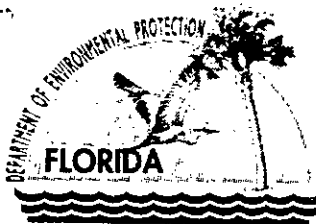


File Barbara



Department of Environmental Protection

Jeb Bush
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

November 24, 1999

Mr. Winston A. Smith, Director
Air, Pesticides and Toxics Management Division
United States Environmental Protection Agency
Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303-8909

Re: Proposed Changes to the PROPOSED Title V Permit for the Florida Power Corporation Anclote Plant to Satisfy EPA Objections
Title V Permit No.: 1010017-003-AV

Dear Mr. Smith:

This letter is to document changes that the Department proposes to satisfy EPA Region 4's objections to Florida's PROPOSED Title V Permit for the Florida Power Corporation Anclote Plant. The objections were detailed in a letter from EPA Region 4 dated July 12, 1999. The changes proposed in this letter result primarily from a letter received from Mr. W. Jeffrey Pardue on November 9, 1999, via the Fax, to Mr. Scott Sheplak.

Please review the following proposed changes to the referenced permit. If you concur with our changes, we will issue the FINAL Permit with these changes.

1. Applicable Requirements: Since Anclote Unit 2 is not subject to 40 CFR 60, Subpart D, no changes to the Proposed Permit are required.
2. Appropriate Averaging Times: The inclusion of a permitting note is made to Specific Conditions A.7. and A.8. as follows:

A.7. Particulate Matter. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods. See specific condition A.18. {Permitting note: The averaging time for the particulate matter standard corresponds to the cumulative sampling time of the specified test method.}
[Rule 62-296.405(1)(b), F.A.C.]

A.8. Particulate Matter - Soot Blowing and Load Change. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change. {Permitting note: The averaging time for the particulate matter standard corresponds to the cumulative sampling time of the specified test method.}
[Rule 62-210.700(3), F.A.C.]

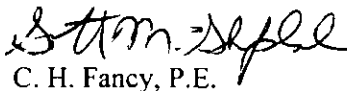
3. Federal Enforceability: Since the basis for the requirements in Specific Condition A.33. are based upon federal regulations and for reasonable assurance purposes (Rules 62-4.070(3) and 62-213.440, F.A.C.) the qualifier “**Not Federally Enforceable**” will be deleted.
4. Acid Rain Requirements: A new condition will be added as follows:

Section IV, Subsection A:

6. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be incorporated into the permit and shall be enforceable by the Administrator.
[40 CFR 70.6(a)(4)(i); and, Rule 62-210.200, Definitions - Applicable Requirements, F.A.C.]
5. Applicable Requirements: Based upon the information supplied by FPC, no changes to the Proposed Permit are required.
6. Statement of Basis: The Statement of Basis will be revised to reflect the allowance of annual particulate testing with a 40 percent VE in accordance with the SIP.
7. Placard Page: TV-3 will be incorporated as an attachment instead of TV-1.
8. Methods of Operation: Condition **A.3.a.** will be modified as follows:
A.3. Methods of Operation. Fuel(s).
 - a. Startup: The only fuels allowed to be burned are new #6 or lighter grades of fuel oils. On-specification used oil shall only be burned if the PCB's are less than 2 ppm and may be blended with new #6 or lighter grades of fuel oil. *Blending as means of achieving the 2-ppm PCB level shall not be allowed.* The maximum sulfur content is 2.5 percent, by weight.
 - b. Normal: The only fuels allowed to be burned are new #6 or lighter grades of fuel oils and on-specification used oil. The maximum sulfur content is 2.5 percent, by weight.
 - c. **Not federally enforceable.** The maximum amount of on-specification used oil, whether generated on or off-site, that can be burned facility-wide shall not exceed 10 percent of the heat input (monthly) or 30 million gallons per year cumulatively.
[Rule 62-213.410, F.A.C.; and, AO 51-254492A & 1010017-001-AO]
9. Minimum Sample Volume for Particulate Testing: Condition **A.24(b)** will be modified as follows:
(b) Minimum Sample Volume. The minimum sample volume per run shall be 30 dry standard cubic feet.
10. Record Keeping: The Statement of Basis will be revised to clarify that the relocatable generators are covered under the other five facility's permits. Additionally, a new condition will be added as follows:
B.23. Although these emission units are relocatable, each facility is required to maintain all appropriate records at each site.
[Rules 62-4.070(3), F.A.C.]

All parties involved have been expeditiously seeking resolution of these issues. We feel that EPA's concerns have been adequately addressed and we look forward to issuing the FINAL Title V permit. Please advise as soon as possible if you concur with the specific changes detailed above. Please call me at 850/921-9503 if you have any questions. You may also contact Mr. Scott M. Sheplak, P.E., at 850/921-9532, if you need any additional information.

Sincerely,


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

Attachment

CF/bm

cc: Howard L. Rhodes
Scott M. Sheplak
Mike Halpin
Pat Comer, Esq.
Gregg Worley, EPA
Scott Osbourn, FPC
Robert Manning, Esq., HGSS

61



RECEIVED

NOV 08 1999

BUREAU OF AIR REGULATION

November 2, 1999

Mr. Scott Sheplak, P.E.
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Re: Florida Power Corporation's Anclote and Suwannee Facilities
EPA Objection to Proposed Title V Permit Nos. 1210003-001-AV and 1010017-003-AV

Dear Mr. Sheplak:

Florida Power Corporation (FPC) is in receipt of a letter from the U.S. EPA, Region IV, dated October 8, 1999, in response to a conference call between representatives of the Florida Department of Environmental Protection (DEP), Florida Power Corporation (FPC), and U.S. Environmental Protection Agency (EPA) Region 4, held on September 13, 1999. This letter constitutes FPC's response to EPA's October 8 letter.

FPC appreciates DEP's and EPA's cooperation thus far in resolving the majority of the issues contained in EPA's objection letters to the above-referenced permits, dated July 12, 1999 and July 16, 1999.

FPC understands that the only remaining issue is EPA's position that the particulate matter emission limits contained in the above-referenced proposed permits are not "practicably enforceable" unless "some form of averaging time" is added. FPC disagrees. These conditions are completely enforceable in their current form; adding an averaging time is simply unnecessary.

However, in an effort to move the Title V permitting process to conclusion, FPC suggests the inclusion of a "permitting note" following Conditions A.7 and A.18, as follows:

For purposes of performing the reference test method, the averaging time for the particulate matter standard corresponds to the cumulative sampling time of the specified test method.

Mr. Sheplak, P.E.
November 2, 1999
Page 2

FPC's suggested resolution of this matter does not constitute or imply concurrence with EPA's position. The Title V process is intended to consolidate existing applicable requirements for each Title V permit on a case-by-case basis, and FPC's suggested resolution applies only to the Anclote and Suwannee Title V facilities/permits. Moreover, the language suggested above is applicable only to the existing particulate matter limit and only for the existing compliance determination method for this limit.

Thank you for attention to this important matter. If you have any questions regarding FPC's response or wish to discuss this matter further, please contact Scott Osbourn at (727) 826-4258 or me at (727) 826-4301.

Sincerely,



W. Jeffrey Pardue, C.E.P.
Director, FPC Environmental Services Department
Responsible Official for Anclote and Suwannee Title V permits

cc: Howard Rhodes, DEP
Clair Fancy, DEP
Winston A. Smith, EPA
Greg Worley, EPA
Elizabeth Bartlett, EPA
Robert Manning, HGSS



August 27, 1999

Mr. Scott Sheplak, P.E.
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Dear Mr. Sheplak:

Re: Florida Power Corporation's Anclote Facility
EPA Objection to Proposed Title V Permit No. 1010017-003-AV

Florida Power Corporation (FPC) is in receipt of a letter from the U.S. EPA, Region IV, dated July 16, 1999, objecting to the issuance of the above-referenced permit. The EPA has objected based on their belief that the proposed permit does not fully meet periodic monitoring requirements, contains conditions which are mislabeled as "Not Federally Enforceable" and is missing some Acid Rain requirements. This letter serves to provide responses to the EPA's objections in the order they were listed.

EPA Objection Issues

1. Applicable Requirements- Based on available information it appears that Anclote Unit 2 may be subject to 40 CFR 60, Subpart D- Standards of Performance for Fossil Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971. According to the application, initial start-up of this unit was October 31, 1978. Please provide verification that construction of Unit 2 commenced prior to August 17, 1971.

Response- Documentation that Unit 2 is not subject to the above-referenced requirement is provided in Attachment 1 to this letter.

2. Appropriate Averaging Times- In order for the emission standard for particulate matter to be practicably enforceable, an appropriate averaging time must be associated with the emission limit and specified in the permit. For example, Specific Condition 2 in Permit No. AO51-169340 for Anclote Unit 2, located in Attachment AN-EU2-L12 of the permit application appropriately states that "the maximum particulate emission rate for this source shall be 0.1 lb/MMBtu heat input over a two hour average." An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission limits are tied to or based on the run time of the test method(s) used for determining compliance, unless otherwise specified.

Response- The "applicable requirement" which provides the basis for Condition A.7 (particulate matter limit) is Florida's Rule 62-296.405(1)(b), F.A.C., which does not specify an averaging time directly. Permit No. AO51-169340 is not an "applicable requirement"; the reference to the two-hour averaging time in Specific Condition 2 of this permit is in error – it has no logical or legal basis. Moreover, neither the existing periodic monitoring rule, the Credible Evidence Rule, nor EPA's policy on practical enforceability provide the authority to impose an averaging time in a Title V permit where none exists in the underlying requirement. Therefore, an averaging time has appropriately not been included in Condition A.7 in the Draft or Proposed Title V permits for FPC's Anclote facility.

FPC had previously discussed this objection issue with the DEP and the EPA, and was willing to accept language regarding the use of appropriate reference test methods that are intended to make this permit condition practically enforceable. EPA was reluctant to accept any permit language short of "the averaging times for all specified emission limits are tied to or based on the run time of the test method(s) used for determining compliance." FPC is unwilling to accept this language in general and, particularly in the case of a particulate matter standard. The reference test methods used for particulate compliance (i.e., Methods 5 or 17) do not have a set run time; the sampling time may vary from one to four hours per run. The run times of the test methods are dependent on other relevant criteria, including the sampling of a minimum of 30 dry standard cubic feet (dscf) and the collection of a filter sample adequate for a representative analysis. Accordingly, EPA's suggested language is not appropriate or acceptable for a particulate limit that is compliance-tested using Methods 5 or 17. Further, the language suggested by the EPA is overly broad in that it applies to all emission limits, whereas the comment is limited solely to the particulate limit imposed by Condition A.7.

If EPA is unclear about the enforceability of Condition A.7, FPC suggests referencing the following conditions in Condition A.7: Condition A.18 (which specifies the test method and is already referenced), A.21 (which specifies the number of sampling runs), A.23 (which specifies how to calculate the actual emission rate), and A.24 (which specifies the sampling time, volume and flow rate). These conditions clearly provide how FPC's compliance with the particulate limit is completely enforceable.

- 3. Federal Enforceability- Condition A.33 contains certain extra limitations and record keeping requirements related to the firing of used oil, and is labeled as not federally enforceable. However, the condition contains documentation, record keeping, and notification requirements for used oil that originate as 40 CFR 279 and 761. Since those conditions are federal requirements, they are automatically federally enforceable. Therefore, the individual requirements of this condition should be broken down into federally enforceable and not federally enforceable conditions.*

Response- FPC is in agreement with this comment and has reviewed the applicable rules in an effort to determine which of the requirements in Condition A.33 are federally enforceable and which are not. FPC has determined that all of the requirements are federally enforceable, except for the following:

Not Federally Enforceable:

- A.33(a)- the requirement for a maximum sulfur content of 2.5 percent;
 - A.33(a)(5)- total halogens shall not exceed 1,000 ppm;
 - A.33(b)- the maximum amount of on-spec used oil that can be burned;
 - A.33(f)- the testing for percent sulfur, ash, and Btu value;
 - A.33(g)(1) and (2)- the record keeping regarding the amounts of on-spec used oil burned per month and per year, respectively; and
 - A.33(h)- the AOR reporting requirements.
4. *Acid Rain Requirements- Language from 40 CFR 70.6(a)(1)(ii) is not addressed in the Acid Rain part of the permit and does not appear to be included elsewhere in the body of the proposed permit. This condition must be added to the Proposed Title V permit for this source.*

Response- FPC has no objection to the inclusion of the proposed language.

5. *Applicable Requirements- Appendix U-1 lists "Surface Coating and Solvent Cleaning" and "Helper Cooling Towers" as unregulated emission units. 40 CFR 63, Subpart T- National Emission Standards for Halogenated Solvent Cleaning applies to this unit if the owner or operator uses a solvent in the machine that contains (in total 5 percent by weight of the following regulated solvents: carbon tetrachloride, chloroform, perchloroethylene, 1,1,1-trichloroethane, trichloroethylene, or methylene chloride. 40 CFR 63, Subpart O – National Emission Standards for Hazardous Air Pollutants for Industrial Cooling Towers applies to this unit if the industrial cooling tower is operated with chromium based water treatment chemicals on or after September 8, 1994. Please provide additional information to confirm that these units are not subject to MACT standards for these sources.*

Response- In response to the above concerns raised by the EPA, FPC plant staff have checked current and past purchase records and MSDS sheets for cleaning solutions and solvent use at the site. This review has confirmed that none of the above-regulated solvents are in use or are intended to be used. Regarding the cooling towers, FPC has been using water treatment chemicals referred to as TowerBrom and Chlorkill, and prior to that, gaseous chlorine. These products do not contain chromium-based chemicals, and have been in use since at least the September 8, 1994 applicability date.

6. *Statement of Basis- The first paragraph on page 2 provides justification for annual testing of particulate based on five years of data showing emissions at less than half of the allowable limit. Review of the permit application indicates that FPC petitioned for annual particulate testing in accordance with the provisions of 62-296.405(1)(a) F.A.C. so that they would be allowed a visible emissions limit of 40 percent with annual rather than quarterly particulate testing. The statement of basis should be modified to reflect the allowance of annual particulate testing with a 40 percent VE in accordance with the SIP.*

Response- FPC is in agreement that the proposed change to the statement of basis should be made.

7. Placard Page- Attachment TV-1 has been superceded by TV-3. Please incorporate this attachment instead of Attachment TV-1. This is necessary in order to ensure that language from TV-3, item 51 on compliance certifications, is present in the permit or its attachments as required under 40 CFR 70.6(c)(5)(iii).

Response- The above change proposed by the EPA would be consistent with other recently issued Title V permits.

8. Methods of Operation- Condition A.3.a is unclear with regard to allowance of blending on-specification used oil for use during startup and the relationship to the 2 ppm PCB requirement. Blending used oil with detectable concentrations of PCBs with fuel to reduce PCBs to levels below detection is not appropriate. It is appropriate, however, for FPC to blend fuel and used oil to adjust sulfur content. This permit condition should be re-worded to ensure that FPC does not blend used oil containing PCBs to achieve non-detect levels for firing during startup or shut down.

Response- FPC has always understood that blending of fuel oils to reduce PCB levels for purposes of testing is inappropriate. Therefore, any language that makes this more clear is not objectionable to FPC.

9. Minimum Sample Volume for Particulate Testing- Condition A.18 specifies a minimum sample volume of 30 dry standard cubic feet (dscf) for particulate testing, in accordance with 62-296.405(e)(2), F.A.C. of the SIP. Condition A.24(b) specifies a minimum sample volume of 25 dscf, or other volume as required by rule. Since these permit conditions are contradictory, a permitting note should be added to Condition A.24(b) to clarify that the required sample volume is 30 dscf.

Response- FPC's initial comment is that the correct citation for the rule referenced above is 62-296.405(1)(e)(2). FPC further researched the State of Florida provisions under "General Compliance Test Requirements", specifically 62-297.310(4)(a)(1) and .310(4)(c). These provisions require a minimum sampling time of one hour and a minimum required flow rate of 0.5 cubic feet per minute, respectively. Effectively, these two provisions result in a minimum sample volume of 30 dscf. Therefore, FPC agrees with the change proposed by the EPA.

10. Record Keeping- Conditions B.21 and B.22 address record keeping for the relocatable diesel generators. The permit states that this generator will be operated at six different facilities, five of which are not covered under this permit. This emission unit should also be included in the permits for the other five facilities. Please clarify in the statement of basis whether or not this is the case. The above referenced permit conditions require the source to keep records for the hours of operation, as well as the fuel oil sulfur content, in order to demonstrate compliance with operational and emission limitations. However, the permit does not indicate whether the records will be transferred with the emission unit when it is

Mr. Sheplak
August 27, 1999
Page 5

moved to another facility, or if each facility will be responsible for maintaining their own records. The permit should specify how these records will be maintained and if record-keeping activities must be coordinated among the facilities.

Response- The relocatable diesel generators are proposed to be operated at six different facilities, five of which are not covered by this permit. As correctly noted above, identical permit language has been placed in the permits for these other five facilities. The current language in each of these permits is very specific in terms of the records that must be maintained. FPC's preference is that the records be maintained at each individual site. FPC's corporate environmental services department is responsible for agency notifications and reporting and is functionally structured to provide coordination among the facilities.

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

Sincerely,



Scott H. Osbourn
Senior Environmental Engineer

cc: Clair Fancy, DEP Tallahassee
Doug Neeley, EPA Region IV
Robert Manning, HGS&S

ATTACHMENT



STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL
2562 EXECUTIVE CENTER CIRCLE, EAST
MONTGOMERY BUILDING, TALLAHASSEE, FLORIDA 32301

PETER P. BALJET
EXECUTIVE DIRECTOR

January 22, 1974

DAVID H. LEVIN
CHAIRMAN

Mr. R. E. Parnelle, Jr.
Florida Power Corporation
P. O. Box 14042
St. Petersburg, Florida 33733

Dear Mr. Parnelle:

In response to your recent request, Florida Power Corporation's Anclote Power Plant, Units 1 and 2 were issued a permit to construct in June, 1971. By definition of these units qualify as an "Existing Source" according to Chapter 17-2, F.A.C. As an existing source these units will be regulated by Section 17-2.04(6)(e) 2. Under this regulation you are expected to comply with the SO₂ emission regulations as expeditiously as possible, but no later than July 1, 1975.

Sincerely yours,

Hamilton S. Oven, Jr.
Hamilton S. Oven, Jr.
Deputy Executive Director

HSOJr/wb

cc: Mr. W. E. Linne

JOHN R. MIDDLEMAS
BOARD MEMBER

GEORGE RUPPEL
BOARD MEMBER

ALICE C. WAINWRIGHT
BOARD MEMBER

W. D. FREDERICK, JR.
BOARD MEMBER

ANCLOTE UNIT 2 CONSTRUCTION PROGRESSDATES OF IMPORTANCE

1. 3/27/72 Waterproofing and foundation forming of B/H
2. 5/8/72 Forms & rebar placement T/G mat
3. 5/17/72 Commence forming west wall B/H
4. 7/17/72 Pour T/G mat
5. 10/30/72 Install B/H column base plates
6. 11/6/72 Erection structural steel B/H
7. 12/4/72 Final T/H Foundation pour
8. 1/1/73 Completed all main building foundation pours
9. 2/12/73 Placed first roof girder
10. 4/13/73 Forming turbine pedestal legs & beams
11. 6/11/73 Forming turbine pedestal superstructure
12. 6/11/73 Install C.W. outlet pipe
13. 6/18/73 Pre-fab Air Duct
14. 7/9/73 Erecting downcomers & buckstrap
15. 8/6/73 Install air duct in B/H
16. 8/13/73 Raised first water wall panel
17. 9/3/73 Commenced air heater construction
18. 9/17/73 Hand riser tubes
19. 11/12/73 Erecting B/H siding
20. 12/31/73 Install air heater basket
21. 4/1/74 Generator stator arrived
22. 7/22/74 Mothballing of boiler
23. 10/28/74 Finalized temporary closure of Unit 2 Building
24. 10/13/75 Install tubes in condenser
25. 1/12/76 Continue boiler assembly - 80% of supply tubes in place & 1st pair welded out

Page 2
Anclote Unit 2 Construction Progress

26. 2/9/76 Hung steam chest
27. 3/8/76 3rd burner assembly installed
28. 1/24/77 Erect breeching to stack
29. 5/30/77 Completed hydro test (6/1/77)
30. 7/25/77 Furnace air test completed (7/29/77)
31. 8/22/77 Wind box air test completed (8/25/77)
32. 2/13/78 1st fire in boiler (Postpone 2/17/78)
33. 2/13/78 1st light oil fire in boiler (2/18/78)
34. 2/27/78 Completed alkaline boil out & boiler acid cleaning 3/2/78
35. 3/20/78 Steam blowing completed - discontinue starting activities 'til 6/1/78. Problems with operating permit - start mothballing
36. 8/28/78 Received work 9/1/78 to restore, start-up & test unit
37. 9/18/78 Light off on light oil
38. 9/23/78 Turbine 1st rolled
39. 9/27/78 Synchronize to line
40. 10/31/78 Declared Commercial



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

-67-

Scott
Scott

JUL 18 1999

RECEIVED

4APT-ARB

Howard L. Rhodes, Director
Division of Air Resources Management
Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

JUL 23 1999
DIVISION OF AIR
RESOURCES MANAGEMENT

SUBJ: EPA's Review of Proposed Title V Permit
Florida Power Corporation
Anclote Power Plant
Permit No. 1010017-003-AV

Dear Mr. Rhodes:

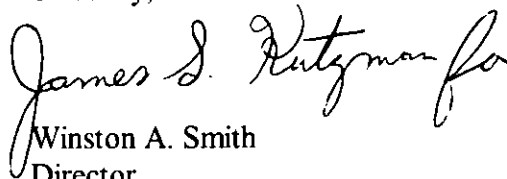
The purpose of this letter is to provide comments to the Florida Department of Environmental Protection (DEP) on the proposed title V operating permit for Florida Power Corporation, Anclote Power Plant, which was posted on DEP's web site on June 2, 1999. Based on the Environmental Protection Agency's (EPA's) review of the proposed permit and the supporting information for this facility, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. § 70.8(c) (see also Florida Regulation 62-213.450), to the issuance of the title V permit for this facility. The basis of EPA's objection is that the permit does not fully meet the periodic monitoring requirements of 40 C.F.R. § 70.6(a)(3)(i), contains conditions which are mislabeled as "Not Federally Enforceable," and is missing some Acid Rain requirements.

Section 70.8(c) requires EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information), if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 C.F.R. Part 70. Section 70.8(c)(4) and Section 505(c) of the Act further provide that if the State fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA and EPA will act accordingly. Because the objection issues must be fully addressed within the 90 days, we suggest that the revised permit be submitted in advance in order that any outstanding issues may be addressed prior to the expiration of the 90-day period.

Pursuant to 40 C.F.R. § 70.8(c), this letter and its enclosure contain a detailed explanation of the objection issues and the changes necessary to make the permit consistent with the requirements of 40 C.F.R. Part 70. The enclosure also contains general comments applicable to the permit.

If you have any questions or wish to discuss this further, please contact Mr. Gregg Worley, Chief, Operating Source Section at (404) 562-9141. Should your staff need additional information they may contact Ms. Elizabeth Bartlett, Florida Title V Contact, at (404) 562-9122, or Ms. Angelia Souder-Blackwell, Associate Regional Counsel, at (404) 562-9527.

Sincerely,



Winston A. Smith
Director
Air, Pesticides and Toxics
Management Division

Enclosure

cc: Mr. W. Jeffrey Pardue, Director
Environmental Services Dept.
Florida Power Corporation

Enclosure

**U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Florida Power Corporation
Anclote Power Plant
Permit no. 1010017-003-AV**

I. EPA Objection Issues

1. Applicable Requirements - Based on available information, it appears that Anclote Unit 2 may be subject to 40 C.F.R. 60 Subpart D - *Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971*. According to the application, initial startup for this unit was October 31, 1978. Please provide verification that construction of Unit 2 commenced prior to August 17, 1971.
2. Appropriate Averaging Times: In order for the emissions standard for particulate matter to be practicably enforceable, an appropriate averaging time must be associated with the emission limit and specified in the permit. For example, specific condition 2. in Permit No. AO51-169340 for Anclote Unit 2, located in Attachment AN-EU2-L12 of the permit application appropriately states that "the maximum particulate emission rate from this source shall be 0.1 pounds per MMBTU heat input over a two hour average." An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission limits are tied to or based on the run time of the test method(s) used for determining compliance, unless otherwise specified.
3. Federal Enforceability - Condition A.33 contains certain extra limitations and record keeping requirements related to the firing of used oil, and is labeled as not federally enforceable. However, the condition contains documentation, record keeping, and notification requirements for used oil which originate as 40 C.F.R. 279 and 761. Since those conditions are federal requirements, they are automatically federally enforceable. Therefore the individual requirements of this condition should be broken down into federally enforceable and not federally enforceable conditions.
4. Acid Rain Requirements - Language from 40 C.F.R. 70.6(a)(1)(ii) is not addressed in the Acid Rain Part of the permit and does not appear to be included elsewhere in the body of the proposed permit. This condition must be added to the proposed title V permit for this source.

5. Applicable Requirements - Appendix U-1 lists "Surface Coating and Solvent Cleaning" and "Helper Cooling Towers" as unregulated emission units. 40 C.F.R. 63 Subpart T - National Emission Standards for Halogenated Solvent Cleaning applies to this unit if the owner or operator uses a solvent in the machine that contains (in total) 5 percent by weight of the following regulated solvents: carbon tetrachloride, chloroform, perchloroethylene, 1,1,1-trichloroethane, trichloroethylene, or methylene chloride. 40 C.F.R. 63 Subpart O - National Emission Standards for Hazardous Air Pollutants for Industrial Cooling Towers applies to this unit if the industrial cooling tower is operated with chromium based water treatment chemicals on or after September 8, 1994. Please provide additional information to confirm that these units are not subject to MACT standards for these sources.

II. General Comments

6. Statement of Basis - The first paragraph on page 2 provides justification for annual testing of particulate based on five years of data showing emissions at less than half of the allowable limit. Review of the permit application indicates that FPC petitioned for annual particulate testing in accordance with the provisions of 62-296.405(1)(a) F.A.C. so that they would be allowed a visible emissions limit of 40 percent with annual rather than quarterly particulate testing. The statement of basis should be modified to reflect the allowance of annual particulate testing with a 40 percent VE in accordance with the SIP.
7. Placard Page - Attachment TV-1 has been superceded by TV-3. Please incorporate this attachment instead of Attachment TV-1. This is necessary to ensure that language from TV-3, item 51 on compliance certifications, is present in the permit or its attachments as required under 40 C.F.R. 70.6(c)(5)(iii).
8. Methods of Operation - Condition A.3.a. is unclear with regard to allowance of blending on-specification used oil for use during startup and the relationship to the 2 ppm PCB requirement. Blending used oil with detectable concentrations of PCB's with fuel to reduce PCBs to levels below detection is not appropriate. It is appropriate, however for FPC to blend fuel and used oil to adjust sulfur content. This permit condition should be reworded to ensure that FPC does not blend used oil containing PCBs to achieve non-detect levels for firing during startup or shut down.
9. Minimum Sample Volume for Particulate Testing - Condition A.18. specifies a minimum sample volume of 30 dry standard cubic feet for particulate testing, in accordance with 62-296.405(e)2. F.A.C. of the SIP. Condition A.24.(b) specifies a minimum sample volume of 25 dscf, or other volume as required by rule. Since these permit conditions are contradictory, a permitting note should be added to Conditions A.24.(b) to clarify that the required sample volume is 30 dry standard cubic feet.

10. Record keeping - Conditions B.21 and B.22 address record keeping for the relocatable generators. The permit states that this generator will be operated at six different facilities, five of which are not covered under this permit. This emission unit should also be included in the permits for the other five facilities. Please clarify in the statement of basis whether or not this is the case. The above referenced permit conditions require the source to keep records for the hours of operation as well as the fuel oil sulfur content in order to demonstrate compliance with operational and emission limitations. However, the permit does not indicate whether the records will be transferred with the emission unit when it is moved to another facility, or if each facility will be responsible for maintaining their own records. The permit should specify how these records will be maintained and if record keeping activities must be coordinated among the facilities.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- 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 will show to whom the article was delivered and the date delivered.

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

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

**Mr. W. Jeffrey Pardue, Director
Environmental Services Dept.
Florida Power Corp.
P. O. Box 14042
Saint Petersburg, FL 33711**

4a. Article Number

P 174 053 163

4b. Service Type

- Registered Certified
- Express Mail Insured
- Return Receipt for Merchandise COD

7. Date of Delivery

JUL 23 1999

5. Received By: (Print Name)

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

6. Signature: (Addressee or Agent)

X *[Signature]*

Thank you for using Return Receipt Service.

PS Form 3811, December 1994

Domestic Return Receipt

P 174 053 163

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

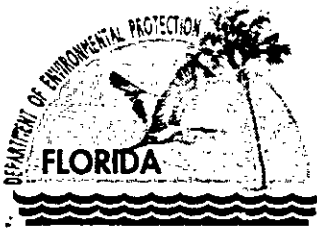
Do not use for International Mail (See reverse)

**Mr. W. Jeffrey Pardue, Director
Environmental Services Dept.
Florida Power Corp.
P. O. Box 14042
Saint Petersburg, FL 33711**

| | |
|---|-----------------|
| Certified Fee | |
| Special Delivery Fee | |
| Restricted Delivery Fee | |
| Return Receipt Showing to Whom & Date Delivered | |
| Return Receipt Showing to Whom, Date, & Addressee's Address | |
| TOTAL Postage & Fees | \$ |
| Postmark or Date | 07-21-99 SAK |

PS Form 3800, April 1995

Barbara / File



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

July 20, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. W. Jeffrey Pardue, Director
Environmental Services Department
Florida Power Corporation
Post Office Box 14042
Saint Petersburg, Florida 33711

Re: EPA Objection to PROPOSED Title V Permit No. 1010017-003-AV
Facility Name: Anclote Power Plant

Dear Mr. Pardue:

On July 16, 1999, the Department received a timely written objection from the United States Environmental Protection Agency to the referenced proposed permit. A copy of EPA's objection is attached.

In accordance with Section 403.0872(8), Florida Statutes (F.S.), the Department must not issue a final permit until the objection is resolved or withdrawn. Pursuant to Section 403.0872(8), F.S., the applicant may file a written reply to the objection within 45 days after the date on which the Department serves the applicant with a copy of the objection. The written reply must include any supporting materials that the applicant desires to include in the record relevant to the issues raised by the objection. The written reply must be considered by the Department in issuing a final permit to resolve the objection of EPA. Please submit any written comments you wish to have considered concerning the objection to Mr. Scott M. Sheplak, P.E., at the above letterhead address.

Pursuant to 40 CFR 70.8(c)(4) the Department will have to resolve the objection by issuing a permit that satisfies EPA within 90 days of the objection, or EPA will assume authority for the permit.

If you should have any other questions, please contact Mr. Scott M. Sheplak, P.E., at 850/921-9532.

Sincerely,

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

CHF/sms/k

Enclosure

cc: Pat Comer, Esquire, OGC w/enclosure
Douglas Neeley, USEPA w/o enclosure
Gregg Worley, USEPA w/o enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 4
 ATLANTA FEDERAL CENTER
 61 FORSYTH STREET
 ATLANTA, GEORGIA 30303-8960

JUL 18 1999

scott
~~*clair*~~
~~*ph*~~
~~*Howard*~~
 7/19

4APT-ARB

Howard L. Rhodes, Director
 Division of Air Resources Management
 Department of Environmental Protection
 Mail Station 5500
 2600 Blair Stone Road
 Tallahassee, Florida 32399-2400

RECEIVED

JUL 19 1999

BUREAU OF AIR REGULATION

SUBJ: ~~EPA's Review of Proposed Title V Permit~~
~~Florida Power Corporation~~
~~Anclote Power Plant~~
 Permit No. 1010017-003-AV

Dear Mr. Rhodes:

The purpose of this letter is to provide comments to the Florida Department of Environmental Protection (DEP) on the proposed title V operating permit for Florida Power Corporation, Anclote Power Plant, which was posted on DEP's web site on June 2, 1999. Based on the Environmental Protection Agency's (EPA's) review of the proposed permit and the supporting information for this facility, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. § 70.8(c) (see also Florida Regulation 62-213.450), to the issuance of the title V permit for this facility. The basis of EPA's objection is that the permit does not fully meet the periodic monitoring requirements of 40 C.F.R. §70.6(a)(3)(i), contains conditions which are mislabeled as "Not Federally Enforceable," and is missing some Acid Rain requirements.

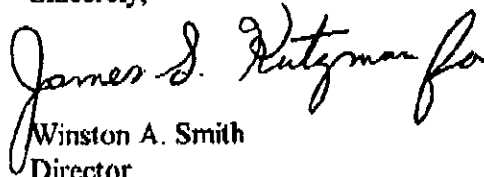
Section 70.8(c) requires EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information), if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 C.F.R. Part 70. Section 70.8(c)(4) and Section 505(c) of the Act further provide that if the State fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA and EPA will act accordingly. Because the objection issues must be fully addressed within the 90 days, we suggest that the revised permit be submitted in advance in order that any outstanding issues may be addressed prior to the expiration of the 90-day period.

2

Pursuant to 40 C.F.R. § 70.8(c), this letter and its enclosure contain a detailed explanation of the objection issues and the changes necessary to make the permit consistent with the requirements of 40 C.F.R. Part 70. The enclosure also contains general comments applicable to the permit.

If you have any questions or wish to discuss this further, please contact Mr. Gregg Worley, Chief, Operating Source Section at (404) 562-9141. Should your staff need additional information they may contact Ms. Elizabeth Bartlett, Florida Title V Contact, at (404) 562-9122, or Ms. Angelia Souder-Blackwell, Associate Regional Counsel, at (404) 562-9527.

Sincerely,



Winston A. Smith
Director

Air, Pesticides and Toxics
Management Division

Enclosure

cc: Mr. W. Jeffrey Pardue, Director
Environmental Services Dept.
Florida Power Corporation

Enclosure

**U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Florida Power Corporation
Anclote Power Plant
Permit no. 1010017-003-AV**

I. EPA Objection Issues

1. **Applicable Requirements** - Based on available information, it appears that Anclote Unit 2 may be subject to 40 C.F.R. 60 Subpart D - *Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971*. According to the application, initial startup for this unit was October 31, 1978. Please provide verification that construction of Unit 2 commenced prior to August 17, 1971.
2. **Appropriate Averaging Times**: In order for the emissions standard for particulate matter to be practicably enforceable, an appropriate averaging time must be associated with the emission limit and specified in the permit. For example, specific condition 2. in Permit No. AO51-169340 for Anclote Unit 2, located in Attachment AN-EU2-I.12 of the permit application appropriately states that "the maximum particulate emission rate from this source shall be 0.1 pounds per MMBTU heat input over a two hour average." An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission limits are tied to or based on the run time of the test method(s) used for determining compliance, unless otherwise specified.
3. **Federal Enforceability** - Condition A.33 contains certain extra limitations and record keeping requirements related to the firing of used oil, and is labeled as not federally enforceable. However, the condition contains documentation, record keeping, and notification requirements for used oil which originate as 40 C.F.R. 279 and 761. Since those conditions are federal requirements, they are automatically federally enforceable. Therefore the individual requirements of this condition should be broken down into federally enforceable and not federally enforceable conditions.
4. **Acid Rain Requirements** - Language from 40 C.F.R. 70.6(a)(1)(ii) is not addressed in the Acid Rain Part of the permit and does not appear to be included elsewhere in the body of the proposed permit. This condition must be added to the proposed title V permit for this source.

5. Applicable Requirements - Appendix U-1 lists "Surface Coating and Solvent Cleaning" and "Helper Cooling Towers" as unregulated emission units. 40 C.F.R. 63 Subpart T - National Emission Standards for Halogenated Solvent Cleaning applies to this unit if the owner or operator uses a solvent in the machine that contains (in total) 5 percent by weight of the following regulated solvents: carbon tetrachloride, chloroform, perchloroethylene, 1,1,1-trichloroethane, trichloroethylene, or methylene chloride. 40 C.F.R. 63 Subpart O - National Emission Standards for Hazardous Air Pollutants for Industrial Cooling Towers applies to this unit if the industrial cooling tower is operated with chromium based water treatment chemicals on or after September 8, 1994. Please provide additional information to confirm that these units are not subject to MACT standards for these sources.

II. General Comments

6. Statement of Basis - The first paragraph on page 2 provides justification for annual testing of particulate based on five years of data showing emissions at less than half of the allowable limit. Review of the permit application indicates that FPC petitioned for annual particulate testing in accordance with the provisions of 62-296.405(1)(a) F.A.C. so that they would be allowed a visible emissions limit of 40 percent with annual rather than quarterly particulate testing. The statement of basis should be modified to reflect the allowance of annual particulate testing with a 40 percent VE in accordance with the SIP.
7. Placard Page - Attachment TV-1 has been superseded by TV-3. Please incorporate this attachment instead of Attachment TV-1. This is necessary to ensure that language from TV-3, item 51 on compliance certifications, is present in the permit or its attachments as required under 40 C.F.R. 70.6(c)(5)(iii).
8. Methods of Operation - Condition A.3.a. is unclear with regard to allowance of blending on-specification used oil for use during startup and the relationship to the 2 ppm PCB requirement. Blending used oil with detectable concentrations of PCB's with fuel to reduce PCBs to levels below detection is not appropriate. It is appropriate, however for FPC to blend fuel and used oil to adjust sulfur content. This permit condition should be reworded to ensure that FPC does not blend used oil containing PCBs to achieve non-detect levels for firing during startup or shut down.
9. Minimum Sample Volume for Particulate Testing - Condition A.18. specifies a minimum sample volume of 30 dry standard cubic feet for particulate testing, in accordance with 62-296.405(e)2, F.A.C. of the SIP. Condition A.24.(b) specifies a minimum sample volume of 25 dscf, or other volume as required by rule. Since these permit conditions are contradictory, a permitting note should be added to Conditions A.24.(b) to clarify that the required sample volume is 30 dry standard cubic feet.

10. Record keeping - Conditions B.21 and B.22 address record keeping for the relocatable generators. The permit states that this generator will be operated at six different facilities, five of which are not covered under this permit. This emission unit should also be included in the permits for the other five facilities. Please clarify in the statement of basis whether or not this is the case. The above referenced permit conditions require the source to keep records for the hours of operation as well as the fuel oil sulfur content in order to demonstrate compliance with operational and emission limitations. However, the permit does not indicate whether the records will be transferred with the emission unit when it is moved to another facility, or if each facility will be responsible for maintaining their own records. The permit should specify how these records will be maintained and if record keeping activities must be coordinated among the facilities.

OPTIONAL FORM 90 (7-90)

FAX TRANSMITTAL

of pages = 6

| | | | |
|-------------|------------------------|---------|-----------------|
| To | Howard Rhodes | From | Bridgette Bacon |
| Date/Agency | Florida Dept. Environ. | Phone # | (404) 562-9094 |
| Fax # | (850) 922-6979 | Fax # | (404) 562-9066 |

NSN 7540-01-317-7368

5099 101

GENERAL SERVICES ADMINISTRATION



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AIR, PESTICIDES & TOXICS MANAGEMENT DIVISION

61 Forsyth St., S. W.

Atlanta, Georgia 30303

Fax Number: 404/562-9095

Electronic Transmission

MEMORANDUM

DATE: July 16, 1999

SUBJ: Initial EPA Comments on Proposed Title V Permit
for
Florida Power Corporation - Anclote Power Plant
Permit Number 101007-003-AV

FROM: Elizabeth K. Bartlett, Environmental Engineer
Operating Source Section, ARTB

TO: Michael P. Halpin, P.E., FDEP - Tallahassee
cc: Scott Sheplak, P.E., FDEP - Tallahassee

Below are initial comments from EPA Region 4 on the above referenced source. Our comments are divided into two categories: 1) Significant Comments and 2) General Comments. Significant comments are defined as those comments that would trigger an objection under 40 C.F.R. Part 70. Given that EPA has several significant comments on this proposed permit, we would like to attempt resolution of all issues in order to avoid a formal objection on this permit. If resolution of our significant comments is not achieved, EPA Region 4 will issue an objection to the proposed permit pursuant to 40 C.F.R. 70.8(c) on or before day-45 of the review period. For purposes of this permit review, day-45 is defined as **July 16, 1999**.

Another option available to you is withdrawal of the proposed permit from EPA review. If you choose to utilize this option, you must submit to EPA a written request that the permit be withdrawn including a statement that a proposed permit will be resubmitted for EPA review at a later date. Your written request to withdraw the proposed permit must be submitted to our office by no later than **July 16, 1999**.

Please contact me as soon as possible regarding resolution of this matter. You may reach me at (404) 562-9122.

1) Significant Comments

- a. Applicable Requirements - Based on available information, it appears that Anclote Unit 2 may be subject to 40 C.F.R. 60 Subpart D - *Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971*. According to the application, initial startup for this unit was October 31, 1978. Please provide verification that construction of Unit 2 commenced prior to August 17, 1971.
- b. Appropriate Averaging Times: In order for the emissions standard for particulate matter to be practicably enforceable, an appropriate averaging time must be associated with the emission limit and specified in the permit. For example, specific condition 2. in Permit No. AO51-169340 for Anclote Unit 2, located in Attachment AN-EU2-L12 of the permit application appropriately states that "the maximum particulate emission rate from this source shall be 0.1 pounds per MMBTU heat input over a two hour average." An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission limits are tied to or based on the run time of the test method(s) used for determining

compliance, unless otherwise specified.

- c. Federal Enforceability - Condition A.33 contains certain extra limitations and record keeping requirements related to the firing of used oil, and is labeled as not federally enforceable. However, the condition contains documentation, record keeping, and notification requirements for used oil which originate as 40 C.F.R. 279 and 761. Since those conditions are federal requirements, they are automatically federally enforceable. Therefore the individual requirements of this condition should be broken down into federally enforceable and not federally enforceable conditions.

- d. Acid Rain Requirements - Language from 40 C.F.R. 70.6(a)(1)(ii) is not addressed in the Acid Rain Part of the permit and does not appear to be included elsewhere in the body of the proposed permit. This condition must be added to the proposed title V permit for this source.

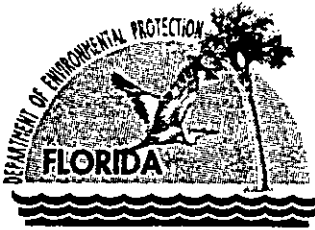
- e. Applicable Requirements - Appendix U-1 lists "Surface Coating and Solvent Cleaning" and "Helper Cooling Towers" as unregulated emission units. 40 C.F.R. 63 Subpart T - *National Emission Standards for Halogenated Solvent Cleaning* applies to this unit if the owner or operator uses a solvent in the machine that contains (in total) 5 percent by weight of the following regulated solvents: carbon tetrachloride, chloroform, perchloroethylene, 1,1,1-trichloroethane, trichloroethylene, or methylene chloride. 40 C.F.R. 63 Subpart O - *National Emission Standards for Hazardous Air Pollutants for Industrial Cooling Towers* applies to this unit if the industrial cooling tower is operated with chromium based water treatment chemicals on or after September 8, 1994. Please provide additional information to confirm that these units are not subject to MACT standards for these sources.

2) General Comments

- a. Statement of Basis - The first paragraph on page 2 provides justification for annual testing of particulate based on five years of data showing emissions at less than half of the allowable limit. Review of the permit application indicates that FPC petitioned for annual particulate testing in accordance with the provisions of 62-296.405(1)(a) F.A.C. so that they would be allowed a visible emissions limit of 40 percent with annual rather than quarterly particulate testing. The statement of basis should be modified to reflect the allowance of annual particulate testing with a 40 percent VE in accordance with the SIP.
- b. Placard Page - Attachment TV-1 has been superseded by TV-3. Please incorporate this attachment instead of Attachment TV-1. This is necessary to ensure that language from TV-3, item 51 on compliance certifications, is present in the permit or its attachments as required under 40 C.F.R. 70.6(c)(5)(iii).
- c. Methods of Operation. - Condition A.3.a. is unclear with regard to allowance of blending on-specification used oil for use during startup and the relationship to the 2 ppm PCB requirement. Blending used oil with detectable concentrations of PCB's with fuel to reduce PCBs to levels below detection is not appropriate. It is appropriate, however for FPC to blend fuel and used oil to adjust sulfur content. This permit condition should be reworded to ensure that FPC does not blend used oil containing PCBs to achieve non-detect levels for firing during startup or shut down.
- d. Minimum Sample Volume for Particulate Testing - Condition A.18. specifies a minimum sample volume

of 30 dry standard cubic feet for particulate testing, in accordance with 62-296.405(e)2. F.A.C. of the SIP. Condition A.24.(b) specifies a minimum sample volume of 25 dscf, or other volume as required by rule. Since these permit conditions are contradictory, a permitting note should be added to Conditions A.24.(b) to clarify that the required sample volume is 30 dry standard cubic feet.

- e. Record keeping - Conditions B.21 and B.22 address record keeping for the relocatable generators. The permit states that this generator will be operated at six different facilities, five of which are not covered under this permit. This emission unit should also be included in the permits for the other five facilities. Please clarify in the statement of basis whether or not this is the case. The above referenced permit conditions require the source to keep records for the hours of operation as well as the fuel oil sulfur content in order to demonstrate compliance with operational and emission limitations. However, the permit does not indicate whether the records will be transferred with the emission unit when it is moved to another facility, or if each facility will be responsible for maintaining their own records. The permit should specify how these records will be maintained and if record keeping activities must be coordinated among the facilities.



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

PROPOSED Permit Electronic Posting Courtesy Notification

Florida Power Corporation
Anclote Power Plant
Facility ID No.: 1010017
Pasco County

Initial Title V Air Operation Permit
PROPOSED Permit No.: 1010017-003-AV

The electronic version of the PROPOSED permit was posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review on June 2, 1999.

USEPA's review period ends on the 45th day after the permit posting date. Day 45 is July 17, 1999. If an objection (veto) is received from USEPA, the permitting authority will provide a copy of the objection to the applicant.

Provided an objection is not received from USEPA, the PROPOSED permit will become a FINAL permit by operation of law on the 55th day after the permit posting date. Day 55 is July 27, 1999.

The web site address is <http://www2.dep.state.fl.us/air>.

Florida's PROPOSED Permit Electronic Notification Cover Memorandum

TO: Gracy R. Danois, U.S. EPA Region 4
CC: Carla E. Pierce, U.S. EPA Region 4
THRU: Scott M. Sheplak, P.E., BAR - Title V Section
FROM: Michael P. Halpin, P.E., Permit Engineer
DATE: 6/1/1999
RE: U.S. EPA Region 4 PROPOSED Title V Operation Permit Review

The following PROPOSED Title V operation permit(s) and associated documents have been posted on the DEP World Wide Web Internet site for your review. Please provide any comments via Internet E-mail, to Scott M. Sheplak, at "Sheplak_S@dep.state.fl.us".

| <u>Applicant Name</u> | <u>County</u> | <u>Method of Transmittal</u> | <u>Electronic File Name(s)</u> |
|--|---------------|------------------------------|--------------------------------|
| Florida Power Corporation Anclote Power Plant | Pasco | INTERNET | 1010017.zip |

This zipped file contains the following electronic files:

1010017p.sob
anclotep
1010017p
1010017x.tb1
1010017p.tb1
1010017p.tb2
1010017u
1010017h
1010017g
tvorder

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- 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 will show to whom the article was delivered and the date delivered.

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

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. W. Jeffrey Pardue, C.E.P.
Director of Environmental Services
Florida Power Corp
3201 34 Street South
Saint Petersburg, FL 33711

4a. Article Number

P 174 053 152

4b. Service Type

- Registered Certified
- Express Mail Insured
- Return Receipt for Merchandise COD

7. Date of Delivery

4/90

5. Received By: (Print Name)

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

6. Signature (Addressee or Agent)

W. Jeffrey Pardue

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

P 174 053 152

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Mr. W. Jeffrey Pardue, C.E.P.
Director of Environmental Services
Florida Power Corp
3201 34 Street South
Saint Petersburg, FL 33711

PS Form 3800, April 1995

| | |
|---|--------|
| Certified Fee | |
| Special Delivery Fee | |
| Restricted Delivery Fee | |
| Return Receipt Showing to Whom & Date Delivered | |
| Return Receipt Showing to Whom, Date, & Addressee's Address | |
| TOTAL Postage & Fees | \$ |
| Postmark or Date | 4-6-90 |