

Florida Power Corporation

3201 THIRTY FOURTH STREET SOUTH • ST. PETERSBURG, FLORIDA 33711
 P.O. BOX 14042 • H2G • ST. PETERSBURG, FLORIDA 33733

*Poston - file 8/17
 Patti - file
 His changes were made by me.
 Clair*

FAX COVER LETTER

ENVIRONMENTAL SERVICES DEPARTMENT

DATE: 8/11/92

6 PAGES AND COVER SHEET

TO: Clair Fancy

FAX #: (904) 922-6979

PHONE #: (813) 866-5158

FROM: Scott Osburn

PROJECT NUMBER:

PLEASE NOTIFY (813) 866-4940 FOR ANY PROBLEMS CONCERNING THE RECEIPT OF THIS FAX.

For your convenience, I have also faxed a copy of our comment letter, highlighting the text of the compromise reached between Brester & myself.

As a matter of principle, FPC has already agreed to a substantial %S reduction (from 0.5% max to 0.2% max) at no profit & additional cost. We believe the 0.2% S max limit is ~~unprecedented~~ unprecedented where fuel oil is the primary fuel, as it is at Intercession City.

The two additional paragraphs highlighted (pg 2 of 3 and 3 of 3) are of no useful purpose. FPC will burn the lower S fuel oil if dictated by economics (as previously stated) and the requirement to burn natural gas at a peaking site, where no natural gas capability exists, goes beyond the bounds of a BACT determination.

Final Determination

The Technical Evaluation and Preliminary Determination for the permit to construct six simple cycle combustion peaking units at Florida Power Corporation's (FPC) Intercession City Electric Generating Station in Intercession City, Osceola County, Florida, was distributed on May 22, 1992. The Notice of Intent to Issue was published in the Orlando Sentinel on June 17, 1992. Copies of the evaluation were available for public inspection at the Department's offices in Orlando and Tallahassee.

FPC's applications for permit to construct six simple cycle combustion peaking units (with a combined capacity of 371 MW) at their Intercession City Electric Generating Station have been reviewed by the Bureau of Air Regulation in Tallahassee.

No adverse comments were submitted by the U.S. Environmental Protection Agency (EPA) in their letter dated June 16, 1992.

Comments were received from Mr. Scott H. Osbourn, Senior Environmental Engineer for FPC, and Mr. John R. Eadie, Acting Regional Director of the U.S. Fish and Wildlife Service.

The Bureau has considered Mr. Osbourn's and Mr. Eadie's comments and has addressed them as follows:

Florida Power Corporation's letter dated July 16, 1992.

COMMENT:

Mr. Osbourn's concerns are regarding the economics (cost differentials per gallon for various grades) of using No. 2 fuel oil with a maximum of 0.2% sulfur by weight vs. No. 2 fuel oil with a 0.3% sulfur average and a maximum of 0.5% sulfur on an annual basis. Initially, Mr. Osbourn requested that Specific Condition No. 5 be deleted, the expiration date of the permit changed, and Specific Condition No. 16 be modified. However, on July 24, 1992, Mr. Osbourn withdrew his requests for changes to Specific Conditions Nos. 5 and 16, via a telephone conversation with Mr. Preston Lewis, Permitting Supervisor.

RESPONSE:

The Department has evaluated Mr. Osbourn's comments and concluded that the BACT determination for this project is justifiable and should not be changed. The limitations for sulfur content and SO₂ emissions will remain as specified in the permit: Distillate fuel oil with a maximum of 0.2% sulfur by weight and 2459 TPY SO₂. However, as requested, the economics (cost differentials per gallon for various grades) of this project will be revisited before start up, and if warranted, the BACT determination and permit conditions will be revised.

Final Determination
AC 49-203114 (PSD-FL-180)
Page 2 of 3

This entire BACT should be deleted. If you're already revisiting BACT, then why would you re-review your PSD SO₂ requirements. Also, it's self-evident that if you burn a lower S fuel oil, your SO₂ emissions will be lower.

delete
Considering the SO₂-BACT revision, it should be noted that if there is an emission increase, this project will have to be reviewed under the Prevention of Significant Deterioration (PSD) requirements for SO₂ before beginning operation. If there is a decrease of emissions resulting from the use of a lower sulfur fuel oil (0.05% S), the conditions of this permit will be changed.

As requested, the expiration date of this permit will be changed to December 31, 1994.

U.S. Fish and Wildlife Service's letter dated July 16, 1992.

COMMENTS:

Mr. Eadie's comments are regarding the sulfur content in the oil and the air quality analyses. He recommended to lower the sulfur content of the No. 2 fuel oil to 0.05% S (by weight) maximum.

RESPONSE:

all are CC with all gas-fired
Mr. Eadie's concerns regarding the sulfur content in the oil are valid. We also believe that new sources should minimize SO₂ emissions when feasible. ~~It is true that recent permit applications (Kissimmee Utilities Authority, Auburndale Power Partners, Central Florida Power) has proposed to fire oil with a maximum sulfur content of 0.05%, but it should be pointed out that they are using fuel oil as a supplementary fuel. However, in this case, it is not economically feasible to require fuel oil with a 0.05% maximum sulfur content since fuel oil is the primary and only fuel at the site. Section 211(i)(1) of the Clean Air Act, Sulfur Content Requirements For Diesel Fuel, states: "Effective October 1, 1993, no person shall manufacture, sell, supply, offer for sale or supply, dispense, transport, or introduce into commerce motor vehicle diesel fuel which contains a concentration of sulfur in excess of 0.05% (by weight) or which fails to meet a cetane index minimum of 40..." Although this regulation is not applicable to stationary sources, and we will continue evaluating sources in a BACT case-by-case basis, it may have an impact on the availability and economics of requiring fuel oil with a lower sulfur content for future projects.~~

In addition, as suggested, a condition will be added to the permit in the final determination that will require FPC to fire the turbines with natural gas as the primary fuel if, and when, it becomes available. Therefore, Specific Condition No. 3 will be modified as follows:

Final Determination
AC 49-203114 (PSD-FL-180)
Page 3 of 3

*As a matter of company
policy, this requirement is
unacceptable.*

FROM: These sources are allowed to use only No. 2 fuel oil with a 0.2% sulfur content maximum, by weight.

TO: These sources are allowed to use only No. 2 fuel oil with a 0.2% sulfur content maximum, by weight. ~~These sources will be required to burn natural gas as a primary fuel when and if it becomes available.~~

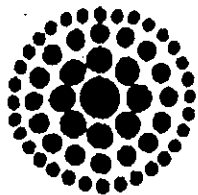
COMMENT:

Mr. Eadie comments on the potential impacts to the Chassahowitzka Wilderness Area.

RESPONSE:

When the Department released its Intent to Issue this permit, we believed the applicant had sufficiently addressed all of the potential impacts to the air quality related values (AQRVs) (such as vegetation, soils, terrestrial wildlife and visibility) in the Chassahowitzka Wilderness Area. The Fish and Wildlife Service (FWS) identified potential effects on fresh water creeks and related wildlife in the wilderness area as an AQRV after the Intent was released. However, the Department agrees with the FWS that, based on modeling results, we do not anticipate that these resources will be adversely affected by emissions from the proposed project. In addition, the Department will require future applicants to address impacts to these aquatic resources.

The final action of the Department will be to issue construction permit AC 49-203114 (PSD-FL-180) as proposed in the Technical Evaluation and Preliminary Determination with the changes noted above.



Florida Power CORPORATION

July 16, 1992

Mr. Preston Lewis
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Dear Mr. Lewis:

Re: Florida Power Corporation (FPC)
Intercession City Expansion
AC49-203114; PSD-FL-180

This correspondence serves to provide Florida Power Corporation's (FPC) comments on the above-referenced draft permit received by FPC on May 29, 1992 and publicly noticed on June 17, 1992. As you recall, on June 3, 1992, I met with you and Ms. Teresa Heron of your staff to discuss FPC's concerns with the draft permit. Presented herein is additional information that supports our discussions and our recommended changes to the construction permit.

Sulfur Dioxide (SO₂) Limitations

FPC is primarily concerned with DER's proposed fuel oil sulfur content limitation of 0.2 percent maximum, by weight. FPC had proposed a limit of 0.5 percent maximum and 0.3 percent annual average. The dispersion modeling analysis performed by FPC was based on the 0.5 percent maximum, as well as other conservative assumptions including the use of the highest combustion turbine (CT) emissions at the 20°F design condition coupled with the lowest exit gas flow rates at 90°F design conditions. The results of these analyses for SO₂ indicated that the maximum predicted SO₂ concentrations were all less than the appropriate AAQS and PSD increments. Due to the fact that compliance was demonstrated with ambient air quality impacts, FPC believes that the Department's SO₂ BACT determination was based solely on economics (e.g., cost-effectiveness).

P. Lewis
 July 16, 1992
 Page 2

In response to correspondence received from the Department on October 31, 1991, FPC submitted additional information (dated December 16, 1991) on the cost-effectiveness and annualized costs associated with the consumption of distillate fuel oil containing maximum percent sulfur contents of 0.2, 0.3, and 0.5. As noted in FPC's BACT analysis (page 4-25), the actual average sulfur content of the distillate fuel oil specified by FPC has historically been less than 0.2 percent. FPC has proposed a BACT level of 0.3 percent sulfur (annual average) to be met by fuel management. While the sulfur content of one or more fuel deliveries may approach 0.5 percent, these shipments will be mixed with the oil in the storage tanks which will have to be of lower sulfur content to assure meeting the annual sulfur condition. Therefore, the actual emissions will likely be those calculated using a sulfur content of 0.3 rather than 0.5 percent. Based on the historical data, there would be no air quality benefit (emissions would not be less) by specifying maximum fuel sulfur contents of 0.3 or 0.2 percent; however, there would be considerable additional cost. The Department has determined that the additional cost of requiring 0.2 percent maximum sulfur (\$8.45 MM in annualized cost or \$1,955/ton removed) is not prohibitive in the context of BACT.

In developing fuel oil cost estimates, both FPC and the Department talked to and received correspondence from the same two vendors-- Coastal Fuels and Steuart Petroleum (correspondence attached). While one letter from Steuart, dated April 29, 1992 seems to indicate that a range of fuel oil sulfur contents (from 0.1 to 0.5 percent max) are readily available, subsequent correspondence (dated June 19, 1992) clarifies that the range was quoted only to indicate that the oil fluctuates within this range. Further, Steuart can only offer and guarantee No. 2 fuel oil with a sulfur content of 0.5 percent max. The letter from Coastal Fuels, dated May 26, 1992, lists cost differentials per gallon for various grades. These were the costs incorporated in FPC's analysis. Coastal did not state that they could supply the lower sulfur oil grades, nor did they include additional tankage and terminalling charges which likely would be required as a condition of supply. Specifically, these additional charges would involve the cost of leasing dedicated fuel oil tankage for a 0.2 percent sulfur fuel if FPC were the only regional customer (estimated to be an additional \$500,000 to \$700,000 per year). Presently, it is very difficult to predict what the actual cost of a 0.2 percent sulfur requirement might be. At the time of fuel contract negotiations, costs could be lower than those estimated or, if FPC becomes a "captive" customer, they could be significantly higher.

FPC believes that the Department should reconsider their proposed BACT level for SO₂, which incorporates additional costs with no significant environmental benefit, and revise to the level initially proposed by FPC (e.g., 0.5 max and 0.3 annual average). If the Department remains unconvinced, FPC requests that permit language be incorporated so as to require the economics to be revisited at the time of unit startup (or actual fuel oil contract negotiations) and, if warranted, a BACT determination revision. During our meeting on June 3, 1992 you had indicated that such language would be an acceptable compromise. Further, as you recall, if the condition for a 0.2 percent sulfur maximum fuel

Clair, This summarizes the compromise reached between Preston & myself.

P. Lewis
July 16, 1992
Page 3

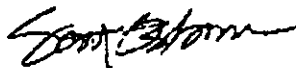
oil remains a requirement, the Department would agree to remove the adjustable capacity factor scale (Specific Condition 5) and merely leave the capacity factor limit at 38.7 percent. Previously, the capacity factor adjustment was incorporated into the FPC DeBary permit due to the uncertainty regarding the annual average. Similarly, in Specific Condition 16, the reference to a weighted 12 month rolling average for sulfur content should be deleted.

Permit Expiration Date

The permit expiration date is currently stated as March 31, 1994. As we discussed at our June 3, 1992 meeting, FPC requests an expiration date at least two years subsequent to final permit issuance.

If you should have any questions or comments on the above, please do not hesitate to contact me at (813) 866-5158. Your efforts to expedite the issuance of the final construction permit for this project would be greatly appreciated.

Sincerely,



Scott H. Osbourn
Sr. Environmental Engineer

Enclosure

cc: Clair Fancy, FDER



United States Department of the Interior



FISH AND WILDLIFE SERVICE
75 Spring Street, S.W.
Atlanta, Georgia
30303

July 16, 1992

RECEIVED
JUL 22 1992
Division of Air
Resources Management

Mr. C. H. Fancy, P.E.
Chief, Bureau of Air Regulation
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

We have completed our review of the material that you sent us regarding Florida Power Corporation's (FPC) proposal to add six combustion turbines to their existing Intercession City facility. Intercession City is located approximately 110 km southeast of the Chassahowitzka Wilderness Area (WA), a Class I air quality area administered by the Fish and Wildlife Service. The modification would result in a significant increase in emissions of nitrogen oxides (NO_x), sulfur dioxide (SO_2), particulate matter, volatile organic compounds, beryllium, and sulfuric acid mist. As you know, we are particularly concerned about the potential for new emission sources to cause or contribute to SO_2 increment exceedances at the wilderness area.

Regarding the best available control technology (BACT) analysis, we agree that wet (water or steam) injection is BACT to minimize NO_x emissions from the proposed simple cycle combustion turbines. We also agree that firing a low sulfur fuel represents BACT to minimize SO_2 emissions from combustion turbines. Although we would prefer that FPC fire natural gas rather than fuel oil in the proposed turbines, we understand that natural gas is not currently available at the site.

We appreciate your efforts to lower the maximum sulfur content of the fuel oil from the 0.50 percent proposed by FPC to 0.20 percent. However, recent permit applicants (i.e., Kissimmee Utility Authority, Auburndale Power Partners, Central Florida Power) have proposed to fire oil with a maximum sulfur content of 0.05 percent. Although the results of FPC's modeling analyses indicate that the proposed emission increases at the Intercession City facility would not cause or contribute to an increment exceedance at the wilderness area, given the SO_2 increment

situation at Chassahowitzka WA, we believe that new sources in the area should minimize SO₂ emissions as much as possible. Therefore, to be consistent with other recently proposed projects, we recommend that you limit the sulfur content of the oil fired in the proposed Intercession City turbines to 0.05 percent. In addition, we recommend that you include a condition in the final permit that requires FPC to fire the turbines with natural gas as the primary fuel if, and when, it becomes available at the site.

Florida Power Corporation sufficiently addressed potential impacts to vegetation, soils, terrestrial wildlife, and visibility in the wilderness area from the proposed emissions. However, FPC failed to assess the potential effects on fresh-water creeks and related wildlife in the Chassahowitzka WA from acid deposition. Nevertheless, based on the modeling results, we do not anticipate that resources will be adversely affected by emissions from the proposed project.

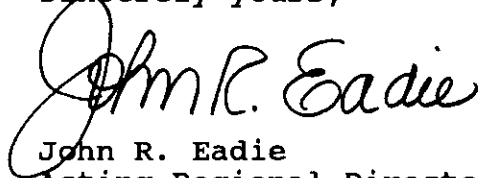
On a related subject, we recently developed some guidelines for applicants proposing to locate near the Chassahowitzka WA regarding the level of detail that they should dedicate to the Class I biological effects analyses. We propose that applicants follow these guidelines until we have enough information to identify resources at risk or to confirm that air pollution-related effects are not a concern at Chassahowitzka WA. We will keep you informed of our progress in obtaining this information.

First, all applicants should conduct a literature review for potential effects on vegetation, wildlife, soils, and aquatic resources for all pollutants to be emitted in significant amounts. Second, all applicants should model the proposed emissions to determine the expected SO₂ and nitrogen dioxide impacts at the wilderness area. For applicants whose modeled impacts are below our proposed significant impact levels, the literature review will be sufficient. While we still maintain that increment consumption does not relate directly to effects on resources, due to the lack of effects data at Chassahowitzka WA, it seems reasonable to follow this approach until more biological effects information is available. Finally, applicants whose modeled impacts are above the significant impact levels should also model deposition of sulfate and/or nitrate using MESOPUFF II. Applicants can contact our Air Quality office in Denver for guidance on the deposition modeling.

We appreciate your continued cooperation in requiring applicants to adequately assess the impacts of new emissions on the resources in our Class I areas. If you have any further questions regarding our comments on the Intercession City

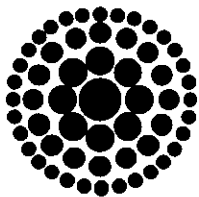
application or the guidelines for biological effects analyses,
please contact Ms. Tonnie Maniero of our Air Quality office in
Denver at 303/969-2071.

Sincerely yours,

A handwritten signature in cursive script that reads "John R. Eadie". The signature is written in black ink and is positioned above the typed name and title.

John R. Eadie
Acting Regional Director

cc:
Ms. Jewell Harper, Chief
Air Enforcement Branch
Air, Pesticides and Toxic Management Division
U.S. EPA, Region 4
345 Courtland Street, NE.
Atlanta, Georgia 30365



**Florida
Power**
CORPORATION

RECEIVED
JUL 20 1992
Division of Air
Resources Management

July 16, 1992

Mr. Preston Lewis
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Dear Mr. Lewis:

Re: Florida Power Corporation (FPC)
Intercession City Expansion
AC49-203114; PSD-FL-180

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P. Lewis
July 16, 1992
Page 3

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Permit Expiration Date

The permit expiration date is currently stated as March 31, 1994. As we discussed at our June 3, 1992 meeting, FPC requests an expiration date at least two years subsequent to final permit issuance.

If you should have any questions or comments on the above, please do not hesitate to contact me at (813) 866-5158. Your efforts to expedite the issuance of the final construction permit for this project would be greatly appreciated.

Sincerely,



Scott H. Osbourn
Sr. Environmental Engineer

Enclosure

cc: Clair Fancy, FDER

J. Helgen
C. Holladay
C. Collins, District
G. Harper, EPA
C. Shauer, NPS
CHF/PL

June 19, 1992

Mr. Dan Putnam, Jr.
Fuel Engineer
Florida Power Corporation
3201 34th Street, So.
St. Petersburg, FL 33733

Dear Mr. Putnam:

Confirming our conversation of today regarding my letter (copy attached) of April 29, 1992, to Ms. Teresa M. Heron of the Bureau of Air Regulation. This is to clarify the quoted sulfur range of .1 to .5% max.

The .1 - .5% max range was quoted only to indicate that the % sulfur of No. 2 fuel oil fluctuates within this range. Steuart Petroleum Company can only offer and guarantee No. 2 fuel oil with a sulfur content of .5% max.

Please let me know if there are any questions or if we may be of further assistance.

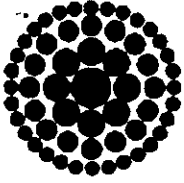
Sincerely,



Keith Hill
General Manager
Southern Marketing

EKH/hc

cc: Bob Bosman



**Florida
Power**
CORPORATION

June 19, 1992

RECEIVED

JUN 24 1992

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

Division of Air
Resources Management

Dear Mr. Fancy:

Re: Proof of Publication of the Notice of Intent to Issue the
Intercession City Construction Air Permit

Pursuant to Section 403.315, Florida Statutes and DER Rule 17-103.150, F.A.C., the Notice of Intent to Issue the Intercession City Construction Air Permit was published June 17, 1992 in the Orlando Sentinel. Enclosed is proof of this publication.

If you have any questions or require any additional information, please contact at (813) 866-5158.

Sincerely,

Scott Osbourn
Sr. Environmental Engineer

Enclosure

cc: S. Heron
C. Halladay
C. Collins
Q. Harper, EPA
C. Shaver, NPS

The Orlando Sentinel

Published Daily
Kissimmee, Osceola County, Florida

State of Florida / SS
COUNTY OF ORANGE

Before the undersigned authority personally appeared
CANDACE CODY

who on oath says that

she is the Legal Advertising Representative of The Orlando Sentinel, a Daily newspaper published at Kissimmee, in Osceola County, Florida; that the attached copy of advertisement,

being a NOTICE OF INTENT in the matter of
FOUR 92.9 Mw and TWO 185.5 SIMPLE CYCLE COMBUSTION

TURBINES in the Court,

was published in said newspaper in the issues of
JUNE 17, 1992

Affiant further says that the said The Orlando Sentinel is a newspaper published at Kissimmee, in said Osceola County, Florida, and that the said newspaper has heretofore been continuously published in said Osceola County, Florida, each Week Day and has been entered as second-class mail matter at the post office in Kissimmee in said Osceola County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Candace Cody

The foregoing instrument was acknowledged before me this 17 day of
JUNE 19 92 by CANDACE CODY

who is personally known to me and who did take an oath
Juanita Rosado
JUANITA ROSADO

Juanita Rosado
Notary Public, State of Florida
My commission expires June 18, 1994
Commission # 00022702

ADVERTISING CHARGE

\$27.22

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF INTENT TO ISSUE PERMIT

The Department of Environmental Regulation gives notice of its intent to issue a permit to Florida Power Corporation, 3201 34th Street South, St Petersburg, Florida 33733, to construct four 92.9 MW and two 185.5 simple cycle combustion turbines. A determination of Best Available Control Technology (BACT) was required. The nearest Class I area is the Chesnowitz National Wilderness Area which is located approximately 110 km away. The Class I sulfur dioxide PSD increment consumed is 19.3 vs. 25 allowable 3-hour average and 4.92 vs. 5 allowable 24-hour average and 0.46 vs. 2 allowable annual average, in micrograms per cubic meter. The Class II sulfur dioxide PSD increment consumed is 63.8 vs. 512 allowable 3-hour average, 17.1 vs. 91 allowable 24-hour average and 1.8 vs. 20 allowable annual average, in micrograms per cubic meter. The Class I particulate matter PSD increment consumed is less than 0.34 vs. 10 allowable 24-hour average and less than 0.02 vs. 5 allowable annual average, in micrograms per cubic meter. The Class II nitrogen dioxide increment consumed is less than 0.34 vs. 2.5 annual average, in micrograms per cubic meter. The maximum predicted increases in ambient concentrations for both particulate matter and nitrogen dioxide are less than significant in the Class II area surrounding the plant, thus no Class II increment consumption was calculated for these pollutants. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2800 Star Stone Road, Tallahassee, Florida 32308-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The petition shall contain the following information: (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in the Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207 F.A.C.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday except legal holidays, at: Department of Environmental Regulation
Bureau of Air Regulation
2800 Star Stone Road
Tallahassee, Florida 32308-2400
Department of Environmental Regulation
Central District
3318 Magnolia Blvd., Suite 232
Orlando, Florida 32803-3787
Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination. Further, a public hearing can be requested by any person. Such requests must be submitted within 30 days of this notice.
OSCR64014 June 17, 1992

FORM NO. AD-263



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

JUN 16 1992

RECEIVED

JUN 22 1992

Division of Air
Resources Management

4APT-AEB

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Florida Power Corporation/Intercession City Facility
(PSD-FL-180)

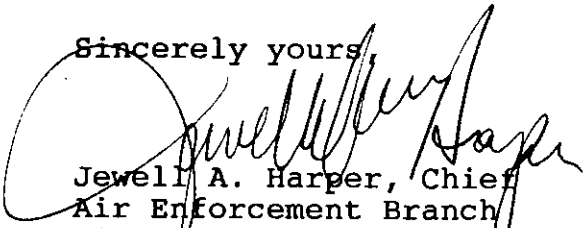
Dear Mr. Fancy:

This is to acknowledge receipt of your preliminary determination and draft Prevention of Significant Deterioration (PSD) permit for the above referenced facility's proposed construction, by your letter dated May 22, 1992. The facility will consist of six simple cycle combustion turbines, with an output power of 92.9 megawatts (four turbines) and 185.5 megawatts (two turbines). The turbines will be fired with No. 2 distillate fuel oil. The facility will be permitted as a peaking power facility, with an operating limitation of 3390 hours of operation per year for each turbine.

Your determination proposes to limit NO_x emissions through the use of maximum water injection, to limit SO₂ and H₂SO₄ emissions through limiting the sulfur content of the No. 2 distillate fuel oil, to limit CO and VOC emissions through the use of efficient combustion, to limit PM/PM₁₀ emissions through efficient combustion and the use of clean fuel, and to limit Be and As emissions through fuel quality.

We have reviewed the package as submitted and have no adverse comments. Thank you for the opportunity to review and comment on this package. If you have any questions or comments, please contact Mr. Scott Davis of my staff at (404) 347-5014.

Sincerely yours,


Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

cc: J. Nege
C. Halladay
C. Collins, E. Diet.
C. Shurr, NPS
K. Kosky, KBN
C/HF/PL



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30303

SOURCE EVALUATION UNIT
AIR ENFORCEMENT BRANCH
FACSIMILE TRANSMISSION SHEET
Fax Number: PPS 257-5207 or 404/347-5207

JUN 16 1992

DATE: _____ NUMBER OF PAGES (including this sheet) 2

TO: Clair Jancy PHONE: 904 488 1344

ADDRESS: EDER FAX NUMBER: 904 922 6979

FROM: Scott Davis PHONE: (404) 347-5014

If the following pages are received p:
at PPS 257-5014 or 404/347-5014

call Angela

SPECIAL INSTRUCTIONS FOR RECEIVER: _____

- cc: J. King
- C. Holloman
- C. Collins, C. List
- C. Shann, NPS
- R. Raskin, RIBU
- CHF/PL



Coastal
The Energy People

File Intercession City

May 26, 1992

Ms. Teresa Heron
Bureau of Air Regulation
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Fl. 32399-2400

Dear Ms. Heron,

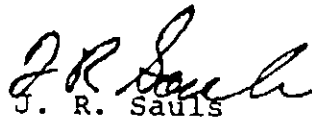
Per our conversation May 19, 1992, the lowest sulphur content of #6 fuel oil available from Coastal Fuels in Florida is 0.7% maximum.

Coastal's required maximum sulphur content for #2 fuel oil is 0.5%, which is the Florida specification. The additional cost to supply 0.3% is estimated to be \$0.01 per gallon and \$0.015 per gallon for 0.2% maximum, not including additional tankage and terminalling charges.

These charges would vary depending on volumes.

If you have any additional questions, please do not hesitate to call (813) 722-0593.

Kindest regards,


J. R. Sauls

Director, Major Accounts

JRS/bks

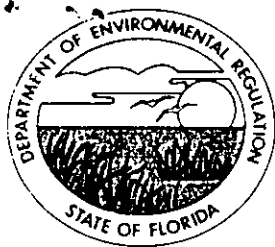
File 1.07.10.000.00 City

FLORIDA POWER CORPORATION - Debary Plant

#2 Combustion Turbine Specifications

		<u>ASTM Test Method</u>
Cetane (min.)	40	D-976
Flash Point (min.)	140 ⁰ F	D-93
Pour Point (max.)	20 ⁰ F	D-97
Water & Sediment % Volume (max.)	.05%	D-96
Carbon Residue on 10% bottoms (max.)	.25%	D-189
Distillation Points		
90% (min.)	540 ⁰ F	D-86
90% (max.)	650 ⁰ F	D-86
Viscosity @ 100 ⁰ F cs (min.)	2.0	D-88
(max.)	3.6	D-88
Ash wt. % (max.)	.01	D-482
Gravity api (min.)	30	D-287
Sulfur wt. % (max.)	.5	D-4294
Vanadium ppm (max.)	1.5	D-2788
Sodium + Potassium ppm (max.)	2	D-2788
Calcium ppm (max.)	4	D-2788
Lead ppm (max.)	1	D-2788
Btu/gal.		
Higher Heating Value (min.)	135,000	D-240
Lower Heating Value (min.)	not specified	D-240
DuPont Stability (max.)	4	N/A
Oxidation Stability		
mg/100 ml (max.)	2.5	D-2274
Fuel Bound Nitrogen	not specified	D-3228

TDP/dyt - 05/26/92



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

May 26, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. W. W. Vierday
Legal and Governmental Affairs
Florida Power Corporation
3201 34th Street South
St. Petersburg, FL 33733

Dear Mr. Vierday:

RE: Florida Power Corporation
Intercession City Facility
AC 49-203114, PSD-FL-180

Page 2 of 2 of the Notice of Intent to Issue Permit for the above referenced project contained an error concerning the number of days allowed for comments. Please replace that page with the enclosed Page 2 of 2. If you have any questions, please feel free to call me at 904/488-1344.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/pa

Enclosure

cc: Kennard Kosky, P.E.
Chuck Collins, C District
Jewell Harper, EPA
Chris Shaver, NPS
Julia Thomas, Fish & Wildlife

contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Central District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination. Further, a public hearing can be requested by any person. Such requests must be submitted within 30 days of this notice.

P 710 058 482



Certified Mail Receipt

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, June 1990

Sent to	
W W Vierday	
Street & No	
Fla Power Corp	
PO, State & ZIP Code	
St. Pete, FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	5-21-92
AC 49-203114	
P50-FL-180	

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

W.W. Vierday
Legal & Governmental Affairs
Fla. Power Corp
3201 34th St. S.
St. Petersburg, FL 33733

4a. Article Number

P 710 058 482

4b. Service Type

- | | |
|---|---|
| <input type="checkbox"/> Registered | <input type="checkbox"/> Insured |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Return Receipt for Merchandise |

7. Date of Delivery

MAY 29 1992

5. Signature (Addressee)

6. Signature (Agent)

[Handwritten Signature]

8. Addressee's Address (Only if requested and fee is paid)

RECEIPT