Barbara \ P-ile

Department of Environmental Protection

Jeb Bush
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

December 9, 1999

Mr. R. Douglas Neeley, Chief
Air and Radiation Technology Branch
Air, Pesticides and Toxics Management Division
United States Environmental Protection Agency
Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8909

Re: Proposed Changes to Satisfy EPA Objections
Florida Power Corporation, Bartow Plant, PROPOSED Title V Permit 1030011-002-AV
Air Construction Permit 1030011-006-AC

Dear Mr. Neeley:

This letter is to document changes that the Department proposes to satisfy EPA Region 4 objections to Florida's PROPOSED Title V permit 1030011-002-AV and 1030011-006-AC for Florida Power Corporation, Bartow Plant. These objections were detailed in a letter from EPA Region 4 dated September 16, 1999, in which EPA indicated the primary basis for objection was that the permit does not ensure compliance with the applicable requirements of 40 CFR 70.6(a)(1).

The changes proposed in this letter result primarily from a letter from Mr. W. Jeffrey Pardue, the Responsible Official for the Bartow Plant, and the past resolution to similar objections the EPA found acceptable. Hopefully these changes will allow Florida to issue the FINAL Title V permit for this plant. Please review the following proposed changes to the referenced permits. If you concur with our changes, we will issue the FINAL Title V permit with these changes.

I. EPA Objection Issues

1. Emissions Limitations - The statement of basis indicates that each emission unit is subject to a particulate matter emissions limit of 0.1 lb/MMBtu, and this limit is effectively equivalent to 0.149 lb/MMBtu due to rounding. This is also stated for conditions of soot blowing, where the particulate matter emission limit of 0.3 lb/MMBtu would be equivalent to 0.349 lb/MMBtu. However, these statements are incorrect. A measured emission rate of 0.149 lb/MMBtu actually rounds to 0.15 lb/MMBtu rather than 0.1 lb/MMBtu, which is in excess of the emission limit, and therefore not allowable.

Part 70 authorizes EPA to object "to issuance of any proposed permit determined by the Administrator not to be in compliance with applicable requirements or requirements under [part 70]." See 40 C.F.R. § 70.8(c)(1). We are objecting to the statement in the statement of basis indicating that the permit's 0.1 lb/MMbtu particulate limit is "effectively equivalent to 0.149 lb/mmbtu because of rounding." This represents an improper and incorrect statement of the legal and factual basis for the permit's 0.1 lb/MMbtu particulate limit, and therefore issuance of the proposed permit with this statement of basis does not comply with the requirement of part 70 at 40 C.F.R. § 70.7(a)(5). Moreover, emission levels of 0.149 lb/MMbtu will not assure compliance with the 0.1

lb/MMBtu particulate limit. Accordingly, issuance of the proposed permit with this statement of basis would not assure compliance with the applicable requirement represented by the 0.1 lb/MMBtu particulate limit.

The statement of basis justifies use of rounding based on "the agreement of March 10, 1998, between EPA, Region 4 and the Department to resolve an objection on this specific issue." However, EPA's March 16, 1998, response to FDEP's March 10, 1998, letter specifically requested that language on rounding be removed from the statement of basis for five Florida Power and Light permits "in order to avoid misinterpretation." As a result, all references to rounding must be removed from the statement of basis.

Future permit determinations should provide justification for allowing annual particulate matter stack testing based on past compliance with emission limits and the potential for variability of emissions based on review of historical data. Periodic monitoring should be based on a case-by-case evaluation of emissions data rather than on a "bright line" test of whether average emissions exceed fifty percent of a "rounded" emission limit.

PERMITTEE RESPONSE: FPC does not agree with the EPA's objection, but does not intend to object to the removal of the specified language from the Statement of Basis.

PROPOSED CHANGE: The Statement of Basis will be changed as follows:

From: Unit No. 1 is a front-fired, fossil fuel steam generator which produces 120 megawatts, electric power. The maximum heat input rate is 1,220 million Btu per hour and the unit fires No. 2 through No. 6 fuel oil, and on-specification used oil. Particulate matter emissions are controlled by a General Electric Services, Inc. Model 1-BAB1.2X37(9)36.0-434-4.3P electrostatic precipitator consisting of five fields in depth. The permit application indicates this ESP was designed to operate when utilizing a coal/oil mixture which is no longer burned by FPC. Because Unit 1 is oil fired and this unit is capable of meeting the applicable particulate matter and opacity limits in Conditions A.5., A.6., A.7., and A.8. without use of the ESP, the provisions of 40 CFR 64 do not apply [40 CFR 64.2(b)(ii)]. A Durag Model 281 Continuous Emissions Monitor for opacity with a recorder is used for continual observation of stack opacity. Unit 1 began commercial service in 1958. 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. This unit is 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, in accordance with the agreement of March 10, 1998 between EPA, Region 4 and the Department to resolve an objection on this specific issue. The applicant has presented historical PM test results which show that the steady-state average results are less than half the applicable effective standard. 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 No. 1 is 0.054, steady-state.

Unit No. 2 is a tangential-fired fossil fuel fired steam generator which produces 120 megawatts, electric power. The maximum heat input rate is 1,317 million Btu per hour and the unit fires No. 2 through No. 6 fuel oil, on-specification used oil, and propane. Emissions from Unit No. 2 are uncontrolled. Unit 2 began commercial service in 1961. 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. This unit is 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, in accordance with the agreement of March 10, 1998 between EPA, Region 4 and the Department to resolve an objection on this specific issue. The applicant has presented historical PM test results which show that the steady-state average results are less than half the applicable effective standard. 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 No. 2 is 0.069, steady-state.

Unit No. 3 is a tangential-fired fossil fuel fired steam generator which produces 225 megawatts, electric power. The maximum heat input rate is 2,211 million Btu per hour and the unit fires No. 2 through No. 6 fuel oil, on-specification used oil, natural gas, and propane. Emissions from Unit No. 3 are uncontrolled. Unit 3 began commercial service in 1963. 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. This unit is 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, in accordance with the agreement of March 10, 1998 between EPA, Region 4 and the Department to resolve an objection on this specific issue. The applicant has presented historical PM test results which show that the steady-state average results are less than half the applicable effective standard. 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 No. 3 is 0.067, steady-state.

To: Unit No. 1 is a front-fired, fossil fuel steam generator which produces 120 megawatts, electric power. The maximum heat input rate is 1,220 million Btu per hour and the unit fires No. 2 through No. 6 fuel oil, and on-specification used oil. Particulate matter emissions are controlled by a General Electric Services, Inc. Model 1-BAB1.2X37(9)36.0-434-4.3P electrostatic precipitator consisting of five fields in depth. The permit application indicates this ESP was designed to operate when utilizing a coal/oil mixture which is no longer burned by FPC. Because Unit 1 is oil fired and this unit is capable of meeting the applicable particulate matter and opacity limits in Conditions A.5., A.6., A.7., and A.8. without use of the ESP, the provisions of 40 CFR 64 do not apply [40 CFR 64.2(b)(ii)]. A Durag Model 281 Continuous Emissions Monitor for opacity with a recorder is used for continual observation of stack opacity. Unit 1 began commercial service in 1958. 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. This unit is subject to a steady-state PM emission limit of 0.1 lb/MMBtu. The applicant has presented historical PM test results which show that the steady-state average results are well below the applicable effective standard. The Department has determined that sources that consistently test below the effective standard shall test annually. A five year average of results of particulate matter emission testing in lb/MMBtu for Unit No. 1 is 0.053798, steady-state.

Unit No. 2 is a tangential-fired fossil fuel fired steam generator which produces 120 megawatts, electric power. The maximum heat input rate is 1,317 million Btu per hour and the unit fires No. 2 through No. 6 fuel oil, on-specification used oil, and propane. Emissions from Unit No. 2 are uncontrolled. Unit 2 began commercial service in 1961. 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. This unit is subject to a steady-state PM emission limit of 0.1 lb/MMBtu. The applicant has presented historical PM test results which show that the steady-state average results are well below the applicable effective standard. The Department has determined that sources that consistently test below the effective standard shall test annually. A five year average of results of particulate matter emission testing in lb/MMBtu for Unit No. 2 is 0.068616, steady-state.

Unit No. 3 is a tangential-fired fossil fuel fired steam generator which produces 225 megawatts, electric power. The maximum heat input rate is 2,211 million Btu per hour and the unit fires No. 2 through No. 6

fuel oil, on-specification used oil, natural gas, and propane. Emissions from Unit No. 3 are uncontrolled. Unit 3 began commercial service in 1963. 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. This unit is subject to a steady-state PM emission limit of 0.1 lb/MMBtu. The applicant has presented historical PM test results which show that the steady-state average results are well below the applicable effective standard. The Department has determined that sources that consistently test below the effective standard shall test annually. A five year average of results of particulate matter emission testing in lb/MMBtu for Unit No. 3 is 0.067344, steady-state.

2. Appropriate Averaging Times - The particulate matter emission limits in conditions A.7 and A.8 do not contain averaging times. Because the stringency of emission limits is a function of both magnitude and averaging time, appropriate averaging times must be added to the permit in order for the limits to be practicably enforceable. An approach that may be used to address this deficiency is to include a general condition in the permit stating 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.

PERMITTEE RESPONSE: The subject conditions in the PROPOSED Title V permit already contain all that is necessary to make them completely (and therefore practicably) enforceable: a requirement, and a method of determining compliance with that requirement. The subject conditions are identical, and read as follows: "Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods." This language, which is incorporated from Florida's EPA–approved SIP, clearly provides the requirement (a 0.1 pound per million Btu particulate matter limit) and the method for determining compliance ("as measured by applicable compliance methods"). The PROPOSED Title V permit clearly defines the "applicable compliance methods" – the permit specifies the test method, the number of sampling runs required, how to calculate the actual emission rate, as well as the sampling time, volume and flow rate. Where the applicable compliance method is this specific (particularly where the test method has a specified duration), enforceability is ensured at all times. Therefore, because the particulate matter limits in FPC's Bartow PROPOSED Title V permit are completely enforceable through the use of these existing conditions, the FINAL Title V conditions relating to particulate matter for this facility should be issued without change.

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 Bartow Title V facility/permit. 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.

PROPOSED CHANGE: Add the following after both Specific Condition A.7. and A.8.:

Add: {Permitting note: The averaging time for the particulate matter standard corresponds to the cumulative sampling time of the specified test method.}

II. EPA General Comments

1. General Comment - The title page of the permit specifies that this permit determination is both a proposed title V permit and a draft construction permit. The statement of basis and the permit should both identify which conditions are part of the draft construction permit, and/or which units are subject to the construction permit.

PERMITTEE RESPONSE: The construction permit is meant to address the modification of the fly ash collection system associated with the Unit 1 electrostatic precipitator (ESP). The modification implemented a closed-loop system, resulting in the elimination of an emission point (ARMS Emission Unit 009). The fly ash system is now included under the listing of insignificant emission units.

PROPOSED CHANGE: The following will be added to both the Statement of Basis and the Facility Description under Section I:

> **Add:** The construction permitting action changes the status of a previously permitted emissions unit, the fly ash collection system associated with the Unit 1 electrostatic precipitator (ESP). The permit to construct reclassifies the fly ash system from a regulated emissions unit to an insignificant emissions unit/activity. A previous modification implemented a closed-loop fly ash system, which replaced a conventional fly ash silo/transfer system. The fly ash system (formally called Emissions Unit I.D. No. –009) now meets the requirements of Rules 62-210.300(3)(a) and 62-213.430(6)(b), F.A.C., and is reclassified as an Insignificant Emissions Unit/Activity, where it is currently listed.

2. CAM Applicability - The Unit No. 1 discussions in the statement of basis and in Section III, Subsection A on page 6 of the permit, state that "the provisions of 40 CFR 64 do not apply [40 CFR 64.2(b)(ii)]." While the electrostatic precipitator for Unit No. 1 may not meet the applicability requirement for CAM specified under 40 C.F.R. 64.2(a)(2), Region 4 believes that CAM should not be referenced in the permit until a formal applicability determination has been made through the title V permit renewal process. Furthermore, reference to CAM is not necessary to support the claim that particulate and opacity limits can be met without use of the ESP.

PERMITTEE RESPONSE: Because 40 CFR Part 64 has been in effect for nearly two years, it is appropriate to make a CAM applicability determination in the Statement of Basis at this time. FPC has provided appropriate documentation, and the DEP has formally concurred, that CAM does not apply to this pollutant-specific emissions unit. Accordingly, FPC requests that this determination remain in the Statement of Basis.

PROPOSED CHANGE: No change is proposed.

3. Statement of Basis - The discussions for units 1 through 3 provide justification for annual testing of particulate matter 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 and supporting orders issued by FDEP.

PERMITTEE RESPONSE: FPC is in agreement that the proposed change to the Statement of Basis should be made.

PROPOSED CHANGE: The following will be added to the Statement of Basis:

Add: In accordance with the provisions of Rule 62-296.405(1)(a), F.A.C., Units 1, 2 and 3 elected to test for particulate matter quarterly and were allowed visible emissions of 40 percent opacity. The Bartow Plant demonstrated that the particulate matter standard was regularly complied with for each unit and petitioned the Secretary for a reduction in the frequency of particulate matter testing from quarterly to annually, as provided by the rule. The request for annual testing was granted to Unit 1 by OGC Order No. 96-A-01, Unit 2 by OGC Order No. 87-1261 and Unit 3 by OGC Order No. 86-1577.

4. Compliance Certification - Facility-wide Condition 11 of the permit should specifically reference the required components of Appendix TV-3, item 51, which lists the compliance certification requirements of 40 C.F.R. 70.6(c)(5)(iii), to ensure that complete certification information is submitted to EPA.

PERMITTEE RESPONSE: FPC has no objection to the inclusion of the proposed language.

PROPOSED CHANGE: The requirement for the annual statement of compliance was contained in the Acid Rain Section of the permit. For consistency with other permits issued to date, the Specific Condition A.4. will be deleted from the Acid Rain Section and the condition will be added to the Facility-wide Requirements in Section II of the permit.

Delete: A.4. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within 60 (sixty) days after the end of the calendar year. {See condition 52., APPENDIX TV-3, TITLE V CONDITIONS}
[Rule 62-214.420(11), F.A.C.]

Add: 12. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within 60 (sixty) days after the end of the calendar year. {See condition 51., APPENDIX TV-3, TITLE V CONDITIONS}
[Rule 62-214.420(11), F.A.C.]

5. Minimum Sample Volume for Particulate Testing - Condition A.20. 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.26.(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.26.(b) to clarify that the required sample volume is 30 dry standard cubic feet.

PERMITTEE 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.

PROPOSED CHANGE: The following change will be made to Specific Condition A.26.:

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

To: (b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet. **See Specific Condition A.20.**

6. Record keeping - Conditions D.19 and D.20 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 and/or statement of basis should specify how these records will be maintained and if record keeping activities must be coordinated among the facilities.

PERMITTEE 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 permit 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.

PROPOSED CHANGE: The following change is made to the Statement of Basis:

From: 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. The generator(s) 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.
7. Anclote Power Plant, 1729 Baileys Road, Holiday, Pasco County

To: 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. The generator(s) 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.
7. Anclote Power Plant, 1729 Baileys Road, Holiday, Pasco County

These generator(s) are included in the Title V permits for each of the above listed facilities. The records required by the permit shall be maintained at each individual site. FPC's corporate environmental services department shall be responsible for agency notifications and reporting and is functionally structured to provide coordination among the facilities.

8. Acid Rain Requirements - Please note that the allowances allocated to the Bartow facility units 001 through 003, as indicated under Section IV, Condition A.2. of the proposed permit have been changed. This revision was published in the Federal Register on September 28, 1998 (Vol. 63 No. 187, pp 51706-51765). We recommend that the allowances that are indicated for these units be adjusted to reflect the revised allocation.

PERMITTEE RESPONSE: FPC agrees with the comment. The revised allowance allocations for Bartow Units 1, 2 and 3 (through 2009) are as follows: Unit 1: 2,805; Unit 2: 2,961; and Unit 3 : 5,428.

PROPOSED CHANGE: The following changes will be made to Specific Condition A.2. of the Acid Rain Section:

From: A.2. Sulfur dioxide (SO_2) allowance allocations requirements for each Acid Rain unit are as follows:

E.U. ID No.	EPA ID	Year	2000	2001	2002	2003	2004
-001	01	**SO2 allowances, under Table 2 or 3 of 40 CFR Part 73**	2785*	2785*	2785*	2785*	2785*
-002	02	**SO2 allowances, under Table 2 or 3 of 40 CFR Part 73**	2941*	2941*	2941*	2941*	2941*
-003	03	**SO2 allowances, under Table 2 or 3 of 40 CFR Part 73**	5383*	5383*	5383*	5383*	5383*

- 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 or 3 of 40 CFR 73.]

- **To: A.2.** Sulfur dioxide (SO_2) allowance allocations requirements for each Acid Rain unit are as follows:

E.U. ID No.	EPA ID	Year	2000	2001	2002	2003	2004
-001	01	**SO2 allowances, under Table 2 or 3 of 40 CFR Part 73**	2805*	2805*	2805*	2805*	2805*
-002	02	**SO2 allowances, under Table 2 or 3 of 40 CFR Part 73**	2961*	2961*	2961*	2961*	2961*
-003	03	**SO2 allowances, under Table 2 or 3 of 40 CFR Part 73**	5428*	5428*	5428*	5428*	5428*

- 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 or 3 of 40 CFR 73.]

As you know, the 90 day period ends December 15th. 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 final permits. 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, or Mr. Edward J. Svec at 850/921-8985, if you need any additional information.

Sincerely,

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

CF/es

Attachments

cc: Scott M. Sheplak
Pat Comer
Scott Osbourn, FPC

copy to El Svec
Scott

DA490 = 12/14/99

Florida Power
CORPORATION

November 8, 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 Bartow Facility
EPA Objection to Proposed Title V Permit No. 1030011-002-AV

Florida Power Corporation (FPC) is in receipt of a letter from the U.S. EPA, Region IV, dated September 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 unclear as to what the source must demonstrate compliance with, 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. *Emissions Limitations- The statement of basis indicates that each emission unit is subject to a particulate matter emissions limit of 0.1 lb/MMBtu, and this limit is effectively equivalent to 0.149 lb/MMBtu due to rounding. This is also stated for conditions of soot blowing, where the particulate matter emission limit of 0.3 lb/MMBtu would be equivalent to 0.349 lb/MMBtu. However, these statements are incorrect. A measured emission rate of 0.149 lb/MMBtu actually rounds to 0.15 lb/MMBtu rather than 0.1 lb/MMBtu, which is in excess of the emission limit, and therefore not allowable[1].*

   Part 70 authorizes EPA to object "to issuance of any proposed permit determined by the Administrator not to be in compliance with applicable requirements or requirements under [part 70]." See 40 C.F.R. Section 70.8(c)(1). We are objecting to the statement in the statement of basis indicating that the permit's 0.1 lb/MMBtu particulate limit is "effectively equivalent to 0.149 lb/MMBtu because of rounding." This represents an improper and incorrect statement of the legal and factual basis for the permit's 0.1 lb/MMBtu particulate limit, and therefore issuance of the proposed permit with this statement of basis does not

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comply with the requirement of part 70 at 40 C.F.R. Section 70.7(a)(5). Moreover, emission levels of 0.149 lb/MMBtu will not assure compliance with the 0.1 lb/MMBtu particulate limit. Accordingly, issuance of the proposed permit with this statement of basis would not assure compliance with the applicable requirement represented by the 0.1 lb/MMBtu particulate limit.

The statement of basis justifies use of rounding based on "the agreement of March 10, 1998, between EPA, Region 4 and the Department to resolve an objection on this specific issue." However, EPA's March 16, 1998, response to FDEP's March 10, 1998, letter specifically requested that language on rounding be removed from the statement of basis for five Florida Power and Light permits "in order to avoid misinterpretation." As a result, all references to rounding must be removed from the statement of basis.

Future permit determinations should provide justification for allowing annual particulate matter stack testing based on past compliance with emission limits and the potential for variability of emissions based on review of historical data. Periodic monitoring should be based on a case-by-case evaluation of emissions data rather than on a "bright line" test of whether average emissions exceed fifty percent of a "rounded" emission limit.

Response – FPC does not agree with EPA's objection, but does not intend to object to the removal of the specified language from the Statement of Basis.

2. *Appropriate Averaging Times – The particulate matter emission limits in conditions A.7 and A.8 do not contain averaging times. Because the stringency of emission limits is a function of both magnitude and averaging time, appropriate averaging times must be added to the permit in order for the limits to be practicably enforceable. An approach that may be used to address this deficiency is to include a general condition in the permit stating 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.*

Response - The subject conditions in the Proposed Title V permit already contains all that is necessary to make them completely (and therefore practicably) enforceable: a requirement, and a method for determining compliance with that requirement. The subject conditions are identical, and read as follows: "Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods." This language, which is incorporated from Florida's EPA-approved SIP, clearly provides the requirement (a 0.1 lb/mmBTU particulate matter limit) and the method for determining compliance ("as measured by applicable compliance methods"). The Proposed Title V permit clearly defines the "applicable compliance methods" -- the permit specifies the test method, the number of sampling runs required, how to calculate the actual emission rate, as well as the sampling time, volume and flow rate. Where the applicable compliance method is this specific (particularly where the test method has a specified duration), enforceability is ensured at all times. Therefore, because the particulate matter limits in FPC's Bartow Proposed Title V permit are completely enforceable through the use of these existing conditions, the Final Title

V Permit conditions relating to particulate matter for this facility should be issued without change.

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 Bartow Title V facility/permit. 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.

General Comments

3. *General Comment – The title page of the permit specifies that this permit determination is both a proposed title V permit and a draft construction permit. The statement of basis and the permit should both identify which conditions are part of the draft construction permit, and/or which units are subject to the construction permit.*

Response – The construction permit is meant to address the modification of the fly ash collection system associated with the Unit 1 electrostatic precipitator (ESP). The modification implemented a closed-loop system, resulting in the elimination of an emission point (ARMS Emission Unit 009). The fly ash system is now included under the listing of insignificant emission units.

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Response – Because 40 CFR Part 64 has been in effect for nearly two years, it is appropriate to make a CAM applicability determination in the Statement of Basis at this time. FPC has provided appropriate documentation, and the DEP has formally concurred, that CAM does not apply to this pollutant-specific emissions unit. Accordingly, FPC requests that this determination remain in the Statement of Basis.

5. *Statement of Basis – The discussions for units 1 through 3 provide justification for annual testing of particulate matter 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 and supporting orders issued by FDEP.*

Response - FPC is in agreement that the proposed change to the statement of basis should be made.

6. *Compliance Certification – Facility-wide Condition 11 of the permit should specifically reference the required components of Appendix TV-3, item 51, which lists the compliance certification requirements of 40 C.F.R. 70.6(c)(5)(iii), to ensure that complete certification information is submitted to EPA.*

Response - FPC has no objection to the inclusion of the proposed language.

7. *Minimum Sample Volume for Particulate Testing – Condition A.20. 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.26.(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.26.(b) to clarify that the required sample volume is 30 dry standard cubic feet.*

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.

8. *Record keeping – Condition D.19 and D.20 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 and/or statement of basis should specify how these records will be maintained and if record keeping activities must be coordinated among the facilities.

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.

9. *Acid Rain Requirements – Please note that the allowances allocated to the Bartow facility units 001 through 003, as indicated under Section IV, Condition A.2. of the proposed permit have been changed. This revision was published in the Federal Register on September 28, 1998 (Vol. 63 No. 187, pp 51706-51765). We recommend that the allowances that are indicated for these units be adjusted to reflect the revised allocation.*

Response - FPC agrees with this comment. The revised allowance allocations for Bartow Units 1, 2 and 3 (through 2009) are as follows: Unit 1: 2,805; Unit 2: 2,961; and Unit 3: 5,428.

Thank you for your attention to these issues. 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 Bartow Title V permit

cc: Howard Rhodes, DEP
Clair Fancy, DEP
Winston A. Smith, EPA
Greg Worley, EPA
Elizabeth Bartlett, EPA
Robert Manning, HGSS

12/8/99 cc: Ed Svec

Florida Power
CORPORATION

November 8, 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 Bartow Facility
EPA Objection to Proposed Title V Permit No. 1030011-002-AV

Florida Power Corporation (FPC) is in receipt of a letter from the U.S. EPA, Region IV, dated September 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 unclear as to what the source must demonstrate compliance with, 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. *Emissions Limitations- The statement of basis indicates that each emission unit is subject to a particulate matter emissions limit of 0.1 lb/MMBtu, and this limit is effectively equivalent to 0.149 lb/MMBtu due to rounding. This is also stated for conditions of soot blowing, where the particulate matter emission limit of 0.3 lb/MMBtu would be equivalent to 0.349 lb/MMBtu. However, these statements are incorrect. A measured emission rate of 0.149 lb/MMBtu actually rounds to 0.15 lb/MMBtu rather than 0.1 lb/MMBtu, which is in excess of the emission limit, and therefore not allowable[1].*

   Part 70 authorizes EPA to object "to issuance of any proposed permit determined by the Administrator not to be in compliance with applicable requirements or requirements under [part 70]." See 40 C.F.R. Section 70.8(c)(1). We are objecting to the statement in the statement of basis indicating that the permit's 0.1 lb/MMBtu particulate limit is "effectively equivalent to 0.149 lb/MMBtu because of rounding." This represents an improper and incorrect statement of the legal and factual basis for the permit's 0.1 lb/MMBtu particulate limit, and therefore issuance of the proposed permit with this statement of basis does not

One Power Plaza • 263 – 13th Avenue South • St. Petersburg, Florida 33701-5511
P.O. Box 14042 • St. Petersburg, Florida 33733-4042 • (727) 820-5151
A Florida Progress Company

comply with the requirement of part 70 at 40 C.F.R. Section 70.7(a)(5). Moreover, emission levels of 0.149 lb/MMBtu will not assure compliance with the 0.1 lb/MMBtu particulate limit. Accordingly, issuance of the proposed permit with this statement of basis would not assure compliance with the applicable requirement represented by the 0.1 lb/MMBtu particulate limit.

The statement of basis justifies use of rounding based on "the agreement of March 10, 1998, between EPA, Region 4 and the Department to resolve an objection on this specific issue." However, EPA's March 16, 1998, response to FDEP's March 10, 1998, letter specifically requested that language on rounding be removed from the statement of basis for five Florida Power and Light permits "in order to avoid misinterpretation." As a result, all references to rounding must be removed from the statement of basis.

Future permit determinations should provide justification for allowing annual particulate matter stack testing based on past compliance with emission limits and the potential for variability of emissions based on review of historical data. Periodic monitoring should be based on a case-by-case evaluation of emissions data rather than on a "bright line" test of whether average emissions exceed fifty percent of a "rounded" emission limit.

Response – FPC does not agree with EPA's objection, but does not intend to object to the removal of the specified language from the Statement of Basis.

2. <u>Appropriate Averaging Times</u> – *The particulate matter emission limits in conditions A.7 and A.8 do not contain averaging times. Because the stringency of emission limits is a function of both magnitude and averaging time, appropriate averaging times must be added to the permit in order for the limits to be practicably enforceable. An approach that may be used to address this deficiency is to include a general condition in the permit stating 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.*

Response - The subject conditions in the Proposed Title V permit already contains all that is necessary to make them completely (and therefore practicably) enforceable: a requirement, and a method for determining compliance with that requirement. The subject conditions are identical, and read as follows: "Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods." This language, which is incorporated from Florida's EPA-approved SIP, clearly provides the requirement (a 0.1 lb/mmBTU particulate matter limit) and the method for determining compliance ("as measured by applicable compliance methods"). The Proposed Title V permit clearly defines the "applicable compliance methods" -- the permit specifies the test method, the number of sampling runs required, how to calculate the actual emission rate, as well as the sampling time, volume and flow rate. Where the applicable compliance method is this specific (particularly where the test method has a specified duration), enforceability is ensured at all times. Therefore, because the particulate matter limits in FPC's Bartow Proposed Title V permit are completely enforceable through the use of these existing conditions, the Final Title

V Permit conditions relating to particulate matter for this facility should be issued without change.

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.*

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Thank you for your attention to these issues. 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.

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W. Jeffrey Pardue, C.E.P.
Director, FPC Environmental Services Department
Responsible Official for Bartow Title V permit

cc: Howard Rhodes, DEP
Clair Fancy, DEP
Winston A. Smith, EPA
Greg Worley, EPA
Elizabeth Bartlett, EPA
Robert Manning, HGSS

xc: Ed Svec

Is your RETURN ADDRESS completed on the reverse side?

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "*Return Receipt Requested*" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
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2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Jeffrey Pardue, Director
Environmental Services Dept.
Florida Power Corp.
3201 34 Street South
Saint Petersburg, FL 33711

BB/A

4a. Article Number
P 265 657 764

4b. Service Type
☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery

5. Received By: *(Print Name)*

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6. Signature: *(Addressee or Agent)*
X Kathy DeLong for Jeff Pardue

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No Insurance Coverage Provided.
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Mr. Jeffrey Pardue, Director
Environmental Services Dept.
Florida Power Corp.
3201 34 Street South
Saint Petersburg, FL 33711

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10-06-99

PS Form **3800**, April 1995

File

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

September 22, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: EPA Objection to PROPOSED Title V Permit No. 1030011-002-AV
Bartow Power Plant

Dear Mr. Pardue:

On September 16, 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 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, OGC w/ enclosure
Douglas Neeley, USEPA w/o enclosure
Gregg Worley, USEPA w/o enclosure

rcd
e-mail 9/16

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SEP 16 1999

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

RECEIVED
SEP 20 1999
DIVISION OF AIR
RESOURCES MANAGEMENT

SUBJ: EPA's Review of Proposed Title V Permit
Florida Power Corporation
Bartow Power Plant
Permit No. 1030011-002-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, Bartow Power Plant, which was posted on DEP's web site on August 3, 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 ensure compliance with the applicable requirements of 40 C.F.R. § 70.6(a)(1).

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.

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. 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

Enclosure

U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Florida Power Corporation
Bartow Power Plant
Permit no. 1030011-002-AV

I. EPA Objection Issues

1. Emissions Limitations - The statement of basis indicates that each emission unit is subject to a particulate matter emissions limit of 0.1 lb/MMBtu, and this limit is effectively equivalent to 0.149 lb/MMBtu due to rounding. This is also stated for conditions of soot blowing, where the particulate matter emission limit of 0.3 lb/MMBtu would be equivalent to 0.349 lb/MMBtu. However, these statements are incorrect. A measured emission rate of 0.149 lb/MMBtu actually rounds to 0.15 lb/MMBtu rather than 0.1 lb/MMBtu, which is in excess of the emission limit, and therefore not allowable[1].

   Part 70 authorizes EPA to object "to issuance of any proposed permit determined by the Administrator not to be in compliance with applicable requirements or requirements under [part 70]." See 40 C.F.R. § 70.8(c)(1). We are objecting to the statement in the statement of basis indicating that the permit's 0.1 lb/MMbtu particulate limit is "effectively equivalent to 0.149 lb/mmbtu because of rounding." This represents an improper and incorrect statement of the legal and factual basis for the permit's 0.1 lb/MMbtu particulate limit, and therefore issuance of the proposed permit with this statement of basis does not comply with the requirement of part 70 at 40 C.F.R. § 70.7(a)(5). Moreover, emission levels of 0.149 lb/MMbtu will not assure compliance with the 0.1 lb/MMBtu particulate limit. Accordingly, issuance of the proposed permit with this statement of basis would not assure compliance with the applicable requirement represented by the 0.1 lb/MMBtu particulate limit.

---

[1] According to the June 6, 1990 memorandum "Performance Test Calculation Guidelines", issued by William G. Laxton, Director of the Technical Support Division, OAQPS, and John S. Seitz, Director of the Stationary Source Compliance Division, OAQPS, when calculating and reporting emission rates and concentrations in determining compliance with the new source performance standards (NSPS) and national emission standards for hazardous pollutants (NESHAP), as well as state implementation plans (SIP's), all emission standards should be considered to have at least two significant figures (SF's), but no more than three. Therefore, since the 0.1 lb/MMBtu emission limit for particulate matter comes from the Florida state SIP, it should be considered to have two SF's. In this case, the emission limit effectively becomes 0.10 lb/MMBtu. In order to comply with the emission limit of 0.1 lb/MMBtu, the highest allowable measured emission rate (measured to four SF's) is 0.1049 lb/MMBtu.

The statement of basis justifies use of rounding based on "the agreement of March 10, 1998, between EPA, Region 4 and the Department to resolve an objection on this specific issue." However, EPA's March 16, 1998, response to FDEP's March 10, 1998, letter specifically requested that language on rounding be removed from the statement of basis for five Florida Power and Light permits "in order to avoid misinterpretation." As a result, all references to rounding must be removed from the statement of basis.

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3. General Comment - The title page of the permit specifies that this permit determination is both a proposed title V permit and a draft construction permit. The statement of basis and the permit should both identify which conditions are part of the draft construction permit, and/or which units are subject to the construction permit.

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9. Acid Rain Requirements - Please note that the allowances allocated to the Bartow facility units 001 through 003, as indicated under Section IV, Condition A.2. of the proposed permit have been changed. This revision was published in the Federal Register on September 28, 1998 (Vol. 63 No. 187, pp 51706-51765). We recommend that the allowances that are indicated for these units be adjusted to reflect the revised allocation.

Florida's PROPOSED Permit Electronic Notification Cover Memorandum

TO: Gracy Danois, U.S. EPA Region 4

CC: Carla E. Pierce, U.S. EPA Region 4

THRU: Scott Sheplak, P.E., Bureau of Air Regulation

FROM: Edward J. Svec, Permit Engineer

DATE: August 2, 1999

RE: U.S. EPA Region 4 PROPOSED Title V Operation Permit Review

The following PROPOSED Title V operation permit(s) and associated documents have been posted on the DEP World Wide Web Internet site for your review. Please provide any comments via Internet E-mail, within forty five (45) days of receiving this notice, to Scott Sheplak, at "SHEPLAK_S@dep.state.fl.us".

Applicant Name	County	Method of Transmittal	Electronic File Name(s)
Florida Power Corporation Bartow Facility	Pinellas	INTERNET	1030011p.zip

This zipped file contains the following electronic files:

1030011p.doc
10300111.xls
10300112.xls
1030011g.doc
1030011u.doc
1030011h.doc
sob.doc

Memorandum

Florida Department of
Environmental Protection

TO: C. H. Fancy

THRU: Scott Sheplak

THRU: Bruce Mitchell

FROM Ed Svec

DATE: July 29, 1999

SUBJECT: PROPOSED Title V Permit

Attached is the combined PROPOSED Title V Permit 1030011-002-AV and Air Construction Permit 1030011-006-AC for Florida Power Corporation's Bartow Facility for your review and approval. Nine comments on the Revised DRAFT permit were received and addressed from PCDEM and four comments were received and addressed from FPC. Their extension of time to file for hearing expires on August 1, 1999.

I recommend your approval of this PROPOSED permit.

attachments

Department of Environmental Protection

Jeb Bush
Governor

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
Bartow Plant
Facility ID No.: 1030011
Pinellas County

Initial Title V Air Operation Permit
PROPOSED Permit No.: 1030011-002-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 August 3, 1999.

USEPA's review period ends on the 45th day after the permit posting date. Day 45 is September 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 September 27, 1999.

The web site address is http://www2.dep.state.fl.us/air.

STATEMENT OF BASIS

Florida Power Corporation
Bartow Plant
Facility ID No.: 1030011
Pinellas County

Initial Title V Air Operation Permit
PROPOSED Permit No.: 1030011-002-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 three fossil fuel fired steam generators subject to Phase II Acid Rain, a pipeline heating boiler, four gas turbine peaking units and relocatable diesel generators that can be located at various Florida Power Corporation power plants, as needed.

Unit No. 1 is a front-fired, fossil fuel steam generator which produces 120 megawatts, electric power. The maximum heat input rate is 1,220 million Btu per hour and the unit fires No. 2 through No. 6 fuel oil, and on-specification used oil. Particulate matter emissions are controlled by a General Electric Services, Inc. Model 1-BAB1.2X37(9)36.0-434-4.3P electrostatic precipitator consisting of five fields in depth. The permit application indicates this ESP was designed to operate when utilizing a coal/oil mixture which is no longer burned by FPC. Because Unit 1 is oil fired and this unit is capable of meeting the applicable particulate matter and opacity limits in Conditions A.5., A.6., A.7., and A.8. without use of the ESP, the provisions of 40 CFR 64 do not apply [40 CFR 64.2(b)(ii)]. A Durag Model 281 Continuous Emissions Monitor for opacity with a recorder is used for continual observation of stack opacity. Unit 1 began commercial service in 1958. 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. This unit is 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, in accordance with the agreement of March 10, 1998 between EPA, Region 4 and the Department to resolve an objection on this specific issue. The applicant has presented historical PM test results which show that the steady-state average results are less than half the applicable effective standard. 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 No. 1 is 0.053798, steady-state.

Unit No. 2 is a tangential-fired fossil fuel fired steam generator which produces 120 megawatts, electric power. The maximum heat input rate is 1,317 million Btu per hour and the unit fires No. 2 through No. 6 fuel oil, on-specification used oil, and propane. Emissions from Unit No. 2 are uncontrolled. Unit 2 began commercial service in 1961. 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. This unit is 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, in accordance with the agreement of March 10, 1998 between EPA, Region 4 and the Department to resolve an objection on this specific issue. The applicant has presented historical PM test results which show that the steady-state average results are less than half the applicable effective standard. 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 No. 2 is 0.068616, steady-state.

Unit No. 3 is a tangential-fired fossil fuel fired steam generator which produces 225 megawatts, electric power. The maximum heat input rate is 2,211 million Btu per hour and the unit fires No. 2 through No. 6 fuel oil, on-specification used oil, natural gas, and propane. Emissions from Unit No. 3 are uncontrolled. Unit 3 began commercial service in 1963. 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. This unit is 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, in accordance with the agreement of March 10, 1998 between EPA, Region 4 and the Department to resolve an objection on this specific issue. The applicant has presented historical PM test results which show that the steady-state average results are less than half the applicable effective standard. 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 No. 3 is 0.067344, steady-state.

The Bartow-Anclote Pipeline Heating Boiler is used to heat fuel oil being transferred from the Bartow Plant to the Anclote Plant. The boiler's maximum heat input rate is 15.5 million Btu per hour firing natural gas, No. 2 fuel oil, or propane. Emissions from the boiler are uncontrolled.

The four gas turbines are natural gas and/or No. 2 fuel oil fired combustion turbines manufactured by General Electric (model number MS7000) and are designated as Gas Turbine Peaking Units #P-1, #P-2, #P-3 and #P-4. The manufacturers fuel flow and heat input ratings for each turbine are 5,174 gallons per hour of No. 2 fuel oil, or 714 million cubic feet per hour of natural gas (corresponds to approximately 714 million Btu per hour , at 59 degrees F). The actual heat input rate of the turbine is a function of the ambient temperature. These combustion turbines are used as peaking units during peak demand times to run a nominal 56 MW generator (each). Emissions from the combustion turbines are uncontrolled. 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 federal fiscal year

(October 1 through September 30). This frequency is justified by the low historical use of fuel oil for these emissions units and the previous VE tests, which documented compliance while firing fuel oil. Moreover, no Method 9 test since 1994 on these emissions units have resulted in an opacity measurement greater than half of the standard. Regarding hours of operation, these emissions units had not significantly exceeded 400 hours per year (going back to 1994), until the summer of 1998. The highest turbine hours of operation on oil for each year are: 1998 (P1) 724 hours; 1997 (P3) 297 hours; 1996 (P2) 308 hours; 1995 (P2) 355 hours; and, 1994 (P2) 235 hours. All electric generating units, not only within FPC's system, but state-wide, operated at record levels during the summer of 1998. The owner or operator will be conducting VE compliance tests while firing fuel oil for each combustion turbine upon that combustion turbine exceeding 400 hours of operation on fuel oil in any federal fiscal year (October 1 through September 30). Regardless of the number of hours of operation on fuel oil, at least one VE compliance test will be conducted on all four combustion turbines every five (5) years, coinciding with the term of the operation permit for these combustion turbines.

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. The generator(s) 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.
7. Anclote Power Plant, 1729 Baileys Road, Holiday, Pasco County

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.

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

Based on the initial Title V permit application received June 14, 1997, this facility is a major source of hazardous air pollutants (HAPs).

Appendix U-1, List of Unregulated Emissions Units and/or Activities.

Florida Power Corporation — **PROPOSED Permit No.:** 1030011-002-AV
Bartow Plant — **Facility ID No.:** 1030011

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'.

E.U. ID No.	Brief Description of Emissions Units and/or Activity
-xxx	General Boiler Building - Emergency diesel generator (basement) - 300 gallon fuel oil tank
-xxx	North Terminal - Diesel engine - Cummings 175 hp - 150 gallon No. 2 oil tank
-xxx	South Terminal - Gasoline tank, filling station
-xxx	South Terminal - No. 2 oil storage tank
-xxx	Turbine - Solvent Storage - Navee cleaner storage tank (4X4X4)
-xxx	Gas Turbine 1, 2, 3, and 4 - Lube oil vent with demister
-xxx	Gas Turbine 1, 2, 3, and 4 - Underground 2,600 gallon lube oil storage tank
-xxx	Gas Turbine 1, 2, 3, and 4 - 500 gallon waste oil storage tank
-xxx	Fuel Storage - Tank No. 1 ,2 and 3 - 150,000 bbls No. 6 fuel oil
-xxx	Fuel Storage - Tank No. 4 and 5 - 200,000 bbls No. 6 fuel oil
-xxx	Fuel Storage - Tank No. 6 - 100,000 bbls No. 2 fuel oil
-xxx	Fuel Storage - Tank No. 7 and 8 - 259,000 bbls No. 6 fuel oil
-xxx	General Site - Two, 500 gallon propane gas tanks for Unit 2 and 3 ignitors
-xxx	Tank No. CT#01(2R), CT#02(3R), and CT#03(4R), CT#04(5R) - 5,509 gallons waste oil
-xxx	Tank No. CT#6(11) - 4,118,142 gallons No. 2 fuel oil
-xxx	Tank No. #1(1R) - 1,008 gallons unleaded gasoline
-xxx	Tank No. #2(16) - 34,128 gallons No. 2 fuel oil
-xxx	Tank No. #4(7) - 6,354,768 gallons No. 6 fuel oil
-xxx	Tank No. #12 - 100 gallons diesel - emergency fire pump
-xxx	Tank No. #13 - 200 gallons diesel - emergency generator
-xxx	Tank No. #15(6) - 550 gallons diesel - vehicle
-xxx	Tank No. #16(19) - 65,460 gallons fuel additive
-xxx	Tank No. Boiler Day Tk(15) - 18,675 gallons No. 2 fuel oil
-xxx	Tank No. Terminal #1(9) - 6,329,232 gallons No. 6 fuel oil
-xxx	Tank No. Terminal #2(10) - 8,447,544 gallons No. 6 fuel oil
-xxx	Tank No. Terminal #3(12) - 10,540,740 gallons No. 6 fuel oil
-xxx	Tank No. Terminal #4(13) - 10,542,294 gallons No. 6 fuel oil
-xxx	Tank No. Substation #1 and Substation #2 - 16,002 gallons cable oil

[electronic file name: 1030011u.doc]

Appendix I-1, List of Insignificant Emissions Units and/or Activities.

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

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.

Brief Description of Emissions Units and/or Activities

1. Water Laboratory solvent use and hood-chemical analyses for water
2. Water Laboratory flammable chemical storage cabinet
3. Machine Shop sand blaster, drill press, welding, lathes, hand-held tools, ect.
4. General Boiler Building fire protection equipment
5. North Terminal - Diesel fire pump building flammable liquid cabinet
6. North Terminal - Foam Building Nat. foam XL - 3%; 2,600 gallons
7. South Terminal - Machine Shop sand blaster, drill press, welding, lathes, hand-held tools, ect.
8. Turbine - Fire Protection CO2 fire system
9. Fuel Storage foam fire protection system
10. General Site surface coating <6.0 gallons per day
11. General Site brazing, soldering and welding
12. Unit 1 Fly Ash Handling System

[electronic file name: 1030011g.doc]

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

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

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.	Brief Description
[-001]	No. 1 Unit, Fossil Fuel Fired Steam Generator with Electrostatic Precipitator
[-002]	No. 2 Unit, Fossil Fuel Fired Steam Generator
[-003]	No. 3 Unit, Fossil Fuel Fired Steam Generator

			Allowable Emissions			Equivalent Emissions*			
Pollutant Name	Fuel(s)	Hours/Year	Standard(s)	lbs./hour	TPY	lbs./hour	TPY	Regulatory Citation(s)	See permit condition(s)
PM [EU-001]	All	8,760	0.1 lb/MMBtu	122.0	534.4			Rules 62-296.405(1)(b), 62-296.700(4)(b) & 62-296.702(2)(a)	A.7.
PM [EU-002]	All	8,760	0.1 lb/MMBtu	131.7	576.9			Rules 62-296.405(1)(b), 62-296.700(4)(b) & 62-296.702(2)(a)	A.7.
PM [EU-003]	All	8,760	0.1 lb/MMBtu	221.1	968.6			Rules 62-296.405(1)(b), 62-296.700(4)(b) & 62-296.702(2)(a)	A.7.
PM [EU-001]	All	8,760	0.3 lb/MMBtu	366.0				Rules 62-210.700(3) & 62-296.700(4)(b)	A.8.
PM [EU-002]	All	8,760	0.3 lb/MMBtu	395.1				Rules 62-210.700(3) & 62-296.700(4)(b)	A.8.
PM [EU-003]	All	8,760	0.3 lb/MMBtu	663.3				Rules 62-210.700(3) & 62-296.700(4)(b)	A.8.
SO_2 [EU-001]	Liquid	8,760	2.75 lb/MMBtu			3,365.0	14,694.9	Rule 62-296.405(1)(c)1.j.	A9.
SO_2 [EU-002]	Liquid	8,760	2.75 lb/MMBtu			3,621.75	15,853.26	Rule 62-296.405(1)(c)1.j.	A9.
SO_2 [EU-003]	Liquid	8,760	2.75 lb/MMBtu			5,080.75	25,631.5	Rule 62-296.405(1)(c)1.j.	A9.
SO_2	Liquid	8,760	2.5% by weight sulfur					Rule 62-296.405(1)(e)3.	A10.
VE	All	8,760	40% opacity					Rule 62-296.405(1)(a) & OGC Orders 86-1577 & 87-1261	A.5.
VE	All	3 hr/24 hr	60% opacity					Rule 62-210.700(3)	A.6.

Notes:
* The "Equivalent Emissions" listed are for informational purposes only.

[electronic file name: 10300111.xls]

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

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

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.	Brief Description
[-004]	Bartow-Anclote Pipeline Heating Boiler

			Allowable Emissions			Equivalent Emissions*			
Pollutant Name	Fuel(s)	Hours/Year	Standard(s)	lbs./hour	TPY	lbs./hour	TPY	Regulatory Citation(s)	See permit condition(s)
SO_2	Liquid	8,760	0.5% by weight sulfur			8.52	37.34	Rule 62-296.406(3)	**B.7.**
VE	All	8,760	20% except 40% 2 min/hr					Rule 62-296.406(1)	**B.5.**
VE	All	3 hr/24 hr	60% opacity					Rule 62-210.700(3)	**B.6.**

Notes:
* The "Equivalent Emissions" listed are for informational purposes only.

[electronic file name: 10300111.xls]

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

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

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.	Brief Description
[-005]	Gas Turbine Peaking Unit #P-1
[-006]	Gas Turbine Peaking Unit #P-2
[-007]	Gas Turbine Peaking Unit #P-3
[-008]	Gas Turbine Peaking Unit #P-4

			Allowable Emissions			Equivalent Emissions*			
Pollutant Name	Fuel(s)	Hours/Year	Standard(s)	lbs./hour	TPY	lbs./hour	TPY	Regulatory Citation(s)	See permit condition(s)
SO_2	Liquid	8,760	0.5% by weight sulfur			392.7	1,720.0	AO52-253215A, 253216A, 253217A & 253218A	C.6.
VE	All	8,760	20% opacity					Rule 62-296.320(4)(b)1.	C.5.

Notes:
* The "Equivalent Emissions" listed are for informational purposes only.

[electronic file name: 10300111.xls]

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

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

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.	Brief Description
[-xxx]	Relocatable Diesel Fired Generator(s)

			Allowable Emissions			Equivalent Emissions*			
Pollutant Name	Fuel(s)	Hours/Year	Standard(s)	lbs./hour	TPY	lbs./hour	TPY	Regulatory Citation(s)	See permit condition(s)
SO_2	Liquid	2,970	0.5% by weight Sulfur			14.16	21.02	Applicant request & AC09-202080	D.4. & D.6.
VE	All	2,970	20% opacity					Applicant request & AO09-205952	D.5.

Notes:
* The "Equivalent Emissions" listed are for informational purposes only.

[electronic file name: 10300111.xls]

Table 2-1, Summary of Compliance Requirements

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

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.	Brief Description
[-001]	No. 1 Unit, Fossil Fuel Fired Steam Generator with Electrostatic Precipitator
[-002]	No. 2 Unit, Fossil Fuel Fired Steam Generator
[-003]	No. 3 Unit, Fossil Fuel Fired Steam Generator

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
VE EU[-001]	All	EPA Method 9	6 months	3/16 & 9/16	60 min	Yes	A.19., A.29.and A.30.
VE EU[-002 & -003]	All	EPA Method 9	Annual	5/28 & 4/28	60 min		A.19.and A.30.
PM EU[-001]	All	EPA Method 17, 5, 5B or 5F	6 months	3/16 & 9/16	1 hr		A.20., A.29.and A.31.
PM EU[-002 & -003]	All	EPA Method 17, 5, 5B or 5F	Annual	5/28 & 4/28	1 hr		A.20.and A.31.
SO_2	Liquid	EPA Method 6, 6A, 6B, or 6C; or fuel analysis	Annual	w/ PM test	1 hr		A.21.and A.22.
Used oil	On-specification	EPA SW-846	each batch				A.11., A.12., A.13., & A.32.

Notes:
* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.
**CMS [=] continuous monitoring system

[electronic file name: 10300112.xls]

Table 2-1, Summary of Compliance Requirements

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

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.	Brief Description
[-004]	Bartow-Anclote Pipeline Heating Boiler

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
VE	All	DEP Method 9	Annual	31-May	30 min		B.12. & B.13.
SO_2	Liquid	ASTM Methods	each delivery				B.14. & B.15.

Notes:
* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.
**CMS [=] continuous monitoring system

[electronic file name: 10300112.xls]

Table 2-1, Summary of Compliance Requirements

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

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.	Brief Description
[-005]	Gas Turbine Peaking Unit #P-1
[-006]	Gas Turbine Peaking Unit #P-2
[-007]	Gas Turbine Peaking Unit #P-3
[-008]	Gas Turbine Peaking Unit #P-4

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
VE	All	EPA Method 9	Annual	1-Feb	30 min		C.11. & C.16.
SO_2	Liquid	ASTM Methods	each delivery				C.12.

Notes:
* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.
**CMS [=] continuous monitoring system

[electronic file name: 10300112.xls]

Table 2-1, Summary of Compliance Requirements

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

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.	Brief Description
[-xxx]	Relocatable Diesel Fired Generator(s)

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
VE		EPA Method 9	Annual	30 days from startup	30 min		D.11.
SO_2	Liquid	ASTM Methods	each delivery				D.12.

Notes:
* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.
**CMS [=] continuous monitoring system

[electronic file name: 10300112.xls]

Appendix H-1, Permit History/ID Number Changes

Florida Power Corporation
P. L. Bartow

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

Permit History (for tracking purposes):

E.U. ID No	Description	Permit No.	Issue Date	Expiration Date	Extended Date[1,2]	Revised Date(s)
-001	Bartow Plant Unit #1	AO52-233149	12/29/93	12/28/98		02/19/97
-002	Bartow Plant Boiler #2	AO52-216412	01/26/93	09/16/98		02/19/97
-003	Bartow Plant Boiler #3	AO52-216413	01/27/93	09/16/98		08/16/95 02/19/97
-004	Bartow Pipeline Heater Boiler	AO52-244478	04/18/94	04/18/99		
-005	Gas Turbine Peaking Unit #P-1	AO52-253215	11/23/94	11/01/99		01/13/97
-006	Gas Turbine Peaking Unit #P-2	AO52-253216	11/23/94	11/01/99		01/13/97
-007	Gas Turbine Peaking Unit #P-3	AO52-253217	11/23/94	11/01/99		01/13/97
-008	Gas Turbine Peaking Unit #P-4	AO52-253218	11/23/94	11/01/99		01/13/97
-009	Flyash Storage Silo w/Baghouse	AO52-232464	08/30/93	08/26/98		09/04/98
-009	Flyash Storage Silo w/Baghouse	1030011-005-AC	09/04/98			
-009	Flyash Storage Silo w/Baghouse	1030011-006-AC				
-xxx	Relocatable Diesel Generator(s)	AO09-205952		03/31/97		

(if applicable) ID Number Changes (for tracking purposes):

From: **Facility ID No.**: 40PNL520011

To: **Facility ID No.**: 1030011

Notes:
1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.
{Rule 62-213.420(1)(b)2., F.A.C., allows Title V Sources to operate under existing valid permits that were in effect at the time of application until the Title V permit becomes effective}

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the matter of:	)	
	)	
Florida Electric Power Coordinating Group, Inc.,	)	ASP No. 97-B-01
	)	
Petitioner.	)	

ORDER ON REQUEST FOR ALTERNATE PROCEDURES AND REQUIREMENTS

Pursuant to Rule 62-297.620, Florida Administrative Code (F.A.C.), the Florida Electric Coordinating Group, Incorporated, (FCG) petitioned for approval to: (1) Exempt fossil fuel steam generators which burn liquid and/or solid fuel for less than 400 hours during the federal fiscal year from the requirement to conduct an annual particulate matter compliance test; and, (2) Exempt fossil fuel steam generators which burn liquid and/or solid fuel for less than 400 hours during the federal fiscal year from the requirement to conduct an annual particulate matter compliance test during the year prior to renewal of an operation permit. This Order is intended to clarify particulate testing requirements for those fossil fuel steam generators which primarily burn gaseous fuels including, but not necessarily limited to natural gas.

Having considered the provisions of Rule 62-296.405(1), F.A.C., Rule 62-297.310(7), F.A.C., and all supporting documentation, the following Findings of Fact, Conclusions of Law, and Order are entered:

FINDINGS OF FACT

1. The Florida Electric Power Coordinating Group, Incorporated, petitioned the Department to exempt those fossil fuel steam generators which have a heat input of more than 250 million Btu per hour and burn solid and/or liquid fuel less than 400 hours during the year from the requirement to conduct an annual particulate matter compliance test. [Exhibit 1]

2. Rule 62-296.405(1)(a), F.A.C., applies to those fossil fuel steam generators that are not subject to the federal standards of performance for new stationary sources (NSPS) in 40 CFR 60 and which have a heat input of more than 250 million Btu per hour.

3. Rule 62-296.405(1)(a), F.A.C., limits visible emissions from affected fossil fuel steam generators to, "20 percent opacity except for either one six-minute period per hour during which

not exceed 40 percent. The option selected shall be specified in the emissions unit's construction and operation permits. Emissions units governed by this visible emission limit shall test for particulate emission compliance annually and as otherwise required by Rule 62-297, F.A.C."

4. Rule 62-296.405(1)(a), F.A.C., further states, "Emissions units electing to test for particulate matter emission compliance quarterly shall be allowed visible emissions of 40 percent opacity. The results of such tests shall be submitted to the Department. Upon demonstration that the particulate standard has been regularly complied with, the Secretary, upon petition by the applicant, shall reduce the frequency of particulate testing to no less than once annually.

5. Rule 297.310(7)(a)1., F.A.C., states, "The owner or operator of a new or modified emissions unit that is subject to an emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit for such emissions unit."

6. Rule 297.310(7)(a)2., F.A.C., states, "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.

7. Rule 297.310(7)(a)3., F.A.C., further states, "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 and/or solid fuel for a total of no more than 400 hours."

8. Rule 297.310(7)(a)4., F.A.C., states, "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..."

9. Rule 297.310(7)(a)5., F.A.C., states. "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 and/or solid fuel, other than during startup, for a total of more than 400 hours."

10. Rule 297.310(7)(a)6., F.A.C., states, "For fossil fuel steam generators on a semi-annual particulate matter emission compliance testing schedule, a compliance test shall not be

required for any six-month period in which liquid and/or solid fuel is not burned for more than 200 hours other than during startup."

11. Rule 297.310(7)(a)7., F.A.C., states, "For emissions units electing to conduct particulate matter emission compliance testing quarterly pursuant to Rule 62-296.405(2)(a), F.A.C., a compliance test shall not be required for any quarter in which liquid and/or solid fuel is not burned for more than 100 hours other than during startup." [Note: The reference should be to Rule 62-296.405(1)(a), F.A.C., rather than Rule 62-296.405(2)(a), F.A.C.]

12. The fifth edition of the U. S. Environmental Protection Agency's Compilation of Air Pollutant Emission Factors, AP-42, that emissions of filterable particulate from gas-fired fossil fuel steam generators with a heat input of more than about 10 million Btu per hour may be expected to range from 0.001 to 0.006 pound per million Btu. [Exhibit 2]

13. Rule 62-296.405(1)(b), F.A.C. and the federal standards of performance for new stationary sources in 40 CFR 60.42, Subpart D, limit particulate emissions from uncontrolled fossil fuel fired steam generators with a heat input of more than 250 million Btu to 0.1 pound per million Btu.

CONCLUSIONS OF LAW

1. The Department has jurisdiction to consider the matter pursuant to Section 403.061, Florida Statutes (F.S.), and Rule 62-297.620, F.A.C.

2. Pursuant to Rule 62-297.310(7), F.A.C., the Department may require Petitioner to conduct compliance tests that identify the nature and quantity of pollutant emissions, if, after investigation, it is believed that any applicable emission standard or condition of the applicable permits is being violated.

3. There is reason to believe that a fossil fuel steam generator which does not burn liquid and/or solid fuel (other than during startup) for a total of more than 400 hours in a federal fiscal year and complies with all other applicable limits and permit conditions is in compliance with the applicable particulate mass emission limiting standard.

ORDER

Having considered the requirements of Rule 62-296.405, F.A.C., Rule 62-297.310, F.A.C., and supporting documentation, it is hereby ordered that:

1. 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 and/or solid fuel, other than during startup, for a total of more than 400 hours;

2. For fossil fuel steam generators on a semi-annual particulate matter emission compliance testing schedule, a compliance test shall not be required for any six-month period in which liquid and/or solid fuel is not burned for more than 200 hours other than during startup;

3. For emissions units electing to conduct particulate matter emission compliance testing quarterly pursuant to Rule 62-296.405(1)(a), F.A.C., a compliance test shall not be required for any quarter in which liquid and/or solid fuel is not burned for more than 100 hours other than during startup;

4. 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 particulate matter emission compliance test results for any fossil fuel steam generator emissions unit that burned liquid and/or solid fuel for a total of no more than 400 hours during the year prior to renewal.

5. Pursuant to Rule 62-297.310(7), F.A.C., owners of affected fossil fuel steam generators may be required to conduct compliance tests that identify the nature and quantity of pollutant emissions, if, after investigation, it is believed that any applicable emission standard or condition of the applicable permits is being violated.

6. Pursuant to Rule 62-297.310(8), F.A.C., owners of affected fossil fuel steam generators shall submit the compliance test report to the District Director of the Department district office having jurisdiction over the emissions unit and, where applicable, the Air Program Administrator of the appropriate Department-approved local air program within 45 days of completion of the test.

PETITION FOR ADMINISTRATIVE REVIEW

The Department will take the action described in this Order unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 of the Florida Statutes, or a party requests mediation as an alternative remedy under section 120.573 before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed decision may petition for an administrative hearing in accordance with 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 must be filed within 21 days of receipt of this Order. 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 (or a request for mediation, as discussed below) 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 of

the Florida Statutes, 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 Department 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 each petitioner, if any;

(e) A statement of facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement identifying the rules or statutes each petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by each petitioner, stating precisely the action each petitioner wants the Department to take with respect to the Department's action or proposed action in the notice of intent.

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 Order. 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 person whose substantial interests are affected by the Department's proposed decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information:

(a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any;

(b) A statement of the preliminary agency action;

(c) A statement of the relief sought; and

(d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following:

(a) The names, addresses, and telephone numbers of any persons who may attend the mediation;

(b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time;

(c) The agreed allocation of the costs and fees associated with the mediation;

(d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation;

(e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen;

(f) The name of each party's representative who shall have authority to settle or recommend settlement; and

(g) The signatures of all parties or their authorized representatives.

As provided in section 120.573 of the Florida Statutes, the timely agreement of all parties to mediate will toll the time limitations imposed by sections 120.569 and 120.57 for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such a modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under sections 120.569 and 120.57 remain available for disposition of the dispute, and the notice will

specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under section 120.542 of the Florida Statutes. 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, 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) of the Florida Statutes, 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

each of those terms is defined in section 120.542(2) of the Florida Statutes, 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 EPA 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.

This Order constitutes final agency action unless a petition is filed in accordance with the above paragraphs. Upon timely filing of a petition, this Order will not be effective until further Order of the Department.

RIGHT TO APPEAL

Any party to this Order has the right to seek judicial review of the Order pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, 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 of Appeal must be filed within 30 days from the date the Notice of Agency Action is filed with the Clerk of the Department.

DONE AND ORDERED this 17 day of March, 1997 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Howard L. Rhodes

HOWARD L. RHODES, Director
Division of Air Resources Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(904) 488-0114

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that a copy of the foregoing was mailed to Rich Piper, Chair, Florida Power Coordinating Group, Inc., 405 Reo Street, Suite 100, Tampa, Florida 33609-1004, on this 18th day of March 1997.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Clerk

3-18-97
Date

FLORIDA ELECTRIC POWER COORDINATING GROUP, INC. (FCG)
405 REO STREET, SUITE 100 • (813) 289-5644 • FAX (813) 289-5646
TAMPA, FLORIDA 33609-1004

January 28, 1997

Clair H. Fancy, P.E.
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32301

RE: Comments Regarding Draft Title V Permits

Dear Mr. Fancy:

The Florida Electric Power Coordinating Group, Inc. (FCG), which is made up of 36 utilities owned by investors, municipalities, and cooperatives, has been following the implementation of Title V in Florida and recently submitted comments to you on draft Title V permit conditions by letter dated December 4, 1996. As indicated in that letter, representatives from the FCG would like to meet with you and other members of your air permitting staff to discuss some significant concerns that FCG member companies have regarding conditions that may be included in Title V permits issued by your office. While we will be discussing these issues with you and your staff in greater detail at that meeting, we would like to explain some of our concerns in this letter.

Primarily, the FCG members are concerned that the Title V permits may contain conditions that are much different in important respects than those conditions currently included in existing air permits. During the rulemaking workshops and seminars conducted by the Department to discuss the rules implementing the Title V permitting program, representations were made on several occasions that industry could expect to see permit conditions that were substantively similar to existing permit conditions and that primarily the format was changing. Representations were also made to industry that Title V did not impose additional substantive requirements beyond what was already required under the Department's rules. Based on the first draft Title V permit that we have reviewed, we are concerned that there may be some attempt to change the substantive requirements on existing facilities through the Title V permitting process, and we would like to discuss this with you at the meeting we have scheduled for January 30, 1997.

1. Federal Enforceability--The FCG has long been concerned about the designation of non-federally enforceable permit terms and conditions. We are concerned about this issue because the Department's first draft Title V permits have included language stating that *all* terms and conditions would become federally enforceable once the permit is issued. This approach is consistent with the Department's guidance memorandum dated September 13, 1996 (DARM-PER/V-18), but we understand that the Department may now intend to remove all references to

the federal enforceability of permit terms and conditions. We are also concerned about this approach because a Title V permit is generally federally enforceable and, without any designation of non-federally enforceable terms and conditions, the entire permit could be interpreted to be federally enforceable. As we stated in the December 4 letter as well as our letter dated October 11, 1996, all terms and conditions in a Title V permit do *not* become enforceable by the U.S. Environmental Protection Agency and citizens under the Clean Air Act simply by inclusion in a Title V permit. To make it clear which provisions in a Title V permit are not federally enforceable (which are being included because of state or local requirements only), it is very important to specifically designate those conditions as having no federally enforceable basis. Such a designation is actually required under the federal Title V rules, which provide that permitting agencies are to "specifically designate as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements." 40 CFR § 70.6(b). We would like to discuss with you our concerns about this issue and to again specifically request that when Title V permits are issued by the Department, conditions having no federally enforceable basis clearly be identified as such.

2. PM Testing on Gas--The FCG understands that the Department may attempt to require annual particulate matter compliance testing while firing natural gas to determine compliance with the 0.1 lb/mmBtu emission limit established under Rule 62-296.405(1)(b), F.A.C. The FCG member companies feel strongly that compliance testing for particulate matter should not be required while firing natural gas. The Department has not historically required particulate matter compliance testing while firing natural gas, it is not required under the current permits for these units, and it should not be necessary since natural gas is such a clean fuel. Typically only *de minimis* amounts of particulate matter would be expected from the firing of natural gas, so compliance testing would not provide meaningful information to the Department, and the expense to conduct such tests is not justified. We understand that Department representatives suggested that industry could pursue an alternative test procedure under Rule 62-297.620, F.A.C., to allow a visible emissions test to be used in lieu of a stack test for determining compliance with the particulate matter limit. While certainly a visible emissions test would be preferable over a stack test, neither of these tests should be needed to demonstrate compliance with the particulate matter limit of 0.1 lb/mmBtu while burning natural gas. The FCG strongly urges that the Department reconsider its position on this issue and clarify that compliance testing for particulate matter while firing natural gas is not required.

3. Excess Emissions--By letter dated December 5, 1996, the U.S. Environmental Protection Agency (EPA) submitted a letter commenting on a draft Title V permit that had been issued by the Department and indicated some concern regarding excess emission provisions included in conditions that were quoted from Rule 62-210.700, F.A.C. Because the permit conditions cited simply quote the applicable provisions of the Department's rules regarding

excess emissions and because these rules have been approved as part of Florida's State Implementation Plan, the permit conditions are appropriate to be included in the permit. We understand that the Department intends to include as applicable requirements in Title V permit conditions the provisions of Rule 62-210.700, F.A.C. If the Department receives any further adverse comments regarding the excess emissions rule under 62-210.700, F.A.C., we would appreciate your contacting us. Because this issue is so important to us, we would like to discuss it with you in greater detail at our meeting on January 30.

4. Compliance Testing for Combustion Turbines--While the Department's November 22, 1995, guidance regarding the compliance testing requirements for combustion turbines clearly states that the use of heat input curves based on ambient temperatures and humidities is to be included as a permit condition *only* if requested by a permittee, we understand that the Department may intend to include this requirement in Title V permits for all combustion turbines. As we are sure you recall, the FCG worked over a period of several months with the Department on the development of the guidance memorandum and it was clearly understood by FCG members that the heat input curves would not be mandated but would remain voluntary for any existing combustion turbine. It was also understood by FCG members that the requirement to conduct testing at 95 to 100 percent of capacity would be required only if the permit applicant requested the use of heat input curves. We understand that the Department may be interpreting the requirement to use heat input curves and to test at 95 to 100 percent of permitted capacity to be mandatory for all combustion turbines. We would like to clarify this with you during our meeting. Also, we would like to confirm that, regardless of whether a combustion turbine uses heat input curves or tests at 95 to 100 percent of permitted capacity, it is necessary to test at four load points and correct to ISO *only* to determine compliance with the nitrogen oxides (NOx) standard under New Source Performance Standard Subpart GG under 40 CFR § 60.332 and not annually thereafter.

5. Test Methods--The FCG is concerned about the possibility of the Department requiring a full permit revision to authorize the use of an approved test method not specifically identified in a Title V permit, even though the Department may have separately approved the use of the particular test method for a unit (i.e., through a compliance test protocol). It is the FCG's position that language should be included in all Title V permits indicating that other test methods approved by the Department may be used. Further, a full permit revision (including public notice) should *not* be necessary when a test method not previously identified in the permit is approved for use by a unit. The Department's subsequent approval of test methods should simply be included in the next permit renewal cycle. The FCG understands that the Department planned to confirm this approach with the U.S. Environmental Protection Agency Region IV, and we would like to discuss this issue with you at the January 30 meeting to learn of the agency's response.

6. Quarterly Reports--The FCG understands that the Department may be interpreting the quarterly reporting requirements under Rule 62-296.405(1)(g), F.A.C., to apply regardless of whether continuous emissions monitors were required under the preceding Rule 62-296.405(1)(f), F.A.C. It is the FCG's position that quarterly reports are required under Rule 62-296.405(1)(g) only when continuous emissions monitors are required under the preceding paragraph (f). While this may not be entirely clear from the language of the rules, paragraphs (f) and (g) were originally included in a separate rule on "continuous emission monitoring requirements" where it was very clear that the requirements of paragraph (g) applied *only* if continuous emission monitoring was required under paragraph (f). Research indicates that Rule 17-2.710, F.A.C. (copy attached), where these provisions were originally located, was first transferred to Rule 17-297.500, F.A.C. (which later became Rule 62-297.500), later repealed in November of 1994, and ultimately replaced with what is now Rule 62-296.405(1)(f) and (g), F.A.C. To the extent that an emissions unit is not subject to Rule 62-296.405(1)(f) and is not required to install and operate continuous emissions monitors (e.g., oil- and gas-fired units), the quarterly reporting requirements of paragraph (g) should not apply.

7. Trivial Activities--As you may recall, in May of 1996, the FCG submitted to the Department a list of small, *de minimis* emissions units and activities that it considered to be "trivial," consistent with the list developed by EPA as part of the Title V "White Paper" and incorporated by reference by the Department in its March 15, 1996, guidance memorandum (DARM-PER/V-15-Revised). We never received a response from the Department and now understand that the Department may not have made a determination as to whether any of the emission units or activities on the list should qualify as "trivial." This is an important issue to the FCG because only "trivial" activities can be omitted from the Title V permit application and permit, and ultimately omitted from emission estimates in the annual air operation reports under Rule 62-210.370(3), F.A.C. The FCG remains hopeful that the Department will consider its request to determine that most, if not all, of the emission units and activities on the May, 1996, list to be "trivial." We would like to discuss a possible resolution of this issue with you and your staff at the January 30 meeting.

8. Permit Shield--The FCG continues to be concerned about the language in Conditions 5 and 20 of Appendix TV-1, Title V Conditions, which circumvents the permit shield provisions under Section 403.0872(15), Florida Statutes, and Rule 62-213.460, F.A.C. The FCG believes that these conditions should be deleted in their entirety. To the extent that the Department attempts to caveat the applicability of those conditions, the FCG believes that it is important to cite to not only the regulatory citation for the permit shield but the statutory citation as well.

Thank you again for considering the FCG's comments on the draft Title V permits. We very much appreciate the cooperation we have received from the Department throughout the

Title V implementation process, and we look forward to our meeting later this week. If you have any questions in the meantime, please call me at 561-625-7661.

Sincerely,

Rich Piper

Rich Piper, Chair
FCG Air Subcommittee

Enclosures

cc: Howard L. Rhodes, DEP
John Brown, DEP
Pat Comer, DEP OGC
Scott M. Sheplak, DEP
Edward Svec, DEP
FCG Air Subcommittee
Angela Morrison, HGSS

s2501

AP-42
FIFTH EDITION
JANUARY 1995

COMPILATION OF AIR POLLUTANT EMISSION FACTORS

VOLUME I: STATIONARY POINT AND AREA SOURCES

Office Of Air Quality Planning And Standards
Office Of Air And Radiation
U. S. Environmental Protection Agency
Research Triangle Park, NC 27711

January 1995

Exhibit 2

1.4 Natural Gas Combustion

1.4.1 General[1-2]

Natural gas is one of the major fuels used throughout the country. It is used mainly for industrial process steam and heat production; for residential and commercial space heating; and for electric power generation. Natural gas consists of a high percentage of methane (generally above 80 percent) and varying amounts of ethane, propane, butane, and inerts (typically nitrogen, carbon dioxide, and helium). Gas processing plants are required for the recovery of liquefiable constituents and removal of hydrogen sulfide before the gas is used (see Section 5.3, Natural Gas Processing). The average gross heating value of natural gas is approximately 8900 kilocalories per standard cubic meter (1000 British thermal units per standard cubic foot), usually varying from 8000 to 9800 kcal/scm (900 to 1100 Btu/scf).

1.4.2 Emissions And Controls[3-5]

Even though natural gas is considered to be a relatively clean-burning fuel, some emissions can result from combustion. For example, improper operating conditions, including poor air/fuel mixing, insufficient air, etc., may cause large amounts of smoke, carbon monoxide (CO), and organic compound emissions. Moreover, because a sulfur-containing mercaptan is added to natural gas to permit leak detection, small amounts of sulfur oxides will be produced in the combustion process.

Nitrogen oxides (NO_x) are the major pollutants of concern when burning natural gas. Nitrogen oxide emissions depend primarily on the peak temperature within the combustion chamber as well as the furnace-zone oxygen concentration, nitrogen concentration, and time of exposure at peak temperatures. Emission levels vary considerably with the type and size of combustor and with operating conditions (particularly combustion air temperature, load, and excess air level in boilers).

Currently, the two most prevalent NO_x control techniques being applied to natural gas-fired boilers (which result in characteristic changes in emission rates) are low NO_x burners and flue gas recirculation. Low NO_x burners reduce NO_x by accomplishing the combustion process in stages. Staging primarily delays the combustion process, resulting in a cooler flame which suppresses NO_x formation. The three most common types of low NO_x burners being applied to natural gas-fired boilers are staged air burners, staged fuel burners, and radiant fiber burners. Nitrogen oxide emission reductions of 40 to 85 percent (relative to uncontrolled emission levels) have been observed with low NO_x burners. Other combustion staging techniques which have been applied to natural gas-fired boilers include low excess air, reduced air preheat, and staged combustion (e. g., burners-out-of-service and overfire air). The degree of staging is a key operating parameter influencing NO_x emission rates for these systems.

In a flue gas recirculation (FGR) system, a portion of the flue gas is recycled from the stack to the burner windbox. Upon entering the windbox, the gas is mixed with combustion air prior to being fed to the burner. The FGR system reduces NO_x emissions by two mechanisms. The recycled flue gas is made up of combustion products which act as inerts during combustion of the fuel/air mixture. This additional mass is heated in the combustion zone, thereby lowering the peak flame temperature and reducing the amount of NO_x formed. To a lesser extent, FGR also reduces NO_x formation by lowering the oxygen concentration in the primary flame zone. The amount of flue gas recirculated is a key operating parameter influencing NO_x emission rates for these systems. Flue gas

recirculation is normally used in combination with low NO_x burners. When used in combination, these techniques are capable of reducing uncontrolled NO_x emissions by 60 to 90 percent.

Two post-combustion technologies that may be applied to natural gas-fired boilers to reduce NO_x emissions by further amounts are selective noncatalytic reduction and selective catalytic reduction. These systems inject ammonia (or urea) into combustion flue gases to reduce inlet NO_x emission rates by 40 to 70 percent.

Although not measured, all particulate matter (PM) from natural gas combustion has been estimated to be less than 1 micrometer in size. Particulate matter is composed of filterable and condensable fractions, based on the EPA sampling method. Filterable and condensable emission rates are of the same order of magnitude for boilers; for residential furnaces, most of the PM is in the form of condensable material.

The rates of CO and trace organic emissions from boilers and furnaces depend on the efficiency of natural gas combustion. These emissions are minimized by combustion practices that promote high combustion temperatures, long residence times at those temperatures, and turbulent mixing of fuel and combustion air. In some cases, the addition of NO_x control systems such as FGR and low NO_x burners reduces combustion efficiency (due to lower combustion temperatures), resulting in higher CO and organic emissions relative to uncontrolled boilers.

Emission factors for natural gas combustion in boilers and furnaces are presented in Tables 1.4-1, 1.4-2, and 1.4-3.[6] For the purposes of developing emission factors, natural gas combustors have been organized into four general categories: utility/large industrial boilers, small industrial boilers, commercial boilers, and residential furnaces. Boilers and furnaces within these categories share the same general design and operating characteristics and hence have similar emission characteristics when combusting natural gas. The primary factor used to demarcate the individual combustor categories is heat input.

Table 1.4-1 (Metric And English Units). EMISSION FACTORS FOR PARTICULATE MATTER (PM) FROM NATURAL GAS COMBUSTION[a]

Combustor Type (Size, 10^6 Btu/hr Heat Input) (SCC)[b]	Filterable PM[c]			Condensable PM[d]		
	kg/10^6 m^3	lb/10^6 ft^3	RATING	kg/10^6 m^3	lb/10^6 ft^3	RATING
Utility/large industrial boilers (> 100) (1-01-006-01, 1-01-006-04)	16 - 80	1 - 5	B	ND	ND	NA
Small industrial boilers (10 - 100) (1-02-006-02)	99	6.2	B	120	7.5	D
Commercial boilers (0.3 - < 10) (1-03-006-03)	72	4.5	C	120	7.5	C
Residential furnaces (< 0.3) (No SCC)	2.8	0.18	C	180	11	D

[a] References 9-14. All factors represent uncontrolled emissions. Units are kg of pollutant/10^6 cubic meters natural gas fired and lb of pollutant/10^6 cubic feet natural gas fired. Based on an average natural gas higher heating value of 8270 kcal/m^3 (1000 Btu/scf). The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. ND = no data. NA = not applicable.

[b] SCC = Source Classification Code.

[c] Filterable PM is that particulate matter collected on or prior to the filter of an EPA Method 5 (or equivalent) sampling train.

[d] Condensable PM is that particulate matter collected using EPA Method 202, (or equivalent). Total PM is the sum of the filterable PM and condensable PM. All PM emissions can be assumed to be less than 10 micrometers in aerodynamic equivalent diameter (PM-10).

Table 1.4-2 (Metric And English Units). EMISSION FACTORS FOR SULFUR DIOXIDE (SO_2), NITROGEN OXIDES (NO_x), AND CARBON MONOXIDE (CO) FROM NATURAL GAS COMBUSTION[a]

Combustor Type (Size, 10^6 Btu/hr Heat Input) (SCC)[b]	SO_2[c]			NO_x[d]			CO[e]		
	kg/10^6 m^3	lb/10^6 ft^3	RATING	kg/10^6 m^3	lb/10^6 ft^3	RATING	kg/10^6 m^3	lb/10^6 ft^3	RATING
Utility/large Industrial Boilers (>100) (1-01-006-01, 1-01-006-04)									
Uncontrolled	9.6	0.6	A	8800	550[f]	A	640	40	A
Controlled - Low NO_x burners	9.6	0.6	A	1300	81[f]	D	ND	ND	NA
Controlled - Flue gas recirculation	9.6	0.6	A	850	53[f]	D	ND	ND	NA
Small Industrial Boilers (10 - 100) (1-02-006-02)									
Uncontrolled	9.6	0.6	A	2240	140	A	560	35	A
Controlled - Low NO_x burners	9.6	0.6	A	1300	81[f]	D	980	61	D
Controlled - Flue gas recirculation	9.6	0.6	A	480	30	C	590	37	C
Commercial Boilers (0.3 - <10) (1-03-006-03)									
Uncontrolled	9.6	0.6	A	1600	100	B	330	21	C
Controlled - Low NO_x burners	9.6	0.6	A	270	17	C	425	27	C
Controlled - Flue gas recirculation	9.6	0.6	A	580	36	D	ND	ND	NA
Residential Furnaces (<0.3) (No SCC)									
Uncontrolled	9.6	0.6	A	1500	94	B	640	40	B

[a] Units are kg of pollutant/10^6 cubic meters natural gas fired and lb of pollutant/10^6 cubic feet natural gas fired. Based on an average natural gas fired higher heating value of 8270 kcal/m^3 (1000 Btu/scf). The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. ND = no data. NA = not applicable.

[b] SCC = Source Classification Code.

[c] Reference 7. Based on average sulfur content of natural gas, 4600 g/10^6 Nm^3 (2000 gr/10^6 scf).

Table 1.4-2 (cont.).

[d] References 10,15-19. Expressed as NO_2.. For tangentially fired units, use 4400 kg/10^6 m^3 (275 lb/10^6 ft^3). At reduced loads, multiply factor by load reduction coefficient in Figure 1.4-1. Note that NO_x emissions from controlled boilers will be reduced at low load conditions.

[e] References 9-10,16-18,20-21.

[f] Emission factors apply to packaged boilers only.

Table 1.4-3 (Metric And English Units). EMISSION FACTORS FOR CARBON DIOXIDE (CO_2) AND TOTAL ORGANIC COMPOUNDS (TOC) FROM NATURAL GAS COMBUSTION[a]

Combustor Type (Size, 10^6 Btu/hr Heat Input) (SCC)[b]	CO_2[c]			TOC[d]		
	kg/10^6 m^3	lb/10^6 ft^3	RATING	kg/10^6 m^3	lb/10^6 ft^3	RATING
Utility/large industrial boilers (> 100) (1-01-006-01, 1-01-006-04)	ND[e]	ND	NA	28[f]	1.7[f]	C
Small industrial boilers (10 - 100) (1-02-006-02)	1.9 E+06	1.2 E+05	D	92[g]	5.8[g]	C
Commercial boilers (0.3 - < 10) (1-03-006-03)	1.9 E+06	1.2 E+05	C	128[h]	8.0[h]	C
Residential furnaces (No SCC)	2.0 E+06	1.3 E+05	D	180[h]	11[h]	D

[a] All factors represent uncontrolled emissions. Units are kg of pollutant/10^6 cubic meters and lb of pollutant/10^6 cubic feet. Based on an average natural gas higher heating value of 8270 kcal/m^3 (1000 Btu/scf). The emission factors in this table may be converted to other natural gas heating values by multiplying the given factor by the ratio of the specified heating value to this average heating value. NA = not applicable.

[b] SCC = Source Classification Code.

[c] References 10,22-23.

[d] References 9-10,18.

[e] ND = no data.

[f] Reference 8: methane comprises 17% of organic compounds.

[g] Reference 8: methane comprises 52% of organic compounds.

[h] Reference 8: methane comprises 34% of organic compounds.

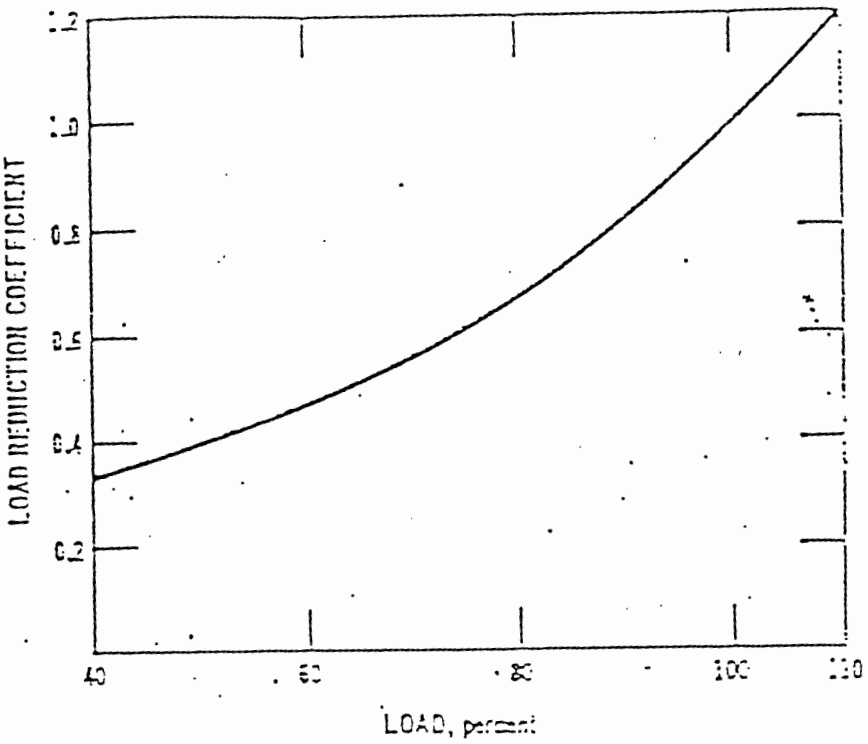

Figure 1.4-1. Load reduction coefficient as a function of boiler load. (Used to determine NO_x reductions at reduced loads in large boilers.)

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5. *Fine Particulate Emissions From Stationary and Miscellaneous Sources in the South Coast Air Basin*, California Air Resources Board Contract No. A6-191-30, KVB, Inc., Tustin, CA, February 1979.

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15. *Emissions Test on 200 HP Boiler at Kaiser Hospital in Woodland Hills*, Energy Systems Associates, Tustin, CA, June 1986.

16. *Results From Performance Tests: California Milk Producers Boiler No. 5*, Energy Systems Associates, Tustin, CA, November 1984.

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18. J. P. Kesselring and W. V. Krill, "A Low-NO_x Burner For Gas-Fired Firetube Boilers", *Proceedings: 1985 Symposium on Stationary Combustion NO_x Control, Volume 2*, EPRI CS-4360, Electric Power Research Institute, Palo Alto, CA, January 1986.

19. *NO_x Emission Control Technology Update*, EPA Contract No. 68-01-6558, Radian Corporation, Research Triangle Park, NC, January 1984.

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21. *Evaluation of the Pollutant Emissions From Gas-Fired Forced Air Furnaces: Research Report No. 1503*, American Gas Association Laboratories, Cleveland, OH, May 1975.

22. *Thirty-day Field Tests of Industrial Boilers: Site 5 - Gas-fired Low-NO_x Burner*, EPA-600/7-81-095a, U. S. Environmental Protection Agency, Research Triangle Park, NC, May 1981.

23. Private communication from Kim Black (Industrial Combustion) to Ralph Harris (MRI), Independent Third Party Source Tests, February 7, 1992.

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 9, 1997

Certified Mail - Return Receipt Requested

Mr. Rich Piper, Chair
Florida Power Coordinating Group, Inc.
405, Reo Street, Suite 100
Tampa, Florida 33609-1004

Dear Mr. Piper:

Enclosed is a copy of a Scrivener's Order correcting an error in the Order concerning particulate matter testing of natural gas fired boilers.

If you have any questions concerning the above, please call Yogesh Manocha at 904/488-6140, or write to me.

Sincerely,

M. D. Harley, P.E., DEE
P.E. Administrator
Emissions Monitoring Section
Bureau of Air Monitoring and
Mobile Sources

MDH:ym

cc: Dotty Diltz, FDEP
Pat Comer, FDEP

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the matter of:	)	
	)	
Florida Electric Power Coordinating Group, Inc.,	)	ASP No. 97-B-01
	)	
Petitioner.	)	

ORDER CORRECTING SCRIVENER'S ERROR

The Order which authorizes owners of natural gas fired fossil fuel steam generators to forgo particulate matter compliance testing on an annual basis and prior to renewal of an operation permit entered on the 17th day of March, 1997, is hereby corrected on page 4, paragraph number 4, by deleting the words "pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C.":

4. 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 particulate matter emission compliance test results for any fossil fuel steam generator emissions unit that burned liquid and/or solid fuel for a total of no more than 400 hours during the year prior to renewal.

DONE AND ORDERED this 2 day of July, 1997 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

HOWARD L. RHODES, Director
Division of Air Resources Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(904) 488-0114

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that a copy of the foregoing was mailed to Rich Piper, Chair, Florida Power Coordinating Group, Inc., 405 Reo Street, Suite 100, Tampa, Florida 33609-1004, on this 10TH day of July 1997.

Clerk Stamp

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Martha Durell Wise 7/10/97
Clerk Date

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

Bartow Plant, FL, 634

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	b	c	d	e
Boiler ID#	Compliance Plan: Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)	Compliance Plan: Repowering Plan	New Units: Commence Operation Date	New Units: Monitor Certification Deadline
1	Yes	*No*		
2	Yes	*No*		
3	Yes	*No*		
	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.

Phase II Permit - Page 2

Plant Name (from Step 1)
Bartow 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)
Bartow 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 *W. Jeffrey Pardue, C.E.P., Director, Environmental Services Dept.*	
Signature	Date *12/14/95*

STEP 5 (optional) Enter the source AIRS and FINDS identification numbers, if known	AIRS
	FINDS

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of: Petition for Reduction in Semiannual Particulate Emissions Compliance Testing, Bartow Unit No. 3; Florida Power Corporation Petitioner.	)	OGC File No. 86-1577

ORDER

On February 18, 1986, the Petitioner, Florida Power Corporation, filed a Petition for Reduction in the Frequency of Particulate Emissions Compliance Testing pursuant to Florida Administrative Code Rule 17-2.600(5)(b)1. for the following fossil fuel steam generating unit:

Bartow Unit No. 3

Pursuant to Florida Administrative Code Rule 17-2.600(5)(b)1., and by Order dated November 7, 1982, Petitioner has conducted semiannual particulate emission compliance tests. Florida Administrative Code Rule 17-2.600(5)(b)1. provides that the Department may reduce the frequency of particulate testing upon a demonstration that the particulate standard of 0.1 pound per million Btu heat input has been regularly met. The petition and supporting documentation submitted by Petitioner indicate that, since January 26, 1982, Petitioner has regularly met the particulate standard. It is therefore,

ORDERED that the Petition for Reduction in the Frequency of Particulate Emissions Compliance Testing in GRANTED. Petitioner may immediately commence testing on an annual basis. Test results from the first regularly scheduled compliance test conducted in FY 87 (October 1, 1986 - September 30, 1987), provided the results of that test meet the particulate standard and the 40% opacity standard, shall be accepted as results from the first annual test. Failure of Bartow Unit No.3 to meet

either the particulate standard or the 40% opacity standard in the future shall constitute grounds for revocation of this authorization.

Persons whose substantial interests are affected by the above proposed agency action have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing) on the proposed action. The Petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes.

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 proposed agency action. Persons whose substantial interests will be affected by any decision of the Department have the right to intervene in the proceeding. A petition for the intervention must be filed pursuant to Model Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the Hearing Officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no Hearing Officer has been assigned, the petition is to filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitues a

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing ORDER has been furnished by United States Mail to J.A. Hancock, Vice President, Fossil Operations, Florida Power Corporation, Post Office Box 14042, St. Petersburg, Florida 33733; on this 17 day of December, 1986, in Tallahassee, Florida.

E. Gary Early
Assistant General Counsel

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida
32399-2400
Telephone (904)488-9730

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the matter of:	)	
	)	
Petition for Reduction in Quarterly Particulate Emissions Compliance Testing	)	OGC File No. 87-1261
	)	
FLORIDA POWER CORPORATION, Bartow Unit 2,	)	
	)	
Petitioner	)	
	)	

ORDER

On May 4, 1987, the Petitioner, Florida Power Corporation, filed a Petition for Reduction in the Frequency of Particulate Matter Emissions Compliance Testing pursuant to Florida Administrative Code Rule 17-2.600(5)(b)1. for the following fossil fuel-fired steam generating unit:

BARTOW UNIT 2

Pursuant to Florida Administrative Code Rule 17-2.600(5)(b)1., Petitioner has conducted semi-annual particulate matter emissions compliance tests. Florida Administrative Code Rule 17-2.600(5)(b)1. provides that the Department may reduce the frequency of particulate matter testing upon a demonstration that the particulate matter standard of 0.1 pounds per million Btu heat input has been regularly met. The petition and supporting documentation submitted by Petitioner indicate that, since December 21, 1982, Petitioner has regularly met the particulate matter standard. It is therefore,

ORDERED that the Petition for Reduction in the Frequency of Particulate Matter Emissions Compliance Testing is GRANTED, and that:

1. Petitioner's generating unit Bartow Unit 2 shall be

required to conduct one steady-state particulate matter emissions compliance test annually and one particulate matter emissions compliance test annually under soot blowing conditions.

2. Bartow Unit 2 shall be subject to a steady-state visible emissions limiting standard of forty (40) percent opacity (number 2 of the Ringlemann Chart).

3. This order supercedes all conflicting conditions relating to frequency of particulate matter emissions compliance testing contained in operating permit A052-56650 for Bartow Unit 2.

4. The Department, or its designee, if after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emissions standard in Chapter 17-2 or in a permit issued pursuant to Chapter 17-2 is being violated, may require additional tests for particulate matter emissions pursuant to Florida Administrative Code Rule 17-2.700(2)(b).

Persons whose substantial interests are affected by the Department's above proposed agency action may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahasse, Florida 32399-2400, within twenty-one (21) days of publication of this notice. Failure to file a petition within the twenty-one (21) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section

120.57, Florida Statutes.

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 proposed agency action. Therefore, persons who may not desire to file a petition may want to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and must be filed with the Hearing Officer if one has been assigned, at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no Hearing Officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

DONE AND ORDERED this 12th day of October, 1987, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

DALE TWACHTMANN
Secretary

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(904) 488-4805

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to S120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

C. Hutchinson
Clerk

10-13-87
Date

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

August 2, 1999

J. Jeffery Pardue
Director, Environmental Services Department
Florida Power Corporation
263 13th Avenue South
St. Petersburg, Florida 33701-5511

Re: PROPOSED Title V Permit No.: 1030011-002-AV
Air Construction Permit No.: 1030011-006-AC
Bartow Plant

Dear Mr. Pardue:

One copy of the "PROPOSED PERMIT DETERMINATION" for the Bartow Plant located at Weedon Island, St. Petersburg, Pinellas County, is enclosed. This letter is only a courtesy to inform you that the Revised 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(5), 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 Edward J. Svec at 850/488-1344.

Sincerely,

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

CHF/s

Enclosures

copy furnished to:
Kennard Kosky, PE, Golder Associates, Inc.
Scott Osbourn, Sr., FPC
Peter Hessling, PCDEM
Ms. Gracy Danois, USEPA, Region 4 (INTERNET E-mail Memorandum)
Mr. Gregg Worley, USEPA, Region 4 (INTERNET E-mail Memorandum)

PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 1030011-002-AV

I. Public Notice.

An "INTENT TO ISSUE A COMBINED AIR CONSTRUCTION PERMIT/TITLE V AIR OPERATION PERMIT" to Florida Power Corporation for the Bartow Plant located at Weedon Island, St. Petersburg, Pinellas County was clerked on June 9, 1999. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in the Neighborhood Times – Northeast Edition on June 27, 1999. The Revised DRAFT Title V Air Operation Permit/Air Construction Permit was available for public inspection at the Pinellas County Department of Environmental Management Air Quality Division in Clearwater and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE A COMBINED AIR CONSTRUCTION PERMIT/TITLE V AIR OPERATION PERMIT" was received on July 9, 1999.

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 two respondents 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. Gary Robbins, Pinellas County Department of Environmental Management Air Quality Division dated July 1, 1999, and received on July 6, 1999.

1.R: The Department acknowledges the comment. The language has been included in Statements of Basis since March 10, 1998 to remove an objection made by EPA, Region 4 on boilers subject to Rule 62-296.405, F.A.C. For clarification, the Statement of Basis will be changed where appropriate, as follows:

> **From:** ----This unit is 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.----
>
> **To:** ---- This unit is 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, in accordance with the agreement of March 10, 1998 between EPA, Region 4 and the Department to resolve an objection on this specific issue.----

2.R: The Department agrees with the comment and will change the rule citation of Facility-Wide Specific Condition 2 to "Pinellas County Code, Section 58-178".

3.R: The Department agrees with the comment and will change the area code for Pinellas County in Facility-Wide Specific Condition 10 to "727". Also, the telephone and fax numbers for EPA, Region 4 are changed to "Telephone: 404/562-9155 and Fax: 404/562-9163".

4.R: The Department feels the condition is properly worded and is consistent with the language contained in other permits which allow the firing of used oil. The condition will remain unchanged.

5.R: The Department disagrees with the comment. This is a quote of the rule and the rule does not specify a specific compliance date. The condition will remain unchanged.

6.R: The Department acknowledges the comment. The basis of Specific Condition A.37. is in existing operation permits. These requirements were carried forward in the Title V permit and are appropriately flagged as being not federally enforceable.

7.R: The Department agrees with the comment and will change the rule citation of Section III, Subsection A. Specific Condition A.40. to "Pinellas County Code, Section 58-128".

8.R: See response **A.5.R:**, above.

9.R: See response **A.5.R:**, above.

B. Letter from Mr. Scott Osbourn, Florida Power Corporation dated July 22, 1999, and received on July 26, 1999.

1.R: The Department agrees with the comment. The Statement of Basis and the description for Unit 1 are changed, as follows:

> **From:**----Because Unit 1 is oil fired and this unit is capable of meeting the applicable particulate matter and opacity limits in Conditions A.5., A.6., A.7., and A.8. without use of the ESP, the provisions of 40 CFR 64 may not apply [40 CFR 64.2(b)(ii)].----
>
> **To:**----Because Unit 1 is oil fired and this unit is capable of meeting the applicable particulate matter and opacity limits in Conditions A.5., A.6., A.7., and A.8. without use of the ESP, the provisions of 40 CFR 64 do not apply [40 CFR 64.2(b)(ii)].----

2.R: The Department agrees with the comment and "ORDER CORRECTING SCRIVENER'S ERROR: ASP Number 97-B-01" will be added to the referenced attachments on the placard page of the permit.

3.R: The Department will link specific condition A.7. to A.20., as follows:

> **From: A.7.** Particulate Matter. Particulate matter emissions during steady state operations shall not exceed the following, as measured by applicable compliance methods:
>
> **To: A.7.** Particulate Matter. Particulate matter emissions during steady state operations shall not exceed the following, as measured by applicable compliance methods (see specific condition **A.20.**):

4.R: The Department agrees with the comment. Specific conditions A.14. and B.8. are changed, as follows:

> **From: A.14.** and **B.8.** Excess emissions 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.]
>
> **To: A.14.** and **B.8.** 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.]

C. The following conditions are added to the Acid Rain Section in order to satisfy previous comments from EPA.

> **A.5.** Fast-Track Revisions of Acid Rain Parts. Those Acid Rain sources making a change described at Rule 62- 214.370(4), F.A.C., may request such change as provided in Rule 62-213.413, F.A.C., Fast-Track Revisions of Acid Rain Parts.
> [Rules 62-213.413 and 62-214.370(4), F.A.C.]
>
> **A.6.** 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 62-213.400, F.A.C.
> [40 CFR 70.6(a)(4)(i); and, Rule 62-213.440(1)(c)1., F.A.C.]
>
> **A.7.** 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)(1)(ii); and, Rule 62-210.200, Definitions - Applicable Requirements, F.A.C.]

III. Conclusion.

The permitting authority hereby issues the PROPOSED Permit No.: 1030011-002-AV, with any changes noted above.

Florida Power Corporation
Bartow Plant
Facility ID No.: 1030011
Pinellas County

Initial Title V Air Operation Permit
PROPOSED Permit No.: 1030011-002-AV
Draft Air Construction Permit No.: 1030011-006-AC

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

Compliance Authority:
Pinellas County Department of Environmental Management
Air Quality Division
300 South Garden Avenue
Clearwater, Florida 34616
Telephone: 813/464-4422
Fax: 813/464-4420

Initial Title V Air Operation Permit
PROPOSED Permit No.: 1030011-002-AV
Draft Air Construction Permit No.: 1030011-006-AC

Table of Contents

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

Permittee:
Florida Power Corporation
263 13th Avenue South
St. Petersburg, Florida 33701-5511

PROPOSED Permit No.: 1030011-002-AV
Air Construction Permit No.: 1030011-006-AC
Facility ID No.: 1030011
SIC Nos.: 49, 4911
Project: Combined Air Construction/Initial Title V Air Operation Permit

This permit is for the operation of the Bartow Plant. This facility is located on Weedon Island, St. Petersburg, Pinellas County; UTM Coordinates: Zone 17, 342.4 km East and 3,082.6 km North; Latitude: 27° 52' 10" North and Longitude: 82° 35' 59" West.

STATEMENT OF BASIS: This combined Air Construction permit/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, 62-212, 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-3, TITLE V CONDITIONS (version dated 04/30/99)
APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)
TABLE 297.310-1, CALIBRATION SCHEDULE (version dated 10/07/96)
Phase II Acid Rain Application/Compliance Plan received December 22, 1995
Alternate Sampling Procedure: ASP Number 97-B-01
ORDER CORRECTING SCRIVENER'S ERROR: ASP Number 97-B-01
OGC Order No. 86-1577
OGC Order No. 87-1261
OGC Order No. 96-A-01

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

Howard L. Rhodes, Director
Division of Air Resources Management

HLR/sms/es

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of three fossil fuel fired steam generators subject to Phase II Acid Rain, a pipeline heating boiler, four gas turbine peaking units and relocatable diesel generators that can be located at various Florida Power Corporation power plants, as needed.

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

Based on the initial Title V permit application received June 14, 1997, this facility is a major source of hazardous air pollutants (HAPs).

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

E.U. ID No.	Brief Description
-001	No. 1 Unit, Fossil Fuel Fired Steam Generator with Electrostatic Precipitator
-002	No. 2 Unit, Fossil Fuel Fired Steam Generator
-003	No. 3 Unit, Fossil Fuel Fired Steam Generator
-004	Bartow-Anclote Pipeline Heating Boiler
-005	Gas Turbine Peaking Unit #P-1
-006	Gas Turbine Peaking Unit #P-2
-007	Gas Turbine Peaking Unit #P-3
-008	Gas Turbine Peaking Unit #P-4
-001	Relocatable Diesel Fired Generator(s) [Facility ID No. 7775047]

Unregulated Emissions Units and/or Activities
{See Appendix U-1}

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
Additional Information Request dated May 20, 1997
Additional Information Response received August 25, 1997
Letter Dated June 24, 1996 Re: PSD Applicability Determination - Bartow Unit No. 1 PSD
Letter received October 17,1997, from Mr. Gary Robbins
Letter received November 24, 1997, from Mr. Scott Osbourn
Construction Permit Application received March 29, 1999
Letter received July 6, 1999, from Mr. Gary Robbins
Letter received July 26, 1999, from Mr. Scott Osbourn

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-3, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-3, 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. No person shall 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.; and, Pinellas County Code, Section 58-178]

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.
[Rules 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. Not federally enforceable. General Pollutant Emission Limiting Standards. Volatile Organic Compounds Emissions or Organic Solvents Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents 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.]
{Permitting note: There are no requirements deemed necessary and ordered by the Department, at this time.}

8. Not federally enforceable. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility 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.; and, 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 Pinellas County Department of Environmental Management (PCDEM) office:

Pinellas County Department of Environmental Management
Air Quality Division
300 South Garden Avenue
Clearwater, Florida 34616
Telephone: 727/464-4422
Fax: 727/464-4420

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 EPRCA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9155
Fax: 404/562-9163

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions units.

E.U. ID No.	Brief Description
-001	No. 1 Unit, Fossil Fuel Fired Steam Generator with Electrostatic Precipitator
-002	No. 2 Unit, Fossil Fuel Fired Steam Generator
-003	No. 3 Unit, Fossil Fuel Fired Steam Generator

Unit No. 1 is a front-fired, fossil fuel steam generator which produces 120 megawatts, electric power. The maximum heat input rate is 1,220 million Btu per hour and the unit fires No. 2 through No. 6 fuel oil, and on-specification used oil. Particulate matter emissions are controlled by a General Electric Services, Inc. Model 1-BAB1.2X37(9)36.0-434-4.3P electrostatic precipitator consisting of five fields in depth. The permit application indicates this ESP was designed to operate when utilizing a coal/oil mixture which is no longer burned by FPC. Because Unit 1 is oil fired and this unit is capable of meeting the applicable particulate matter and opacity limits in Conditions A.5., A.6., A.7., and A.8. without use of the ESP, the provisions of 40 CFR 64 do not apply [40 CFR 64.2(b)(ii)]. A Durag Model 281 Continuous Emissions Monitor for opacity with a recorder is used for continual observation of stack opacity. Unit 1 began commercial service in 1958.

Unit No. 2 is a tangential-fired fossil fuel fired steam generator which produces 120 megawatts, electric power. The maximum heat input rate is 1,317 million Btu per hour and the unit fires No. 2 through No. 6 fuel oil, on-specification used oil, and propane. Emissions from Unit No. 2 are uncontrolled. Unit 2 began commercial service in 1961.

Unit No. 3 is a tangential-fired fossil fuel fired steam generator which produces 225 megawatts, electric power. The maximum heat input rate is 2,211 million Btu per hour and the unit fires No. 2 through No. 6 fuel oil, on-specification used oil, natural gas, and propane. Emissions from Unit No. 3 are uncontrolled. Unit 3 began commercial service in 1963.

{Permitting note(s): The emissions units are regulated under Acid Rain, Phase II; Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with more than 250 million Btu per Hour Heat Input; Rule 62-296.700, F.A.C. Reasonably Available Control Technology (RACT) Particulate Matter; and, Rule 62-296.702, F.A.C. Fossil Fuel Steam Generators.}

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

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

E.U. ID No.	MMBtu/hr Heat Input	Fuel
-001	1,220	new No. 2 through 6 fuel oil
	1,220	On-specification used oil
-002	1,317	new No. 2 through 6 fuel oil
	1,317	On-specification used oil
-003	2,211	new No. 2 through 6 fuel oil
	2,266	Natural gas
	2,211	On-specification used oil
	2,266	Natural gas and new No. 6 fuel oil and/or on-specification used oil with a maximum of 2,211 MMBtu/hr from the new No. 6 fuel oil and/or on-specification used oil

[Rules 62-4.160(2), 62-210.200(PTE), 62-296.405 and 62-296.702, 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.}

A.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **A.24.**
[Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation. Fuels. The only fuels allowed to be burned are:

E.U. ID No.	Fuel
-001	new No. 2 through 6 fuel oil
	On-specification used oil
-002	new No. 2 through 6 fuel oil
	On-specification used oil
	Propane
-003	new No. 2 through 6 fuel oil
	Natural gas
	On-specification used oil
	Propane

Each emissions unit may burn the allowed fuels either alone or in any combination. On-Specification used oil containing any quantifiable levels of PCBs can only be fired when the emissions unit is at normal operating temperatures.
[Rule 62-213.410, F.A.C.; and, 40 CFR 761.20(e)(3)]
{Permitting Note: 40 CFR 761.20, dated March 18, 1996, defines "quantifiable level" of PCBs as greater than or equal to 2 parts per million.}

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.
[Rules 62-296.405(1)(a) and 62-296.702(2)(b), F.A.C.; and, OGC Order Nos. 86-1577, 87-1261, & 96-A-01]

A.6. Visible Emissions - Soot Blowing and Load Change. Visible emissions 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 the 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 under this subparagraph, for boiler cleaning and load changes, at units which have installed and are operating, or have committed to install or operate, continuous opacity monitors.

Particulate matter emissions shall not exceed an average of 0.3 lb. per million Btu heat input during the 3-hour period of excess emissions allowed by this subparagraph.

[Rules 62-210.700(3) and 62-296.702(2)(b), F.A.C.]

A.7. Particulate Matter. Particulate matter emissions during steady state operations shall not exceed the following, as measured by applicable compliance methods (see specific condition **A.20.**):

E.U. ID No.	lb/MMBtu heat input	lb/ hr	Tons per Year
-001	0.1	122.0	534.4
-002	0.1	131.7	576.9
-003	0.1	221.1	968.6

[Rules 62-296.405(1)(b), 62-296.700(4)(b) and 62-296.702(2)(a), F.A.C.]

A.8. Particulate Matter - Soot Blowing and Load Change. Particulate matter emissions shall not exceed an average of the following during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

E.U. ID No.	lb/MMBtu heat input	lb/ hr
-001	0.3	366.0
-002	0.3	395.1
-003	0.3	663.3

[Rules 62-210.700(3) and 62-296.700(4)(b), 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 new No. 6 fuel oil sulfur content shall not exceed 2.5 percent, by weight. The sulfur content of the on-specification used oil shall not exceed 2.5 percent by weight. See specific condition **A.22.**
[Rule 62-296.405(1)(e)3., F.A.C.; and, AO 52-216412, AO 52-216413 & AO 52-233149]

A.11. "On-Specification" Used Oil. Only "on-specification" used oil shall be fired in these units. The quantity of on-specification used oil fired in emissions units -001, -002 and -003 shall not exceed a total of 14.85 million gallons per consecutive 12-month period and 2.475 million gallons per month. "On-specification" used oil is defined as used oil that meets the 40 CFR 279 (Standards for the Management of Used Oil) specifications listed below. Used oil that does not meet all of the following specifications is considered "off-specification" oil and shall not be fired.

CONSTITUENT / PROPERTY*	ALLOWABLE LEVEL
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash Point	100 °F minimum
PCBs	less than 50 ppm**

* As determined by approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).
** Used oil shall not be blended to meet this requirement.
[40 CFR 279.11; 40 CFR 761.20; and, AO 52-216412, AO 52-216413 & AO 52-233149]

A.12. "On-Specification" Used Oil. Before accepting from each marketer the first shipment of on-specification used oil with a PCB concentration above the detectable level, the permittee shall provide each marketer with a one-time written and signed notice certifying that the permittee 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 PCB concentrations above the detectable level. 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, Florida 32399-2400.
[40 CFR 279.61 and 40 CFR 761.20(e)(3)(ii)]

A.13. "On-Specification" Used Oil. Each shipment or on-site generated batch of used oil shall be sampled and analyzed for the constituents listed in specific condition **A.11.** A claim that the used oil does not contain quantifiable levels 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 used oil contains no detectable PCBs.
[40 CFR 761.20(e)(2); and, Rule 62-4.070(3), F.A.C.]

Excess Emissions

A.14. 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.15. 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.16. 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.17. 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 the permittee upon each fuel delivery.** This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions **A.10., A.21. and A.22.**
[Rule 62-296.405(1)(f)1.b., F.A.C.]

A.18. 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.19. Visible emissions. The test method for visible emissions shall be:
a. E.U. ID Nos. -001, -002 and -003 EPA Method 9, incorporated in Chapter 62-297, F.A.C.
b. E.U. ID No. -001 Continuous opacity monitor.
[Rule 62-296.702(3)(a), F.A.C.; and, AO 52-233149]

A.20. 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., 62-297.401 and 62-296.702(3)(b), F.A.C.]

A.21. 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 or the permittee upon each fuel delivery.** See specific conditions **A.10. and A.22.**
[Rules 62-213.440, 62-296.405(1)(e)3. and 62-297.401, F.A.C.; and, AO 52-216412, AO 52-216413 & AO 52-233149]

A.22. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition.
[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.23. 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.24. Operating Rate During Testing. Testing of emissions shall be conducted while firing new No. 6 fuel oil or new No. 6 fuel oil/on-specification used oil 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.; and AO 52-216412, AO 52-216413 & AO 52-233149]

A.25. 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.26. 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, attached as part of this permit.

(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.27. 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.28. 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.

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 PCDEM, 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 PCDEM, 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 PCDEM.

(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, SIP approved]

A.29. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:

a. only gaseous fuel(s); or
b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
c. only liquid fuel(s) for less than 400 hours per year.

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

A.30. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:
a. only gaseous fuel(s); or
b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
c. only liquid fuel(s) for less than 400 hours per year.
[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

Record keeping and Reporting Requirements

A.31. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the PCDEM 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 PCDEM.
[Rule 62-210.700(6), F.A.C.]

A.32. Submit to the PCDEM 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.33. Test Reports.
(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the PCDEM on the results of each such test.
(b) The required test report shall be filed with the PCDEM 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 PCDEM 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.34. Not federally enforceable. Special Recordkeeping 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 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.

These records shall be recorded in a permanent form suitable for inspection by the PCDEM upon request, and shall be retained for at least a five year period.
[40 CFR 279.61; 40 CFR 761.20(e); and, Rule 62-213.440(1)(b)2.b., F.A.C.]

A.35. The permittee shall include in the "Annual Operating Report for Air Pollutant Emitting Facility" a statement of the total quantity of on-specification used oil fired during the calendar year.
[Rule 62-4.070(3), F.A.C.; and, AO 52-216412, AO 52-216413 & AO 52-233149]

A.36. Compliance with the oil sulfur content and the sulfur dioxide emissions limitations of specific conditions **A.9.** and **A.10.** shall be documented by the permittee through submittal of quarterly reports of the Bartow Plant monthly average fuel oil sulfur content, heat content and the resulting sulfur dioxide emission rate in pounds per million Btu heat input. These quarterly reports shall be submitted to PCDEM within 30 days of the end of each calendar quarter.
[Rule 62-4.070(3), F.A.C.; and AO 52-216412, AO 52-216413 & AO 52-233149]

A.37. Not Federally Enforceable. Submit to the Air Section of PCDEM each calendar year on or before March 1, a completed "Annual Operating Report for Air Pollutant Emitting Facility" form for the preceding calendar year. Until further notice by the Department the permittee shall calculate particulate matter emissions by multiplying the particulate matter stack test results by the hours of operation. Other annual emissions shall be determined by multiplying the annual fuel use by the following emissions factors:

E.U. ID No. -001

Pollutant	No. 6 fuel oil (lb/1000 gal)
SO_2	157(S)
CO	5
NO_X	67
VOC	0.76

E.U. ID No. -002

Pollutant	No. 6 fuel oil (lb/1000 gal)
SO_2	157(S)
CO	5
NO_X	42
VOC	0.76

E.U. ID No. -003

Pollutant	No. 6 fuel oil (lb/1000 gal)	Natural Gas (lb/MMcf)
SO_2	157(S)	0.6
CO	5	5
NO_X	42	550
VOC	0.76	1.4

[AO 52-216412, AO 52-216413 & AO 52-233149]

A.38. 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.]

Miscellaneous Requirements

A.39. Process Parameters.

	E.U. ID No. -001	E.U. ID No. -002	E.U. ID No. -003
Heat Input Rate	1,220 MMBtu/hr (maximum)	1,317 MMBtu/hr (maximum)	2,266 MMBtu/hr (maximum)
Fuel	New No. 6 fuel oil with a sulfur content of 2.5%, by weight (maximum) and on-specification used oil with a sulfur content of 2.5%, by weight (maximum)	New No. 6 fuel oil with a sulfur content of 2.5%, by weight (maximum) and on-specification used oil with a sulfur content of 2.5%, by weight (maximum)	New No. 6 fuel oil with a sulfur content of 2.5%, by weight (maximum) and on-specification used oil with a sulfur content of 2.5%, by weight (maximum) (also natural gas when available)
Fuel Firing Rate	7,854 gal/hr (187 BBL/hr) new No. 6 fuel oil and/or on-specification used oil (maximum)	8,778 gal/hr (209 BBL/hr) new No. 6 fuel oil and/or on-specification used oil (maximum)	14,742 gal/hr (351 BBL/hr) new No. 6 fuel oil and/or on-specification used oil, 2.2 MMcf/hr natural gas (maximum)
Ash Content	As sampled	As sampled	As sampled
Steam Temperature	1,000°F	1,000°F	1,000°F
Steam Pressure	1,850 psi	1,850 psi	2,050 psi
Steam Flow Rate	900,000 lb/hr	919,600 lb/hr	1,423,500 lb/hr
Stack Height	300 ft	300 ft	300 ft
Boiler Manufacturer	Babcock & Wilcox	Combustion Engineering	Combustion Engineering
Burner Arrangement	Front fired	Tangential fired	Tangential fired

Inspection and Maintenance Program.

(a) 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.
(b) Scheduled during non-peak load periods in Spring and Fall: This schedule is affected by forced outage requirements.

(c) the following operating parameters are to be continuously monitored and maintained at appropriate levels to produce efficient fuel combustion:

1. fuel flow rate
2. fuel temperature
3. fuel pressure
4. air flow rate
5. steam flow rate
6. steam temperature
7. steam pressure

(d) Plant operators are to monitor, adjust and record the following operating parameters at least once per day to assure efficient plant operation:

1. temperatures (superheat, reheat, and fuel)
2. flows (steam, feedwater, and fuel)
3. unit load

(e) fuel oil quality is to be checked prior to delivery and a daily sample taken each day the facility is operated for a monthly composite analysis. Fuel oil analysis (by ASTM Methods) is to be analyzed for the following:

1. heat content (Btu/gal)
2. sulfur content (%S by weight)
3. density
4. API gravity

Records of inspection, maintenance, and performance parameters shall be retained a minimum of five years and shall be mad available for inspection upon request.
[Rule 62-296.700 (6)(d), F.A.C.; and, AO 52-216412, AO 52-216413 & AO 52-233149]

A.40. E.U. ID No. -001 Operation and Maintenance Plan. The General Electric Services, Inc. Model 1-BAB1.2X37(9)36.0-434-4.3P electrostatic precipitator shall be operated and maintained in accordance with the Operation and Maintenance (O&M) Plan, dated 10/04/93 and on file with the Department. The O&M Plan documentation logs shall be maintained for a minimum of five years and made available for inspection upon request. At a minimum, the O&M Plan shall include:

1. The operating parameters of the control device
2. A timetable of routine weekly, bi-weekly, or monthly observations of the pollution control device.
3. A list of the type and quantity of the required spare parts which are stored on the premises for the pollution control device.
4. A record log which shows at a minimum when maintenance was performed, what maintenance was performed, and by whom.

[Rule 62-296.700(6), F.A.C.; and Pinellas County Code, Section 58-128]

Section III. Emissions Unit(s) and Conditions.

Subsection B. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-004	Bartow-Anclote Pipeline Heating Boiler

The Bartow-Anclote Pipeline Heating Boiler is used to heat fuel oil being transferred from the Bartow Plant to the Anclote Plant. The boiler's maximum heat input rate is 15.5 million Btu per hour firing natural gas, No. 2 fuel oil, or propane. Emissions from the boiler are uncontrolled.

{Permitting note(s): The emissions unit is regulated under Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with Less than 250 million Btu per Hour Heat Input}

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum operation heat input rate is 15.5 million Btu per hour. [Rules 62-4.160(2), 62-210.200(PTE) and 62-296.406, 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.}

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **B.16.** [Rule 62-297.310(2), F.A.C.]

B.3. Methods of Operation. Fuels. This boiler is permitted to fire only the following fuels and at the maximum rates shown:

Fuel	Maximum % Sulfur	Maximum MMBtu/hr	Maximum Fuel Usage
Natural Gas	- -	15.5	15 Mcf/hr
No. 2 Fuel Oil*	0.5% by weight	15.5	110 gal/hr
Propane	- -	15.5	191 gal/hr

* New No. 2 fuel oil only (waste or recycled oil is not allowed)
[Rule 62-213.410, F.A.C.; and, AO 52-244478]

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

Emission Limitations and Standards

{Permitting note: 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 shall not exceed 20 percent opacity, except for one two-minute period per hour during which opacity shall not exceed 40 percent.
[Rule 62-296.406(1), F.A.C.; and, AO 52-244478]

B.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.

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 the subparagraph, for boiler cleaning or load changes, at units which have installed and are operating, or have committed to install and operate, continuous opacity monitors.
[Rule 62-210.700(3), F.A.C.]

B.7. Sulfur Dioxide - Sulfur Content. The new No. 2 fuel oil sulfur content shall not exceed 0.5 percent, by weight. See specific condition **B.15.**
[Rule 62-296.406(3), F.A.C.; and, AO 52-244478]

Excess Emissions

B.8. 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.]

B.9. 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.]

B.10. 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.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: 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. Visible emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. See specific condition **B.13.**
[Rules 62-213.440 and 62-297.401, F.A.C.]

B.13. 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.]

B.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 the permittee upon each fuel delivery.** This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions **B.7.** and **B.15.**
[Rule 62-296.406(3), F.A.C.]

B.15. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition.
[Rules 62-213.440 and 62-297.440, F.A.C.]

B.16. 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.]

B.17. 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.

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

B.18. 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.

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 PCDEM, 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 PCDEM, 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 PCDEM.

(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, SIP approved]

B.19. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:

a. only gaseous fuel(s); or

b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or

c. only liquid fuel(s) for less than 400 hours per year.

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

B.20. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:

a. only gaseous fuel(s); or

b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or

c. only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

Record keeping and Reporting Requirements

B.21. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify PCDEM 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 PCDEM.
[Rule 62-210.700(6), F.A.C.]

B.22. All recorded data shall be maintained on file by the Source for a period of five years.
[Rule 62-213.440, F.A.C.]

B.23. Test Reports.
(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the PCDEM on the results of each such test.
(b) The required test report shall be filed with the PCDEM 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 PCDEM 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.]

Section III. Emissions Unit(s) and Conditions.

Subsection C. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-005	Gas Turbine Peaking Unit #P-1
-006	Gas Turbine Peaking Unit #P-2
-007	Gas Turbine Peaking Unit #P-3
-008	Gas Turbine Peaking Unit #P-4

The four gas turbines are natural gas and/or No. 2 fuel oil fired combustion turbines manufactured by General Electric (model number MS7000) and are designated as Gas Turbine Peaking Units #P-1, #P-2, #P-3 and #P-4. The manufacturers fuel flow and heat input ratings for each turbine are 5,174 gallons per hour of No. 2 fuel oil, or 714 million cubic feet per hour of natural gas (corresponds to approximately 714 million Btu per hour , at 59 degrees F). The actual heat input rate of the turbine is a function of the ambient temperature. These combustion turbines are used as peaking units during peak demand times to run a nominal 56 MW generator (each). Emissions from the combustion turbines are uncontrolled.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. These emissions units are not subject to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines. Each combustion turbine has its own stack. Each combustion turbine began commercial operation in 1972.}

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

Essential Potential to Emit (PTE) Parameters

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

Unit No.	MMBtu/hr Heat Input	Fuel Type
P-1	714	Natural Gas
	714	No. 2 Fuel Oil
P-2	714	Natural Gas
	714	No. 2 Fuel Oil
P-3	714	Natural Gas
	714	No. 2 Fuel Oil
P-4	714	Natural Gas
	714	No. 2 Fuel Oil

[Rules 62-4.160(2) and 62-210.200(PTE), 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.}

C.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **C.13.**
[Rule 62-297.310(2), F.A.C.]

C.3. Methods of Operation - Fuels. Only natural gas and/or new No. 2 fuel oil shall be fired in the combustion turbines. New No. 2 fuel oil is defined as fuel oil that has been refined from crude oil and has not been used and which may or may not contain additives.
[Rule 62-213.410(1), F.A.C.; and, AO 52-253215A, AO 52-253216A, AO 52-253217A, and AO 52-253218A]

C.4. Hours of Operation. These emissions units may operate continuously, i.e., 8,760 hours/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, AO 52-253215A, AO 52-253216A, AO 52-253217A, and AO 52-253218A]

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.}

C.5. Visible Emissions. Visible emissions from each turbine shall not be equal to or greater than 20 percent opacity.
[Rule 62-296.320(4)(b)1., F.A.C.; and, AO 52-253215A, AO 52-253216A, AO 52-253217A, and AO 52-253218A]

C.6. Not federally enforceable. Sulfur Dioxide - Sulfur Content. The sulfur content of the No. 2 fuel oil shall not exceed 0.5 percent, by weight.
[AO 52-253215A, AO 52-253216A, AO 52-253217A, and AO 52-253218A]

Excess Emissions

C.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 PCDEM for longer duration.
[Rule 62-210.700(1), F.A.C.]

C.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

C.9. Not federally enforceable. 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 **C.12.**
[Rule 62-213.440, F.A.C.]

C.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.}

C.11. The test method for visible emissions shall be EPA Method 9, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C.
[Rules 62-204.800, 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

C.12. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or latest edition.
[Rules 62-213.440 and 62-297.440, F.A.C.]

C.13. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the peak heat input rate based on the average turbine inlet temperature during the test. The peak heat input rate is defined by a graph of Fuel Heat Input verses Ambient Temperature for each gas turbine. 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 operation is 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.
[Rules 62-297.310(2), F.A.C.; and, AO 52-253215A, AO 52-253216A, AO 52-253217A, and AO 52-253218A]

C.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.]

C.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; 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.

9. The owner or operator shall notify the PCDEM, 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 PCDEM, 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 PCDEM.
(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, SIP approved]

C.16. Visible Emissions Testing - Annual. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:
a. only gaseous fuels; or
b. gaseous fuels in combination with any amount of liquid fuels for less than 400 hours per year; or
c. only liquid fuels for less than 400 hours per year.
[Rules 62-297.310(7)(a)4. & 8., F.A.C.]

Recordkeeping and Reporting Requirements

C.17. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the PCDEM 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.]

C.18. Test Reports.
(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with PCDEM on the results of each such test.
(b) The required test report shall be filed with PCDEM as soon as practical but no later than 45 days after the last sampling run of each test is completed.
[Rule 62-297.310(8), F.A.C.]

C.19. Not Federally Enforceable. Operating Reports. The annual operating report shall be based on the following:
(a) The Btu heating value, sulfur content (percent by weight), API gravity and density of the fuel being fired in the peaking units, shall be based on a weighted 12-month average (calendar year) and be calculated from the fuel delivery receipts and the vendors fuel oil analysis.
(b) Until further notice by the PCDEM, Florida Power Corporation shall calculate annual emissions (pounds per hour and tons per year), for the Annual Operating Report, by multiplying the total million Btu from fuel usage by the following emissions factors:

	Emissions Factors for No. 2 Fuel Oil Pound per MMBtu
Particulate Matter (PM)	0.061 (Total)
PM_{10}	0.48 PM
Carbon Monoxide	0.048
Sulfur Dioxide	1.01(S)
Nitrogen Oxides	0.698
Hydrocarbons (TOC)	0.017

"S" denotes sulfur content, percent by weight. The sulfur dioxide emissions shall be based on a weighted 12-month average "S" value.
[AO 52-253215A, AO 52-253216A, AO 52-253217A, and AO 52-253218A]

Section III. Emissions Unit(s) and Conditions.

Subsection D. This section addresses the following emissions unit(s).

Facility ID No.	E. U. ID No.	Brief Description
7775047	-001	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.

The generators may be relocated to 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.
7. Anclote Power Plant, 1729 Baileys Road, Holiday, Pasco County

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. Each generator has its own stack. This section of the permit is only applicable when the generator(s) is(are) located at the Bartow Facility.}

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

Essential Potential to Emit (PTE) Parameters

D.1. Permitted Capacity. The maximum (combined) heat input rate shall not exceed 25.74 million Btu per hour.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

D.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **D.12.**
[Rule 62-297.310(2), F.A.C.]

D.3. Methods of Operation - Fuels. Only new No. 2 fuel oil with a maximum sulfur content of 0.5%, by weight, shall be fired in the diesel generator(s).
[Rule 62-213.410, F.A.C. and, AC 09-202080.]

D.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, AC 09-202080.]

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.}

D.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, AC 09-202080.]

Excess Emissions

D.6. 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.]

D.7. 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

D.8. Fuel Sulfur Analysis. 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 **D.3.** and **D.11.**
[Rule 62-213.440, F.A.C.]

D.9. 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.}

D.10. 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.]

D.11. 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.]

D.12. 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 for each generator. 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, AC 09-202080.]

D.13. 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.]

D.14. 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.
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 PCDEM.

(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.]

D.15. 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.]

D.16. 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 **D.3.**, **D.5.**, and **D.8.**
[Rules 62-4.070(3) and 62-297.310(7)(b),F.A.C.; and, AO 09-205952.]

Recordkeeping and Reporting Requirements

D.17. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, the owner or operator shall notify PCDEM, 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 PCDEM.
[Rule 62-210.700(6), F.A.C.]

D.18. 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 PCDEM, 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.]

D.19. To demonstrate compliance with specific condition **D.4.**, records shall indicate the daily hours of operation for each of the generators, the daily hours of operation expressed as "engine- hours" and the 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 and the Air Quality Division of the PCDEM upon request.
[Rules 62-213.440 and 62-297.310(8), F.A.C.; and, AO 09-205952.]

D.20. To demonstrate compliance with specific condition **D.3.**, 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 PCDEM upon request.
[Rule 62-297.310(8), F.A.C.; and, AC 09-202080.]

Source Obligation

D.21. Specific conditions in construction permit AC 09-202080, limiting the "engine hours", were accepted by the applicant to escape Prevention of Significant Deterioration new source 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.]

D.22. 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 PCDEM.
[Rule 62-4.070(3), F.A.C.; and, AC 09-202080]

PROPOSED Permit No.: 1030011-002-AV
Air Construction Permit No.: 1030011-006-AC

Section IV. This section is the Acid Rain Part.

Operated by: Florida Power Corporation
ORIS code: 634

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

The emissions unit(s) listed below are regulated under Acid Rain, Phase II.

E.U. ID No.	Brief Description
-001	No. 1 Unit, Fossil Fuel Fired Steam Generator with Electrostatic Precipitator
-002	No. 2 Unit, Fossil Fuel Fired Steam Generator
-003	No. 3 Unit, Fossil Fuel Fired Steam Generator

A.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 Phase II acid rain unit(s) must comply with the standard requirements and special provisions set forth in the application(s) listed below:
a. DEP Form No. 62-210.900(1)(a), dated July 1, 1995
[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

A.2. Sulfur dioxide (SO_2) allowance allocations requirements for each Acid Rain unit are as follows:

E.U. ID No.	EPA ID	Year	2000	2001	2002	2003	2004
-001	01	**SO2 allowances, under Table 2 or 3 of 40 CFR Part 73**	2785*	2785*	2785*	2785*	2785*
-002	02	**SO2 allowances, under Table 2 or 3 of 40 CFR Part 73**	2941*	2941*	2941*	2941*	2941*
-003	03	**SO2 allowances, under Table 2 or 3 of 40 CFR Part 73**	5383*	5383*	5383*	5383*	5383*

* 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 or 3 of 40 CFR 73.]

A.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.
1. 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 62-213.400(3), F.A.C.
2. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.
3. Allowances shall be accounted for under the Federal Acid Rain Program.
[Rule 62-213.440(1)(c), F.A.C.]

A.4. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within 60 (sixty) days after the end of the calendar year. {See condition 52., APPENDIX TV-3, TITLE V CONDITIONS}
[Rule 62-214.420(11), F.A.C.]

A.5. Fast-Track Revisions of Acid Rain Parts. Those Acid Rain sources making a change described at Rule 62-214.370(4), F.A.C., may request such change as provided in Rule 62-213.413, F.A.C., Fast-Track Revisions of Acid Rain Parts.
[Rules 62-213.413 and 62-214.370(4), F.A.C.]

A.6. 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 62-213.400, F.A.C.
[40 CFR 70.6(a)(4)(i); and, Rule 62-213.440(1)(c)1., F.A.C.]

A.7. 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)(1)(ii); and, Rule 62-210.200, Definitions - Applicable Requirements, F.A.C.]

A.8. Comments, notes, and justifications:
None