



# Progress Energy

November 30, 2007

RECEIVED

DEC 06 2007

BUREAU OF AIR REGULATION

Mr. Al Linero, P.E.  
DEP/DARM  
South Permitting Section  
Division of Air Resource Management  
2600 Blair Stone Road MS 5500  
Tallahassee, Florida 32399-2400

Re: Air Construction Permit No. 0970014-012-AC  
Title V Permit No. 0970014-011-AV Revision  
Progress Energy Florida—Intercession City Power Plant  
Request for Additional Information—Combustion Turbine Nos. 12, 13 and 14

Dear Mr. Linero:

Progress Energy Florida (PEF) is in receipt of the Department's Request for Additional Information (RAI) dated October 10, 2007. The RAI requests additional information related to PEF's requests for additional time for periods of excess emissions during startups, shutdowns and malfunctions, as well as related to the request for a 24-hour averaging period associated with the current heat input limits. This letter serves to notify the Department that PEF is withdrawing the request relating to the heat input limit. Therefore, the responses provided herein are only in relation to the excess emissions issue.

Item 1 of the Department's letter requests additional information to support the rationale for our request for additional time periods of excess emissions during startups, shutdowns and malfunctions. PEF is providing Attachment A, which summarizes the operation of combustion turbine (CT) Nos. 12, 13 and 14 from January 1 to December 31, 2006. Highlighted in yellow are the number of times that these CTs operated twice in one day. This typically occurs during the winter months. The first start up and shut down cycle is required by system demand, when our customers wake up and start their day. The second cycle occurs during the evening, at the end of the day.

The number to the left of the highlighted section indicates the number of hours that have been excluded for start up or shut down. These hours are excluded as they are in excess of the 24-hour average NO<sub>x</sub> limit of 10 ppmvd, corrected to 15 percent O<sub>2</sub>.

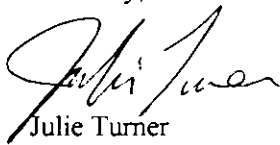
As an example, refer to Attachment B for an illustration of the operating cycle on February 13, 2006. The unit started up at hour 5 and shut down at hour 8 to meet the morning peak demand. The unit again operated at hour 21 and shut down at hour 22 to meet the evening demand. The permit allows a maximum exclusion of four hours. As you can see in this example, we have excluded four hours for startup and shut down. If these CTs were to have a malfunction (for example at hour 07), PEF would not be able to exclude the

Mr. Linero  
November 30, 2007  
Page 2

malfunction hour and would have a violation of the 24-hour average daily NOx limit of 10 ppmvd, corrected to 15 percent O<sub>2</sub>. In order to avoid a violation for a malfunction event, PEF is requesting that the permit allow for an additional two hours for malfunctions, as requested in our permit application (refer to Attachment C).

As this response letter is in relation to the Department's request for additional information of an engineering nature, a professional engineer certification form, as well as a certification form completed by the facility's responsible official, accompanies this submittal. If you should have any questions regarding this response, please contact Mr. Dave Meyer at (727) 820-5295. Thank you in advance for your timely consideration of this permit revision request.

Sincerely,

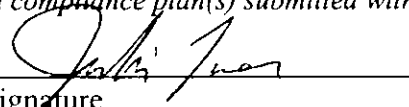


Julie Turner  
Plant Manager and Responsible Official

## APPLICATION INFORMATION


### Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

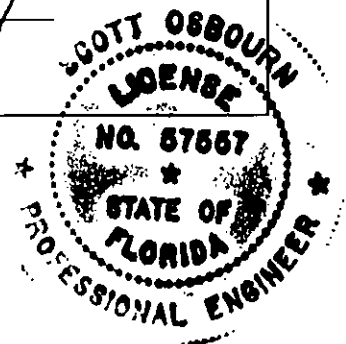
1. Application Responsible Official Name: <b>Julie Turner</b>
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation 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.
3. Application Responsible Official Mailing Address... Organization/Firm: <b>Florida Power Corporation dba Progress Energy Florida</b> Street Address: <b>6525 Osceola-Polk County Line Road</b> City: <b>Intercession City</b> State: <b>Osceola</b> Zip Code: <b>33848</b>
4. Application Responsible Official Telephone Numbers... Telephone: <b>(863) 679-3020</b> ext. Fax: ( ) -
5. Application Responsible Official Email Address: <b>Julie.Turner@gpnmail.com</b>
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature  Date <u>11/30/07</u>

# APPLICATION INFORMATION

## Professional Engineer Certification

1. Professional Engineer Name: <b>Scott Osbourn, Senior Consultant</b> Registration Number: <b>57557</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Golder Associates, Inc.*</b> Street Address: <b>5100 Lemon Street, Suite 114</b> City: <b>Tampa</b> State: <b>FL</b> Zip Code: <b>33609</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(813) 287 - 1717</b> ext. <b>211</b> Fax: <b>(813) 287 - 1716</b>
4. Professional Engineer Email Address: <b>sosbourn@golder.com</b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature <u></u> Date <u>11/16/07</u> (seal)

\* Board of Professional Engineers Certificate of Authorization No. 000016





TCP P12 L52GX = "CLOSED" and PreValTCP P12 L52GX="OPEN" and TCP P12 TNH = 5  
TCP P12 L52GX

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3	07-Jan-06 06 20 34	CLOSED											01-A
	07-Jan-06 21 00 32	CLOSED											02-A
	06-Jan-06 04 26 22	CLOSED											03-A
	06-Jan-06 05 19 04	CLOSED											04-A
3	10-Jan-06 06 50 56	CLOSED											05-A
	10-Jan-06 18 16 04	CLOSED											06-A
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P13

ICP P13 L52GX="CLOSED" and PrevVal(ICP P13 L52GX)="OPEN" and ICP P13 TNH > 5  
ICP P13 L52GX

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													26-Jul-06 10:41:46	CLOSED
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													28-Jul-06 10:45:14	CLOSED
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													30-Jul-06 11:39:04	CLOSED
													31-Jul-06 11:53:22	CLOSED

Attachment

P14

P14

1/1/2006		2/1/2006		3/1/2006		4/1/2006		5/1/2006		6/1/2006		7/1/2006		8/1/2006		Num]
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											30-May-06 12 48 20 CLOSED		30-Jun-06 10 33 12 CLOSED		23-Jul-06 13 02 04 CLOSED	21-A
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															30-Jul-06 11 48 12 CLOSED	28-A
															31-Jul-06 11 53 12 CLOSED	29-A
																31-Au

Attachment A



P12

X Reports

Report Date: 02/13/2006

Created: 10/23/2007 09:15

HOUR	EMISSIONS FROM GAS FUEL ppmvd @ 15% O2	EMISSIONS FROM OIL FUEL ppmvd @ 15% O2	EXCEEDS VALUE	EX	EXCLUSION JUSTIFICATION
00	Off-Line				
01	Off-Line				
02	Off-Line				
03	Off-Line				
04	Off-Line				
05	46.291		Y	Y	Startup
06	8.590			N	
07	8.155			N	
08	15.309		Y	Y	Shutdown
09	Off-Line				
10	Off-Line				
11	Off-Line				
12	Off-Line				
13	Off-Line				
14	Off-Line				
15	Off-Line				
16	Off-Line				
17	Off-Line				
18	Off-Line				
19	Off-Line				
20	Off-Line				
21	19.685		Y	Y	Startup
22	12.234		Y	Y	Shutdown
23	Off-Line				

DAILY  
AVERAGES: 8.373 0.000

LIMITS: 10.049 42.049

--More--(92X)[Hit space to continue, Del to abort]

Attachment B

~~60.332 by the performance test required in 40 CFR 60.8 or any period during which the fuel bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by the fuel bound nitrogen allowance used during the performance test required in 40 CFR 60.8. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, gas turbine load, and nitrogen content of the fuel during the period of excess emissions, and the graphs or figures developed under 40 CFR 60.335(a).~~

~~{Permitting Note: A properly installed and maintained NO<sub>x</sub> CEMS may be used as an acceptable alternative to measure periods of excess emissions.}~~

**B.41. Alternate Standards and NO<sub>x</sub> CEMS Data Exclusion:** The following permit conditions establish alternate standards or allow the exclusion of monitoring data for specifically defined periods of startup, shutdown, and documented malfunction of a gas turbine. These conditions apply only if operators employ the best operational practices to minimize the amount and duration of emissions during such episodes. For the following identified operational periods, 1-hour NO<sub>x</sub> emissions rate values may be excluded from the 24-hour block compliance averages in accordance with the corresponding requirements.

(1) Excess emissions resulting from startup, shutdown and malfunction of any emissions unit shall be permitted providing: (1) best operational practices to minimize emissions are adhered to, and (2) the duration of excess emissions shall be minimized but in no case exceed two hours due to startup or shutdown in any 24 hour period for each startup and shutdown cycle. No more than 2 hourly emission rate values shall be excluded in a 24-hour period due to malfunction. The duration of excess emissions shall be minimized but in no case exceed these durations unless specifically authorized by the Department. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.

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- (1) ~~**Startup, Shutdown, and Malfunction:** No more than 1 hourly emission rate value due to startup shall be excluded per cycle. No more than 1 hourly emission rate value due to shutdown shall be excluded per cycle. No more than 2 hourly emission rate values shall be excluded in a 24-hour period due to malfunction. No more than 4 hourly emission rate values shall be excluded in a 24-hour period due to all startups, shutdowns, and malfunctions. Note: A fuel switch is not considered "startup".~~

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**C.5. Permitted Capacity:** Each combustion turbine shall operate only in simple-cycle mode and generate a nominal 91 MW of electrical power. Operation of each unit shall not exceed 905 MMBtu per hour of heat input from firing natural gas or 978 MMBtu per hour of heat input from firing low sulfur distillate oil (LHV, at 59° F) ~~on a 24-hour rolling average basis.~~ Excluding startup and shutdown, operation below 50% base load is prohibited. The maximum heat inputs are based on the lower heating value (LHV) of each fuel, an inlet air temperature of 59°F, a relative humidity of 60%, an ambient air

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pressure of 14.7 psi, and 100% of base load. Therefore, heat input rates will vary depending upon ambient conditions and the combustion turbine characteristics. Compliance shall be determined by data compiled from the Speedtronic™ Control System adjusted for these parameters. Manufacturer's performance curves, corrected for site conditions or equations for correction to other ambient conditions, shall have been provided to the Permitting and Compliance Authorities within 45 days of completing the initial compliance testing and shall be resubmitted at any time that they are changed as the result of new testing.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, 0970014-006-AC].

**C.18. Alternate Standards and NO<sub>x</sub> CEMS Data Exclusion:** The following permit conditions establish alternate standards or allow the exclusion of monitoring data for specifically defined periods of startup, shutdown, and documented malfunction of a gas turbine. These conditions apply only if operators employ the best operational practices to minimize the amount and duration of emissions during such episodes.

- (a) **Opacity:** During startup and shutdown, visible emissions excluding water vapor shall not exceed 20% opacity for up to 2.0 hours in any 24-hour period.
- (b) **NO<sub>x</sub> CEMS Data Exclusion:** For the following identified operational periods, 1-hour NO<sub>x</sub> emissions rate values may be excluded from the 24-hour block compliance averages in accordance with the corresponding requirements.

(1) Excess emissions resulting from startup, shutdown and malfunction of any emissions unit shall be permitted providing: (1) best operational practices to minimize emissions are adhered to, and (2) the duration of excess emissions shall be minimized but in no case exceed two hours due to startup or shutdown in any 24 hour period for each startup and shutdown cycle. No more than 2 hourly emission rate values shall be excluded in a 24-hour period due to malfunction. The duration of excess emissions shall be minimized but in no case exceed these durations unless specifically authorized by the Department. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.

- (1) ~~**Startup, Shutdown, and Malfunction:** No more than 1 hourly emission rate value due to startup shall be excluded per cycle. No more than 1 hourly emission rate value due to shutdown shall be excluded per cycle. No more than 2 hourly emission rate values shall be excluded in a 24-hour period due to malfunction. No more than 4 hourly emission rate values shall be excluded in a 24-hour period due to all startups, shutdowns, and malfunctions. Note: A fuel switch is not considered "startup".~~

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