

August 28, 2012

**Transmittal Via e-mail**

Mr. Yousry “Joe” Attalla, Permitting Engineer  
Office of Permitting & Compliance  
Division of Air Resource Management  
Florida Department of Environmental Protection  
2600 Blair Stone Road, MS 5500  
Tallahassee, Florida 3239-2400

**RE:** Comments on Draft/Proposed Permit – Higgins Power Plant  
Title V Air Operating Permit Renewal  
DEP File No: 1030012-007-AV  
Florida Power Corp. d/b/a Progress Energy Florida, Inc.  
Facility ID No: 1030012  
Pinellas County

Dear Mr. Attalla:

Please find below comments on the Draft/Proposed Title V Air Operating Renewal Permit for the Florida Power Corporation d/b/a Progress Energy Florida, Inc. ("PEF") Higgins Power Plant. Any requested changes are shown in red with ~~striketrough~~ for deletion and double underline for insertion.

**Comment:** *Placard Page, third paragraph* – The latitude and longitude noted in the referenced paragraph is not consistent with the coordinates provided in the application. Therefore, PEF request the following changes:

*The purpose of this project is to renew the Title V air operation permit for the above referenced facility. The existing Higgins Power Plant is located at 998 East Shore Drive, Oldsmar, Pinellas County, Florida 34677. UTM Coordinates: Zone 17, 336.5 km East and 3098.4 km North; Latitude: 28 00' ~~0211~~" North and Longitude: 82 39' ~~4641~~" West.*

**Comment:** *Subsection III, Subsection A, Specific Condition A.1- Permitted Capacity* – The permitting note that has been included in all previous Title V Air Operation Permit has been removed. Therefore, PEF requests that this permitting note be re-inserted in the final permit as follows:

*{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.}*

**Comment:** *Subsection III, Subsection A, Specific Condition A.3.b. - Fuel consumption rates* - This condition states that the heat inputs in Specific Condition A.1 are based on the following fuel consumption rates while firing new No. 2 fuel oil and natural gas. Even if this information is added as a permitting note, PEF requests the individual fuel heat content employed to determine the specific fuel consumption rates presented in this condition. Therefore, as an example PEF requests language similar to the following permitting note:

*{Permitting Note: The fuel heat content used to determine the individual fuel consumption rates for new No. 2 fuel oil and natural gas were 138,010 Btu/gal and 1,030 Btu/SCF, respectively.}*

**Comment:** *Subsection III, Subsection, Specific Condition A.20 - Temporary Use of Replacement Combustion Turbine (CT)* – PEF request clarification of Specific Conditions A.20.b.(3) & (4), which appear to assume that a temporary replacement CT will be operated. As you may recall the Higgins facility is comprised entirely of peaking combustion turbines (CTs) and quite far down the economic dispatch order; i.e., they are not “base-load” units. As a result, it is impossible to predict when the units would “commence operation” or “will be operated”; however, PEF can provide information regarding the date of the temporary units are brought onsite and approximately the expected period of time the units will remain in place. Therefore, PEF requests the following language change:

*b. No less than 7 days prior to installation, the permittee shall provide written notification (by letter, facsimile, or e-mail) to the Compliance Authority of the planned installation date of the temporary CT. Written notification shall include the following information:*

- (1) Identification of the CT being replaced (emission unit number and facility location).*
- (2) Identification of the temporary replacement CT including make and model.*
- (3) Date the temporary replacement CT will be brought onsite ~~and commence operation.~~*
- (4) Expected period of time the temporary replacement CT will ~~be operated~~ remain in place.*

**Comment:** *Referenced Attachments, Table 1- Summary of Air Pollutant Emission Standards* – The standard for visible emissions (VE) under “Allowable Emissions” states that visible emissions must be “less than or equal to” (“<=”) 20% opacity; however, Specific Condition A.5 states that visible emissions “shall not be equal to or greater than 20% opacity.” Therefore, in an effort to avoid any confusion with Specific Condition A.5, PEF requests the following changes to Table 1:

**TABLE 1 – SUMMARY OF AIR POLLUTANT STANDARDS AND TERMS**

E.U. ID Nos.		Brief Description							
004 & 005		Combustion Turbine Peaking Units - CTP 1 & CTP 2							
			Allowable Emissions			Equivalent Emissions *			
Pollutant Name	Fuel(s)	Hours/Year	Standards	lb/hour	TPY	lb/hour	TPY	Regulatory Citation(s)	See Permit Condition(s)
Visible Emissions	New No. 2 F.O.	8760	<u>Less than</u> <= 20% Opacity					Rule 62-296.320, F.A.C.	<b>A.5.</b>
Sulfur Dioxide	New No. 2 F.O. N.G	8760	Max. 0.5% S by wt. or 1 gr/100 dscf			286.3 **	1253.9 **	Rule 62-213.440, F.A.C.	<b>A.6.</b>

\* The “Equivalent Emissions” listed are for informational purposes only.

\*\* Based on a maximum F.O. consumption of 96.0 bbl/hr, 7.1 lb/gal, operating 8760 hr/yr., and maximum F.O. sulfur content of 0.50 %, by wt.

\*\*\* Based on a maximum F.O. consumption of 107.0 bbl/hr, 7.1 lb/gal, operating 8760 hr/yr., and maximum F.O. sulfur content of 0.50 %, by wt.

This table summarizes information for convenience purposes only and does not supersede any of the terms or conditions of this permit.

The equivalent emissions are for each emissions unit, except as otherwise noted.

Comments on Draft/Proposed Permit – Higgins Power Plant  
Title V Air Operating Permit Renewal  
DEP File No: 1030012-007-AV  
Page 4 of 4

If you have any questions, please contact Mr. Chris Bradley by telephone at (727) 820-5962 or via e-mail at [Chris.Bradley@pgnmail.com](mailto:Chris.Bradley@pgnmail.com).

Sincerely,

Reginald Anderson  
Plant Manager

cc: Luis Gonzalez, BP43A  
Gus Schaefer, PEF 903  
Chris Bradley, PEF 903  
Tom Davis, ECT