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BUREAU OF AIR REGULATION

March 5, 2001

Mr. Al Linero, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Linero:

Re: UF Cogen Plant CT Replacement - DEP File No. 0010001-003-AC

Florida Power has received your letter of February 9 regarding the above-referenced permit application. In the letter, you requested additional information on the operation of the existing steam boilers and an explanation of the apparent higher than normal operation of Boiler Number 5 in 1999.

Steam Boilers Number 4 and 5 are used to supply backup and/or supplemental steam to Shands Hospital on an as-needed basis. Primarily this occurs when the cogen unit is shutdown or is operating at reduced load, resulting in an insufficient amount of steam supply to the hospital. The original construction permit and the current Title V operating permit allow the steam boilers to be "operated as necessary for backup, as long as total NOx emissions from this permitted facility do not exceed 194.3 tons/year." As you know, the permit does not contain an hours of operation limit for these boilers.

Florida Power acknowledges that the reported hours of operation for Boiler 5 in 1999 appear unusually high. Upon further investigation, Florida Power has determined that the reported hours also reflect the operation of the pilot flame, which operates nearly year-round. The total hours of operation of the boiler from a demand, or loaded, perspective were 717 in 1999. For future reporting, Florida Power will not include the hours of operation designated as "warm standby" mode; rather, the reporting will reflect the hours that the boilers were loaded to provide steam. This change will more accurately reflect their true operation. Note that, in either case, the reported fuel flow is still an accurate representation of emissions potential.

Thank you for your consideration of Florida Power's application. Please contact Mike Kennedy at (727) 826-4334 or me at (352) 337-6904 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kris Edmondson", written over a white background.

Kris Edmondson
Plant Manager

bcc: J. M. Kennedy
S. H. Osbourn, ENSR

c: J. Reynolds
C. Kutz, NED

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1. Article Addressed to: Mr. Kris Edmonson Plant Manager UF Cogen Plant Mowry Road, Bldg. 82, UF Gainesville, FL 32611-2295	C. Signature <i>Carl Williams</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
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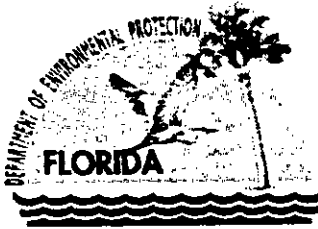
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 Mr. Kris Edmonson

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 Gainesville, FL 32611-2295

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Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

February 9, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Kris Edmonson
Plant Manager
UF Cogen Plant
Mowry Road, Bldg. 82, UF
Gainesville, FL 32611-2295

Re: DEP File No. 0010001-003-AC (Replacement of Combustion Turbine for UF-Cogen Plant)

Dear Mr. Edmonson:

This confirms our recent conversation with Mike Kennedy and Scott Osbourn regarding the subject construction permit application. We discussed the possibility of Florida Power Corporation seeking a PSD permit to utilize the full-load potential of the additional capacity of the replacement turbine for 8,760 annual hours rather than having operation at 48 MW limited to a lesser number of hours to avoid PSD. Such an approach would have allowed full utilization of the replacement turbine capacity, but would have required a BACT determination for the LM6000 - PC-ESPRINT emissions.

It is understood that FPC prefers not to seek a PSD permit and would rather operate the new turbine at lower annual hours at maximum load such that continuously monitored emissions will not exceed PSD threshold amounts. Therefore, the permit application will be processed accordingly to accommodate FPC's projected target date of May 2001 for commencement of construction. However, for our files, we do need clarification on the proposed operation of the existing boilers including an explanation of the higher than normal operation of Boiler No. 5 in 1999. This request for additional information will not affect the schedule for processing the application.

If there are any questions regarding the above, please call John Reynolds at 850/921-9530.

Sincerely,

A. A. Linero, P.E. Administrator
New Source Review Section

AAL/JR

cc: Len Koslov, CD
Mike Kennedy, FPC
Scott Osbourn, ENSR

"More Protection, Less Process"

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