

# Florida Department of Environmental Protection

Bob Martinez Center 2600 Blair Stone Road Tallahassee, Florida 32399-2400 Charlie Crist Governor

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

June 30, 2009

Sent via Electronic Mail - Received Receipt Requested

Rufus.Jackson@pgnmail.com

Mr. Rufus Jackson Plant Manager Florida Power Corporation dba Progress Energy Florida, Inc. (PEF) Anclote Power Plant 1729 Baillies Bluff Road Holiday, Florida 34691

Re: Additional Information, File Number 1010017-012-AV

Title V Air Operation Permit Renewal Application

Anclote Power Plant

Dear Mr. Jackson:

On May 20, 2009, the Department received a Title V air operation permit renewal application for the subject facility via hard copy submission. Thank you for using the latest version of the air permit application form. The Anclote Power Plant is located at 1729 Baillies Bluff Road, Holiday in Pasco County, Florida.

In order to continue processing your application, the Department needs the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the permit application form.

1. New Applicable Requirements: The Title V air operation permit, permit no. 1010017-006-AV, had been renewed with an effective date of January 1, 2005. Subsequent to this effective date, several new federal regulations have been promulgated by U.S. EPA and adopted by the State of Florida. Some of these new federal regulations may be new applicable requirements for the facility applying to certain types of engines.

New Applicable Requirements - New Source Performance Standards (NSPS) Requirements from 40 Code of Federal Regulations (CFR) 60:

40 CFR 60 Subpart IIII also known as (a.k.a.) NSPS "4-I's" or "CI-ICE"

U.S. EPA promulgated on July 11, 2006, the NSPS for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE) under 40 CFR 60 Subpart IIII. This new NSPS applies to new engines. Florida adopted this regulation by reference soon thereafter at Rule 62-204.800(8)(b)78., Florida Administrative Code (F.A.C.).

40 CFR 60 Subpart JJJJ a.k.a, NSPS "4-J's" or "SI-ICE"

U.S. EPA promulgated on January 18, 2008, the NSPS for Stationary Spark Ignition (SI) Internal Combustion Engines (ICE) under 40 CFR 60 Subpart JJJJ. This new NSPS applies to new engines. Florida adopted this regulation by reference soon thereafter at Rule 62-204.800(8)(b)79., F.A.C

a. This facility has proposed insignificant emissions units, e.g., "general purpose engines" and "emergency generators" in Attachment E, items 16. & 17. of the renewal application. Also, the current permit has a Subsection B. for Relocatable Diesel Fired Generator(s) and "General Purpose Engines" & "Emergency Generator(s)" (Emissions Unit ID Nos. -006 & -005) listed in Appendix

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Page 2

U-1. These new NSPS could therefore apply. Are any engines on-site regulated under these new NSPS?

If not, for each engine on-site please provide key non-applicability descriptors to show that each engine is clearly not subject to these new NSPS, like 'existing,' model year/construction (manufacturer) date, manufacturer name, size of engine, e.g., equivalent brake horsepower (HP), type of engine, etc.

New Applicable Requirements - National Emissions Standards for Hazardous Air Pollutants (NESHAP)
Requirements also known as (a.k.a) Maximum Available Control Technologies (MACT) from 40 CFR 63
Subpart ZZZZ:

### 40 CFR 63 Subpart ZZZZ a.k.a. MACT "4-Z's" or "RICE MACT"

U.S. EPA promulgated on February 24, 2004, the Reciprocating Internal Combustion Engines (RICE) MACT under 40 CFR 63 Subpart ZZZZ. This new MACT applies to new and existing engines at a Title V source that is a major source of hazardous air pollutants (HAP). Florida adopted this regulation by reference soon thereafter at Rule 62-204.800(11)(b)82., Florida Administrative Code (F.A.C.).

b. This facility is a major source of HAP and has engines. This new MACT may therefore apply to engines at the facility. Are any engines on-site regulated under the RICE MACT?

If not, for each engine on-site please provide key non-applicability descriptors to show that each engine is clearly not subject to the RICE MACT, like 'existing,' model year/construction (manufacturer) date, manufacturer name, size of engine, e.g., equivalent brake horsepower (HP), type of engine, e.g., compression ignition (CI), etc.

These new federal regulations along with fact sheets are posted on the following U.S. EPA web site: <a href="http://www.epa.gov/ttn/atw/combust/list.html">http://www.epa.gov/ttn/atw/combust/list.html</a>.

2. New Acid Rain Forms: The Department revised the acid rain forms last year. The current acid rain forms have an effective date of 03-16-2008. The form submitted with the permit renewal application is therefore outdated. Please submit completed acid rain form(s) using the current version of the form. The current versions of the acid rain forms can be accessed at the following web site: <a href="http://www.dep.state.fl.us/Air/forms/acidrain.htm">http://www.dep.state.fl.us/Air/forms/acidrain.htm</a>.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), Florida Administrative Code (F.A.C.) requires that all applications for a Department Title V air operation permit must be certified by a professional engineer (P.E.) registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the responsible official (R.O.).

Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within **ninety** (90) days or provide a written request for an additional period of time to submit the information. The processing of this application is under time constraints due to acid rain requiring this permit to be effective January 1, 2010. A response no later than **September 28**, 2009 is appreciated.

Re: Additional Information, File Number 1010017-012-AV

Title V Air Operation Permit Renewal Application

Anclote Power Plant

Page 3

If you should have any questions, please contact me by telephone at 850/921-9532 or by e-mail at Scott.Sheplak@dep.state.fl.us.

Sincerely,

Scott M. Sheplak, P.E. DEP - Title V Section Mail Station #5505 2600 Blair Stone Road Tallahassee, FL 32399

copy to: Mr. Chris Bradley, PEF: Chris.Bradley@pgnmail.com

Mr. Thomas W. Davis, P.E., ECT: tdavis@ectinc.com

Ms. Cindy Zhang-Torres, P.E., DEP SWD: Zhang-Torres@dep.state.fl.us

To:

rufus.jackson@pgnmail.com

Cc: Subject: chris.bradley@pgnmail.com; Tom Davis; Zhang-Torres; Sheplak, Scott; Gibson, Victoria Request for Additional Information. File Number 1010017-012-AV - FPC dba Progress Energy

Request for Additional Information, Floirda, Inc. - Anclote Power Plant

Attachments:

RufusJackson1010017-012-AVFPCdbaProgressEnergyAnclotePowerPlant.pdf

#### Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <a href="http://www.adobe.com/products/acrobat/readstep.html">http://www.adobe.com/products/acrobat/readstep.html</a> > .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

From:

**Exchange Administrator** 

Sent:

Tuesday, June 30, 2009 2:38 PM

To:

Friday, Barbara

Subject:

Delivery Status Notification (Relay)

Attachments:

ATT675079.txt; Request for Additional Information, File Number 1010017-012-AV - FPC dba

Progress Energy Floirda, Inc. - Anclote Power Plant

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

rufus.jackson@pgnmail.com
chris.bradley@pgnmail.com

From:

Jackson, Rufus [Rufus.Jackson@pgnmail.com]

To:

Sent:

Friday, Barbara Tuesday, June 30, 2009 2:50 PM

Subject:

Read: Request for Additional Information, File Number 1010017-012-AV - FPC dba Progress

Energy Floirda, Inc. - Anclote Power Plant

Your message

Rufus.Jackson@pgnmail.com

Subject:

was read on 6/30/2009 2:50 PM.

From:

Jackson, Rufus [Rufus.Jackson@pgnmail.com]

Sent:

Wednesday, July 01, 2009 2:17 PM

To: Cc: Friday, Barbara Hamilton, Suzanne

Subject:

RE: Request for Additional Information, File Number 1010017-012-AV - FPC dba Progress

Energy Floirda, Inc. - Anclote Power Plant

#### Email recieved

**From:** Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]

Sent: Tuesday, June 30, 2009 2:37 PM

To: Jackson, Rufus

Cc: Bradley, Chris; Tom Davis; Zhang-Torres; Sheplak, Scott; Gibson, Victoria

Subject: Request for Additional Information, File Number 1010017-012-AV - FPC dba Progress Energy Floirda, Inc. -

**Anclote Power Plant** 

#### Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

From:

To:

Sent:

Subject:

Bradley, Chris [Chris.Bradley@pgnmail.com]
Friday, Barbara
Tuesday, June 30, 2009 11:57 PM
Read: Request for Additional Information, File Number 1010017-012-AV - FPC dba Progress
Energy Floirda, Inc. - Anclote Power Plant

Your message

Chris.Bradley@pgnmail.com

Subject:

was read on 6/30/2009 11:57 PM.

From:

Exchange Administrator

Sent:

Tuesday, June 30, 2009 2:38 PM

To:

Friday, Barbara

Subject:

Delivery Status Notification (Relay)

Attachments:

ATT675062.txt; Request for Additional Information, File Number 1010017-012-AV - FPC dba

Progress Energy Floirda, Inc. - Anclote Power Plant

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

tdavis@ectinc.com

From:

Tom Davis [tdavis@ectinc.com] Tuesday, June 30, 2009 2:44 PM

Sent: To:

Friday, Barbara

Subject:

RE: Request for Additional Information, File Number 1010017-012-AV - FPC dba Progress

Energy Floirda, Inc. - Anclote Power Plant

Barbara,

I have received the documents referenced in your email below.

Thanks.

**From:** Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]

Sent: Tuesday, June 30, 2009 2:37 PM

To: rufus.jackson@pgnmail.com

Cc: chris.bradley@pgnmail.com; Tom Davis; Zhang-Torres; Sheplak, Scott; Gibson, Victoria

Subject: Request for Additional Information, File Number 1010017-012-AV - FPC dba Progress Energy Floirda, Inc. -

Anclote Power Plant

Dear Sir/Madam:

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Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

From:

System Administrator

To:

Sheplak, Scott

Sent:

Tuesday, June 30, 2009 2:37 PM

Subject:

Delivered: Request for Additional Information, File Number 1010017-012-AV - FPC dba

Progress Energy Floirda, Inc. - Anclote Power Plant

### Your message

To:

rufus.jackson@pgnmail.com

Cc:

chris.bradley@pgnmail.com; Tom Davis; Zhang-Torres; Sheplak, Scott; Gibson,

Victoria

Subject:

Request for Additional Information, File Number 1010017-012-AV - FPC dba

Progress Energy Floirda, Inc. - Anclote Power Plant

Sent: 6/30/2009 2:37 PM

was delivered to the following recipient(s):

Sheplak, Scott on 6/30/2009 2:37 PM

From:

Sheplak, Scott

To: Sent: Friday, Barbara

Sent:

Tuesday, June 30, 2009 3:01 PM

Subject:

Read: Request for Additional Information, File Number 1010017-012-AV - FPC dba Progress

Energy Floirda, Inc. - Anclote Power Plant

### Your message

To:

rufus.jackson@pgnmail.com

Cc:

chris.bradley@pgnmail.com; Tom Davis; Zhang-Torres; Sheplak, Scott; Gibson,

Victoria

Subject:

Request for Additional Information, File Number 1010017-012-AV - FPC dba

Progress Energy Floirda, Inc. - Anclote Power Plant

Sent: 6/30/2009 2:37 PM

was read on 6/30/2009 3:01 PM.

From:

System Administrator

To: Sent: Zhang-Torres; Gibson, Victoria Tuesday, June 30, 2009 2:37 PM

Subject:

Delivered: Request for Additional Information, File Number 1010017-012-AV - FPC dba

Progress Energy Floirda, Inc. - Anclote Power Plant

#### Your message

To: rufus.jackson@pgnmail.com

Cc:

chris.bradley@pgnmail.com; Tom Davis; Zhang-Torres; Sheplak, Scott; Gibson,

Victoria

Subject:

Request for Additional Information, File Number 1010017-012-AV - FPC dba

Progress Energy Floirda, Inc. - Anclote Power Plant

Sent: 6/30/2009 2:37 PM

was delivered to the following recipient(s):

Zhang-Torres on 6/30/2009 2:37 PM Gibson, Victoria on 6/30/2009 2:37 PM

From:

Zhang-Torres

To:

Friday, Barbara

Sent:

Wednesday, July 01, 2009 4:31 PM

Subject:

Read: Request for Additional Information, File Number 1010017-012-AV - FPC dba Progress

Energy Floirda, Inc. - Anclote Power Plant

### Your message

To: rufus.jackson@pgnmail.com

Cc: chr

chris.bradley@pgnmail.com; Tom Davis; Zhang-Torres; Sheplak, Scott; Gibson,

Victoria

Subject:

Request for Additional Information, File Number 1010017-012-AV - FPC dba

Progress Energy Floirda, Inc. - Anclote Power Plant

Sent: 6/30/2009 2:37 PM

was read on 7/1/2009 4:31 PM.

From:

Gibson, Victoria

Sent:

Tuesday, June 30, 2009 2:37 PM

To:

Friday Barbara

Subject:

Out of Office AutoReply: Request for Additional Information, File Number 1010017-012-AV -

FPC dba Progress Energy Floirda, Inc. - Anclote Power Plant

on Tuesday, June 30 and Wednesday, July 1. Will be returning on Thursday, July 2nd. I will get back with you at that time. Have a good week.

From:

Gibson, Victoria

To: Sent: Friday, Barbara Monday, July 06, 2009 1:31 PM

Subject:

Read: Request for Additional Information, File Number 1010017-012-AV - FPC dba Progress

Energy Floirda, Inc. - Anclote Power Plant

#### Your message

To:

rufus.jackson@pgnmail.com

Cc:

chris.bradley@pgnmail.com; Tom Davis; Zhang-Torres; Sheplak, Scott; Gibson,

Victoria

Subject:

Request for Additional Information, File Number 1010017-012-AV - FPC dba

Progress Energy Floirda, Inc. - Anclote Power Plant

Sent: 6/30/2009 2:37 PM

was read on 7/6/2009 1:31 PM.