



Florida Power

A Progress Energy Company

RECEIVED

OCT 28 2002

BUREAU OF AIR REGULATION

October 24, 2002

Mr. Al Linero, P.E.
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Dear Mr. Linero:

Re: Florida Power Bartow Plant – Unit 1 Electrostatic Precipitator
Draft Permit No. 1030011-007-AC

Florida Power has received the draft construction permit referenced above. This letter serves to provide comments on the draft permit, which are as follows:

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.

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.

Mr. Al Linero
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Page 2

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.

Florida Power appreciates the opportunity to review and comment on the draft permit for this beneficial work effort. Please contact Jamie Hunter at (727) 826-4363 or Mike Kennedy at (727) 826-4334 if you have any questions.

Sincerely,



Brenda Brickhouse
Plant Manager
Title V Responsible Official



Florida Power

A Progress Energy Company

Bartow Plant

fax

To: Mr. Al Linero, P.E.
Company: FL Dept. of Env. Protection
Fax No.: 850-922-6979
Subject: Bartow Plant ESP

From: Steven Ryan,
Environmental Specialist
Phone No.: 727-827-6107
Date: October 25, 2002
Pages: 3

Comments:

Please see the accompanying letter regarding the Bartow Power Plant ESP Draft Permit. The original letter will be mailed today. Please feel free to contact me or Mike Kennedy with questions or additional information requests.



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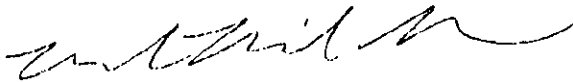
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Sincerely,



Brenda Brickhouse
Plant Manager
Title V Responsible Official

Jeff
Thank you,
All

What is a
minimum level

Allowable is 0.30 lb/m³ air

8/6/01 0.036 (soot blow?)

8/6/01 0.032

7/12/00 0.022 (soot blow?)

7/17/00 0.021

5/21/99 0.029

5/20/99 0.081 (soot blow?)

9/11/98 0.104 (soot blow)

9/10/98 0.077

9/7/97 0.009 (soot blow)

9/8/97 0.008

9/4/96 0.02 soot blow

9-4-96 0.019

2-23-96 0.044 soot blow

2-22-96 0.043

9-12-95 0.033

9-22-95 0.022 soot blow

3-22-95 0.021

9-15-94 0.051 soot blow



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

DARM-PER-19

SUBJECT: Guidance on the Replacement or Addition of Air Pollution Control Equipment on Existing Sources

DATE: March 1, 2000

This memo is to provide guidance to district, local program, and headquarters staff on the permitting action required when a source owner replaces or adds an air pollution control device to an existing source. It has been determined that replacement or addition of air pollution control equipment is not in and of itself a source that will be a source of air pollution, and consequently, does not need a construction permit.

If the pollution control equipment is for a unit with uncontrolled emissions of less than 100 tons per year, and the equipment is "off the shelf", then no permitting action is required.

If the pollution control equipment is custom designed for any source, or is "off the shelf" to control a unit with uncontrolled emissions greater than or equal to 100 tons per year, the source owner will need to apply for an amendment to the operating permit. The request would need to be signed and sealed by a P.E. as required in Rule 62-4.050(3). The Department or local program, if it finds the replacement air pollution equipment to be satisfactory, shall issue a letter amendment to the operation permit. No public notice shall be required for such an action.

Howard L. Rhodes, Director
Division of Air Resources Management

"More Protection, Less Process"

Printed on recycled paper.

October 23, 2002

Mr. Al Linero, P.E.
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Dear Mr. Linero:

Re: Florida Power Bartow Plant – Unit 1 Electrostatic Precipitator
Draft Permit No. 1030011-007-AC

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Mr. Al Linero
October 23, 2002
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Sincerely,

Brenda Brickhouse
Plant Manager
Title V Responsible Official



RECEIVED

OCT 18 2002

BUREAU OF AIR REGULATION

October 17, 2002

Mr. Al Linero, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Bartow Power Plant
Title V Permit – Draft Renewal Permit
DEP File No.: 1030011-007-AC
Public Notice – Proof of Publication

Dear Mr. Linero:

Please find enclosed the “proof of publication” for the public notice of the above referenced draft permit. The notice was published on October 12, 2002.

Please contact me at (727) 826-4363 if you have any questions or need additional information.

Sincerely,



Jamie Hunter
Lead Environmental Specialist

c: Scott Sheplak, FDEP – Tallahassee

enclosure

jjh/JJH046

ST. PETERSBURG TIMES

Published Daily
St. Petersburg, Pinellas County, Florida

STATE OF FLORIDA } S.S.
COUNTY OF PINELLAS }

Before the undersigned authority personally appeared N. Olsen
who on oath says that he is Legal Clerk
of the St. Petersburg Times
a daily newspaper published at St. Petersburg, in Pinellas County, Florida: that the
attached copy of advertisement, being a Legal Notice
in the matter RE: Notice of Intent
was published in said newspaper in the issues of October 12, 2002

Affiant further says the said St. Petersburg Times
is a newspaper published at St. Petersburg, in said Pinellas County, Florida, and that the said
newspaper has heretofore been continuously published in said Pinellas County, Florida, each
day and has been entered as second class mail matter at the post office in St. Petersburg, in
said Pinellas 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 corporation any discount, rebate, commission or refund for the
purpose of securing this advertisement for publication in the said newspaper.

N. Olsen
Signature of Affiant

Sworn to and subscribed before
me this 14th day of
October A.D. 2002

Kathleen J. Klase
Notary Public

OFFICIAL NOTARY SEAL
KATHLEEN J. KLASE
NOTARY PUBLIC STATE OF FLORIDA
COMMISSION NO. CC947304
MY COMMISSION EXP. JUNE 20, 2004

RECEIVED
OCT 18 2002
BUREAU OF AIR REGULATION

LEGAL NOTICE

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 1030011-007-AC
Florida Power Corporation Bartow Plant Unit 1
Redesign and Rebuild of Electrostatic Precipitator Florida
Pinellas County

The Department of Environmental Protection (Department) gives notice of its intent to issue an Air Construction Permit to Florida Power Corporation (FPC). The permit will authorize the redesign and rebuild of two mechanical fields within the existing electrostatic precipitator (ESP) on Unit 1 at the Bartow Plant in Pinellas County. A Best Available Control Technology (BACT) determination was not required. The applicant's name and address are Florida Power Corporation, Post Office Box 14042, St. Petersburg, Florida 33733.

FPC Unit 1 is a nominal 120-megawatt residual fuel oil-fired unit. According to the company, the ESP was originally designed to control particulate emissions and opacity from a discontinued fuel that was a mixture of 50 percent coal and 50 percent oil. FPC proposes to redesign the ESP and rebuild two mechanical sections with more durable rigid discharge electrodes instead of wires. Following the redesign and rebuild, particulate emissions and opacity from Unit 1 are expected to be less than or equal to emissions prior to the project. According to FPC, the revised design is also more durable and less maintenance-intensive. The project will be conducted during a planned outage between October and December of 2002.

The Department has reasonable assurance that the project will not result in significant net emission increases from the unit that would otherwise require a review under the rules for the Prevention of Significant Deterioration at Section 62-212.400, F.A.C. or 40 CFR 52.21.

The Department will issue the FINAL Permit in accordance with the conditions of the 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 Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2800 Blair Stone Road, Mail Station #505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department 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., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the 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 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. 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 person other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice of intent. However, any person who asked the Department 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 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department'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 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 petitioner must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department'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.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

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:

Dept. of Environmental Protection Bureau of Air Regulation 111 S. Magnolia Drive, Suite 4 Tallahassee, Florida 32301 Telephone: 850/488-0114 Fax: 850/922-8979	Dept. of Environmental Protection Southwest District Office 3804 Coconut Palm Drive Tampa, Florida 33619-8218 Telephone: 813/744-8100 Fax: 813/744-6084
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Pinellas County Department of Environmental Management
300 South Garden Avenue
Clearwater, Florida 33758
Telephone: 727/464-4422
Fax: 727/464-4420

The complete project file includes the technical evaluation and the Draft Permit, and the information submitted by the Florida Power Corporation, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Program Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114; for additional information. The draft permit and technical evaluation can be accessed at www.dep.state.fl.us/air/permitting/construct.htm

(1000434187) 10/12/02 73276