# (850) 922-2979

COMPANY: FDEP

FROM: [Signature]

PHONE # (813) 866-5158

FAX # 1

NUMBER OF PAGES TRANSMITTED 12

Please call number listed above for any transmission problems.

**COMMENTS:**

As we discussed. Call me if you have any questions



Florida Power Corporation  
Anclote Power Plant  
Page 2 of 29

DRAFT Permit No.: 1010017-003-AV

**Section I. Facility Information.**

**Subsection A. Facility Description.**

This facility consists of two fuel oil fired steam electric generating stations, E.U. ID No. -001 (Unit No. 1) and -002 (Unit No. 2). Unit No. 1 consists of a Combustion Engineering, Inc., Type CCRR boiler/steam generator and steam turbine which drives a generator with a nameplate rating of 540 Megawatts. Unit No. 2 consists of a Combustion Engineering, Inc., Type CCRR boiler/steam generator and steam turbine which drives a generator with a nameplate rating of 525 Megawatts. Units No. 1 and No. 2 share a common stack. Also included in this permit are miscellaneous unregulated emissions units and/or activities. ~~Three~~ relocatable ~~820~~ <sup>25.74</sup> kilowatt diesel fired generators with a maximum heat input of ~~8.58~~ <sup>2.46</sup> MMBtu/hour are located at the facility but may be relocated at other FPC facilities.   
 (maximum 2,460kw)

*each*

*X Ok*  
*the unit*

*SEE Facility page 10*

Based on the initial Title V permit application received on June 14, 1996, this facility is ~~not~~ a major source of hazardous air pollutants (HAPs).

*nickel*

**Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).**

<u>E.U. ID No.</u>	<u>Brief Description</u>
-001	Fuel Oil Fired Steam Electric Generator No. 1
-002	Fuel Oil Fired Steam Electric Generator No. 2
-xxx	(3 - Relocatable <del>820</del> <sup>25.74</sup> Kilowatt Diesel Generators) <del>(MAXIMUM 2,460kw)</del>

**Unregulated Emissions Units and/or Activities**

- xxx Surface Coating and Solvent Cleaning
- xxx Fuel Storage Tanks
- xxx Emergency Generators
- xxx General Purpose Engines

*Help for cooling towers*

*OK*

*-xxx Help for cooling towers*

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Florida Power Corporation  
Anclote Power Plant  
Page 7 of 29

DRAFT Permit No.: 1010017-003-AV

#2 oil,  
on-spec

A.3. Methods of Operation, Fuel(s).

- a. Startup: The only fuels allowed to be burned are new #6 or higher grades of fuel oils, and on-spec used oil. The maximum sulfur content is 2.5 percent, by weight. OK  
lighter
- b. Normal: The only fuels allowed to be burned are new #6 or higher grades of fuel oils and on-specification used oil. The maximum sulfur content is 2.5 percent, by weight. lighter OK
- c. The maximum amount of on-specification used oil, whether generated on or off-site, that can be burned in each emissions unit shall not exceed 10 percent of the total permitted heat input per emissions unit. OK  
← 2 ppm PCB's

[Rule 62-213.410, F.A.C.; and, AO 51-254492A]

A.4. Hours of Operation. These emissions units may operate continuously, i.e., 8,760 hours/year.

[Rule 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.5. Visible Emissions. Visible emissions shall not exceed 40 percent opacity. Emissions units governed by this visible emissions standard shall conduct a compliance test for particulate matter emissions annually. Failure of the facility to demonstrate compliance with the particulate matter allowable in specific condition A.7 or the opacity standard of this condition shall constitute grounds for revocation of this condition.

[Rule 62-296.405(1)(a), F.A.C.; and, OGC File No. 86-1574/Order dated Decembr 11, 1986.]

A.6. Visible Emissions - Soot Blowing and Load Change. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

[Rule 62-210.700(3), F.A.C.]

A.7. Particulate Matter. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods.

[Rule 62-296.405(1)(b), F.A.C.]

A.8. Particulate Matter - Soot Blowing and Load Change. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

[Rule 62-210.700(3), F.A.C.]



Florida Power Corporation  
Anclote Power Plant  
Page 8 of 29

DRAFT Permit No.: 1010017-003-AV

A.9. Sulfur Dioxide. When burning liquid fuel, sulfur dioxide emissions shall not exceed 2.75 pounds per million Btu heat input, as measured by applicable compliance methods.  
[Rule 62-296.405(1)(c)1j., F.A.C.]

A.10. Sulfur Dioxide - Sulfur Content. The sulfur content of fuel oils, on-specification used oil, or any combination of the two burned in these units, shall not exceed 2.5 percent, by weight. See specific condition A.20.  
[Rule 62-296.405(1)(e)3., F.A.C.; and, requested by the applicant in Title V Application dated June 12, 1996.]

#### Excess Emissions

A.11. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.  
[Rule 62-210.700(1), F.A.C.]

A.12. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.  
[Rule 62-210.700(2), F.A.C.]

A.13. 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.  
[Rule 62-210.700(4), F.A.C.]

#### Monitoring of Operations

✓ A.14. Sulfur Dioxide. The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery. This protocol is allowed because the emissions units do not have an operating flue gas desulfurization device. See specific conditions A.10., A.19. and A.20.  
[Rule 62-296.405(1)(f)1.b., F.A.C.]

OK  
OK for permittee

A.15. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

Florida Power Corporation  
Anclote Power Plant  
Page 10 of 29

DRAFT Permit No.: 1010017-003-AV

missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.]

A.18. Particulate Matter. The test methods for particulate emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17.

[Rules 62-296.405(1)(e)2. and 62-297.401, F.A.C.]

A.19. Sulfur Dioxide. The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedences of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, as an alternate sampling procedure authorized by permit, the permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery. See specific conditions A.9., A.10. and A.20.

[Rules 62-213.440, 62-296.405(1)(e)3. and 62-297.401, F.A.C.; and, Permits 1010017-001-AO and AO 51-254492A.]

A.20. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, or both ASTM D4057-88 and ASTM D129-01.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

A.21. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's

Florida Power Corporation  
Anclote Power Plant  
Page 20 of 29

DRAFT Permit No.: 1010017-003-AV

### Section III. Emissions Units and Conditions.

Subsection B. This section addresses the following emissions units.

E.U. ID No.	Brief Description
-xxx	(3) Relocatable 820 Kilowatt Diesel Fired Generators (Maximum 2,400 kw)

These relocatable emissions units are Caterpillar Model 3508 DITA 820 kilowatt diesel generators. They each have a maximum heat input of 2.58 million Btu per hour (MMBtu/hour) while being fueled by 62 gallons of new No. 2 fuel oil per hour. Emissions from the generators are uncontrolled. The generators may be relocated at any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Higgins Plant, Shore Drive, Oldsmar, Pinellas County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. The future FPC Polk County Site, County Road 555, 1 mi. southwest of Homeland, Polk County.

(Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. Each generator has its own stack.

The following specific conditions apply to the emissions units listed above regardless of location:

#### Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum operation heat input rates are as follows:

Unit No.	MMBtu/hr/generator Heat Input	Fuel Type
-xxx	2.58 <sup>2.574</sup> maximum	New Low Sulfur No. 2 Fuel Oil
-xxx	8.58	New Low Sulfur No. 2 Fuel Oil
-xxx	8.58	New Low Sulfur No. 2 Fuel Oil

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition B.13. [Rule 62-297.310(2), F.A.C.]

186.3

25.74  
chk. w/ sheet

level cannot be



Florida Power Corporation  
Anclote Power Plant  
Page 21 of 29

DRAFT Permit No.: 1010017-003-AV

*in permit & cannot blend*

B.3. Methods of Operation - Fuels. Only <sup>new</sup> low sulfur No. 2 fuel oil shall be fired in the combustion turbine(s). X  
[Rule 62-213.410, F.A.C.]

B.4. Hours of Operation. The hours of operation expressed as "engine-hours" shall not exceed 2970 hours in any consecutive 12 month period. The total hours of operation expressed as "engine-hours" shall be the summation of the individual hours of operation of each generator.  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, AO 09-205952.]

#### Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.5. Visible Emissions. Visible emissions from each generator shall not be equal to or greater than 20 percent opacity.  
[Rule 62-296.320(4)(b)1., F.A.C.; and, AO 09-205952.]

B.6. Not federally enforceable. Sulfur Dioxide - Sulfur Content. The sulfur content of the new No. 2 fuel oil shall not exceed 0.50 percent, by weight. X  
[Requested in initial Title V permit application dated June 12, 1996; and, AO 09-225952.]

#### Excess Emissions

B.7. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.  
[Rule 62-210.700(1), F.A.C.]

B.8. 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.  
[Rule 62-210.700(4), F.A.C.]

#### Monitoring of Operations

B.9. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery. See specific condition B.12.  
[Rule 62-213.440, F.A.C.]

*on the permittee*  
*OK*

Florida Power Corporation  
Anclote Power Plant  
Page 22 of 29

DRAFT Permit No.: 1010017-003-AV

**B.10. Determination of Process Variables.**

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

**Test Methods and Procedures**

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.11. The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C.

[Rules 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

B.12. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, or both ASTM D4057-88 and ASTM D1295-91. 95 OK

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

B.13. **Operating Rate During Testing.** Testing of emissions shall be conducted with the generators operating at  $\pm 10$  percent of the maximum fuel firing rate of 62.1 gallons per hour. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operations may be limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Failure to submit the actual operating rate may invalidate the test.

[Rules 62-297.310(2), F.A.C.; and, Permit AO 09-205952.]

**B.14. Applicable Test Procedures.**

(a) **Required Sampling Time.**

2. **Opacity Compliance Tests.** When either EPA Method 9 or DEP Method 9 is specified as

Florida Power Corporation  
Anclote Power Plant  
Page 24 of 29

DRAFT Permit No.: 1010017-003-AV

exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62-210.300(4), F.A.C.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply. [Rule 62-297.310(7), F.A.C.; and, AO 09-205952.]

B.16. Visible Emissions Testing - Annual. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning liquid fuels for less than 400 hours per year.

[Rules 62-297.310(7)(a)4. & 8., F.A.C.]

B.17. After each relocation, each generator shall be tested within 30 days of startup for opacity and the fuel shall be analyzed for the sulfur content. See specific conditions B.6, B.9, and B.12. [Rules 62-4.070(3) and 62-297.310(7)(b), F.A.C.; and, AO 09-205952.]

#### Recordkeeping and Reporting Requirements

B.18. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management, if a generator is located in Pinellas County, in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

*Anclote is in Pasco county*

B.19. Test Reports.

(a) Each generator shall be tested on an annual basis within 30 days of the date October 25.

(b) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

Florida Power Corporation  
Anclote Power Plant  
Page 25 of 29

DRAFT Permit No.: 1010017-003-AV

(c) The required test report shall be filed with the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management, if a generator is located in Pinellas County, as soon as practical but no later than 45 days after the last sampling run of each test is completed. ?

(d) The test reports for a unit that has been relocated shall be submitted to the the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management, if a generator is located in Pinellas County, within 45 days of testing. ?  
[Rule 62-297.310(8), F.A.C.; and, AO 09-25952.]

B.20. To demonstrate compliance with specific condition B.4, records shall indicate the daily hours of operation for each of the generators, the daily hours of operation expressed as "engine-hours" for each month. The records shall be maintained for a minimum of 2 years and made available to the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management upon request. ?  
[Rule 62-297.310(8), F.A.C.; and, AO 09-205952.]

B.21. To demonstrate compliance with specific condition B.5, records of the sulfur content, in percent by weight, of all the fuel burned shall be kept based on either vendor provided as-delivered/received fuel sample analysis. The records shall be maintained for a minimum of 5 years and made available to the Southwest District Office and the Air Quality Division of the Pinellas County Department of Environmental Management upon request.  
[Rule 62-297.310(8), F.A.C.; and, AO 09-205952.]

#### Reasonable Assurances

B.21. Specific conditions in construction permit AC 09-202080, limiting the "engine hours", were accepted by the applicant to escape Prevention of Significant Deterioration review. If Florida Power Corporation requests a relaxation of any of the federally enforceable emission limits in this permit, the relaxation of limits may be subject to the preconstruction review requirements of Rule 62-212.400(5), F.A.C., as though construction had not yet begun.  
[Rule 62-212.400(2)(g), F.A.C.; and, AC 09-202080 and AO 09-205952.]



Florida Power Corporation  
Anclote Power Plant  
Page 28 of 29

DRAFT Permit No.: 1010017-003-AV

**Appendix U-1. List of Unregulated Emissions Units and/or Activities.**

Unregulated Emissions Units and/or Activities. An emissions unit which emits no "emissions-limited pollutant" and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither 'regulated emissions units' nor 'exempt emissions units'.

Emissions Unit	Description
-xxx	Surface Coating and Solvent Cleaning
-xxx	General Purpose Engines
-xxx	Fuel Storage Tanks
-xxx	Emergency Generator

-- Helix cooling towers OK

**Table 2-1, Summary of Compliance Requirements**

Florida Power Corporation  
Anclote Power Plant

*Unit 1 23 July  
Unit 2 24 Aug*

DRAFT Permit No.: 1010017-003-AV  
Facility ID No.: 1010017

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. -001	Fossil Fuel Fired Steam Generator #1						
Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time or Frequency	Frequency Base Date <sup>1</sup>	Min. Compliance Test Time	CMS <sup>2</sup>	See Permit Condition(s)
Visual Emissions Steady State	F.O.	DEP Method 9	Annual	7 1-Oct. 23	1 hour	NA	A.16, A.17
	F.O.	DEP Method 9	Annual	1-Oct. 24	1 hour		A.16, A.17
Soot Blowing or Load Changing							
Particulate Matter Steady State	F.O.	EPA Methods 17 <sup>3</sup> , 5, 5B, 5F	Annual	7 1-Oct.	3 hour	NA	A.18
	F.O.		Annual	1-Oct.			
Soot Blowing or Load Changing							
Sulfur Dioxide	F.O.	Fuel sampling and analysis	Each Delivery	Each delivery	NA	NA	A.14, A.19, A.20
Arsenic, Cadmium, Chromium, Lead, Total Halogens, Flash Point, PCB	OSUO	SW 846 <sup>5</sup>	Each Delivery	Each Delivery	NA	NA	A.32

1 - Frequency base date established for planning purposes only; see guidance memo and Rule 62-297.310, F.A.C.  
 2 - Continuous Monitoring System.  
 3 - EPA Method 17 may be used only if the stack gas exit temperature is less than 375 degrees F.  
 4 - On-Specification Used Oil.  
 5 - EPA Publication, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods.

TO: Scott M. Sheplak, P.E.  
FROM: Charles S. Logan   
DATE: ~~June 12, 1997~~  
*August 8, 1997*  
Re: Intent package for DRAFT Permit No.: 1010017-003-AV  
Florida Power Corporation  
Anclote Power Corporation

**Permit Clock: NA**

This permit is for the initial Title V air operation permit for the subject facility.

Additional information was not requested. Comments were not received from the District office.

This facility reported that each emissions unit was in compliance at the time of the application

I recommend that this Intent to Issue be sent out as attached.

csl/

6/12/97 TO: CHARLES LOGAN

Florida Department of

Memorandum

Environmental Protection

TO: Jerry Kissel, Southwest District

FROM: Clair Fancy, Chief *CHF*  
Bureau of Air Regulation

DATE: September 15, 1995

SUBJECT: Florida Power Corp Anclote 1  
AO 51-254492  
Request to Burn On-Specification Off-Site Generated  
Used Oil

After reviewing this situation and discussing with Scott Osborn of FPC and Bruce Mitchell of BAR, I have concluded that there are no federally enforceable restrictions to prevent FPC from burning on-spec used oil. There are no physical modifications required to burn this material, and therefore, the unit appears to be capable of accommodating this fuel, and consequently, PSD applicability is not an issue.

The draft permit sent to Al Linero on May 24 can be issued.

Rule 62-710, F.A.C., entitled Used Oil Management, requires that the hauler be registered with the Department. Permits shall not be required under this rule for the burning of used oil provided a valid Department air permit is in effect for the facility (Rule 62-710.800(5)).

CHF/h

cc: Howard L. Rhodes

RECEIVED  
SEP 19 1995  
Department of Environmental Protection  
BY SOUTHWEST DISTRICT





# Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: _____	LOCTN: _____
To: _____	LOCTN: _____
To: _____	LOCTN: _____
FROM: _____	DATE: _____

TO: District Managers  
 District Air Engineers  
 District Air Permitting Engineers  
 Local Program Air Directors

DRAFT

THRU: Randy Armstrong  
 Howard Rhodes  
 Richard Wilkins

FROM: Clair Fancy

DATE: October 22, 1987

SUBJ: Policy to Regulate Used Oil Burning

On November 29, 1985, the U.S. EPA promulgated final regulations on the burning of used oil fuel. These regulations establish specifications for used oil fuel that may be burned in non-industrial boilers. The Department has adopted the rule by reference and has communicated its position on used oil burning by means of a memorandum sent to managers of electric utilities, asphalt plants, and other industrial burners on January 5, 1987.

At the time that the January 5, 1987 memorandum was distributed, the Department was uncertain how used oil fuel which did not meet the specifications established by the EPA rule should be handled. Since that time, the Bureau of Air Quality Management (BAQM) has been actively involved in developing guidelines to regulate the burning of used oil fuel which does not meet EPA specifications. This memorandum provides a summary of the specification limits established by the EPA for burning used oil in non-industrial boilers as well as presenting the BAQM's policy for regulating the emissions from burning off-specification used oil in industrial furnaces and boilers. The policy to regulate off-specification used oil is based on a paper which was presented at the 1987 Annual Conference of the Florida Section's Air Pollution Control Association by Barry Andrews. A copy of the paper is attached. In addition, this memorandum will address how sources burning either specification or off-specification used oil should be permitted.

NOV 2 1987

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

1,000 ppm max \*  
\*used oils w/ > 1000 ppm  
still not be burned unless  
the fuel supplier demonstrates  
no halogenated hazardous waste

On-Specification Used Oil Burning

Emission Limitations

Non-industrial boilers may only burn oil which is in compliance with the following limitations:

<u>Constituent/Property</u>	<u>Allowable Level</u>
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	4,000 ppm maximum *
Flash Point	100 degrees Fahrenheit minimum

\* It is presumed that used oil containing greater than 1,000 ppm total halogens has been mixed with a halogenated hazardous waste. Used oil fuels that contain more than 1,000 ppm total halogens should not be burned in non-industrial boilers unless the marketer can show that the used oil does not contain any halogenated hazardous waste.

Industrial boilers and furnaces may also burn specification used oil.

Permitting Guidelines

Specification used oil will be considered to be equivalent to virgin oil. Only in the case that an air permit or BACT determination does specifically prohibit the burning of used oil, will it be necessary to contact the appropriate district or local office to obtain authorizations.

Off-Specification Used Oil Burning

Emission Limitations

Non-industrial boilers may not burn used oil which exceeds the previously mentioned specification levels.

Industrial boilers and furnaces may only burn used oil which complies with the following limitations. These emission limitations are based on the type of fuel burning equipment used as follows:

Asphaltic Concrete Kilns, Light-Weight Aggregate Kilns,  
Lime Kilns, and Industrial Boilers

Arsenic, Cadmium, and Chromium:

$$\frac{(As)}{3.9 \times 10^{-4}} + \frac{(Cd)}{9.8 \times 10^{-4}} + \frac{(Cr)}{1.4 \times 10^{-3}} \leq 1.0$$

where (As), (Cd), and (Cr) defined by

$$MFR = \frac{(M_w \times R_w) + (M_F \times R_F)}{H_T} \times 10^{-6}$$

where:

MFR - individual metal feed rate in pounds per million Btu of total heat input

M<sub>w</sub> - individual metal concentration in used oil (ppm)

R<sub>w</sub> - used oil feed rate in pounds per hour

M<sub>F</sub> - concentration of metal in the other fuel (ppm)

R<sub>F</sub> - feed rate of other fuel in pounds per hour

H<sub>T</sub> - total heat input to the device in million Btu/hour

Lead:

MFR shall not exceed  $1.6 \times 10^{-2}$  pounds per million Btu.

Hydrogen Chloride:

CFR shall not exceed 0.70 pounds per million Btu.

where CFR is defined by

$$CFR = \frac{(C_w \times R_w) + (C_F \times R_F)}{H_T} \times 10^{-6}$$

Where:

CFR - total chlorine feed rate in pounds per million Btu

C<sub>w</sub> - Chlorine concentration in the used oil (ppm)

C<sub>F</sub> - Chlorine concentration in the other fuel (ppm)

DDATT

Cement Kilns (Wet & Dry)

Arsenic, Cadmium, and Chromium:

$$\frac{(As)}{1.7 \times 10^{-3}} + \frac{(Cd)}{4.3 \times 10^{-3}} + \frac{(Cr)}{6.3 \times 10^{-3}} \leq 1.0$$

Lead:

MFR shall not exceed  $6.7 \times 10^{-2}$  pounds per million Btu.

Hydrogen Chloride:

CFR shall not exceed 1.8 pounds per million Btu.

Permitting Guidelines

For facilities presently burning or planning to burn off-specification used oil it will be necessary to contact the appropriate district or local program office to obtain authorization (permit revision). It is expected that the majority of the requests to burn off-specification used oil will be in compliance with the emission limitation equations presented herein. To expedite approval, the various districts will be provided with worksheets and detailed instructions to quickly determine if an off-specification used oil burner will be in compliance.

Exemptions

Exemptions will be granted to facilities which generate and burn small quantities of off-specification used oil on site. To qualify for this exemption a burner must only burn off-specification used oil fuel that is generated on-site and is burned in quantities that do not exceed one percent of a particular fuel burning equipment's total volume consumption or heat input. On-site burners will be characterized as "small quantity" burners by the following criteria:

Page 5  
October 22, 1987

<u>Equipment</u>	<u>Size (MMBtu/hr)</u>	<u>Quantity limit/device (gallon/month)</u>	<u>384</u>
Boilers (1)	0.4 to 1.5	7	
	>1.5 to 10	13	
	>10 to 50	26	
	>50 to 150	55	
	>150 to 400	100	
	>400	300	3,600
Asphaltic Concrete kilns (2)	>18	110	
Lime kilns (3)	>60	200	
Light-Weight Aggregate kilns (4)	>45	110	
	90 to 200	170	
Wet Cement kilns (5)	>200	420	
	60 to 160	140	
Dry Cement kilns (5)	>160	280	

- (1) No more than two boilers at a time
- (2) No more than one asphaltic concrete kiln at a time
- (3) No more than two lime kilns at a time
- (4) No more than three light-weight aggregate kilns at a time
- (5) No more than three cement kilns at a time

### Conclusion

The Bureau of Air Quality Management believes that the policy outlined in the memorandum will accomplish the Department's goal to encourage the burning of used oil, yet provide assurance that the public's health and environment will not be threatened.

As with any regulation or policy development, it is difficult to address all the situations and problems that could occur when writing proposals for regulating sources. Any questions regarding the content of this memorandum should be directed to Barry Andrews, Project Engineer, Bureau of Air Quality Management, at (904)488-1344.

CF/plm

REC 100996

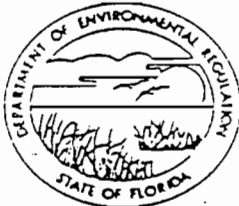
Best Available Copy

OIL, USED

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

MEMORANDUM

TO: Managers of Electric Utilities, Asphalt Plants, and Other Industrial Burners

FROM: Victoria J. Tschinkel

DATE: January 5, 1987

RE: Used Oil as a Fuel

On April 28, 1986, I issued a memorandum to inform you of recently promulgated federal rules on the burning of used oil. Because some recipients of that memorandum have voiced concerns about the Department's interpretation of certain provisions of the regulations, this memorandum supersedes all previous communication on the subject of used oil as a fuel.

On November 29, 1985, the U.S. EPA promulgated final RCRA regulations on the burning of used oil fuel. The Department has adopted these regulations by reference. The EPA regulations establish specifications for used oil fuel that may be burned in nonindustrial boilers.

Used Oil Specifications

<u>Constituent/Property</u>	<u>Allowable Level</u>
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	4,000 ppm maximum
Flash Point	100 degrees Fahrenheit minimum

Burning of off-specification used oil and hazardous waste fuels in non-industrial boilers is prohibited by the RCRA rules. The April 28 memorandum may have left some readers with the impression that industrial burners were also restricted by these rules to burning fuel that met specifications; however,

Memorandum  
Page Two  
January 5, 1987

industrial boilers and furnaces may burn hazardous waste fuel and used oil fuel, regardless of whether the fuels meet specifications. It should be noted, however, that facilities that burn hazardous waste fuel and off-specification used oil fuel are still subject to administrative requirements such as notification, receipt of an identification number, compliance with the manifest or invoice systems, and, for hazardous waste fuels, compliance with hazardous waste storage standards for hazardous waste fuels.

No level for PCBs is included in the used oil specifications, since the use, including burning for energy recovery, of used oil containing any concentrations of PCBs is prohibited under current federal regulations. Some readers of the April 28 memorandum expressed concern about this statement, asserting that 40 CFR §761.1 makes federal PCB regulations applicable only to substances containing more than 50 ppm PCBs. I have conferred with EPA headquarters concerning the federal position on the issue of burning used oil contaminated with less than 50 ppm PCBs. It is EPA's position that the burning for energy recovery of used oils containing any concentration of PCBs was prohibited as of October 1, 1984. This conclusion is based on 40 CFR §761.20(a), which prohibits use of PCBs in any concentration unless it is specifically authorized under 40 CFR §761.30. Although EPA has authorized the processing and distribution in commerce of PCBs in concentrations of less than 50 PPM for purposes of disposal, 40 CFR §761.20(c)(4), that agency has taken the position that burning for energy recovery is "use" rather than "disposal" and is, therefore, prohibited. Note, however, that PCBs in concentrations of less than 50 ppm may be burned in a high efficiency boiler as an approved PCB disposal method pursuant to 40 CFR §761.60, provided that state air permitting requirements have also been satisfied.

Ms. Jane Kim of the Office of Toxic Substances at EPA headquarters (202/382-3991) has indicated to Department staff that EPA is considering amending federal PCB regulations to allow the burning for energy recovery of used oil containing less than 50 ppm PCBs. Until then, she suggests that companies wishing to burn these oils submit a request to EPA Region IV for authorization with respect to the federal rules. I suggest that interested parties direct any comments on the federal regulation or the anticipated amendment directly to EPA.\*

\* Since the state PCB rule, Rule 17-34, Florida Administrative Code, only regulates the storage for disposal of PCBs, the use of PCBs is not regulated by the Department. However, Department air rules 17-2, F.A.C., and the basic permitting requirement of Chapter 403 F.S. must be complied with.

BEST AVAILABLE COPY

Memorandum  
Page Three  
January 5, 1987

Although the specification for total halogens (chemicals containing chlorine, bromine, iodine, or fluorine) is 4,000 ppm, used oil containing over 1,000 ppm will be presumed to have been mixed with a halogenated hazardous waste. In the April 29 memorandum, I stated that used oil fuels with more than 1,000 ppm total halogens should not be burned in boilers unless the marketer can show that the used oil does not contain any halogenated hazardous wastes. To clarify any confusion that this statement may have caused, I would like to make the following points:

1. As noted above, hazardous waste fuel and off-specification used oil fuel may be burned for energy recovery in industrial boilers. We did not intend to suggest that such use is prohibited by the RCRA rule.
2. Also, as previously noted, persons may rebut the presumption that used oil containing more than 1,000 ppm total halogens has been mixed with hazardous waste (for example, by showing that the used oil does not contain significant concentrations of halogenated hazardous constituents). The use of the word "any" may have caused some confusion in our cautionary statement; however, since the management and storage standards for used oil and hazardous waste fuels differ, the Department felt that a strong caution was in order.

Finally, I would like to clarify the discussion in my April 28, 1986, memorandum regarding air permitting considerations for the burning of used oil. In that memorandum I stated that the authorization to burn used oil requires that air construction permits be modified to insure that any changes to permit conditions will be federally enforceable. Upon reconsideration on this point, I am now revising the guidance in the previous memorandum as follows:

1. If your current air pollution operation permit, construction permit, or BACT determination does not specifically prohibit the burning of used oil, then you may responsibly burn "on-specification" used oil without any permit modification until the Department notifies you that your permit needs to be revised.



BEST AVAILABLE COPY

Memorandum  
Page Four  
January 5, 1987

2. If your air permit or BACT determination specifically prohibits the burning of used oil, or if you are burning "off-specification" used oil, you will need to contact the appropriate Department district office within the next 90 days to discuss what type of authorization is needed.

In addition to the air permitting considerations, facilities that burn more than 10,000 gallons of used oil annually must register with the Department as use oil recyclers in accordance with Florida Administrative Code Rule 17-7, Part V, unless specifically exempted under the provisions of that rule.

By burning used oil in an approved manner, you will help Florida recycle a valuable resource, to cut down on its energy dependence, and to protect our fragile environment. You also will be saving money on your fuel bill. We will all benefit by efforts to properly recycle used oil through its use as a fuel.

If you have any questions or comments, please refer them to David Kelley at (904)488-0300 in the Bureau of Waste Management or Barry Andrews at (904)488-1344 in the Bureau of Air Quality Management.

VJT/ks

Date: 11/21/96 9:40:31 AM  
From: Robert Soich TPA  
Subject: FPC Anclote Power Plant

In response to your November 14, 1996 letter regarding the compliance status of the FPC Anclote Power Plant there are no pending enforcement actions at this time. Tom Ellison checked ARMs in order to verify this.

As you know in the past this facility had problems with fallout. Large oily soot droplets were impacting citizens within a mile radius of the facility. The district investigated complaints of fallout. Determined that fallout was coming from the Anclote Plant and through a compliance meeting required FPC to eliminate the fallout problem or the Department would pursue enforcement action under 403, FAC health, welfare and damage to property and vegetation. All during this time, Anclote showed continued compliance with the following data: stack tests, ambient monitoring and continuous monitoring on their stack. As of June of this year FMC had installed air tempering coils in response to citizen complaints and the departments investigation. This has eliminated the oily soot fallout problem.

Since the installation of these coils, a detached condensed plume appears under certain weather and load conditions. FPC currently has unit #2 down in order to change the burners. They think this will alleviate the plume visibility problem. The unit will not be back on line until December.

This is an ongoing compliance investigation in case fallout reappears. Currently the detached condensed plume has not been associated with problems concerning fallout or compliance with permit conditions.

The completeness review has not yet been completed by our permitting section.

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
 PERMITTING APPLICATION DETAIL REPORT

19-JUL-96

Facility: ANCLOTE  
 Owner: FLORIDA POWER CORP.  
 Office: SW: TAMPA

AIRS ID: 1010017  
 County: PASCO

----- PROJECT -----

AIR Permit #: - - Project #: 003 CRA Reference #: 2076  
 Permit Office: TAL (HEADQUARTERS) Agency Action: Pending  
 Project name: ANCLOTE POWER PLANT Desc: Title V Permit  
 Type/Sub/Req: AV/00 / Air Operate  
 Received: 14-JUN-1996 Issued: Expires:  
 Fee: \$000.00 Realized: Dele: Override: NONE

----- RELATED PARTIES -----

Role: APPLICANT Begin: 19-JUL-1996 End:  
 Name: , FLORIDA POWER CORPORATION SSN/FEID:  
 Addr: 3201 34TH STREET SOUTH, P.O. BOX 14042  
 City: ST. PETERSBURG State: FL Zip: 33711-  
 Country: U.S.A. Phone: 813-866-5151 Fax: 813-866-4926


Role: FACILITY CONTACT Begin: 19-JUL-1996 End:  
 Name: OSBOURN, SCOTT SSN/FEID:  
 Addr: 3201 34TH STREET SOUTH,  
 City: ST. PETERSBURG State: FL Zip: 33711-  
 Country: U.S.A. Phone: 813-866-5158 Fax: 813-866-4926

Role: PROFESSIONAL ENGINEER Begin: 19-JUL-1996 End:  
 Name: KOSKY, KENNARD F. SSN/FEID:  
 Addr: 6241 NW 23RD STREET, SUITE 500  
 City: GAINSVILLE State: FL Zip: 32653-1500  
 Country: U.S.A. Phone: 352-336-5600 Fax: 352-336-6603

Role: RESPONSIBLE OFFICIAL Begin: 19-JUL-1996 End:  
 Name: PARDUE, W. JEFFREY SSN/FEID:  
 Addr: 3201 34TH STREET SOUTH,  
 City: ST. PETERSBURG State: FL Zip: 33711-  
 Country: USA Phone: 813-866-5151 Fax: 813-866-4926

----- PROCESSORS -----

Processor	Primary	Active Date:	Inactive Date:
LOGAN_C	Y	19-JUL-1996	
SHEPLAK_S	N	19-JUL-1996	

TO: Bill Thomas, SWD  
FROM: Bruce Mitchell   
DATE: November 14, 1996  
SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit  
Florida Power Corporation, Anclote: 1010017-003-AV

The Title V operating permit application package for the referenced facility is being processed in Tallahassee. The application was previously forwarded to your office for your files and future reference. Please have someone review the package for completeness and respond in writing by December 12, 1996, if you have any comments. Otherwise, no response is required. If there are any questions, please call the project engineer, Charles Logan, at 904/488-1344 or SC:278-1344. It is very important to verify the compliance statement regarding the facility. Since we do not have a readily effective means of determining compliance at the time the application was submitted, please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. Also, do not write on the documents.

If there are any questions regarding this request, please call me or Scott Sheplak at the above number(s).

RBM/bm


cc: Jerry Kissel

Memorandum

Florida Department of  
Environmental Protection

---

TO: Bill Thomas, SWD

FROM: Bruce Mitchell 

DATE: November 14, 1996

SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit  
Florida Power Corporation, Anclote: 1010017-003-AV

The Title V operating permit application package for the referenced facility is being processed in Tallahassee. The application was previously forwarded to your office for your files and future reference. Please have someone review the package for completeness and respond in writing by December 12, 1996, if you have any comments. Otherwise, no response is required. If there are any questions, please call the project engineer, Charles Logan, at 904/488-1344 or SC:278-1344. It is very important to verify the compliance statement regarding the facility. Since we do not have a readily effective means of determining compliance at the time the application was submitted, please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. Also, do not write on the documents.

If there are any questions regarding this request, please call me or Scott Sheplak at the above number(s).

RBM/bm

cc: Jerry Kissel

Date: 11/21/96 9:40:31 AM  
From: Robert Soich TPA  
Subject: FPC Anclote Power Plant

In response to your November 14, 1996 letter regarding the compliance status of the FPC Anclote Power Plant there are no pending enforcement actions at this time. Tom Ellison checked ARMs in order to verify this.

As you know in the past this facility had problems with fallout. Large oily soot droplets were impacting citizens within a mile radius of the facility. The district investigated complaints of fallout. Determined that fallout was coming from the Anclote Plant and through a compliance meeting required FPC to eliminate the fallout problem or the Department would pursue enforcement action under 403, FAC health, welfare and damage to property and vegetation. All during this time, Anclote showed continued compliance with the following data: stack tests, ambient monitoring and continuous monitoring on their stack. As of June of this year FMC had installed air tempering coils in response to citizen complaints and the departments investigation. This has eliminated the oily soot fallout problem.

Since the installation of these coils, a detached condensed plume appears under certain weather and load conditions. FPC currently has unit #2 down in order to change the burners. They think this will alleviate the plume visibility problem. The unit will not be back on line until December.

This is an ongoing compliance investigation in case fallout reappears.

Currently the detached condensed plume has not been associated with problems concerning fallout or compliance with permit conditions.

The completeness review has not yet been completed by our permitting section.

Initial Title V Air Operation Permit

Florida Power Corporation  
Anclote Power Plant  
Suwannee County

**DRAFT Permit No.: 1010017-003-AV**  
**Facility I.D. No.: 1010017**

Permitting Authority:

State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
Title V Section

Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Phone-(904)488-1344  
Fax-(904)922-6979

November 27, 1996

Initial Title V Air Operation Permit

Florida Power Corporation  
Anclote Power Plant  
Suwannee County

**DRAFT Permit No.: 1010017-003-AV**  
**Facility I.D. No.: 1010017**

Permitting Authority:

State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
Title V Section

Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Phone-(904)488-1344  
Fax-(904)922-6979

November 27, 1996