



November 19, 2009

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BUREAU OF AIR REGULATION

UPS GROUND

Mr. Jonathan Holtom, P.E.
Title V Program Administrator
Division of Air Resource Management
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 23
Tallahassee, Florida 32301-2973

RE: Comments on Draft/Proposed Title V Air Operation Renewal Permit
Project No: 1270028-009-AV
Florida Power Corporation d/b/a Progress Energy Florida, Inc.
DeBary Power Plant
Facility ID: 1270028
Volusia County

Dear Mr. Holtom:

Please find below comments on the draft/proposed Title V Air Operation Renewal Permit for the Florida Power Corporation d/b/a Progress Energy Florida, Inc. ("PEF") DeBary Power Plant. Any requested changes are shown in red with ~~strikethrough~~ for deletion and underline for insertion.

Draft Title V Air Operation Permit Revision & Renewal: 1270028-009-AV

1. *Appendix I – List of Insignificant Emissions Units and/or Activities:* The requested change is to correct the identification of ten of the storage tanks. From a regulatory standpoint the term "waste oil storage tanks" included in the Appendix I Table needs to be clarified and the name changed. In addition, each unit has a surge tank for lube oil; therefore, there are ten lube oil surge tanks on site. Therefore, the requested changes are as follows:

20. Ten 546 (nominal) gallon storage tanks for ~~waste~~ used oil.
21. ~~One~~ Ten 2700 (nominal) gallon surge tank for lube oil.

2. *Appendix I – List of Insignificant Emissions Units and/or Activities:* The requested change is to add two tanks located onsite that were omitted from Appendix I. These tanks are utilized for the storage of caustic and sulfuric acid for water treatment. Therefore, the requested changes to Appendix I are as follows:

27. One 5,000 (nominal) gallon sulfuric acid tank

28. One 6,500 (nominal) gallon caustic tank

3. *Section III, Subsection B, Specific Condition B.21- Test Methods:* The requested change clarifies that there are alternatives to determining sulfuric acid mist and sulfur dioxide emissions other than those identified in the table included under this permit condition. Therefore, the requested change is as follows:

B.21. Test Methods. Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5	Method for Determining Particulate Matter Emissions
7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
8 <u>(Also see Specific Condition B.31.)</u>	Determination of Sulfuric Acid Mist and Sulfur Dioxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources

4. *Appendix I – List of Insignificant Emissions Units and/or Activities:* As discussed in our telephone conversation on November 19, 2009, the requested changes are to correct the previous description of the Emissions Units/Activities Nos. 27 and 28 in Appendix I. Therefore the requested changes to Appendix I are as follows:

27. Diesel ~~Generator~~ Fire Pump (115 HP Detroit Diesel Allison-PTA-1SD-50).

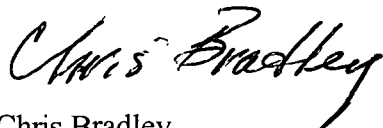
28. Diesel/Caterpillar 3500/2500 hp/ 1879 kW.

5. *Appendix U – List of Unregulated Emissions Units and/or Activities:* As discussed in our telephone conversation on November 19, 2009, the requested changes are to delete Appendix U from the final permit. The Emissions Units/Activities delineated identified as E.U. No. -021 in Appendix U were included at insignificant emissions units in the permit renewal application and were listed in Appendix I of the current Title V Air Operating Permit. Therefore the requested change is to delete Appendix U:

E.U. No.	Brief Description of Emissions Units and/or Activity
-021	<p>General Purpose Stationary Reciprocating Internal Combustion Engines (RICE)</p> <ul style="list-style-type: none"> — 115 HP <u>Detroit Allison Diesel</u> Fire Pump installed around 1975. — Engine Model No. 10447110, 284 cu. inch displacement — 2,532 HP Diesel Generator installed around 1991. — Caterpillar Engine Model No. 3516 <p>(Note: These engines are subject to regulation under 40 CFR 63, Subpart ZZZZ— NESHAP for Stationary Reciprocating Internal Combustion Engines. However, since the engine meets the Subpart ZZZZ definition of “existing unit”, there are no unit specific applicable requirements that must be met pursuant to this rule at this time.</p>

Thank you for your assistance and if you have any questions, you may contact me by e-mail at Chris.Bradley@pgnmail.com or via telephone at (727) 820-5962.

Sincerely,



Chris Bradley
 Sr. Environmental Specialist
 Progress Energy Florida, Inc.

cc: Mr. Jonathon Holtom, P.E., Title V Administrator – DEP/DARM (via e-mail)
 Mr. Lyndon Dupont, Plant Manager – DB 44 (via e-mail)