

Sheplak, Scott

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From: Bradley, Chris [Chris.Bradley@pgnmail.com]
Sent: Wednesday, October 28, 2009 10:58 AM
To: Holtom, Jonathan
Cc: Sheplak, Scott
Subject: RE: Tiger Bay - Previous discussion on Draft/Proposed TV Renewal - Condition A.6
Attachments: Tiger Bay TV Renewal_TV-AC_App_pages.pdf

Good morning Jon -

I think we all agree that the condition as currently written is unusual. As I mentioned in my conversation with you yesterday, and in a later conversation with Scott Sheplak, the condition is also very unclear in its current form. My goal is not necessarily to change the intent of the condition, but at least identify the original intent and rewrite the condition or add a permitting note to clarify the original intent. Again, the main concern for the facility is to comply with the 120 lb/hour 24-hour average, they may be required to restart in an effort to generate recorded data during the specified averaging time regardless of power demand. The result is mass emissions greater than necessary; certainly this was not the original intent of the condition. Furthermore, there is a concern that multiple triggering events (the condition suggests that a SU or a SD are triggering events) occurring in a given 24-hour period would require tracking multiple 24-hour block 120 lb/hr averages.

In addition, I presume the potential PSD ramifications of the 120 lbs/hr for 24-hours (Total mass emitted 2,880 lbs) were researched before 1050223-013-AC was issued and none were identified. Clearly proposing 2,880 lbs of NOx emissions within the 24-hour period triggered by a start up would provide adequate flexibility to comply with the 120 lb/hour average and would eliminate the need to start-up the unit to generate recordable data in an effort to average down the lb/hour value.

The bottom line is the facility would just like to know clearly what the rules of the game are as I am sure that is what the DEP wants to clearly convey. Initially PEF would prefer to clarify this condition. Upon clarification there may not be a need to submit an additional AC permit application. However, the clarification may result in an interpretation that makes it very difficult for the facility to comply with the condition. At that time PEF would gather the information, perform the required analysis and proceed with an AC permit application.

Please call me if you care to discuss in further detail.

Thank you.

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From: Holtom, Jonathan [mailto:Jonathan.Holtom@dep.state.fl.us]
Sent: Wednesday, October 28, 2009 9:36 AM

10/28/2009

To: Bradley, Chris
Cc: Vielhauer, Trina; Koerner, Jeff; Sheplak, Scott
Subject: RE: Tiger Bay - Previous discussion on Draft/Proposed TV Renewal - Condition A.6

Good Morning Chris,

I talked with Trina this morning and we both agree that this is an odd condition. It was done as a way to get around EPA's objections to our excess emissions rule, but this style of excess emissions condition was a very short lived style and not the way our office would write the permit today. We typically do not allow anyone to average in zeros in order to meet a limit, but it is unclear whether or not the wording in this permit could allow you to do so.

Attached is a document that was prepared by Scott Osbourn and submitted with the AC permit request to establish the allowable startup limit. The request states that the worst case average over a 5-hour startup period would be 125 lbs/hour. We issued a permit that allowed a 120 lb/hour average over a 24-hour period. I don't think I anticipated averaging in zeros, but again, the permit condition is not clear. Usually, averages are the result of the data recorded for the hours that a unit actually operates during the specified averaging time.

Since this condition was created based on information provided by Progress Energy as worst case emissions during a startup, we do not feel that it is appropriate to relax the limit by adding any notes that would imply you could average in zeros. For now, we are going to let the condition stand as is and not alter the AC permit condition with the issuance of this Title V permit. If you feel that the plant is having trouble complying with this limit, then the recommended solution is to gather all the available startup data and submit a new AC application proposing a different limit for startup emissions. We can then review your request while evaluating any potential PSD implications and create a new condition that makes more sense to everyone.

Please do not hesitate to contact me if you have any further questions about this condition.

Jon

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: Vielhauer, Trina
Sent: Tuesday, October 27, 2009 9:21 PM
To: Holtom, Jonathan
Cc: Koerner, Jeff
Subject: RE: Tiger Bay - Previous discussion on Draft/Proposed TV Renewal - Condition A.6

after reading the condition again- this isn't hte one we discussed most recently but it does ring a bell. The condition is written just to limit the emissions from the startup or shutdown period and goes on to say it is averaged over the 24 hours. So it is VERY odd and definitely not the typical case where I'd say no way you get to add zeros. But I kindof think that's what this one implies.

-----Original Message-----

From: Holtom, Jonathan
Sent: Tue 10/27/2009 5:38 PM
To: 'Bradley, Chris'

10/28/2009

Cc: Vielhauer, Trina; Koerner, Jeff

Subject: RE: Tiger Bay - Previous discussion on Draft/Proposed TV Renewal - Condition A.6

I only vaguely recall that conversation, but think that we decided that was an acceptable interpretation based on how the permit was written. I will double check with Trina and Jeff K. tomorrow to make sure they are still OK with this approach. If so, I think a permitting note would be an acceptable clarifying solution.

Jon

From: Bradley, Chris [mailto:Chris.Bradley@pgnmail.com]

Sent: Tuesday, October 27, 2009 5:19 PM

To: Holtom, Jonathan

Cc: Sheplak, Scott

Subject: Tiger Bay - Previous discussion on Draft/Proposed TV Renewal - Condition A.6

Importance: High

Hey Jon-

I spoke to Scott Sheplak this afternoon regarding the A.6 condition included below.

A.6. Nitrogen Oxides - while Burning Natural Gas.

(a) Nitrogen oxide emissions from the CT shall not exceed 15 ppmvd at 15 percent oxygen, 97.21bslhr nor 425.7 TPY, while burning natural gas. This limit will be achieved by using appropriate combustion technology improvements or SCR. If SCR is chosen as the control technology, the maximum nitrogen oxides emission limits shall not exceed 10 ppmvd at 15 percent oxygen, 64.8 lbs/hr, nor 283.8 TPY.

(b) The maximum allowable nitrogen oxide emissions resulting from a start up or shut down of the CT shall not exceed an average of 120 lbs/hour, based on a 24-hour period commencing with the beginning of a start up or a shut down of the unit. The 24-hour average shall be based on all available data excluding calibration data and periods of emissions due to malfunction during the start up period. [AC53-214903/PSD-FL-190, 1050223-007-AC, 1050223-013-AC/PSD-FL-190A; and, Rule 62-210.700(5), F.A.C.]

I began researching the PEF end of this condition and the data that we generated and provided to DEP. While doing so I came across some notes regarding a discussion Trina, you and I had several months ago on this condition. To summarize, after looking into this, BAR concluded that the facility could average in zeros (0) for any hour it did not operate during that 24-hour block period that was triggered by a start-up. The average of the zeros (0) would allow PEF to reach the 120 lb/hour average required by permit without starting up the unit (even if the demand of power is not there) just to average down the NOx emissions; i.e., increased mass emissions of NOx to reduce the average mass emission rate (lbs/hour).

If this is your recollection, then PEF can certainly craft something for the condition itself or as an explanatory Permitting Note; just let me know.

Please contact me if you have any questions.

Chris Bradley

10/28/2009

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