



BUREAU OF  
AIR REGULATION

MAY 26 1999

RECEIVED

May 24, 1999

Mr. William Proses  
Florida Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Dr.  
Tampa, Florida 33619-8318

Dear Mr. Proses:

Re: Anclote Facility  
Initial and Annual Compliance Testing

Florida Power Corporation (FPC) had previously been issued a construction permit (No. 1010017-004-AC) for the installation of natural gas-firing capability at the above-referenced facility. Unit 1 has been modified and is currently available for the compliance testing required by the construction permit. As you know, particulate and visible emissions tests are also required annually on the Anclote units within the time period 60 days prior to June 28<sup>th</sup>. This letter serves to provide notification that testing to demonstrate compliance with the natural gas construction permit and to fulfill the requirements for annual particulate testing will be conducted on June 21-23, 1999. Similar testing for Unit 1 was conducted on April 12, 1999.

If you should have any questions concerning this request, please do not hesitate to contact me at (727) 826-4258.

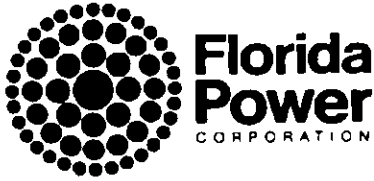
Sincerely,

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

Scott H. Osbourn  
Senior Environmental Engineer

cc: Al Linero, DEP  
Pete Burnette, ACE Testing

Anclote - most recent active file.



**RECEIVED**

MAR 26 1999

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March 23, 1999

Mr. William Proses  
Florida Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Dr.  
Tampa, Florida 33619-8318

Dear Mr. Proses:

Re: Anclote Facility  
Initial and Annual Compliance Testing

Florida Power Corporation (FPC) had previously been issued a construction permit (No. 1010017-004-AC) for the installation of natural gas-firing capability at the above-referenced facility. Unit 2 has been modified and is currently available for the compliance testing required by the construction permit. As you know, particulate and visible emissions tests are also required annually on the Anclote units within the time period 60 days prior to June 28<sup>th</sup>. This letter serves to provide notification that testing to demonstrate compliance with the natural gas construction permit will be conducted on April 12-14, 1999. Further, FPC requests that the annual test date for Unit 2 also be moved up to this time period, in order that the two tests may be combined.

Unit 1 is currently undergoing modification to accommodate natural gas firing. It's anticipated that testing to demonstrate compliance with the construction permit can be conducted within the current window provided for annual testing (i.e., prior to June 28<sup>th</sup>). FPC will provide notification when appropriate.

If you should have any questions concerning this request, please do not hesitate to contact me at (727) 826-4258.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott H. Osbourn".

Scott H. Osbourn  
Senior Environmental Engineer

cc: Al Linero, DEP  
Pete Burnette, ACE Testing

al



January 29, 1999

**RECEIVED**

FEB 08 1999

BUREAU OF  
AIR REGULATION

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

Dear Mr. Fancy:

Re: Fuel Oil Sampling at Anclote

I am writing to follow-up on our recent telephone conversation regarding fuel sampling and analysis for demonstration of compliance with the air construction permit that allows the use of natural gas at Florida Power Corporation's (FPC) Anclote Units 1 and 2. We discussed a practicable sampling program that ensures compliance with the permit while minimizing the burden to the plant. The following summarizes the program that FPC would like to use until such time that the Title V permit is finalized and becomes effective. FPC understands that the incorporation of periodic monitoring may alter these procedures somewhat in the final permit.

- 1) FPC currently takes an as-fired sample of #6 oil on a daily basis. These samples are used to develop a monthly composite sample for analysis. These monthly composite analyses are useful for determining compliance with the annual fuel sulfur limit of 1.5%.
- 2) The permit allows a maximum as-fired fuel sulfur limit of 1.8%. If an individual oil shipment contains less than 1.8% sulfur, then no additional sampling is necessary to ensure compliance with the daily limit. The on-going sampling discussed in 1) above will continue to ensure compliance with the annual 1.5% sulfur limit.
- 3) On occasion, a fuel oil shipment will contain greater than 1.8% sulfur. If this occurs, there are two ways of assuring compliance.
  - a. As-fired sampling and analysis will be necessary in order to ensure compliance with the as-fired maximum limit. However, there may be a need to burn the fuel prior to receiving the analysis results. In such cases, a material balance calculation will be performed in order to closely estimate the sulfur content of the fuel to be burned. This can serve as assurance until the actual laboratory analysis is received. FPC understands that the calculation is not the ultimate compliance assurance, and that FPC will operate at its own risk until the final analysis is received.

Mr. Clair H. Fancy  
January 29, 1999  
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b. Similar to 2) above, if a blended sample analysis shows sulfur content under 1.8% prior to burning or prior to shipment to Anclote, then no additional daily sampling would be required.

Thank you for continuing to work with FPC on the conditions of this new permit. Please feel free to contact me at (727) 826-4334 if you have any questions.

Sincerely,



J. Michael Kennedy, Q.E.P.  
Manager, Air Programs