

Florida Department of Environmental Protection

Bob Martinez Center 2600 Blair Stone Road Tallahassee, Florida 32399-2400 Charlie Crist Governor

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

June 30, 2009

Sent via Electronic Mail - Received Receipt Requested

Martin.Drango@pgnmail.com

Mr. Martin J. Drango Plant Manager Florida Power Corporation dba Progress Energy Florida, Inc. (PEF) Tiger Bay Cogeneration Facility 3219 State Road 630 West Ft. Meade, Florida 33841

Re:

Additional Information, File Number 1050223-015-AV Title V Air Operation Permit Renewal Application

Tiger Bay Cogeneration Facility

Dear Mr. Drango:

On May 20, 2009, the Department received a Title V air operation permit renewal application for the subject facility via hard copy submission. Thank you for using the latest version of the air permit application form. The Tiger Bay Cogeneration Facility is located at 3219 State Road 630 East, Ft. Meade in Polk County, Florida.

In order to continue processing your application, the Department needs the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the permit application form.

1. New Applicable Requirements: The Title V air operation permit, permit no. 1050223-012-AV, had been renewed with an effective date of January 1, 2005. Subsequent to this effective date, several new federal regulations have been promulgated by U.S. EPA and adopted by the State of Florida. Some of these new federal regulations may be new applicable requirements for the facility applying to certain types of engines.

New Applicable Requirements - New Source Performance Standards (NSPS) Requirements from 40 Code of Federal Regulations (CFR) 60:

40 CFR 60 Subpart IIII also known as (a.k.a.) NSPS "4-I's" or "CI-ICE"

U.S. EPA promulgated on July 11, 2006, the NSPS for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE) under 40 CFR 60 Subpart IIII. This new NSPS applies to new engines. Florida adopted this regulation by reference soon thereafter at Rule 62-204.800(8)(b)78., Florida Administrative Code (F.A.C.).

40 CFR 60 Subpart JJJJ a.k.a. NSPS "4-J's" or "SI-ICE"

U.S. EPA promulgated on January 18, 2008, the NSPS for Stationary Spark Ignition (SI) Internal Combustion Engines (ICE) under 40 CFR 60 Subpart JJJJ. This new NSPS applies to new engines. Florida adopted this regulation by reference soon thereafter at Rule 62-204.800(8)(b)79., F.A.C

a. This facility has proposed insignificant emissions units, e.g., "general purpose engines" and "emergency generators" in Attachment E, items 16. & 17. of the renewal application. Also, an "Emergency Generator(s)" (item 8.) is listed in Appendix I-1. These new NSPS could therefore apply. Are any engines on-site regulated under these new NSPS?

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Tiger Bay Cogeneration Facility
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If not, for each engine on-site please provide key non-applicability descriptors to show that each engine is clearly not subject to these new NSPS, like 'existing,' model year/construction (manufacturer) date, manufacturer name, size of engine, e.g., equivalent brake horsepower (HP), type of engine, etc.

These new federal regulations along with fact sheets are posted on the following U.S. EPA web site: http://www.epa.gov/ttn/atw/combust/list.html.

2. New Acid Rain Forms: The Department revised the acid rain forms last year. The current acid rain forms have an effective date of 03-16-2008. The form submitted with the permit renewal application is therefore outdated. Please submit completed acid rain form(s) using the current version of the form. The current versions of the acid rain forms can be accessed at the following web site: http://www.dep.state.fl.us/Air/forms/acidrain.htm.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), Florida Administrative Code (F.A.C.) requires that all applications for a Department Title V air operation permit must be certified by a professional engineer (P.E.) registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the responsible official (R.O.).

Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within **ninety** (90) days or provide a written request for an additional period of time to submit the information. The processing of this application is under time constraints due to acid rain requiring this permit to be effective January 1, 2010. A response no later than **September 28, 2009** is appreciated.

If you should have any questions, please contact me by telephone at 850/921-9532 or by e-mail at Scott.Sheplak@dep.state.fl.us.

Sincerely,

Scott M. Sheplak, P.E. DEP - Title V Section Mail Station #5505

Stm. Seple

2600 Blair Stone Road Tallahassee, FL 32399

copy to: Mr. Chris Bradley, PEF: <u>Chris.Bradley@pgnmail.com</u> Mr. Thomas W. Davis, P.E., ECT: <u>tdavis@ectinc.com</u>

Ms. Cindy Zhang-Torres, P.E., DEP SWD: Zhang-Torres@dep.state.fl.us

To:

martin.drango@pgnmail.com

Cc:

chris.bradley@pgnmail.com; Tom Davis; Zhang-Torres

Subject:

Request For Additional Information, File Number 1050223-015-AV, FPCdbaProgress Energy

Florida, Inc. - Tiger Bay Cogeneration Facility

Attachments:

MartinJ.Drango1050223-015-AVFPCdbaProgressEnergyTigerBayCogeneration.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: http://www.adobe.com/products/acrobat/readstep.html .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

From:

Exchange Administrator

Sent:

Tuesday, June 30, 2009 2:47 PM

To:

Friday, Barbara

Subject:

Delivery Status Notification (Relay)

Attachments:

ATT675846.txt; Request For Additional Information, File Number 1050223-015-AV,

FPCdbaProgress Energy Florida, Inc. - Tiger Bay Cogeneration Facility

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

martin.drango@pgnmail.com
chris.bradley@pgnmail.com

From:

Drango, Martin J [Martin.Drango@pgnmail.com] Tuesday, June 30, 2009 2:47 PM

Sent:

To:

Friday, Barbara

Subject:

Out of Office AutoReply: Request For Additional Information, File Number 1050223-015-AV,

FPCdbaProgress Energy Florida, Inc. - Tiger Bay Cogeneration Facility

I will be on vacation from 6/27-7/5/09. If you need assistance please contact George Kerst at internal 280- 6101, external 863-519-6101, or cell @ 863 -280-0101.

If this is an emergency I can be reached at 863-344-0059

Marty

From:

Bradley, Chris [Chris.Bradley@pgnmail.com] Friday, Barbara Tuesday, June 30, 2009 11:58 PM

To:

Sent:

Subject:

Read: Request For Additional Information, File Number 1050223-015-AV, FPCdbaProgress

Energy Florida, Inc. - Tiger Bay Cogeneration Facility

Your message

To:

Chris.Bradley@pgnmail.com

Subject:

was read on 6/30/2009 11:58 PM.

From:

Exchange Administrator

Sent:

Tuesday, June 30, 2009 2:47 PM

To:

Friday, Barbara

Subject: Attachments:

Delivery Status Notification (Relay)

ATT675836.txt; Request For Additional Information, File Number 1050223-015-AV,

FPCdbaProgress Energy Florida, Inc. - Tiger Bay Cogeneration Facility

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

tdavis@ectinc.com

From: Sent: Tom Davis [tdavis@ectinc.com] Tuesday, June 30, 2009 6:22 PM

To:

Friday, Barbara

Subject:

RE: Request For Additional Information, File Number 1050223-015-AV, FPCdbaProgress

Energy Florida, Inc. - Tiger Bay Cogeneration Facility

Barbara.

I have received the documents referenced in your email below.

Thanks.

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]

Sent: Tuesday, June 30, 2009 2:46 PM

To: martin.drango@pgnmail.com

Cc: chris.bradley@pgnmail.com; Tom Davis; Zhang-Torres

Subject: Request For Additional Information, File Number 1050223-015-AV, FPCdbaProgress Energy Florida, Inc. - Tiger

Bay Cogeneration Facility

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: http://www.adobe.com/products/acrobat/readstep.html > .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.

From:

System Administrator

To:

Zhang-Torres

Sent:

Tuesday, June 30, 2009 2:46 PM

Subject:

Delivered: Request For Additional Information, File Number 1050223-015-AV, FPCdbaProgress Energy Florida, Inc. - Tiger Bay Cogeneration Facility

Your message

To:

martin.drango@pgnmail.com

Cc: 0

chris.bradley@pgnmail.com; Tom Davis; Zhang-Torres

Subject:

Request For Additional Information, File Number 1050223-015-AV,

FPCdbaProgress Energy Florida, Inc. - Tiger Bay Cogeneration Facility

Sent: 6/30/2009 2:46 PM

was delivered to the following recipient(s):

Zhang-Torres on 6/30/2009 2:46 PM

From:

Zhang-Torres

To: Sent: Friday, Barbara

Tuesday, June 30, 2009 3:36 PM

Subject:

Read: Request For Additional Information, File Number 1050223-015-AV, FPCdbaProgress

Energy Florida, Inc. - Tiger Bay Cogeneration Facility

Your message

To:

martin.drango@pgnmail.com

Cc:

chris.bradley@pgnmail.com; Tom Davis; Zhang-Torres

Subject:

Request For Additional Information, File Number 1050223-015-AV,

FPCdbaProgress Energy Florida, Inc. - Tiger Bay Cogeneration Facility

Sent: 6/30/2009 2:46 PM

was read on 6/30/2009 3:36 PM.

From:

Sheplak, Scott

To:

Friday, Barbara

Sent:

Wednesday, July 01, 2009 11:50 AM

Subject:

Read: FW: Request For Additional Information, File Number 1050223-015-AV,

FPCdbaProgress Energy Florida, Inc. - Tiger Bay Cogeneration Facility

Your message

To: Sheplak, Scott

Subject: FW: Request For Additional Information, File Number 1050223-015-AV,

FPCdbaProgress Energy Florida, Inc. - Tiger Bay Cogeneration Facility

Sent: 7/1/2009 11:46 AM

was read on 7/1/2009 11:50 AM.