

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

Florida Power – Bartow Power Plant
P.O. Box 14042
St. Petersburg, FL 33733

Authorized Representative:
Brenda Brickhouse, Plant Manager

Permit No. 1030011-007-AC
Facility ID No. 1030011
SIC No. 4911
Unit 1 ESP Redesign Project

Enclosed is Final Air Permit No. 1030011-007-AC, which authorizes the rebuild of the electrostatic precipitator (ESP) for the existing Unit 1 boiler at the Florida Power Bartow Plant. The facility is located on Weedon Island in St. Petersburg, Pinellas County, Florida. As noted in the attached Final Determination, only minor changes and clarifications were made. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty (30) days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



A. A. Linero
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 10/28/02 to the persons listed:

Brenda Brickhouse, FPC*
J. Michael Kennedy, FPC
Kay Prince, EPA
Beverly Spagg, EPA
Jerry Kissel, DEP SWD
Peter Hessling, Pinellas County DEM

Clerk Stamp

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

Victoria Gibson October 28, 2002
(Clerk) (Date)

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- Print your name and address on the reverse so that we can return the card to you.
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1. Article Addressed to:

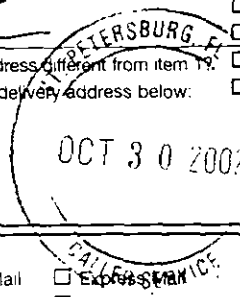
Brenda Brickhouse
 Plant Manager
 Florida Power - Bartow Power Plant
 PO Box 14042
 St. Petersburg, FL 33733

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C. Signature  Agent
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4. Restricted Delivery? (Extra Fee) Yes

2. Ar 7001 0320 0001 3692 7768

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

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 or PO Box No. Box 14042
 City, State, ZIP+4
 St. Petersburg, FL 33733

PS Form 3800, January 2001

See Reverse for Instructions

FINAL DETERMINATION
File No. 1030011-007-AC
FPC BARTOW UNIT 1. PINELLAS COUNTY
ELECTROSTATIC PRECIPITATOR REDESIGN/REBUILD

The Department distributed a Public Notice package on October 8, 2002 for the project to redesign and rebuild the existing electrostatic precipitator at the Bartow Plant Unit 1 in Pinellas County. The project involves a rebuild of the second and third mechanical fields utilizing rigid discharge electrodes while leaving the first field vacant for use as an expansion chamber. The Public Notice of Intent to Issue was published on October 12 in St. Petersburg Times, Pinellas County, Florida.

Written comments were received during the 14-day public comment period from FPC. These are listed below and followed by the Department's response.

- 1. The need for a construction permit: The work that is planned to be performed on the Bartow Unit 1 electrostatic precipitator (ESP) is not new construction, but is an enhancement of the current ESP. Maintenance is normally performed on the ESP during unit outages. During this particular outage, Florida Power is proposing to take advantage of a more efficient and durable design of certain components of the ESP, such as replacing wires with rigid discharge electrodes. ESP performance will remain at, or improve over, the current level, so there will be no increase in emissions as a result of the work. Issuing a construction permit is more process than is necessary for this activity. Florida Power plans to conduct particulate emissions compliance testing within 30 days after completion of the project, and will use the results to verify the performance of the ESP.*

As stated above, Florida Power prefers to avoid the process of issuing a construction permit for this work effort, but if it is the DEP's decision to continue with that approach, Florida Power offers the following comments on the draft permit.

In the Intent to Issue, the Department determined that an Air Construction Permit is required. FPC published notice in the St. Petersburg Times of the Department's Intent to Issue Air Construction Permit.

The ESP is the only pollution control equipment on Unit 1. A redesign and rebuild of this key device is very important. While two mechanical fields will be rebuilt, one will be left vacant. While the design appears to be an improvement overall, it is not a certainty that it will in fact achieve performance superior to the present configuration.

The Department notes that the additional process was minimal and was expedited. It also provided the opportunity for public comment at the time that the decision was made. A decision that no permit or public notice is required would have left an open-ended possibility of a future challenge.

- 2. Specific Condition 2: This condition primarily consists of a description of the ESP redesign effort. The second sentence of the last paragraph – "Reliability and availability should also increase with the rebuilt ESP." – is awkwardly worded. Florida Power expects the new ESP design to be less maintenance-intensive, so the overall reliability of the ESP should improve somewhat, but this is in terms of the amount of required maintenance during outages. The availability of Unit 1 is not expected to be affected by this ESP redesign. Florida Power requests that this sentence be deleted from the permit.*

The awkward sentence is a verbatim quotation (actually the key conclusion) from the review dated August 26, 2002 prepared by BHA and reviewed and sealed by the Harris Group, Inc. for FPC. The Department will modify the sentence to further clarify that BHA and the Harris Group did not mean to imply that Unit 1 will be more reliable and available, but rather that the ESP will be more reliable and available. The sentence within Specific Condition is modified as follows:

Reliability and availability of the ESP should also improve ~~increase~~ after it is ~~with the~~ rebuilt-ESP.

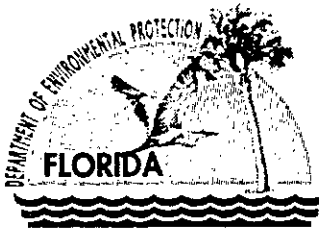
3. *Specific Condition 5: This condition contains the general rule language regarding PSD applicability and the required annual reporting associated with physical or operational changes to emissions units that avoid PSD. It is Florida Power's position that this condition does not apply to this project and is unnecessary. Again, this is not new construction, nor is it a physical or operational change to the emissions unit. This work is a beneficial redesign of portions of existing emissions control equipment. It is more appropriate in this case to determine that PSD is not applicable and remove the additional reporting language from the permit. Florida Power requests that this condition be deleted from the permit.*

The Department did in fact conclude that PSD is not applicable. The reporting language is actually part of the definition of actual emissions for electric utility steam generators. The language is what allows the Department to rely on future actual representative actual emissions (instead of potential emissions) for comparison with past actual emissions. The language also clarifies that FPC can exclude from any apparent increases that portion that "could have been accommodated during the representative baseline period and is attributable to an increase in projected capacity utilization at the unit that is unrelated to the particular change." In other words, the reliance is clearly on the "causation" effect of the ESP, which is expected to be beneficial. However it is still possible that the effect could be a minimal (less than significant) increase in emissions.

The reporting is not burdensome as it can be derived from the same information that will be submitted to the Department for the purposes of the required annual operating report.

CONCLUSION

The final action of the Department is to issue the permit with the change noted above.



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

PERMITTEE

Brenda Brickhouse
Florida Power – Bartow Power Plant
P.O. Box 14042
St. Petersburg, FL 33733

Permit No. 1030011-007-AC
Expires: May 1, 2003
Facility ID No. 1030011 (SIC No. 4911)
Unit 1 ESP Redesign Project

PROJECT AND LOCATION

This permit authorizes the rebuild of the electrostatic precipitator (ESP) for the existing Unit 1 boiler at the Florida Power Bartow Plant. The ESP was originally designed to control particulate matter from a fuel mixture of 50% coal and 50% fuel oil. Unit 1 no longer fires coal as an authorized fuel. The project includes a redesign of the existing ESP to improve the particulate matter collection efficiency when firing the primary fuel of No. 6 fuel oil. The facility is located on Weedon Island in St. Petersburg, Pinellas County, Florida. The map coordinates are: UTM Zone 17, 342.4 km East and 3082.6 km North (Latitude: 27° 52' 10" North and Longitude: 82° 35' 59" West).

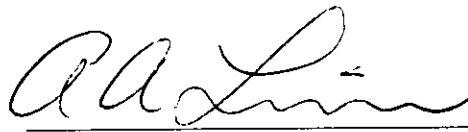
STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the work specified 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. This permit supplements all other air construction and operation permits for the subject emissions unit and does not alter any requirements from such previously issued air permits.

APPENDICES

The following appendices are attached as part of this permit.

Appendix GC - Construction Permit General Conditions


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

"More Protection, Less Process"

Printed on recycled paper.

SECTION I. FACILITY INFORMATION

FACILITY DESCRIPTION

The existing facility is an electrical generating plant consisting of three fossil fuel fired steam generators subject to Phase II Acid Rain, a pipeline heating boiler, four gas turbine peaking units and diesel generators that can be relocated at various Florida Power plants, as needed.

PROJECT

The proposed project affects the following existing emissions unit:

ID No.	Emission Unit Description
001	Unit 1 is a 120 MW fossil fuel fired steam generator

REGULATORY CLASSIFICATION

Title III: Based on the initial Title V permit, the facility is a major source of hazardous air pollutants.

Title IV: The facility operates emissions units that are subject to the Phase II, Federal Acid Rain Program.

Title V: The facility is classified as a "major" source of air pollution with respect to Title V of the Clean Air Act because emissions of at least one regulated criteria air pollutant exceeds 100 tons per year.

PSD: The project is located in an area designated as "attainment" or "unclassifiable" for each pollutant subject to a National Ambient Air Quality Standard. The facility is considered a "fossil fuel fired steam electric plant of more than 250 million BTU per hour of heat input", which is one of the 28 PSD source categories with the lower PSD applicability threshold of 100 tons per year. Potential emissions of at least one regulated pollutant exceed 100 tons per year. Therefore, the facility is classified as a PSD-major source of air pollution with respect to Rule 62-212.400, F.A.C., the Prevention of Significant Deterioration (PSD) of Air Quality.

RELEVANT DOCUMENTS

- Application and information for Unit 1 ESP project received on October 1, 2002; and
- Current Title V Air Operation Permit No. 1030011-002-AV, as amended.

SECTION II. ADMINISTRATIVE REQUIREMENTS

GENERAL AND ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: All documents related to applications for permits to construct, modify or operate this emissions unit shall be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (DEP), at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and phone number 850/488-0114. Copies of these documents shall be submitted to each Compliance Authority.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office at 3804 Coconut Palm Drive, Tampa, Florida 33619-8218. Copies of all such documents shall also be submitted to the Air Quality Division of the Pinellas County Department of Environmental Management at 300 South Garden Avenue, Clearwater, Florida 33756.
3. General Conditions: The owner and operator are subject to, and shall operate under, the attached General Conditions listed in *Appendix GC* of this permit. General Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of this project shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). 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. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. Permit Expiration: For good cause, the permittee may request that this air construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation at least sixty (60) days prior to the expiration of this permit. [Rules 62-4.070(4), 62-4.080, and 62-210.300(1), F.A.C.]
6. New or Additional Conditions: For good cause shown 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. [Rule 62-4.080, F.A.C.]
7. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
8. Title V Permit: This permit authorizes construction of the proposed project and initial operation to determine compliance with Department rules. Upon completion of construction of this project, a Title V operation permit revision is required for regular operation of the new equipment. The permittee shall apply for a revised Title V operation permit prior to expiration of this permit. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

EU 001. Unit 1 – 120 MW Fossil Fuel Fired Steam Generating Unit

The proposed project affects the following existing unit:

ID No.	Emission Unit Description
001	Unit 1 is a front-fired, fossil fuel steam-generating unit that produces a nominal 120 MW of electric power. It began commercial service in 1958 and is a Phase II Acid Rain Unit. Authorized fuels include No. 6 fuel oil, distillate oil, and on-specification used oil fuel. The maximum heat input rate is 1220 MMBtu per hour. Particulate matter emissions are controlled by an electrostatic precipitator originally manufactured by General Services, Inc. Stack opacity is continuously monitored and recorded.

ADMINISTRATIVE REQUIREMENTS

1. Previous Permit Conditions: This permit authorizes the redesign of the existing Unit 1 electrostatic precipitator. The following conditions are in addition to those of any other air construction or operation permits. [Rule 62-4.210, F.A.C.]

CONSTRUCTION ACTIVITIES

2. ESP Redesign Project: The permittee is authorized to redesign the existing electrostatic precipitator (ESP) from three mechanical fields to two mechanical fields. The original design was based on a primary fuel mixture of 50% coal and 50% fuel oil. As coal is no longer an authorized fuel, the new design will be based on No. 6 fuel oil. The preliminary ESP inlet design conditions include:

- Gas Flow Rate: 488,000 acfm (308,830 dscfm)
- Gas Temperature: 250° F to 320° F
- Gas Pressure: -2 to -4 inches w.c.
- Gas moisture content: 6% to 8% by volume

The redesign leaves the first mechanical field vacant to provide uniform gas flow to the second and third mechanical fields. A new perforated plate will be added to the inlet to the second mechanical field. The gas passage width will be increased to allow for more durable rigid discharge electrodes that will replace current wire electrodes. New transformer rectifiers will be installed to provide the increased voltage required for the new rigid electrodes. The preliminary design is based on the following critical operating parameters:

- Total Collecting Plate Area: 92,711 square feet (based on actual 11 inch gas passage width)
- Treatment length: 21 feet
- Aspect Ratio: 0.57
- Specific Collecting Area (SCA): 190 square feet per 1000 acfm (based on 11 inch gas passage width)
- Gas Velocity: 4.0 feet per second
- Treatment Time: 5.2 seconds

The redesigned ESP is expected to provide emission rates equal to or better than the original design and lower than reported in recent stack tests. Reliability and availability of the ESP should also improve after it is rebuilt. The project is not expected to result in any operational or capacity increases. It is estimated that the project will be completed within approximately eight weeks. [Applicant Request]

3. Unconfined Particulate Emissions: During the construction period, unconfined particulate emissions shall be minimized by dust suppressing techniques such as covering, enclosing, applying water or chemicals to the affected areas, or any combination of techniques, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

EU 001. Unit 1 – 120 MW Fossil Fuel Fired Steam Generating Unit

NOTIFICATIONS AND REPORTS

4. Notifications: Within one week of beginning construction, the permittee shall notify the Compliance Authority that the project has commenced and provide a general schedule of construction activities. Within one week of completing construction, the permittee shall notify the Compliance Authority that the project has concluded and provide a general schedule of bringing the unit back on line. [Rule 62-4.210, F.A.C.]
5. PSD Applicability Report: The permittee shall maintain information demonstrating that the project did not result in any significant net emissions increase of particulate matter, which is defined in Rule 62-212.400(2)(e), F.A.C. as follows:

Net Emissions Increase. A modification to a facility results in a net emissions increase when, for a pollutant regulated under the Act, the sum of all of the contemporaneous creditable increases and decreases in the actual emissions of the facility, including the increase in emissions of the modification itself and any increases and decreases in quantifiable fugitive emissions, is greater than zero.

Significant Net Emissions Increase. A significant net emissions increase of a pollutant regulated under the Act is a net emissions increase equal to or greater than the applicable significant emission rate listed in Table 212.400-2, Regulated Air Pollutants – Significant Emission Rates.

The permittee shall submit an annual report to the Department of such information for a period of 5 years representative of normal post-change operations of the unit (within the period not longer than 10 years following the change). For an existing electric utility steam-generating unit, actual emissions of the unit following a physical or operational change shall equal the representative actual annual emissions of the unit following the physical or operational change. The following definition of “representative actual annual emissions” found in 40 CFR 52.21(b)(33) is adopted and incorporated by reference in Rule 62-204.800, F.A.C.

Representative actual annual emissions means the average rate, in tons per year, at which the source is projected to emit a pollutant for the two-year period after a physical change or change in the method of operation of a unit, (or a different consecutive two-year period within 10 years after that change, where the Administrator determines that such period is more representative of normal source operations), considering the effect any such change will have on increasing or decreasing the hourly emissions rate and on projected capacity utilization. In projecting future emissions the Administrator shall:

- (i) *Consider all relevant information, including but not limited to, historical operational data, the company's own representations, filings with the State or Federal regulatory authorities, and compliance plans under title IV of the Clean Air Act; and*
- (ii) *Exclude, in calculating any increase in emissions that results from the particular physical change or change in the method of operation at an electric utility steam generating unit, that portion of the unit's emissions following the change that could have been accommodated during the representative baseline period and is attributable to an increase in projected capacity utilization at the unit that is unrelated to the particular change, including any increased utilization due to the rate of electricity demand growth for the utility system as a whole.*

Each required annual report shall be submitted to the Department prior to March 1st and shall quantify operations for the previous calendar year(s).

[Rules 62-204.800, 62-210.200(11) and 62-212.400(2), F.A.C.; and 40 CFR 52.21(b)(33)]

SECTION IV. EMISSIONS UNIT SPECIFIC CONDITIONS

Appendix GC - Construction Permit General Conditions

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. 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.
- G.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 or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and 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 or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.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.
- G.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 Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or 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.
- G.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 a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- Have access to and copy and records that must be kept under the conditions of the permit;
 - Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- G.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 description of and cause of non-compliance; and
 - The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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.

- G.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 Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

SECTION IV. EMISSIONS UNIT SPECIFIC CONDITIONS

Appendix GC - Construction Permit General Conditions

- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, 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.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology (not applicable to project);
 - (b) Determination of Prevention of Significant Deterioration (not applicable to project); and
 - (c) Compliance with New Source Performance Standards (not applicable to project).
- G.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 or this permit. These materials shall be retained at least three 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.
- G.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 that 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.

Florida Department of
Environmental Protection

Memorandum

TO: ~~Howard Rhodes, Division of Air Resources Management~~

FROM: Al Linero, New Source Review Section *AL* 10/28

DATE: October 25, 2002

SUBJECT: Final Air Construction Permit No. 1030011-007-AC
Florida Power – Bartow Plant
Unit 1 ESP Redesign Project

The Final Permit for this project is attached for your approval and signature, which authorizes the rebuild of the electrostatic precipitator (ESP) for the existing Unit 1 boiler at the Florida Power Bartow Plant. We received the application on October 1, 2002 and issued a draft permit package on October 8, 2002. A public notice was published in the St. Petersburg Times on October 12, 2002. Only the applicant provided minor comments.

Day #90 is December 30, 2002. I recommend your approval of the attached Final Permit for this project.

Attachments

AAL