

Holtom, Jonathan

From: Carter, Kathy
Sent: Wednesday, October 09, 2002 4:32 PM
To: Holtom, Jonathan
Cc: Chisolm, Jack
Subject: extension request

Jonathan:

OGC received a request for extension of time from Florida Power Corp. (0970014-007-AV). Jack Chisolm will assign.

Kathy C. Carter

Agency Clerk for the
Department of Environmental Protection
Office of General Counsel
#SC205-2212 FAX SC205-2303
(850) 245-2212 Fax 245-2303
Kathy.Carter@dep.state.fl.us



September 25, 2002

RECEIVED
SEP 27 2002

Mr. Scott Sheplak, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation, Title V Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

BUREAU OF AIR REGULATION

Re: Intercession City Facility
Title V Permit Renewal Application
File No.: 0970014-007-AV
Response to Request for Additional Information

Dear Mr. Sheplak:

In regards to your letter dated August 13, 2002 requesting additional information related to the above referenced application, please see the response below. The two items noted in the August 13th letter are repeated for clarity.

Item 1

The Acid Rain application that was submitted with the Title V renewal application was not a current application. Your updated Acid Rain application was received on August 7, 2002.

Response:

As noted, this information was previously provided. No additional response is required.

Item 2

CT 7 through 11 are subject to Subpart GG, which requires water-to-fuel monitoring when water injection is used to control NOx emissions. Your application states that the use of the Acid Rain NOx CEMS satisfies the requirements of Continuous Assurance Monitoring (CAM). Pursuant to 40 CFR 64.2(b)(vi), continuous emissions monitoring can provide an exemption for CAM if the continuous emissions monitor is required for a continuous demonstration of compliance, and not just for monitoring purposes. Because your NOx CEMS is not currently required (for these units) for continuous compliance, it does not provide the intended exemption from CAM applicability. Please provide either a certified statement that you wish to have your Acid Rain NOx CEMS imposed as a continuous compliance determination method or provide a complete CAM plan submittal for the referenced CTs.

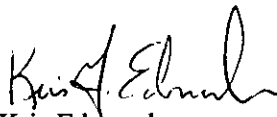
Response:

Florida Power is willing to accept the use of the existing Acid Rain NOx CEMS as the continuous compliance determination method for Units P7-P11, in lieu of annual compliance testing, provided that the averaging time of the CEMS data is based on a 24-hour block (midnight-to-midnight) average and that provisions to exclude inappropriate data (startup, shutdown, malfunction, etc.) from the average are allowed. Monitoring conditions similar to those that currently exist in Permit PSD-FL-268A for Units P12-P14 at this facility are requested.

If the appropriate conditions related to the incorporation of the NOx CEMS as the continuous compliance methodology for Units P7-P11 cannot be agreed upon, Florida Power will submit a CAM Plan to address these units.

If you have any questions regarding any of the information, please contact Jamie Hunter at (727) 826-4363.

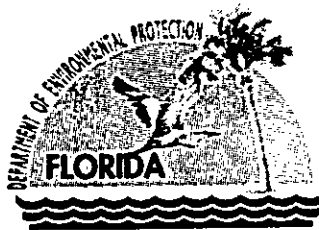
Sincerely,



Kris Edmondson
Plant Manager/Responsible Official

c: Jonathan Holtom, P.E., FDEP – Tallahassee Office
Leonard Kozlov, FDEP - Central District Office
Ken Kosky, P.E., Golder Associates Inc.

jhb/JH044



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

August 13, 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Martin J. Drango, P.E., Plant Manager
Florida Power / Progress Energy
6525 Osceola Polk County Line Road
Intercession City, Florida 33848

Re: Request for Additional Information Regarding Title V Permit Renewal Application
File No.: 0970014-007-AV
Intercession City Facility

Dear Mr. Drango:

The Title V permit renewal application for the Intercession City Facility was received in a timely manner (July 1, 2002). However, in order to continue processing this application, the Department is requesting the additional information outlined below. Should your response to any of the listed items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. The Acid Rain application that was submitted with the Title V renewal application was not a current application. Your updated Acid Rain application was received on August 7, 2002.
2. CT 7 through CT 11 are subject to Subpart GG, which requires water-to-fuel monitoring when water injection is used to control NO_x emissions. Your application states that the use of the Acid Rain NO_x CEMS satisfies the requirements of Compliance Assurance Monitoring (CAM). Pursuant to 40 CFR 64.2(b)(vi), continuous emissions monitoring can provide an exemption from CAM if the continuous emissions monitor is required for a continuous demonstration of compliance, and not just for monitoring purposes. Because your NO_x CEMS is not currently required (for these units) for continuous compliance, it does not provide the intended exemption from CAM applicability. Please provide either a certified statement that you wish to have your Acid Rain NO_x CEMS imposed as a continuous compliance determination method or provide a complete CAM plan submittal for the referenced CTs.

The above comments require a written response to the Department within ninety days of receipt of this notice unless additional time is requested pursuant to Rule 62-213.420(1)(b)6., F.A.C. If you should have any questions, please contact Jonathan Holtom, P.E., at (850) 921-9531, or me at (850) 921-9532.

Sincerely,

Scott M. Sheplak, P.E.
Administrator
Title V Section

SMS/jh

CC: Mr. Kennard F. Kosky, P.E., Golder Associates
Mr. Jamie Hunter, Florida Power
Mr. Len Kozlov, DEP, Central District Office

"More Protection, Less Process"

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Received by (Please Print Clearly) <i>Sandra Durston</i> B. Date of Delivery <i>8-19-02</i></p>
<p>1. Article Addressed to:</p> <p>Mr. Martin J. Drango, P.E. Plant Manager Florida Power/Progress Energy 6525 Osceola Polk County Line Road Intercession City, Florida 33848</p>	<p>C. Signature <i>X Sandra Durston</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>
<p>2. Article Number (Copy from service label) 7000 0600 0021 6524 3363</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <i>X No</i> <i>POB 4368</i></p>
<p>PS Form 3811, July 1999</p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>Domestic Return Receipt</p>	<p>102595-00-M-0952</p>

U.S. Postal Service CERTIFIED MAIL RECEIPT <i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
7000 0600 0021 6524 3363	<p>Article Sent To: <i>Mr. Martin J. Drango, P.E.</i></p>
<p>Postage \$</p> <p>Certified Fee</p> <p>Return Receipt Fee (Endorsement Required)</p> <p>Restricted Delivery Fee (Endorsement Required)</p> <p>Total Postage & Fees \$</p>	<p>Postmark Here</p>
<p>Name (Please Print Clearly) (to be completed by mailer) <i>Mr. Martin J. Drango, P.E.</i> Street, Apt. No., or PO Box No. <i>6525 Osceola Polk County Line Road</i> City, State, ZIP+4 <i>Intercession City, Florida 33848</i></p>	
<p>PS Form 3800, July 1999</p>	<p>See Reverse for Instructions</p>

Jan 20
S/H
7/15



Department of Environmental Protection

Division of Air Resource Management RESPONSIBLE OFFICIAL NOTIFICATION FORM

Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.

Identification of Facility

1. Facility Owner/Company Name: Florida Power Corporation	
2. Site Name: Intercession City Plant	3. County: Osceola County
4. Title V Air Operation Permit/Project No. (leave blank for initial Title V applications): 970014-004-AV	

Notification Type (Check one or more)

<input type="checkbox"/> INITIAL:	Notification of responsible officials for an initial Title V application.
<input type="checkbox"/> RENEWAL:	Notification of responsible officials for a renewal Title V application.
<input checked="" type="checkbox"/> CHANGE:	Notification of change in responsible official(s). Effective date of change in responsible official(s) <u>July 8, 2002</u>

Primary Responsible Official

1. Name and Position Title of Responsible Official: Kris Edmondson – Plant Manger Central CT Sites
2. Responsible Official Mailing Address: Organization/Firm: Florida Power Corporation Street Address: 100 Central Avenue City: St. Petersburg State: FL MAC: IC44 Zip Code: 33701
3. Responsible Official Telephone Numbers: Telephone: (863)679-3020 Fax: (863)679-3055
4. Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

5. Responsible Official Statement:

I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.

Kristi Edrle

Signature

July 12, 2002

Date

Additional Responsible Official

1. Name and Position Title of Responsible Official: William Dudley, Production Manager – CT
2. Responsible Official Mailing Address: Organization/Firm: Florida Power Corporation Street Address: 100 Central Avenue MAC: IC44 City: St. Petersburg State: FL Zip Code: 33701
3. Responsible Official Telephone Numbers: Telephone: (863) 679-3030 Fax: (863) 679-3055
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

Additional Responsible Official

1. Name and Position Title of Responsible Official: David Sorrick, General Manager CT Operations, Florida
2. Responsible Official Mailing Address: Organization/Firm: Florida Power Corporation Street Address: 100 Central Avenue MAC: BB1C City: St. Petersburg State: FL Zip Code: 33701
3. Responsible Official Telephone Numbers: Telephone: (727)826-4026 Fax: (727)826-4222
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

Additional Responsible Official

1. Name and Position Title of Responsible Official: J. Michael Kennedy, Manager, Air Programs, DR
2. Responsible Official Mailing Address: Organization/Firm: Florida Power Corporation Street Address: 100 Central Avenue MAC: BB1A City: St. Petersburg State: FL Zip Code: 33701
3. Responsible Official Telephone Numbers: Telephone: (727) 826-9334 Fax: (727) 826-4216
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input checked="" type="checkbox"/> The designated representative at an Acid Rain source.



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JUL 15 2002

DIVISION OF AIR
RESOURCES MANAGEMENT

July 12, 2002

Mr. Howard Rhodes, Director
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Rd. MS 5500
Tallahassee, FL 32399-2400

Subject: Responsible Official Notification Form

Dear Mr. Rhodes:

On July 10, 2002 Mr. Habermeyer, Jr. President & Chief Executive Officer of Florida Power Corp. sent you a letter delegating me as a Title V Primary Responsible Official. As indicated in Mr. Habermeyer's letter I am attaching the Responsible Official Notification Forms.

If you have any questions, please contact me at (863) 679-3020.

Very truly yours,

Kris G. Edmondson
Plant Manager Central CT Sites

Attachment

c: Mr. Ron Blackburn (FL-DEP)
Mr. William Dudley
Mr. J. Michael Kennedy
Mr. Leonard Kozlov (FL-DEP)
Mr. David Sorrick
Mr. Scott Sheplak, (FL-DEP)



Department of Environmental Protection

Division of Air Resource Management

RESPONSIBLE OFFICIAL NOTIFICATION FORM

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2. Site Name: Intercession City Plant	3. County: Osceola County
4. Title V Air Operation Permit/Project No. <i>(leave blank for initial Title V applications):</i> 970014-004-AV	

Notification Type *(Check one or more)*

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Kristi A. Edrington

Signature

July 12, 2002

Date

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JUL 16 2002

BUREAU OF AIR REGULATION

July 11, 2002

Mr. Scott Sheplak, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation, Title V Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

0970014-005-AV

Re: WITHDRAW OF TITLE V PERMIT REVISION REQUEST
INTERCESSION CITY FACILITY NO. 0970014 - FLORIDA POWER

Dear Mr. Sheplak:

In response to your letter dated June 6, 2002 regarding the status of additional information previously requested by the Department related to the 2001 Title V revision request, please note that Florida Power wishes to formally withdraw the requested revision. In lieu of pursuing the requested changes through the original modification request, Florida Power is currently seeking the changes in conjunction with the recently filed Title V permit renewal application for the facility.

If you have any questions regarding any of the information, please contact me at (727) 826-4363.

Sincerely,

Jamie Hunter
Lead Environmental Specialist

c: Tom Cascio, FDEP - Tallahassee

jjh/JJH039



June 27, 2002

RECEIVED

JUL 01 2002

BUREAU OF AIR REGULATION

Mr. Scott Sheplak, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation, Title V Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: SUBMITTAL OF TITLE V PERMIT RENEWAL APPLICATION
INTERCESSION CITY FACILITY NO. 0970014 - FLORIDA POWER

Dear Mr. Sheplak:

Enclosed for your review is an original and three copies of the Title V application for Florida Power's Intercession City Facility. An additional copy has been sent to the FDEP's Central District Office.

The following is a requested permit change for the reporting of excess emissions:

Permit No. 0970014-004-AV Conditions III.B.13 currently reads:

B.13.

The permittee shall operate a continuous monitoring system (CMS) to monitor and record the fuel consumption and the ratio of water to fuel being fired in each turbine. This system shall be accurate to within ± 5.0 percent and shall be approved by the Administrator. [40 CFR 60.334(a)]

Florida Power is requesting that Condition III.B.13 be amended to read:

B.13.

a. The NO_x CEM data may be used in lieu of the monitoring system for water-to-fuel ratio and the reporting of excess emissions in accordance with 40 CFR 60.334(c)(1), Subpart GG. Subject to EPA approval, the calibration of the water-to-fuel ratio-monitoring device required in 40 CFR 60.335(c)(2) will be replaced by the 40 CFR 75 certification tests of the NO_x CEMS.


b. The NO_x CEM data shall be used in lieu of the requirement for reporting excess emissions in accordance with 40 CFR 60.334(c)(1), Subpart GG.

c. When requested by the Department, the CEMS emission rates for NO_x on this unit shall be corrected to ISO conditions to demonstrate compliance with the NO_x standard established in 40 CFR 60.332.

d. For the purposes of reporting excess emissions pursuant to 40 CFR 60.334(c)(1), 24-hour block average concentrations of the NO_x emission limits expressed in ppmvd @ 15% O₂ dry basis shall be used.

If you have any questions regarding any of the information contained in this application, please do not hesitate to contact Cal Ogburn at (919) 362-3585 or Jamie Hunter at (727) 826-4363.

Sincerely,

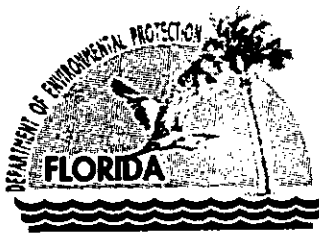

Martin J. Drango, P.E.
Plant Manager/Responsible Official

Enclosures

c: Leonard Kozlov, DEP Central District (w/enc)
Ken Kosky, Golder Associates Inc.

jhb/JJH037

enclosures



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

June 6, 2002

Mr. Jamie Hunter
Lead Environmental Specialist
Florida Power Corporation
P.O. Box 14042
St. Petersburg, FL 33733

Dear Mr. Hunter:

In our letter to Martin Drango dated July 19, 2001, we indicated certain incompleteness items needed to process your Company's application for a Title V Permit Revision for the **Intercession City Plant** (Facility ID 0970014). However, to date, we have not received a written response. Please note that Rule 62-4.055(1), F.A.C., requires a response to requests for information within 90 days.

If you wish to further pursue this permitting action, please provide the needed information within 30 days of receipt of this letter. Alternately, you could formally withdraw the application, thus avoiding the need for us to *deny the request for the revision to the permit*.

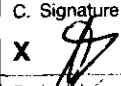
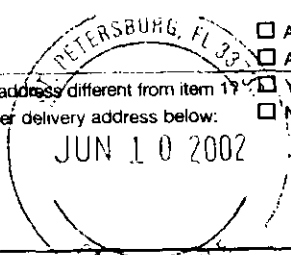
Please call Tom Cascio at 850-921-9526 if you need to discuss this matter further.

Sincerely,

Scott M. Sheplak, P.E.
Administrator
Title V Section

"More Protection, Less Process"

Printed on recycled paper.

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Received by (Please Print Clearly)	B. Date of Delivery
<p>1. Article Addressed to:</p> <p>Mr. Jamie Hunter Lead Environmental Specialist Florida Power Corporation P.O. Box 14042 St. Petersburg, FL 33733</p>	C. Signature 	<input 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 	
	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	

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U.S. Postal Service
CERTIFIED MAIL RECEIPT
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Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	

Sent To: **Jamie Hunter**

Street, Apt. No., or P.O. Box: **Box 14042**

City, State, ZIP+4: **St. Petersburg, FL 33733**

PS Form 3800, January 2001
See Reverse for Instructions