

HOPPING GREEN SAMS & SMITH

PROFESSIONAL ASSOCIATION

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(850) 222-7500

FAX (850) 224-8551

FAX (850) 425-3415

JAMES S. ALVES
BRIAN H. BIBEAU
KATHLEEN BLIZZARD
ELIZABETH C. BOWMAN
RICHARD S. BRIGHTMAN
PETER C. CUNNINGHAM
RALPH A. DEMEO
THOMAS M. DEROSE
WILLIAM H. GREEN
WADE L. HOPPING
FRANK E. MATTHEWS
RICHARD D. MELSON
MICHAEL P. PETROVICH
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WILLIAM D. PRESTON
CAROLYN S. RAEPPLE
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GARY P. SAMS
ROBERT P. SMITH
CHERYL G. STUART

GARY K. HUNTER, JR.
JONATHAN T. JOHNSON
ROBERT A. MANNING
ANGELA R. MORRISON
GARY V. PERKO
KAREN M. PETERSON
R. SCOTT RUTH
W. STEVE SYKES
T. KENT WETHERELL, II

OF COUNSEL
W. ROBERT FOKES

Writer's Direct Dial No.
(850) 425-2263

February 2, 1998

RECEIVED

FEB 02 1998

**BUREAU OF
AIR REGULATION**

HAND-DELIVERY

Doug Beason, Esq.
Department of Environmental Protection
Office of General Counsel
Room 669
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Resolution of Petition on Anclote Draft Title V Permit

Dear Mr. Beason:

On behalf of Florida Power Corporation (FPC), we appreciate the Department's continued cooperation and assistance in resolving the fundamental issues that are the subject of the Petition for Administrative Hearing on the Anclote Draft Title V Permit. This letter is written to convey our understanding of the status and to provide a recommendation as to the resolution of this matter. First, based on a conversation with Jeff Brown in your office, FPC filed a Status Report and Request for Extension of Additional Time until March 2, 1998 to the Administrative Law Judge. This request is based on our understanding that agreement has been reached on the fundamental issues involved in the Petition. Once FPC receives confirmation of this agreement in writing from the Department, we intend to attach this agreement to a motion to relinquish DOAH's jurisdiction pursuant to Rule 60Q-2.033, F.A.C. Once DOAH relinquishes jurisdiction, the Department will be able to proceed with the issuance of the Anclote Title V permit.

Second, FPC understands that the Department believes that it is necessary to provide an additional public notice on a Revised Draft Title V permit for the Anclote facility, triggering an additional 30-day public comment period. FPC disagrees that re-publication of the public notice

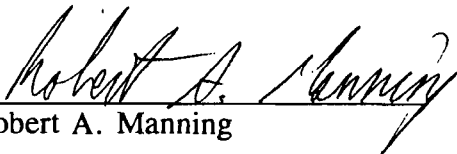
Doug Beason, Esq.
February 2, 1998
Page 2

is appropriate in this case, and believes that it will unnecessarily delay the issuance of the permit. FPC's disagreement on this matter is based on the fact that the Department is not creating or changing any authority for the Anclote facility to utilize used oil, it is simply reflecting existing practice by the facility already authorized by EPA and DEP guidance, and reflected in the Anclote facility's existing air permit conditions. Further, the public was provided adequate notice via the initial publication, which appeared on August 25, 1997, by the language indicating that the final permit may contain conditions different than what is included in the draft permit. Also, pursuant to Section 120.569, Florida Statutes, until DOAH relinquishes jurisdiction of this matter, the Department does not have the authority to take any further action on the permit (e.g., publishing a notice of Revised Draft Permit). Finally, if the Department continues to insist on an additional public notice of a revised draft permit, the Department should bear the cost of such publication.

If you have any questions or comments regarding this information, please contact me at your earliest convenience at the number or e-mail address listed above. We look forward to the resolution of this matter.

Sincerely,


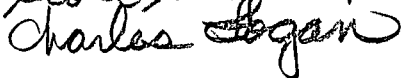
HOPPING GREEN SAMS & SMITH, P.A.

By: 
Robert A. Manning

ATTORNEYS FOR FLORIDA POWER
CORPORATION

RAM/clh

cc: Scott Sheplak
Clair Fancy
Charles Logan

2/2/98 cc: 




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OCT 14 1997

**BUREAU OF
AIR REGULATION**

October 13, 1997

Mr. Scott M. Sheplak, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Florida Power Corporation, Anclote Power Plant
DRAFT Title V Permit No. 1010017-003-AV;
Need to Address Common Issues within Permits

Dear Mr. Sheplak:

We appreciated the opportunity to meet with you and other representatives from the Department on September 24, 1997 regarding the issues associated with Florida Power Corporation's (FPC) Petition for Administrative Hearing on the Draft Title V Permit for the Anclote Power Plant. FPC believes that substantial progress was made towards resolving the primary issues contained in the Petition. For example, FPC understands that the Department intends to revise the draft Title V permit for the Anclote facility to allow the burning of used oil in the same manner as currently allowed under its existing air operating permit.

Several other miscellaneous issues associated with the draft Title V permit were included in FPC's Petition for Administrative Hearing. Due to the 14-day time limit for filing the Petition, FPC indicated that it may have additional comments after further review of the draft permit. Accordingly, attached for your consideration are several supplemental comments regarding the draft Title V permit for the Anclote Power Plant.

Further, several of the issues FPC has identified regarding its draft Title V permits for each of its Title V sources are very similar and at times identical. FPC has, in several instances already, had to resolve these common issues during separate discussions with different DEP personnel (there are 6 separate DEP permit writers working on 10 FPC Title V permits), which has at times resulted in significantly different approaches and permit language. It is to everyone's advantage to have a single resolution of common issues, and consistent permit language, for facilities that have essentially identical emissions units. In the interest of efficiency, FPC would like to have a single meeting to address such common permit issues.

Mr. Sheplak
October 13, 1997
Page 2

Accordingly, FPC requests an opportunity to meet with you as soon as possible to discuss any draft revisions to the draft Title V permit for the Anclote facility, as well as address the common issues associated with the other FPC facilities. In this regard, I will be calling within the next few days to confirm your receipt of this letter and to set up such a meeting. Again, FPC appreciates the Department's attention and cooperation in processing the Title V Permit for the Anclote Power Plant.

If you have any questions in the meantime, please call me at (813) 866-5158.

Sincerely,



Scott H. Osbourn,
Senior Environmental Engineer

cc: Douglas Beason, DEP
Clair Fancy, P.E., DEP
Ken Kosky, P.E., Golder Associates
Robert Manning, HGS&S

10/15/97 cc: Charles Logan
Scott Sheplak

**FLORIDA POWER CORPORATION
SUPPLEMENTAL COMMENTS ON DRAFT TITLE V PERMIT
ANCLOTE POWER PLANT**

General Comments

1. In the Intent to Issue Title V Air Operation Permit, as well as in certain places in the draft permit, DEP incorrectly states that FPC's Title V application was submitted on June 12, 1997. The correct application submittal date, which DEP also states in the draft permit, is June 14, 1997.

2. Because FPC is ultimately responsible for ensuring the publication of the Public Notice of Intent to Issue Title V Air Operation Permit in the manner prescribed by rule, as well as being affected by the content of such notice, FPC requests that DEP provide a copy of the notice that DEP intends to publish, and also provide proof of such publication within a reasonable time after publication occurs.

Section II. Facility-wide Conditions

1. Condition 1. FPC understands that DEP is continuing to revise Appendix TV-1, Title V Conditions, and therefore requests that its final Title V permit incorporate the most up-to-date version of this Appendix.

2. Condition 3. FPC requests the following revision to the last sentence in this Condition because the specified test method does not apply to every unit at the facility, and because Chapter 62-297 does not provide the authority for this method: "For purposes of this Condition, EPA Method 9 is the method of compliance. ~~pursuant to Chapter 62-297, F.A.C.~~"

3. Condition 7. FPC requests that this Condition be edited as follows: "The permittee shall not allow no person to store, pump," The language utilized by DEP is not the explicit language in Rule 62-296.320(1)(a), F.A.C. Further, this condition should be identified as "Not Federally Enforceable", to be consistent with other draft Title V permits previously issued.

Section III. Subsection A.

1. Condition A.3. In paragraph a. and b., there appears to be a typographical error in the first line: "new #6 or higher grades of fuel oils." The appropriate terminology is "lighter," rather than "higher."

2. Condition A.9. Because this unit is only authorized to burn oil, this condition should be edited as follows: "~~When burning liquid fuel~~, Sulfur dioxide emissions...." Also, for clarification, this condition should specify that the sulfur shall be measured in accordance with Condition A.19., instead of "by applicable compliance methods."

2. Condition A.10. This Condition should be deleted because there is no regulatory authority for its inclusion. FPC does not believe that it requested this limit in its Title V application, as stated by DEP in the draft permit. Table 1-1, Summary of Air Pollutant Standards and Terms should be revised accordingly.

Appendix E-1, List of Exempt Emissions Units and/or Activities.

1. Because the following units have trivial, if any, emissions, FPC requests that they be deleted from Appendix E-1: (a) Oil Water Separators, (b) Hazardous Waste Building, and (c) Lube Oil Storage Building (FPC's Anclote Plant does not contain a lube oil storage building).

Table 2-1, Summary of Compliance Requirements.

1. Footnote 1 to this Table references a DEP "guidance document." FPC requests that this reference include a complete title, including the date, for this document.

Anclote



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OCT 15 1998

BUREAU OF AIR REGULATION

October 12, 1998

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

Dear Mr. Sheplak:

Re: Status of Title V Permits

As you know, a meeting was held on August 28, 1998 between the Department and Mr. Scott Osbourn of my staff. The purpose of the meeting was to resolve several pending Title V issues in order to advance these permits to the "proposed" stage as expeditiously as possible. Based upon the meeting, the following is a brief summary of FPC's understanding and position regarding the status of several of FPC's Title V permits.

1. **Bartow facility** (DRAFT Title V Permit No. 1030011-002-AV)

FPC received the Intent to Issue Title V Air Operation Permit and draft Title V permit for the Bartow facility on October 6, 1997. Following several extensions of time and discussions with the Department, FPC filed a Petition for Administrative Hearing on April 30, 1998 (Petition). The primary issue involved in this Petition is whether FPC is required to retain an electrostatic precipitator (ESP) associated with Unit 1, although there are numerous other less contentious permit issues that also require resolution.

As detailed in FPC's November 11, 1997 comment letter and FPC's Petition filed April 30, 1998, FPC maintains that there is no factual or legal basis to require FPC to retain and operate the electrostatic precipitator (ESP) associated with Bartow Unit 1. However, in an effort to move the Title V permitting process forward, FPC is willing to accept a permit that requires that the ESP be retained and used. In exchange for accepting such a requirement, FPC requests the inclusion of additional permit language to clarify this unique situation. Specifically, the ESP utilized at the Bartow facility was not designed to be operated during fuel oil firing (i.e., the ESP was designed based on the use of a coal/oil mixture (COM) fuel). The ESP is also reaching the end of its anticipated design life. Therefore, significant capital investment will be required to continue its operation. Also, because this unit is oil-fired, the ESP is not needed to assure compliance with the applicable particulate matter limits. FPC requests that the statement of basis for the Bartow Title V

permit recognize these facts, in order to ensure that the Credible Evidence rule and the Compliance Assurance Monitoring (CAM) rule, to the extent they may be triggered for Unit 1, are appropriately implemented. Specifically, the final CAM rule (40 CFR Part 64.2(b)(ii), Control Devices Criterion) applies only to pollutant-specific emissions units that rely on a control device to achieve compliance. In this regard, FPC requests that the description/statement of basis for Unit 1 be revised as follows:

Unit 1 is a Particulate matter emissions are controlled by a General Electric Services, Inc. Model 1-BAB1.2X37(9)36.0-434-4.3P electrostatic precipitator (ESP) consisting of five fields in depth. This ESP was designed to operate when utilizing a coal/oil mixture, which is no longer burned by FPC. Moreover, because Unit 1 is oil-fired, this unit is capable of meeting the applicable particulate matter and opacity limits in Conditions A.7 and A.8 without the use of the ESP and, therefore, the provisions of 40 CFR Part 64 do not apply.

In addition, FPC submitted an application to the Department requesting a permit amendment for modification of the fly ash collection system associated with the ESP. The Department has responded that this request is acceptable and that operating permits AO52-233149 and -232464 (for Unit 1 and the fly ash system, respectively) will be amended. Therefore, several Title V conditions relating to operation of the fly ash system will need to be revised. The current request for an extension of time in which to file a petition for an administrative hearing expires on October 15, 1998. In order to properly address the above issues, FPC has requested a further extension until November 15, 1998.

2. **Anclote facility** (Draft Title V Permit No. 1010017-003-AV)

Although there are several issues involved with this permit, the provision regarding used oil appears to be the primary issue. This permit is under Petition for Administrative Hearing with DOAH, to which we currently have an extension of time until December 1, 1998. In order to withdraw its Petition for Administrative Hearing, FPC needs to receive a document from DEP reflecting revised language to which both parties agree.

In this regard, FPC has provided DEP with additional data regarding how other states have authorized facilities to utilize on-specification used oil. None of the examples found thus far have expressed any concern regarding lead emissions; in fact, the lead criteria for "on-specification" used oil was established at a level expressly designed to protect the National Ambient Air Quality Standard for lead.

3. **DeBary facility** (Draft Title V permit No. 1270028-001-AV)

FPC understands that the issues involved with this permit were resolved at our August 28, 1998 meeting. As requested by the Department during our meeting, attached is a summary of combustion turbine operating hours for 1997 and 1998. We appreciate the Department's efforts to reach this agreement and look forward to withdrawing our Petition for Administrative Hearing after receiving a document from the Department reflecting the revised conditions.

4. **Crystal River facility** (Draft Title V Permit No. 1270020-001-AV)

FPC received a revised draft permit from the Department on October 5, 1998, and the issues involved with this permit have largely been resolved. The *Notice of Intent to Issue Title V Permit* was published on October 12, 1998. In order to properly review the revised draft permit, FPC has requested an extension of time in which to file a petition for an administrative hearing until November 12, 1998.

5. **Periodic Monitoring**

By letter dated August 27, 1998 (attached), FPC requested specific language to be added to FPC's permits regarding heat input. FPC specifically reiterates this request for the four permits discussed above. FPC has still not finalized its position on other periodic monitoring issues.

Thank you for your attention and cooperation in issuing Title V permits to FPC's facilities. If the above information is not consistent with your understanding, or we need to discuss any of these issues or deadlines further, please contact either Mr. Scott Osbourn at (727) 826-4258 or me at (727) 826-4301 at your earliest convenience. Again, it is FPC's desire to advance these Title V permits to the "final" stage as expeditiously as possible.

Sincerely,



W. Jeffrey Pardue, C.E.P.
Director, Environmental Services
FPC Responsible Official

Attachments

cc: Clair Fancy, DEP BAR
Robert Manning, Esq., HGS&S
Ken Kosky, P.E., Golder Associates

DeBary Operating Hours

Author: Wilson B. Hicks Jr. at east/o=FLORIDA POWER/c=US/a=MCI/p=FLPROG
Date: 8/31/98 12:08 PM
Priority: Normal
Receipt Requested
TO: Scott H. Osbourn at goc,openmail
Subject: DEBARY P7-P10 1997 AND 1998 OPERATING HOURS

----- Message Contents -----

SCOTT:

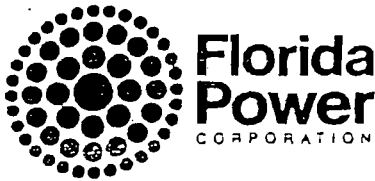
PER YOUR REQUEST, HERE ARE THE HOURS:

YEAR	1997	1998
P-7	1817	1453
P-8	870	673
P-9	1722	1393
P-10	822	676

IF YOU NEED ANY ADDITIONAL INFORMATION, PLEASE, LET ME KNOW.

WILSON

Heat Input Correspondence



bcc: J. M. Kennedy
J. L. Tillman

File: Title V Periodic Monitoring
k:\user\sosbourn\1998\heatinpu.doc
927-616000-AIR

August 27, 1998

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

Dear Mr. Fancy:

Re: Periodic Monitoring in Title V Permits: Heat Input Limits

As you know, a meeting was held between the EPA, the Department and utility representatives at the Florida Electric Power Coordinating Group (FCG) offices on July 14, 1998. The purpose of the meeting was to discuss the periodic monitoring requirements of 40 CFR 70.6(a)(3)(i) as applied to Title V permits. The meeting presented an opportunity for all parties to represent their views, and it was clear that there remains considerable disagreement as to the proper application of the periodic monitoring guidance.

In addition to the July 14, 1998 meeting, FPC has also reviewed DEP's March 10, 1998 letter to EPA (Re: Proposed Changes to FPL Proposed Title V Permits to Satisfy EPA Objections). FPC has still not formalized its position on periodic monitoring, including all of the issues raised in the March 10, 1998 letter. However, the resolution outlined in the March 10th letter regarding heat input limitations appears to be reasonable and one that FPC is willing to accept. This resolution required adding a note to the "permitted capacity" condition for each Title V permit, and an explanation that regular record keeping is not required for heat input. Specifically, the Department stated that they would add the following language to the statement of basis:

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 emissions 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, requires measurement of process variables for emissions 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.

Also, the Department added the following language to each permit 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.}

Accordingly, FPC requests that this language regarding heat input be added to all of FPC's Title V permits currently being processed by the Department. FPC intends to notify the Department as soon as possible after formalizing its position on the remainder of periodic monitoring issues. 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: Robert Manning, HGS&S



October 2, 1997

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OCT 06 1997

BUREAU OF
AIR REGULATION

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

Dear Mr. Sheplak:

Re: Relocatable Diesel Generators Associated with FPC's Crystal River, Bartow,
Anclote and Higgins Plant Sites

Please find enclosed a revised air permit for relocatable diesel generators to be used at the above-referenced facilities. Originally, the permit was written for three specific diesel generators that were leased for an outage at FPC's Crystal River nuclear unit. The federally enforceable limit on fuel flow (i.e., 186.3 gal/hr total) was necessary to avoid new source review. As the diesel generators specifically referenced in the permit may not always be necessary or even available, FPC had requested that the permit be amended to make the language more generic. The intent of the federal enforceability is still preserved.

Language in this revised permit is consistent with the comments that have been made by FPC regarding these generators as they have been described in Title V permits for the above-referenced facilities. Transmittal of this permit is intended to supplement FPC's original applications for these plant sites and to further support previous comments made regarding these generators.

If you should have any questions, please do not hesitate to contact me at (813) 866-5158.

Sincerely,

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

Scott H. Osbourn
Senior Environmental Engineer

Enclosure

cc: Ken Kosky, Golder Associates
Robert Manning, HGS&S



Department of Environmental Protection

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SEP 30 1997

Environmental Svcs
Department

Virginia B. Wetherell
Secretary

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

In the matter of an
Application for Permit by:

Mr. W. Jeffrey Pardue, CEP
Director, Environmental Services
Department
Florida Power Corporation
3201 34th Street South
St. Petersburg, FL 33711 /

DEP File No.: 0170004-006-AO
Counties: Citrus, Pasco,
Pinellas, Polk, &
Sumter

Enclosed is permit number 0170004-006-AO for the operation of the relocatable diesel generators which can operate in the above counties. Procedures for administrative hearing, mediation, and variance/waiver are described below.

Administrative Hearing

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this permit. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 of the Florida Statutes, or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

- (d) A statement of the material facts disputed by the petitioner if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the permit.

Because the administrative action or proposed action addressed in this hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation

A person whose substantial interests are affected by the Department's permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information:

- (a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any;
- (b) A statement of the preliminary agency action;
- (c) A statement of the relief sought; and
- (d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this permit or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following:

- (a) The names, addresses, and telephone numbers of any persons who may attend the mediation;
- (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time;
- (c) The agreed allocation of the costs and fees associated with the mediation;

- (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation;
- (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen;
- (f) The name of each party's representative who shall have authority to settle or recommend settlement; and
- (g) The signatures of all parties or their authorized representatives.

As provided in section 120.573 of the Florida Statutes, the timely agreement of all parties to mediate will toll the time limitations imposed by sections 120.569 and 120.57 for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such a modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under sections 120.569 and 120.57 remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

Variance/Waiver

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under section 120.542 of the Florida Statutes. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to this permit.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;

- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in section 120.542(2) of the Florida Statutes, and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

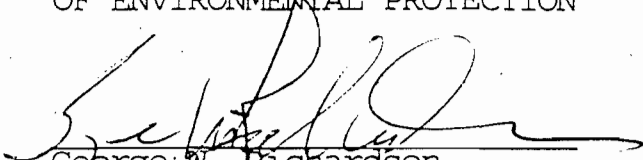
Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of EPA and by the person under the Clean Air Act unless and until Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permit is final and effective on the date filed with the Clerk of the Department unless a timely petition for an administrative hearing is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, F.A.C., or a party requests mediation as an alternative remedy before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. Upon timely filing of a petition or a request for an extension of time to file the petition or a request for mediation, this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate procedure, with the Clerk of the Department in the Office of General Counsel, Douglas Building, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


George W. Richardson
Air Permitting Engineer
Southwest District

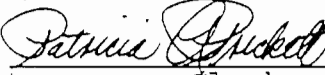
cc: Kennard F. Kosky, P.E., Golder Associates, Inc.
Pinellas County Department of Environmental Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT ISSUANCE was sent to the addressee by certified mail and all copies were sent by regular mail before the close of business on 9/29/97 to the listed persons, unless otherwise noted.

Clerk Stamp

FILING AND ACKNOWLEDGEMENT FILED,
on this date, pursuant to Section
120.52(7), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.


Clerk

9/29/97
Date



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

PERMITTEE:

Florida Power Corporation
3201 34th Street South
St. Petersburg, FL 33711 /

Permit No.: 0170004-006-AO
Amendment Date:
Expiration Date: 3/31/97
Counties: Citrus, Pasco,
Pinellas, Polk &
Sumter
Project: Relocatable Diesel
Generators

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204 through 62-297 and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the operation of one to three relocatable diesel generators rated at a maximum total of 2,460 kw (2.46 mw). The maximum total heat input rate is 25.74 MMBTU/hour (186.3 gallons/hour of diesel fuel). The diesel generators burn new/virgin No 2 diesel fuel oil having a maximum sulfur content of 0.5% by weight. The diesel generators may be located at any Florida Power Corporation facility listed below:

- Locations:
- (1) The Crystal River Plant, Powerline Road Red Level, Citrus County.
 - (2) The Anclote Plant, Anclote Road, west of Alternate 19, Tarpon Springs, Pinellas County.
 - (3) The Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
 - (4) The Higgins Plant, Shore Drive, Oldsmar, Pinellas County.
 - (5) The Bayboro Plant, 13th Avenue & 2nd Street South, St. Petersburg, Pinellas County.
 - (6) The Wildwood Reclamation Facility, State Road 462, 1 mile east of US 301, Wildwood, Sumter County.
 - (7) The FPC Polk County Site, County Road 555, 1 mile southwest of Homeland, Polk County.

Facility ID No.: 0004 Emission Unit ID No.:
012-Diesel Generators



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

PERMITTEE:

Florida Power Corporation
3201 34th Street South
St. Petersburg, FL 33711 /

Permit No.: 0170004-006-AO
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Generators

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 - (6) The Wildwood Reclamation Facility, State Road 462,
1 mile east of US 301, Wildwood, Sumter County.
 - (7) The FPC Polk County Site, County Road 555, 1 mile
southwest of Homeland, Polk County.

Facility ID No.: 0004

Emission Unit ID No.:

012-Diesel Generators

PERMITTEE:
Florida Power Corporation

Permit No.: 0170004-006-AO
Project: Relocatable Diesel
Generators

Amends Permit No.: A009-205952

Note: Please reference Permit No., Facility No., and Emission Unit ID in all correspondence, test report submittals, applications, etc.

1. A part of this permit is the attached 15 General Conditions [Rule 62-4.160, F.A.C.].
2. Visible emissions from each of the diesel generators shall not be equal to or exceed 20% opacity [Rule 62-296.320((4)(b), F.A.C.].
3. Florida Power Corporation shall not discharge air pollutants which cause or contribute to an objectionable odor [Rule 62-296.320(2), F.A.C.].
4. The hours of operation expressed as "engine-hours" shall not exceed 2,970 in any consecutive 12 month period. The hours of operation expressed as "engine-hours" shall be the summation of the individual hours of operation of each diesel generator [Permit AC09-202080].
5. Florida Power corporation is permitted to burn only new/virgin No. 2 diesel fuel oil having a maximum sulfur content not to exceed 0.5% by weight in the diesel generators [Permit AC09-202080].
6. The total heat input rate to all diesel generators shall not exceed 25.74 MMBTU/hour (186.3 gallons/hour) [Permit AC09-202080].
7. Florida Power Corporation shall notify the Department, in writing, at least 15 days prior to the date on which any diesel generator is to be relocated. The notification shall specify:
 - (A) which diesel generator, by serial number, is being relocated;
 - (B) which location the diesel generator is being relocated from;
 - (C) which location the diesel generator is being relocated to; and
 - (d) the approximate startup date at the new location.

If a diesel generator is to be relocated within Pinellas County, then Florida Power Corporation shall provide the same notice to the Pinellas County Department of Environmental Management, Air Quality Division [Rule 62-4.070(3), F.A.C.].

PERMITTEE:
Florida Power Corporation

Permit No.: 0170004-006-AO
Project: Relocatable Diesel
Generators

8. Test each diesel generator for the following pollutants on an annual basis within 30 days of the relocation date. Within 45 days of testing, submit a copy of the test data to the Air Compliance Section of the Department's Southwest District Office and the Pinellas County Department of Environmental Management, Air Quality Division for each diesel generator located in Pinellas County [Rules 62-297.310(7) and 62-297.310(8)(b), F.A.C.].

- (X) Opacity
- (X) Fuel Sulfur Analysis

9. After each relocation, test each relocated diesel generator for then following pollutants within 30 days of startup. Within 45 days of testing, submit a copy of the test data to the Air Compliance Section of the Department's Southwest District Office and the Pinellas County Department of Environmental Management, Air Quality Division for each diesel generator located in Pinellas County [Rules 62-297.310(7) and 62-297.310(8)(b), F.A.C.].

- (X) Opacity
- (X) Fuel Sulfur Analysis

10. Compliance with the emission limitations specified in Specific Condition No. 2 shall be determined using EPA Method 9. The test method is contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The Method 9 compliance test shall be conducted by a certified observer and be a minimum of 30 minutes. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A.

11. Testing of each diesel generator shall be accomplished while the diesel generator is being operated within 90 to 100% of the maximum fuel firing rate in gallons per hour. Failure to submit the actual operating rate during the test may invalidate the test data [Rule 62-4.070(3), F.A.C.].

12. The permittee shall notify the Air Compliance Section of the Department's Southwest District Office and the Pinellas County Department of Environmental Management, Air Quality Division, if applicable, at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted (Rule 62-297.340(1)(i), F.A.C.).

PERMITTEE:
Florida Power Corporation

Permit No.: 0170004-006-AO
Project: Relocatable Diesel
Generators

13. Compliance with Specific Condition No. 4 shall be documented by record keeping. At a minimum, the records shall indicate the daily hours of operation of each individual diesel generator expressed as "engine-hours", and a cumulative total hours of operation expressed as "engine-hours" for each month. The records shall be recorded in a permanent form suitable for inspection and shall be retained for at least the most recent 2 years and be made available for inspection by the Department or the Pinellas County Department of Environmental Management, Air Quality Division, if applicable, upon request [Rule 62-4.070(3), F.A.C.,].

14. In order to document continuing compliance with the sulfur content limitations, in % by weight, the permittee shall keep records of either vendor provided as-shipped analysis or an analysis of as-received samples taken at the plant. The analysis shall be determined by ASTM Methods ASTM D4057-88 and ASTM D129-91, ASTM D2622-94 or ASTM D4294-90 adopted by reference in Rule 62-297.440(1), F.A.C. The records shall be recorded in a permanent form suitable for inspection and shall be retained for at least the most recent 2 years and be made available for inspection by the Department or the Pinellas County Department of Environmental Management, Air Quality Division, if applicable, upon request [Rule 62-4.070(3), F.A.C.,].

15. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320(4)(c), F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling.

16. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297 & 62-4 or any other requirements under federal, state, or local law [Rule 62-210.300, F.A.C.,].

17. Florida Power Corporation shall submit to the Air Section of the Department's Southwest District Office each calendar year on or before March 1, completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility," for the preceding calendar year (Rule 62-210.370(3)(a)2., F.A.C.). The Report shall contain at a minimum the following information:

- (A) the location of each diesel generator, by serial number, at the end of the preceding calendar year;

PERMITTEE:
Florida Power Corporation

Permit No.: 0170004-006-AO
Project: Relocatable Diesel
Generators

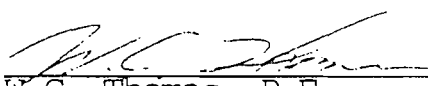
Specific Condition No. 17 continued:

- (B) the annual amount of fuel burned in each diesel generator, by serial number;
- (C) the annual hours of operation of each diesel generator, by serial number;
- (D) the annual hours of operation expressed in "engine-hours", as defined in Specific Condition No. 4;
- (E) a copy of the fuel sulfur content records required by Specific Condition No. 14 for the preceding calendar year;
- (F) annual emissions of particulate, PM₁₀, carbon monoxide, SO₂, and NOx based on actual diesel generator operation and fuel usage (provide a copy of the calculation sheets and the basis for calculations);
- (G) any changes in the information contained in the permit application.

If any diesel generator operated within Pinellas County at any time during the preceding calendar year, then Florida Power Corporation shall provide a copy of the AOR to the Pinellas County Department of Environmental Management, Air Quality Division.

18. At least 60 days prior to the expiration date of this operation permit, the permittee shall submit at least two copies of DEP Short Form No. 62-210.900(2), for the renewal of this operating permit along with the processing fee established in Rule 62-4.050(4), F.A.C., and a copy of the latest compliance tests to the Air Permitting Section of the Department's Southwest District Office and one copy to the Pinellas County Department of Environmental Management, Air Quality Division, if applicable [Rule 62-4.090(1), F.A.C.].

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



W.C. Thomas, P.E.
District Air Program
Administrator
Southwest District

ATTACHMENT - GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

GENERAL CONDITIONS:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

GENERAL CONDITIONS:

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Scott B
x. Bruce
9/22**RECEIVED**

SEP 22

BUREAU OF
AIR REGULATION

September 17, 1997

Mr. Clair Fancy
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

Dear Mr. Fancy:

Re: Petition for Administrative Hearing

As you know, Florida Power Corporation (FPC) has filed a petition for administrative hearing on the draft Title V permit for its Anclote facility. The primary issue raised in the petition is DEP's proposal to limit emissions of lead from the burning of used oil to 1200 pounds/year. This proposed condition, which includes a quarterly lead emissions reporting requirement, is new and it represents a tightening of the emission standards that currently apply to the facility. FPC previously applied for, and received, approval from the DEP to burn used oil at the Anclote plant through proper public notice permitting. Title V operating permits are intended to include all existing air regulatory requirements; I have not understood the Title V permitting process as an occasion to develop new, more stringent emission limits. Retroactively applying the PSD significance threshold as the emission limit is unwarranted, especially for a facility that the DEP considers "capable of accommodating" the fuel.

It is FPC's position that the burning of used oil is the most beneficial alternative to disposing of the oil. In terms of total management of the ecosystem, burning used oil has the least overall impact to the environment. FPC has approval to burn used oil at four of its facilities, and has applied for approval at two others. I understand that the draft Title V permits for these facilities may contain similar conditions regarding used oil burning. If so, and if FPC and the DEP are unable to agree on an appropriate permit condition, FPC will file similar petitions for administrative hearing and will seek to consolidate them into a single case.

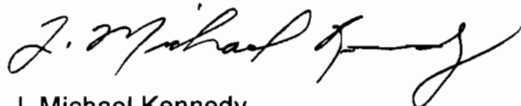
The Anclote permit has, and the other draft permits most likely will have, other more "mundane" issues that FPC and the DEP should be able to settle without taking them to administrative hearing. FPC will request that the DEP grant an appropriate extension of time in which to file for administrative hearing when these issues arise so that only the most serious issues, such as used oil, are raised in an administrative proceeding. In fact, FPC would prefer not to take the used oil issue to hearing, but to reach an agreement with the DEP outside of the hearing process.

We would like to meet with you to discuss this issue at your earliest convenience. By meeting and discussing the used oil issue, perhaps we can reach a solution without having to complete the time-consuming and costly administrative hearing process.

Mr. Clair Fancy
September 17, 1997
Page Two

Please contact me at (813) 866-4344 if you have any questions or comments.

Sincerely,



J. Michael Kennedy
Manager, Air Programs

cc: James Alves, Esq., HGSS

RECEIVED

SEP 22 1997

BUREAU OF
AIR REGULATION

Date: 8/20/97 1:20:16 PM
From: Elizabeth Walker TAL
Subject: new posting
To: See Below

There are three new draft permits posted on the Florida Website.

Florida Power Corp Intercession City Power Plant 0970014
DRAFT

Florida Power Corp University of Florida Cogeneration 0010001 DRAFT

Florida Power Corp Anclote Power Plant 1010017 Draft

If you have any questions please let me know.

Thanks, Elizabeth

To: adams yolanda
To: pierce carla
To: Barbara Boutwell TAL
To: Scott Sheplak TAL
To: Terry Knowles TAL
To: gates.kim@epamail.epa.gov@in
CC: Charles Logan TAL

TO: Scott M. Sheplak, P.E.
FROM: Charles S. Logan *CSL*
DATE: August 7, 1997
Re: Intent package for DRAFT Permit No.: 1010017-003-AV
Florida Power Corporation
Anclote Power Plant

Permit Clock: NA

This permit is for the initial Title V air operation permit for the subject facility. This facility consists of two pre-NSPS fuel oil fired steam electric generating stations. Relocatable diesel fired generator(s) are also located at this facility and may be relocated to other facilities. Additional information was not requested. Comments were not received from the District office. This facility reported that each emissions unit was in compliance at the time of the application.

I recommend that this Intent to Issue be sent out as attached.

csl/



Jeb Bush
Governor

Department of Environmental Protection

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.]

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

File Barbara

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:

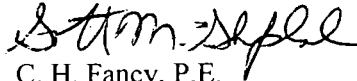
(b) Minimum Sample Volume. The minimum sample volume per run shall be 30 dry standard cubic feet.

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.

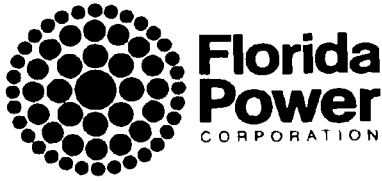
Sincerely,


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

**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. Owen, Jr.
Hamilton S. Owen, 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. 4/3/73 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

-file-
Scott

JUL 16 1999

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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:

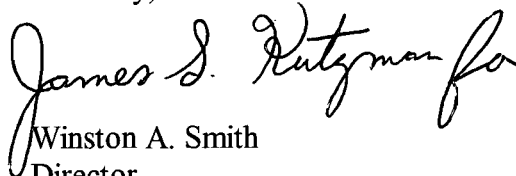
The purpose of this letter is to provide comments to the Florida Department of Environmental Protection (DEP) on the proposed title V operating permit for Florida Power Corporation, Anclote Power Plant, which was posted on DEP's web site on June 2, 1999. Based on the Environmental Protection Agency's (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.

P 174 053 163

US Postal Service

Receipt for Certified Mail

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

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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
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- Return Receipt for Merchandise COD

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JUL 23 1999

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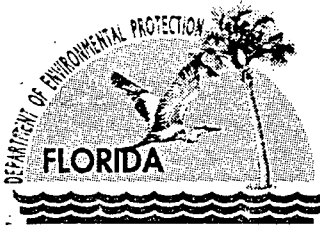
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JUL 27 1999

BUREAU OF AIR REGULATION • Print your name, address, and ZIP Code in this box •
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR RESOURCES MANAGEMENT
BUREAU OF AIR REGULATION - TITLE V
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400
MS 5505

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

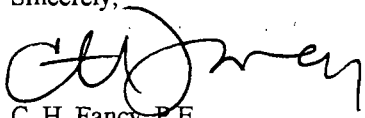
Dear Mr. Pardue:

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*
~~*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.

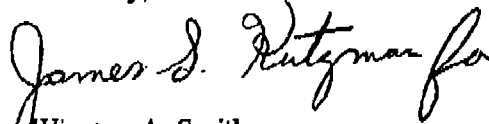
Section 70.8(c) requires EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information), if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 C.F.R. Part 70. 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-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)(f) 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.

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages = 6

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

NSN 7510-01-317-7388

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. A051-169340 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.

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- 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.

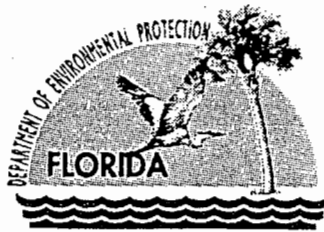
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Jeb Bush
Governor

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

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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

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Special Delivery Fee	
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Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
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Postmark or Date	

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

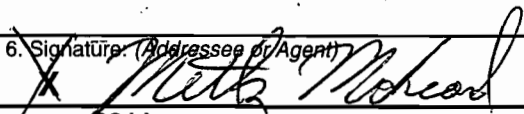
- Registered Certified
- Express Mail Insured
- Return Receipt for Merchandise COD

7. Date of Delivery

4/90

5. Received By: (Print Name)

6. Signature (Addressee or Agent)



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

Thank you for using Return Receipt Service.

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DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR RESOURCES MANAGEMENT
BUREAU OF AIR REGULATION - TITLE V
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

MS 5505

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APR 1 1989

BUREAU OF
AIR REGULATION





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AUG 11 1999

BUREAU OF AIR REGULATION

August 10, 1999

Title V Section Chief
Bureau of Air Regulation
Division of Air Resources Management
Florida Dept of Environmental Protection
2600 Blair Stone Rd., Mail Stop 5505
Tallahassee, FL 32399-2400

RE: Florida Power Corp., Anclote Power Plant, Facility ID No. 1010017

Dear Section Chief:

We recently received information regarding the possible use of off-spec or contaminated waste oil at the Florida Power Corp (FPC) Anclote power plant in Pasco County. We understand that Anclote is permitted to burn various grades of new fuel oil and on-spec oil that meets certain criteria. The information we received concerns waste oil generated off-site that may be imported from foreign suppliers or otherwise not handled, managed or certified properly. We also understand there may be a number of citizen complaints about pollution from this facility and its effects on the nearby community.

We understand that FPC is generally required to conduct an annual formal compliance test for visible emissions, lead over 5 tons, and any regulated air pollutant more than 100 tons. We would like to review the test data for the last three years for Anclote. If DEP has waived compliance test requirements for any year, we would like to review the Department's determination and the information submitted by FPC to demonstrate a basis for such determination as well as any alternative test or procedure results.

We would also like to review all documentation relating to the use of waste oil at Anclote, including any demonstration or test to show that the oil meets specifications (including supplier or operator certifications; that its use is limited to allowable quantities; and that it is managed in appropriate ways.

By copy of this letter, we are also requesting the District Office to provide us with information relating to any excess emissions notifications it has received from FPC during 1997, 1998 and 1999.

Please notify me by phone or e-mail (gkamaras@lewisweb.net) when requested documents are available for review. Thank you.

Sincerely,

Gail Kamaras

Gail Kamaras, Director
Energy Advocacy Program

c: Division of Air Resources Management
Florida Dept of Environmental Protection
Southwest District Office
3804 Coconut Palm Drive
Tampa, FL 33619-8318

-file-

DEPARTMENT OF ENVIRONMENTAL PROTECTION
3900 Commonwealth Blvd., MS 31
Tallahassee, FL 32399-3000
Phone: 904/488-1073; SC 278-1073
Fax: 904/921-6227; SC 291-6227

original to Howard
copy Clarr, Jim

MEDIA HOT SHEET

Topic: Florida Power Corporation - Anclote Power Plant

Date: 08/27/98

Reporter: Mary Masley 727/938-5303

From (Newspaper, TV, Radio, etc.): Kreelance writer for weekly newspapers

Person Interviewed: Scott Sheplak Phone: 850/921-9532

Division/Bureau/Office: Air Resources Management / Air Regulation / Title V Section

Date Interviewed: 08/27/98 ~ 4:30 p.m.

Questions asked:

1. Who permits air pollutant emissions from the subject plant?

2. Is the subject plant in compliance?

3. Who permits desalination plants?

Follow-up Needed? _____

Deadline: _____

Summary of Conversation (use back of page, if necessary)

I called the subject reporter at Jim Pennington's request. Mary Masley indicated that she is very concerned about the effects of air pollution from the subject plant on the children, homes, and cars in the neighborhood. She said that she has gotten "the run around from the Tampa office." She claims that numerous homes are being painted frequently at Florida Power Corp's expense because the paint is "eaten off by air pollutant emissions." She intends to submit a complaint with 100% of pictures from this morning to the Tampa office.

over →

1. I discussed briefly the permitting roles of the Tallahassee and Tampa offices - pre-Title V, Title V, PSD. I informed her that we issued a DRAFT Title V permit to the plant. I recommended that she view the draft from our web site if she was interested in the permit conditions. She inquired about the emission limitations that apply to the plant. I briefly discussed the acid rain requirements from Phase II SO₂.
2. I informed her that the Tampa office is responsible for compliance inspections, audits, etc. I informed her that the plant indicated they were in compliance at the time of the Title V application submittal. She plans to submit a formal complaint with a copy to Jim Pennington.
3. I was unable to answer her question on desalination plants.

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8/11/99

Telephone conversation w/ Gail
Kamras.

The district office handles
compliance matters. The
supervisor of compliance in Tampa
is Bill Proses.

Scott Steplek