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09/03/97

5 INVOICE NO.
798840001

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6 DATE	7 REFERENCE NUMBER	8 10 9 11	DESCRIPTION	12 AD SIZE	13 RATE	14 AMOUNT DUE
09/03	WO#471967301 INV#798840001	530342	PUBLIC NOTICE OF INTENT SII101702832 LEGL 1 XTRA AFFIDAVI	LLOC 2X1125 22.50	18.40	414.00
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ATTN SHAROLYN WOOD MS 5500
2600 BLAIR STONE RD
TALLHASSEE FL 323992400

16 BILLED ACCOUNT NO. 043637205 004465011401	17 DATE 09/03/97	18 DOCUMENT NO. 21
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Sentinel Communications

publisher of
THE ORLANDO SENTINEL
633 NORTH ORANGE AVENUE
ORLANDO, FLORIDA 32801
LEGAL ADVERTISING

The Orlando Sentinel

Published Daily

State of Florida } S.S.
COUNTY OF ORANGE

Before the undersigned authority personally appeared Beverly Simmons, who on oath says that he/she is the Legal Advertising Representative of The Orlando Sentinel, a daily newspaper published at Orlando in Orange County, Florida; that the attached copy of advertisement, being a Public Notice of Intent to Issue Title V Air Operation Permit in the Orange Court, was published in said newspaper in the issue of 9/3/97

Affiant further says that the said Orlando Sentinel is a newspaper published at Orlando in said Orange County, Florida, and that the said newspaper has heretofore been continuously published in said Orlando County, Florida, each Week Day and has been entered as second-class mail matter at the post office in Orlando in said Orange 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.

The foregoing instrument was acknowledged before me this 16th day of October, 19 97, by Beverly Simmons who is personally known to me and who did take an oath.



JULIA NICHOLS
My Comm. Exp. 9/23/2001
Bonded By Service Ins
No. 0683016
[] Personally Known [] Other I.C.

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT STATE OF FLORIDA DEPARTMENT OF ENVIRONMENT PROTECTION TITLE DV DRAFT Permit No. 0970014-001-AV Intercession City Plant Osceola County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Florida Power Corporation for the Intercessions City Plant located at 6525 Osceola Polk County Line Road, Intercession City, Osceola County. The applicant's name and address are: Florida Power Corporation, 3201 34th Street South, St. Petersburg, Florida, 33711. The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition of an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573 F.S. will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Section 120.569 and 120.57 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 of Environmental Protection, 1900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-8000 (Telephone 904/488-7070; Fax

904/487-4938). Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver to that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding, and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code. A petition must contain the following information:

- The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
- A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
- A statement of the material facts disputed by the petitioner, if any;
- A statement of the facts that the petitioner contends warrant a reversal or modification of the permitting authority's action or proposed action;
- A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and
- A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d (b) (2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day per public comment period provided in this notice, unless the petitioner demonstrated to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 410 M. Street, SW, Washington DC 20460.

A complete project file 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:

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4,
Tallahassee, Florida 32301
Telephone: 850/488-1344
Fax 850/922-6979

Affected District
Department of Environmental Protection
Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767
Telephone: 407/894-7555
Fax: 407/897-2966

The complete project file includes the DRAFT Permit, the application and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/488-1344 for additional information.

COR1702832

SEPTEMBER 3, 1997



October 2, 1997

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

RECEIVED

OCT 06 1997

BUREAU OF
AIR REGULATION

Dear Ms. Carter:

RE: Florida Power Corporation, Intercession City Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 0970014-001-AV

On August 22, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. Mr. Scott Osbourn of my staff has had discussions with Mr. Bruce Mitchell of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including October 10, 1997.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Pardue", written over a circular stamp.

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

A handwritten signature in black ink that reads "Robert A. Manning".

Robert A. Manning, Esq. *farm*
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP

10/9/97 *Scott Sheplak*
Charles Poljan



RECEIVED
SEP 24 1997
BUREAU OF
AIR REGULATION

September 19, 1997

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

Dear Ms. Carter:

RE: Florida Power Corporation, Intercession City Plant
REQUEST FOR EXTENSION OF TIME on Intent to Issue Title V Air Operation Permit
Draft Permit No. 0970014-001-AV

On August 22, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. Department representatives previously agreed to an extension of time to file a petition until September 19, 1997. Mr. Robert Manning (attorney for FPC) has had discussions with Mr. Scott Sheplak with the Department who agreed that an extension of time for 14 more days to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing on the draft Title V permit under Sections 120.569 and 120.57, Fla. Stat., up to and including October 3, 1997.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue", written over a circular scribble.

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP

9/25/97 Charles Fogar



September 17, 1997

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

Dear Mr. Sheplak:

RE: Florida Power Corporation, Intercession City Plant
DRAFT Title V Permit No. 0970014-001-AV

On behalf of Florida Power Corporation (FPC), attached are comments regarding the DRAFT Title V permit for the Intercession City Plant as identified above. FPC appreciates the Department's efforts in processing this permit and understands the need to resolve these issues in as timely a manner as possible. In this regard, DEP agreed to grant FPC's Request for Extension of Time until September 19, 1997. If we are unable to reach a resolution of these comments within this time period, we would appreciate the opportunity to file a second Request for Extension of Time.

Please contact me at (813) 866-5158 as soon as you have had a chance to review these comments to set up either a telephone or in-person conference. Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Osbourn", is written over a horizontal line.

Scott H. Osbourn
Senior Environmental Engineer

cc: Clair Fancy, P.E., DEP
9/22/97 Charles Logan, DEP
Ken Kosky, P.E., Golder
Robert Manning, HGSS

RECEIVED

SEP 22 1997

BUREAU OF
AIR REGULATION

**FLORIDA POWER CORPORATION
COMMENTS ON DRAFT TITLE V PERMIT
INTERCESSION CITY PLANT**

General Comments

1. FPC understands that Appendix TV-1, Title V Conditions, may continue to be revised. FPC requests that its Title V permit reflect the most up-to-date version of this Appendix.

2. FPC understands that DEP will publish the Intent to Issue Title V Air Operation Permit. Because the applicant is ultimately responsible for the publication of the Intent to Issue, FPC requests that DEP provide a copy of the Notice intended to be published, as well as proof of publication.

Section I., Facility Information, Subsection A.

1. The description states that the FPC's Title V application for the Intercession City Plant was received on "June 18, 1996." The correct submittal date was "June 14, 1996."

Section II., Facility-wide Conditions.

1. Condition 2. The word "not" was apparently inadvertently added, and should be deleted from, the second line of this Condition.

2. Condition 3. For clarity and to make this Condition specific to FPC's Intercession City Plant, FPC requests that Condition 2. be edited as follows:

~~Except as otherwise provided in this permit for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause~~

Also, because the reference to Chapter 62-297 in the last sentence of Condition 2. appears to be misplaced, FPC requests Condition 2. be edited as follows: **"EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C."**

3. Condition 6. In the context of this permit, how does DEP intend to respond to EPA's comments regarding the need to change the phrase "exempt" to "insignificant"?

4. Condition 7. For clarity, FPC requests that the first sentence of this Condition be edited as follows: **"The permittee shall not allow no person to store, pump,"** Also, because this condition is not included in Florida's SIP (based on our research), and to be consistent with other permits issued by DEP, this condition should be marked as "Not Federally Enforceable."

Section III. Subsection A.

1. For clarity, FPC requests the following revision to the description: (fourth line) "These units are not subject to ~~any~~ the following federal requirements, NSPS - 40 CFR 60"

2. Condition A.5. FPC requests that this Condition be deleted because it is redundant to Condition 3., and there is no other authority for making this a unit-specific applicable requirement.

3. Condition A.12. The ASTM methods should be updated as follows to reflect the current methods: ". . . ASTM D4292-90 (1995), or both ASTM D4057-88 and ASTM D 129-91 95, or the latest edition(s)."

4. Condition A.13. For clarity, the first clause in this condition ("When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method") should be deleted because the permit specifies EPA Method 9, pursuant to Condition A.10.

5. Condition A.14. Because there is an applicable standard for visible emissions, paragraph (a)4.a. should be edited as follows: "**Visible emissions, ~~if there is an applicable standard.~~**"

Section III. Subsection B.

1. FPC requests that the description be edited as follows: (second line) "of ~~92.9~~ 96.3 megawatts/CT and 171 megawatts/CT, respectively. . . ." Also, the description should be revised to clarify that the Seimens unit began commercial operation in 1996, instead of 1994.

2. Condition B.1. As reflected in comment 1. above, the generator nameplate rating should be 96.3, instead of 92.9.

3. Condition B.3. FPC requests that the second sentence of this Condition (which imposes a gallons per hour limit on fuel oil consumption) be deleted because the sulfur dioxide emissions are already sufficiently limited by the imposition of a maximum heat input limit, an hours of operation limit, and a fuel oil sulfur limit.

4. Condition B.4. This Condition incorrectly places a unit-specific limit on hours of operation, whereas the existing permit imposes an aggregate limit. Accordingly, FPC requests the first sentence of this Condition be deleted and the following sentence added: "Total hours of operation for all units contained in this Subsection B. shall not exceed 16,950 hours per year.

5. Condition B.5. This Condition does not contain any citation as to the authority for its inclusion in the permit. This citation should include AC 49-303114/PSD-FL-180(A).

6. Conditions B.7. and B.8. These units should not be subject to individual tons per year emission limitations. The tons per year number listed in Table 1 of the PSD permit was an "aggregate" number; individual units' annual emissions were limited only by the fact that they could not emit, in combination with the other three CT's, emissions in excess of the aggregate annual limits. Accordingly, the individual tpy limits for NO_x, SO₂, PM/PM₁₀, VOC, CO, and SAM in Conditions B.7. - B.12. should be deleted and an aggregate limit for all four units for each of these pollutants should be inserted.

7. Condition B.7. The standard for the H₂SO₄ (New No.2 F.O. - max. 0.2% by wt.) should be revised to be listed under oil usage, and not for gas.

8. Condition B.14. In accordance with FPC's letter to the Department dated September 10, 1997, FPC requests that this Condition be revised to include the following: "The permittee shall monitor sulfur content of the natural gas in accordance with the customized fuel monitoring schedule in Attachment __. Monitoring of the natural gas sulfur content is not required."

9. Conditions B.16. through B.20. The citation to Rule 62-296.320(4)(b)4.a. is incorrect and should be deleted. Also, the citation to AC 49-20311/PSD-FL-180(A) should be included in each of these Conditions.

10. Condition B.20. and B.29. Based on a previous amendment to the construction permit, VOC testing is not required so long as compliance with the CO limit is demonstrated. These Conditions should be revised accordingly.

11. Condition B.24. The reference to sulfur dioxide in this Condition should be deleted because the equation for sulfur dioxide is not included. Also, paragraph (b) of this Condition should be deleted because it only applies to the initial performance test.

12. Condition B.25. For clarity, FPC requests the following revision: "The permittee shall determine compliance with the sulfur content standard in 40 CFR 60.333(b) as follows: ASTM D2880-96 or the latest edition shall be used . . . and ASTM D1072-90(94)E-1, D 3031-81(86), D 4084-94, or D 3246-92 or the latest edition(s) shall be used for the sulfur content of gaseous fuels [incorporated by reference in 40 CFR 60.17]."

13. Condition B.28. In accordance with PSD-FL-180(A), this Condition should be revised to include the heat input/temperature curves.

14. Condition B.29. Paragraph (a)4.a. of this Condition should be revised to reflect the additional limits beyond visible emissions applicable to this unit.

15. Condition B.30. For clarity, the first clause in paragraph (a)2. of this Condition ("When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method") should be deleted because the permit specifies EPA Method 9, pursuant to Condition B.17.

16. Condition B.38. FPC requests that this Condition clarify that, in accordance with 40 CFR § 60.332(a), the determination of periods of excess emissions for nitrogen oxides take into account the fuel-bound nitrogen content of the fuel being fired. Also, in paragraph b., the sulfur content was incorrectly listed as 0.05. FPC requests that this sulfur content be corrected to 0.2.

Section IV. Acid Rain Part

1. Condition 1.a. should reference the actual application that FPC submitted rather than DEP's form number.

2. Condition 4. This Condition should be moved to the facility-wide section of this permit because it applies to every unit and every applicable requirement, not just to the Acid Rain requirements.

Table 1-1, Air Pollutant Emission Allowables and Terms

1. The citation to Rule 62-212.400(6), F.A.C. is incorrect because these limits are not BACT limits.

Tables 1-2 and 1-3, Air Pollutant Emission Allowables and Terms

1. This Table should be edited in accordance with the specific comments made above. For example, for Units 7-10, the hours of operation per year limitation (per unit) should be deleted, and the tons per year emission limits should be listed as an aggregate tons per year limit, and not an individual unit tons per year limit.

Table 2-1, Compliance Testing Requirements

1. This Table should be edited in accordance with the specific comments made above. For example, the specific requirements regarding PM and VOC testing should be included. Also, the citation to Condition B.4. does not make sense.



September 5, 1997

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
2600 Blair Stone Rd
Tallahassee, FL 32399-2400

Dear Ms. Carter:

RE: Florida Power Corporation, Intercession City Plant
REQUEST FOR EXTENSION OF TIME on Intent to Issue Title V Air Operation Permit
Draft Permit No. 0970014-001-AV

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If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

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W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

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Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP /
Charles Logan, DEP