

May 21, 2012

Mr. Sherrill Culliver Florida Department of Environmental Protection South District 2295 Victoria Avenue Suite 364 Fort Myers, FL 33901

Re: Avon Park Compliance Evaluation ORIS 624 Units P3 and P4

Dear Mr. Culliver

I have enclosed a copy of the Compliance Evaluation for Progress Energy, Florida's Avon Park Units referenced above. The visible emissions (VE) evaluations were conducted on May 18, 2012.

The units were found to be in compliance.

Please contact Thomas Stark at (727) 820-5593 if you have any questions.

I hereby certify that, based on the information and belief formed after reasonable inquiry, the statements and information in the attached documents are true, accurate and complete.

Sincerely,

Martin J. Drango Plant Manager Combustion Turbines-Central

Enclosure

Progress Energy Florida, Inc. P.O. Box 14042 St. Petersburg, FL 33733

Visible Emissions Test Report

Completed for:

Progress Energy Florida, Inc. Avon Park Power Plant

Gas Turbine Peaking Units 1 & 2 (EU -003 & -004)

Test Report Number: 20-5174-0102-001

Tests Completed: May 18, 2012



Air Emissions Compliance Test Report

Progress Energy Florida, Inc. Avon Park Power Plant Gas Turbine Peaking Units 1 and 2 (EU -003 & -004) Avon Park, Florida

C.E.M. Solutions Project No. 5174

Testing Completed: May 18, 2012

C.E.M. Solutions, Inc. Report Number: 20-5174-0102-001

C.E.M. Solutions, Inc. 1183 E. Overdrive Circle Hernando, Florida 34442 Phone: 352-489-4337

Statement of Validity

I hereby certify the information and data provided in this emissions test report for tests performed at the Progress Energy Florida, Inc. Avon Park Power Plant, on the Gas Turbine Peaking Units (EU -003 and -004), conducted on May 18, 2012 are complete and accurate to the best of my knowledge.

Joe Conti Quality Assurance Manager, C.E.M. Solutions, Inc.

Project Background

Name of Source Owner:	Progress Energy Florida, Inc.
Address of Owner:	299 First Avenue North St. Petersburg, Florida 33701
Source Identification:	Facility ID: 0550003 Emission Units: Unit 1 (EU-003) and Unit 2 (EU-004)
Location of Source:	Oldsmar, Florida
Type of Operation:	SIC Code: 4911
Tests Performed:	Method 9 – Determination of Visible Emission ASTM D-240 – Fuel Analysis (by others) ASTM D-1552 – Sulfur in Petroleum Products (by others)
Test Supervisor:	Josh Cooper
Date(s) Tests Conducted:	May 18, 2012: V.E. on Unit 1 and Unit 2
Site Test Coordinator:	Tom Stark
State Regulatory Observers:	No Observer Present

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1.0 Introduction

Progress Energy Florida, Inc. (PEF) retained C.E.M. Solutions, Inc. to perform source emissions testing on the Gas Turbine Peaking Units (EU -003 and -004) located at its Avon Park Power Plant in Avon Park, Florida.

The test program was conducted in order to evaluate the compliance status of the Gas Turbine Peaking Units exhaust, while firing No.2 distillate fuel oil, in respect to Title V air operating permit number 0550003-005-AV. The test program and results are presented and discussed in this report.

Tom Stark of the Progress Energy Florida, Inc. Environmental Services Section coordinated plant operations throughout the test program. All testing was conducted in accordance with test methods promulgated by the USEPA.

A summary of the visible emission results are located in Table 1 below.

Table 1: Summary of ResultsProgress Energy Florida, Inc.Avon Park Power PlantGas Turbine Peaking Units 1 & 2

Unit	Emission Standard/ Permit Limitation	Test Results
Unit 1	Visible Emission no greater than 20% opacity	12.1%*
Unit 2	Visible Emission no greater than 20% opacity	14.8%*

*Six minute block average

2.0 Facility Description

Avon Park Units 1 and 2 are Gas Turbine Peaking Units that fire No. 2 fuel oil. These Units are used as peaking units. Units 1 and 2 have a maximum heat input rate of 562.6 mmbtu/hr and are capable of generating 33.8 MW.

2.1 **Process Equipment**

Emissions from the Gas Turbine Peaking Units are uncontrolled. Turbine engine exhausts are vented to the atmosphere through a 35 foot stacks.

2.2 Regulatory Requirements

PEF conducted emissions tests for the following pollutants while operating at peak load. Emission testing was conducted to determine the compliance status of the following pollutants:

• Opacity in percent

Table 1 summarizes the applicable emissions limits for the Gas Turbine Peaking Unit.

Table 2: Summary of Emissions LimitsProgress Energy Florida, Inc.Avon Park Power PlantGas Turbine Peaking Units 1 & 2

Pollutant	Control Technology	Emission Limit	Permit Condition		
Visible	Good	20%	A.5		
Emissions	Combustion	2078	A.J		

^a While firing new No. 2 Fuel Oil

3.0 Test Program/Operating Conditions

Emissions tests were completed at the Avon Park Power Plant to determine the compliance status of the No. 2 fuel oil fired turbine on May 18, 2012.

Visible emission testing was performed while the units were at base load, firing No. 2 Distillate Fuel Oil.

Turbine operating data was collected and provided by facility personnel during the entire test program. Data provided include, but was not limited to:

- Unit Generation (MW)
- Fuel flow rate
- Heat input (mmbtu/hr)

During the test program, Unit 1 heat input averaged 350.2 mmBtu/hr while operating on 100 percent No. 2 fuel oil, which correlates to 70 percent of the maximum heat input (501.5 mmBtu/hr).

During the test program, Unit 2 heat input averaged 357.2 mmBtu/hr while cofiring natural gas and oil, which correlates to 71 percent of the maximum heat input (501.5 mmBtu/hr).

The heat input plant data for the Avon Park CTs can be viewed in Appendix A.

4.0 Test Methods

All testing was performed in accordance with methods approved by the USEPA and FDEP. The following discusses the methods, as well as quality assurance and sample handling procedures.

4.1 Determination of Visible Emission

USEPA Method 9 was utilized to determine Visible Emissions.

Visible emission observations were performed by a FDEP certified visible emission reader. Readings were taken at 15 second intervals and reduced into six minute averages as required by the applicable EPA standard. One-sixty minute visible emission run was performed while the Unit was operating at maximum capacity.

5.0 Test Results

The test program results are presented below. Summaries of the compliance test results for visible emissions are listed below. Supporting Visible Emission field data reports are presented in Appendix B and C, respectively.

5.1 Unit 1 (EU-003)

The highest six-minute block average visible emission recorded for Unit 1 was 12.1%, passing the 20% permit limitation.

5.2 Unit 2 (EU-004)

The highest six-minute block average visible emission recorded for Unit 2 was 14.8%, passing the 20% permit limitation.

Appendix A: Plant Operating Data



Avon Park - VE Operating Data 2012

Units	Date	Fuel	Inlet Temp	Calculated Heat Input	Permitted Heat Input at Inlet Temp	Capacity
			deg F	mmBTU/hr	mmBTU/hr	%
P1	5/18/12	Oil	82.5	350.2	501.5	70%
P2	5/18/12	Oil	83.1	357.2	501.5	71%

Avon Park	🚫 Progress Energy	P1	
5/18/12 9:15	GGA LIQUID RTD TEMPERATURE	UNIT2 GROSS POWER OUT PE	Fuel Oil Flow
5/18/12 10:15	APP01_U1FLEX:P1A_LIQ_TMP.MEAS	APP01_GROSS POWER OUT.PE	A + B
lm	Deg F	MW	lbs/s
18-May-12 09:15:00	81.8	24.7	5.0
18-May-12 09:16:00	81.9	24.7	5.0
18-May-12 09:17:00	81.9	24.7	5.0
18-May-12 09:18:00	81.9	24.7	5.0
18-May-12 09:19:00	81.9	24.7	5.0
18-May-12 09:20:00	82.0	24.7	5.0
18-May-12 09:21:00	82.0	24.7	5.0
18-May-12 09:22:00 18-May-12 09:23:00	82.0 82.0	24.7 24.7	5.0
18-May-12 09:24:00	82.0	24.7	5.0 5.0
18-May-12 09:25:00	82.0	24.7	5.0
18-May-12 09:26:00	82.1	24.7	5.0
18-May-12 09:27:00	82.1	24.7	5.0
18-May-12 09:28:00	82.1	24.7	5.0
18-May-12 09:29:00	82.2	24.7	5.0
18-May-12 09:30:00	82.2	24.7	5.0
18-May-12 09:31:00	82.2	24.7	5.0
18-May-12 09:32:00	82.2	24.7	5.0
18-May-12 09:33:00	82.3	24.7	5.0
18-May-12 09:34:00	82.3	24.7	5.0
18-May-12 09:35:00	82.3	24.7	5.0
18-May-12 09:36:00	82.3	24.7	5.0
18-May-12 09:37:00	82.3	24.7	5.0
18-May-12 09:38:00	82.4	24.7	5.0
18-May-12 09:39:00	82.4	24.7	5.0
18-May-12 09:40:00	82.4	24.7	5.0
18-May-12 09:41:00	82.4	24.7	5.0
18-May-12 09:42:00 18-May-12 09:43:00	82.5 82.5	24.7 24.7	5.0
18-May-12 09:44:00	82.5	24.7	5.0 5.0
18-May-12 09:45:00	82.5	24.7	5.0
18-May-12 09:46:00	82.6	24.7	5.0
18-May-12 09:47:00	82.6	24.7	5.0
18-May-12 09:48:00	82.6	24.7	5.0
18-May-12 09:49:00	82.6	24.7	5.0
18-May-12 09:50:00	82.7	24.7	5.0
18-May-12 09:51:00	82.7	24.7	5.0
18-May-12 09:52:00	82.7	24.7	5.0
18-May-12 09:53:00	82.7	24.7	5.0
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18-May-12 10:09:00	83.1	24.7	5.0
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Avon Park	🚫 Progress Energy	P2	
5/18/12 9:15	GGA LIQUID RTD TEMPERATURE	UNIT1 GROSS POWER OUT PE	Fuel Oil Flow
5/18/12 10:15	APP02_U2FLEX:P2B_LIQ_TMP.MEAS	APP02_GROSS POWER OUT.PE	A + B
1m	Deg F	MW	lbs/s
18-May-12 09:15:00	82.8	24.7	5.1
18-May-12 09:16:00	82.8	24.7	5.1
18-May-12 09:17:00	82.8	24.7	5.1
18-May-12 09:18:00	82.9	24.7	5.1
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18-May-12 09:20:00	82.9	24.7	5.1
18-May-12 09:21:00	82.9	24.7	5.1
18-May-12 09:22:00	82.9	24.7	5.1
18-May-12 09:23:00	82.9	24.7	5.1
18-May-12 09:24:00	82.9	24.7	5.1
18-May-12 09:25:00	82.9	24.7	5.1
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18-May-12 09:35:00	83.0	24.7	5.1
18-May-12 09:37:00	83.0	24.7	5.1
18-May-12 09:38:00	83.1	24.7	5.1
18-May-12 09:39:00	83.1	24.7	5.1
18-May-12 09:40:00	83.1	24.7	5.1
18-May-12 09:41:00	83.1	24.7	5.1
18-May-12 09:42:00	83.1	24.7	5.1
18-May-12 09:43:00	83.1	24.7	5.1
18-May-12 09:44:00	83.1	24.7	5.1
18-May-12 09:45:00	83.1	24.7	5.1
18-May-12 09:46:00	83.1	24.7	5.1
18-May-12 09:47:00	83.1	24.7	5.1
18-May-12 09:48:00	83.2	24.7	5.1
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18-May-12 09:51:00	83.2	24.7	5.1
18-May-12 09:52:00	83.2	24.7	5.1
18-May-12 09:53:00	83.2	24.7	5.1
18-May-12 09:54:00	83.2	24.7	5.1
18-May-12 09:55:00	83.2	24.7	5.1
18-May-12 09:56:00	83.2	24.7	5.1
18-May-12 09:57:00	83.2	24.7	5.1
18-May-12 09:58:00	83.3	24.7	5.1
18-May-12 09:59:00	83.3	24.7	5.1
18-May-12 10:00:00	83.3	24.7	5.1
18-May-12 10:01:00	83.3	24.7	5.1
18-May-12 10:02:00	83.3	24.7	5.1
18-May-12 10:03:00	83.3	24.7	5.1
18-May-12 10:04:00	83.3 83.3	24.7	5.1
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18-May-12 10:07:00 18-May-12 10:08:00	83.4 83.4	24.7 24.7	5.1
18-May-12 10:08:00	83.4	24.7	5.1
18-May-12 10:09:00	83.4	24.7	5.1
18-May-12 10:10:00	83.4	24.7	5.1
18-May-12 10:11:00	83.5	24.7	5.1
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Appendix B: Method 9 Support Data

VE Field Documentation VE Observers Certificate

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RECORD OF VISUAL DETERMINATION OF OPACITY

CEM Solutions, Inc. Method 9: Determination of the Opacity of Emissions from Stationary Sources 6-Minute Data Reduction

Company:	PEF
Facility:	Avon Park
Unit No.:	1
Sample Location:	Stack

Date:	5/18/2012
Project #:	5174
Operator:	Josh Cooper

		Readings					
Time	minutes	0	15	30	45		
9:15	0	5	15	5	10		
9:16	1	10	10	10	10		
9:17	2	5	5	5	10		
9:18	3	10	10	10	10		
9:19	4	10	10	10	10		
9:20	5	10	10	10	15		
9:21	6	10	10	10	15		
9:22	7	10	10	10	10		
9:23	8	10	10	10	10		
9:24	9	10	10	10	10		
9:25	10	10	10	10	10		
9:26	11	10	15	10	10		
9:27	12	10	10	10	10		
9:28	13	10	5	10	10		
9:29	14	10	15	15	10		
9:30	15	10	15	10	10		
9:31	16	10	10	10	10		
9:32	17	10	10	10	10		
9:33	18	10	10	10	10		
9:34	19	10	10	10	10		
9:35	20	10	10	10	15		
9:36	21	10	15	10	15		
9:37	22	10	10	10	10		
9:38	23	10	10	10	10		
9:39	24	10	10	10	10		
9:40	25	15	10	15	15		
9:41	26	10	10	15	10		
9:42	27	10	10	10	10		
9:43	28	10	10	15	10		
9:44	29	10	10	10	10		
9:45	30	10	10	15	15		

		Readings			
Time	minutes	0	15	30	45
9:46	31	10	15	15	10
9:47	32	10	10	10	10
9:48	33	10	10	10	10
9:49	34	15	15	10	15
9:50	35	10	15	15	15
9:51	36	10	10	10	10
9:52	37	10	10	10	10
9:53	38	10	10	10	10
9:54	39	10	10	10	10
9:55	40	10	10	10	10
9:56	41	10	10	10	10
9:57	42	10	10	10	10
9:58	43	10	10	10	10
9:59	44	10	10	10	10
10:00	45	10	10	10	10
10:01	46	10	10	10	10
10:02	47	10	10	10	10
10:03	48	15	15	10	10
10:04	49	10	15	10	10
10:05	50	10	10	10	10
10:06	51	10	10	10	10
10:07	52	10	10	10	10
10:08	53	10	10	10	10
10:09	54	10	10	10	10
10:10	55	10	10	10	10
10:11	56	10	10	10	10
10:12	57	10	10	10	
10:13	58	10	10	10	10
10:14	59	10	10	10	

Highest 6-minute average: 12.1

Highest 6-Min Average Start Time: 9:45:00 Highest 6-Min Average End Time: 9:51:00

CEM Solutions, Inc. Method 9: Determination of the Opacity of Emissions from Stationary Sources 6-Minute Data Reduction

Company:	PEF
Facility:	Avon Park
Unit No.:	2
Sample Location:	Stack

Date:	5/18/2012			
Project #:	5174			
Operator:	Josh Cooper			

		Readings			
Time	minutes	0	15	30	45
9:15	0	10	15	10	15
9:16	1	15	10	15	15
9:17	2	15	15	15	15
9:18	3	15	10	10	10
9:19	4	10	10	10	15
9:20	5	15	10	15	15
9:21	6	15	10	20	15
9:22	7	10	10	15	15
9:23	8	15	15	15	10
9:24	9	10	15	15	15
9:25	10	15	15	10	15
9:26	11	15	15	10	10
9:27	12	15	15	10	15
9:28	13	10	10	10	15
9:29	14	15	15	15	15
9:30	15	15	15	15	15
9:31	16	15	15	15	15
9:32	17	15	10	15	15
9:33	18	15	15	15	15
9:34	19	10	15	15	15
9:35	20	10	15	15	15
9:36	21	10	15	15	10
9:37	22	10	15	15	10
9:38	23	15	10	10	15
9:39	24	15	15	10	10
9:40	25	15	10	15	15
9:41	26	15	10	15	15
9:42	27	15	15	10	15
9:43	28	10	15	15	15
9:44	29	15	15	10	15
9:45	30	10	10	15	15

		Readings			
Time	minutes	0	15	30	45
9:46	31	10	10	15	15
9:47	32	10	10	15	10
9:48	33	10	15	10	10
9:49	34	15	15	15	15
9:50	35	15	15	15	15
9:51	36	15	15	15	15
9:52	37	15	15	10	15
9:53	38	15	10	10	20
9:54	39	10	10	15	15
9:55	40	15	15	15	15
9:56	41	15	10	15	15
9:57	42	15	15	15	15
9:58	43	15	10	15	15
9:59	44	15	15	15	15
10:00	45	15	10	15	15
10:01	46	15	10	15	15
10:02	47	10	10	10	10
10:03	48	15	15	15	10
10:04	49	10	15	15	15
10:05	50	10	10	15	10
10:06	51	10	15	15	10
10:07	52	15	15	15	15
10:08	53	15	15	15	15
10:09	54	15	15	10	15
10:10	55	15	15	15	15
10:11	56	15	15	15	15
10:12	57	15	15	15	15
10:13	58	15	15	15	15
10:14	59	15	10	10	10

Highest 6-minute average: 14.8

Highest 6-Min Average Start Time: 10:07:00 Highest 6-Min Average End Time: 10:13:00

VISIBLE EMISSIONS EVALUATOR

Joshua Cooper

This is to certify that the above named observer has met the specifications of Federal Reference Method 9 and is qualified as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates, Inc. of Raleigh, N.C.

This certificate is valid for six months from date of issue.

400822COO752114Certificate NumberStudent ID Number2/8/2012Orlando, FLDate of CertificationLocation8/9/2012TMPF09Certification Expiration DateLast Lecture

Marty Hughes
Director of Training