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AIR REGULATION

February 23, 1999

Ms. Kathy Carter, Clerk  
Office of General Counsel  
Florida Department of Environmental Protection  
Room 638  
3900 Commonwealth Blvd.  
Tallahassee, FL 32399-3000

Dear Ms. Carter:

RE: Florida Power Corporation, Anclote Facility  
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,  
*REVISED Draft Permit No. 1010017-003-AV*

On August 21, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. On September 4, 1997, FPC filed a Petition for Administrative Proceeding on this permit. On November 30, 1998, FPC received a REVISED Draft Permit from the Department. The Department's cover letter to the REVISED permit stated that the initial Draft permit had been withdrawn. A review of the REVISED permit conditions has revealed that several issues remain to be resolved. Accordingly, FPC requests an extension of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including April 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties' mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (727) 826-4258.

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

A handwritten signature in black ink, appearing to read "Robert A. Manning", written in a cursive style.

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

cc: Scott Sheplak, DEP  
Doug Beason, DEP, OGC



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February 24, 1999

MAR 02 1999

Mr. Clair Fancy, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

BUREAU OF AIR REGULATION

BAR conference room

Dear Mr. Fancy:

March 17 (10-12 noon, 1-3 p.m.)

Re: Status of Title V Permits

As you know, several of Florida Power Corporation's (FPC) Title V permits remain in the Initial Draft or Revised Draft stages and progress is being made very slowly. This is no one's fault in particular; it's difficult to establish any momentum when the involved parties are processing so many permits and some of the issues (e.g., periodic monitoring) are moving targets. As you and Mr. Scott Osbourn recently discussed, it may be helpful if all involved parties at FPC and the Department were to meet at one time to discuss any remaining unresolved issues.

FPC proposes, with your concurrence, to arrange for a one- or two-day meeting between FPC and the Department to resolve issues associated with the following Title V permits that remain in either the Initial Draft or Revised Draft stage: Anclote, Bartow, Crystal River, Suwannee, Tiger Bay, Bayboro and the University of Florida. It would be desirable to have you, Scott Sheplak and the permit engineers responsible for these facilities in attendance. Mr. Scott Osbourn and I will represent FPC.

It is FPC's desire to advance these Title V permits to the Final Permit stage as expeditiously as possible. FPC has recently requested additional extensions of time on the above-mentioned permits until April 1, 1999 and would like to resolve these permits prior to that date. We will contact you in the next day or two to coordinate a meeting date. If you should have any questions in the meantime, please contact either Scott Osbourn at (727) 826-4258 or me at (727) 826-4334.

Sincerely,

J. Michael Kennedy (handwritten signature)

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

cc: Scott Sheplak
Doug Beason, OGC
Jeffrey Brown, OGC
Robert Manning, HGS&S

processor

Andote Mike
Bartow Ed
Crystal Ed
Suwannee Bruce
Tiger Bay Jonathan
Bayboro Ed
UofF Bruce

See responses to FPC comments for Bartow or Crystal River for consistency



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**FEB 12 1999**

**BUREAU OF  
AIR REGULATION**

February 11, 1999

Mr. Scott Sheplak, P.E.  
Bureau of Air Regulation  
Division of Air Resources Management  
Department of Environmental Protection  
2600 Blair Stone Rd., MS 5505  
Tallahassee, Florida 32399-2400

Dear Mr. Sheplak:

Re: Anclote Facility  
Revised DRAFT Permit No.: 1010017-003-AV

Florida Power Corporation (FPC) is providing comments related to the Revised DRAFT Title V permit referenced above. The comments are presented below in the same order as the conditions appear in the permit. FPC has filed a Request for Extension of Time until April 1, 1999. If we are unable to resolve each of the issues described below before this time, FPC intends to file an additional Request for Extension. Accordingly, at your earliest convenience after reviewing this letter, please contact me at (727) 826-4258 to discuss.

1. Page i. In the Table of Contents, Section III.B should read as follows: "Diesel Fired Generators (~~3—820 Kilowatt each~~).
2. Page 1. The Statement of Basis should include clarifying language on the intent of the heat input limits. This has been done, where appropriate, in other Title V permits (see attached EPA letter regarding FPL resolution).
3. Page 7. The permitting note under the heat input limits (Condition A.1) is incomplete. The note should also include language regarding recordkeeping requirements (see attachment per no. 2 above).
4. Condition A.32 (pages 16-18). Condition A.32.g(2) requires used oil records to be kept for the "preceding consecutive 12-month period". FPC interprets this as a 12-month rolling period. This requirement is inconsistent with Conditions A32.b and A.32.h, that require recordkeeping on a calendar year basis. In order to be consistent with the references to calendar year in the other requirements, FPC requests that Condition A.32.g(2) be revised to a calendar year basis. Finally, FPC requests that the last sentence of Condition A.32.h

Mr. Sheplak  
February 11, 1999  
Page 2

be deleted. If lead meets the threshold for reporting in the AOR, it will be duly reported anyway.

5. Section III, Subsection B. The provisions governing the operation of these relocatable diesel generators when they are located at the Anclote facility should be essentially identical to the provisions contained in FPC's Final Title V permit for the Higgins Facility (see attached page from Final Title V permit for Higgins).
6. Table 1-1. The fuel oil sulfur content limit for Steam Units 1 and 2 should be 2.5%, not 2.50%. Finally, the hours per year of operation for the relocatable diesel generators should be 2,970 hr/yr, not 8,760 hr/yr.

FPC appreciates the opportunity to comment on the Revised DRAFT Title V permit. Thank you again for your prompt attention to this matter.

Sincerely,



Scott H. Osbourn  
Senior Environmental Engineer

Attachments

cc: Robert Manning, HGS&S

2/16/99 cc: Scott Sheplak  
Mike Halpin

## **ATTACHMENTS**

03/13/98 15:02  
Mr. R. Douglas Neeley  
March 10, 1998  
Page 6 of 9

and blending at the terminal is required to obtain a fuel mix equal to the applicable percent sulfur limit, an analysis of a fuel sample representative of fuel from the fuel storage tanks shall be performed by FPL prior to transferring oil to the Manatee plant. Reports of percent sulfur content of these analyses shall be maintained at the power plant facility.

The owner or operator shall maintain records of the as-fired fuel oil heating value, density or specific gravity, and the percent sulfur content. Fuel sulfur content, percent by weight, for liquid fuels shall be determined by either ASTM D2622-94, ASTM D4294-90 (95), ASTM D1552-95, ASTM D1266-91, or both ASTM D4057-88 and ASTM D129-95 (or latest editions) to analyze a representative sample of the fuel oil.

[Rules 62-213.440, 62-296.405(1)(c)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C., and applicant agreement with EPA on March 3, 1998]

#### Lauderdale, Manatee, Martin, Putnam and Turkey Point

The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. A note will be added to the permitted capacity condition for each permit clarifying this, and an explanation that regular record keeping is not required for heat input will be added to the statement of basis. The following specific changes will be made:

Add to the statement of basis for each permit:

The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. A note below the permitted capacity condition clarifies this. Regular record keeping is not required for heat input. Instead the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, is requires measurement of process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.

Add to each permit below the condition titled Permitted Capacity:

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.}

#### Manatee, Martin, Port Everglades, Riviera and Turkey Point

No revisions of the permits are necessary to address the comment related to records of soot blowing and load changes. All parties in the meeting agreed that the current permit requirements related to reporting of excess emissions are sufficient to satisfy this comment. FPL will continue to document and report excess emission events. This issue is considered resolved, so no changes to the permits will be made.

**Subsection C. This section addresses the following emissions units.**

E.U. ID No.	Brief Description
-7775047 -001	Relocatable Diesel Fired Generator(s)

The relocatable diesel generator(s) will have a maximum (combined) heat input of 25.74 MMBtu/hour while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum (combined) rating of 2460 kilowatts. Emissions from the generator(s) are uncontrolled. These conditions were requested in the Initial Title V Permit Application for the Anclote Power Plant received June 14, 1996. The generator(s) may be relocated at this facility and any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Anclote Power Plant, 1729 Baileys Bluff Road, Holliday, Pasco County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. ~~The future FPC Polk County Site~~, *Hines Energy Complex*, County Road 555, 1 mi. southwest of Homeland, Polk County.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. Each generator has its own stack.}

**The following specific conditions apply to the emissions units listed above regardless of location:**

**Essential Potential to Emit (PTE) Parameters**

**C.1.** These conditions become active and enforceable once FPC has given notification to the Air Quality Division of the Pinellas County Department of Environmental Management, if appropriate, that these units will be relocated to this facility. Notification shall be given as per specific condition C.24. [Rule 62-4.070(3), F.A.C.; Anclote Power Plant Permit AC 09-202080; and, Initial Title V Permit Application for the Anclote Power Plant received June 14, 1996.]

**C.2. Permitted Capacity.** The maximum operation heat input rates are as follows:  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Unit No.	MMBtu/hr/generator(s) Heat Input	Fuel Type
-7775047 -001	25.74	New Low Sulfur No. 2 Fuel Oil