



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

May 6, 1999

Scott H. Osbourn
Senior Environmental Engineer
Florida Power Corporation
3201 34th Street South
St. Petersburg, Florida 33711

Re: Bartow Plant Annual Compliance Testing

Dear Mr. Osbourn:

This letter authorizes Florida Power Corporation to conduct a "one time only test" in 1999 of Bartow Unit 1 without the operation of the electrostatic precipitator. The purpose of the test is to provide documentation to the Department that Bartow Unit 1 is capable of meeting all applicable particulate matter emissions limits without the control device in operation. In addition, the test results will allow the Department to determine potential applicability of the Compliance Assurance Monitoring rule as it relates to the electrostatic precipitator. Florida Power Corporation has committed to the continued operation and maintenance of the electrostatic precipitator and this test is to be in addition to the normal annual compliance test conducted with the operation of the electrostatic precipitator.

If you have any other questions, please contact Edward J. Svec at 850/921-8985.

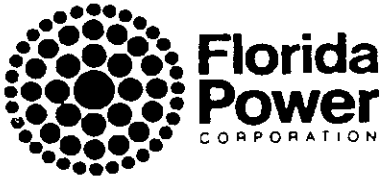
Sincerely,

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

CHF/s

cc: Mr. Bill Thomas, P.E., FDEP SWD
Mr. Jerry Kissel, P.E., FDEP SWD
Mr. Gary Robbins, PDEM
Mr. Bill Proses, FDEP SWD

5/6/99 cc - Reading File
Ed Svec



RECEIVED

February 24, 1999

MAR 02 1999

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

BUREAU OF AIR REGULATION

BAR conference room

Dear Mr. Fancy:

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

Re: Status of Title V Permits

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

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

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

Sincerely,

J. Michael Kennedy (signature)

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

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

processor
Anclote Mike
Bartow Ed
Crystal Ed
Suwannee Bruce
Tiger Bay Jonathan
Bayboro Ed
UofF Bruce

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



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

January 28, 1999

Mr. W. Jeffrey Pardue, C.E.P.
Director, Environmental Services
Florida Power Corporation
P.O. Box 14042
St. Petersburg, FL 33733

Re: Response to Comments
File No. 1030011-002-AV
Bartow Plant, Pinellas County

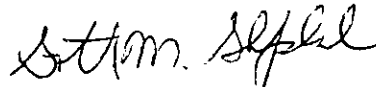
Dear Mr. Pardue:

In addition to the Department's original responses to your comments addressed in our letter dated January 25, 1999, we will revise the Statement of Basis and the description in **Section III. A.** for Unit 1 to read, as follows:

Unit No. 1 is a front-fired, fossil fuel steam generator which produces 120 megawatts, electric, power. The maximum heat input rate is 1,220 million Btu per hour and the unit fires No. 6 fuel oil, No. 2 fuel oil, and on-specification used oil. 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. The application for the permit to construct indicates this ESP was designed to operate when utilizing a coal/oil mixture, which is no longer burned by FPC. The permittee claims, 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. A Durag Model 281 Continuous Emissions Monitor for opacity with a recorder is used for continual observation of stack opacity. Unit 1 began commercial service in 1958.

If you have any questions or require any additional information, please call me at 850/921-9532 or Edward J. Svec at 850/921-8985.

Sincerely,



Scott M. Sheplak, P.E.
Administrator
Title V Section

SMS/es

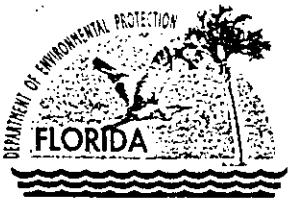
copy to:

Ken Kosky, P.E., Golder Associates

Mr. Bill Thomas, P.E., DEP Southwest District, Air Section

Mr. Gary Robbins, PCDEM, Air Quality Division

1/29/99 cc: Ed Svec
Reading File



Ed SVEC

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

March 27, 1998

Mr. Scott H. Osbourn
Senior Environmental Engineer
Florida Power Corporation
P.O. Box 14042
St. Petersburg, FL 33733

Re: Comments on DRAFT Title V Permit
File No. 1030011-002-AV
Bartow Plant, Pinellas County

Dear Mr. Osbourn:

We received your comments dated November 11, 1997 on the Draft Title V permit for the Bartow Plant. The following comments are in response to your comments. We included revised language where necessary to clearly show the revisions or changes to the permit. We often did not include the revised language when we agreed with the requested change. Nothing in the following changes will require the publication of a new Notice of Intent to Issue, nor will they prevent the issuance of the Proposed permit.

Please advise if your comments have been adequately addressed, or if you have comments on the other changes so that we may proceed to the Proposed permit stage. If you should have any questions, please call Edward J. Svec at 850/921-8985.

Sincerely,

A handwritten signature in cursive script that reads "Scott M. Sheplak".

Scott M. Sheplak, P.E.
Administrator
Title V Section

SMS/es

attachment

copy to:

Mr. W. Jeffrey Pardue, C.E.P., FPC
Ken Kosky, P.E., Golder Associates
Mr. Bill Thomas, P.E., DEP Southwest District, Air Section
Mr. Gary Robbins, PCDEM, Air Quality Division

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

PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 1030011-002-AV

Page 1 of 16

I. Public Notice.

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" to Florida Power Corporation for the Bartow Plant located at Weedon Island, St. Petersburg, Pinellas County was clerked on October 1, 1997. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in the Tampa Tribune on November 18, 1997. The DRAFT Title V Air Operation Permit was available for public inspection at the Pinellas County Department of Environmental Management Air Quality Division in Clearwater and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on December 18, 1997.

II. Public Comment(s).

Comments were received and the DRAFT Title V Operation Permit was changed. The comments were not considered significant enough to reissue the DRAFT Title V Permit and require another Public Notice. Comments were received from two respondents during the 30 (thirty) day public comment period. Listed below is each comment letter in the chronological order of receipt and a response to each comment in the order that the comment was received. The comment(s) will not be restated. Where duplicative comments exist, the original response is referenced.

A. Letter from Mr. Gary Robbins, Pinellas County Department of Environmental Management Air Quality Division dated October 17, 1997, and received on October 22, 1997.

1.R: The Department agrees with the comment and as a result the rule cite for **Section II. Facility-wide Conditions.**, specific condition **2.** is changed as follows:

From: 2. Not federally enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.; and, Pinellas County Ordinance No. 89-70, Subpart 6.620, as amended]

To: 2. Not federally enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.; and, Pinellas County Ordinance 97-05, Section 33, Sec. 58-178]

2.R: The Department disagrees with the comment. The applicable requirement for frequency of testing in Rule 62-297.310(7), F.A.C. states that "During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for...". The test date can be agreed upon by the regulatory agency and the permittee but there is no rule basis for establishing a specific testing date. The condition will remain as noticed.

3.R: The Department agrees with the comment, except for specific condition **E.19.** which will remain as noticed. As a result of the comment, the following changes are made:

From:

A.28., B.18., C.15., and D.13. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which

9. The owner or operator shall notify the Department, 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 for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

.....

A.35., B.23., and D.14. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

.....

A.36. In order to document continuing compliance with specific condition **A.11.**, the permittee

.....

(h) The total of used oil burned at the facility for the most recent consecutive 12-month period. These records shall be recorded in a permanent form suitable for inspection by the Department upon request, and shall be retained for at least a five year period.

[40 CFR 279.65 & 66; 40 CFR 761.20(3)(b); and, Rule 62-4.070(3), F.A.C.]

B.21. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.]

C.7. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

C.18. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

[Rule 62-297.310(8), F.A.C.]

E.18. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, the owner or operator shall notify the Department's Southwest District Office, if a generator is located in Pasco County, in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.]

To:

A.28., B.18., C.15., and D.13. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which

9. The owner or operator shall notify the PCDEM, 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 for the owner or operator.

(b) **Special Compliance Tests.** When the PCDEM, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the PCDEM.

.....

A.35., B.23., and D.14. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the PCDEM on the results of each such test.
- (b) The required test report shall be filed with the PCDEM as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the PCDEM to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

.....

A.36. In order to document continuing compliance with specific condition **A.11.**, the permittee

....

(h) The total of used oil burned at the facility for the most recent consecutive 12-month period. These records shall be recorded in a permanent form suitable for inspection by the PCDEM upon request, and shall be retained for at least a five year period.

[40 CFR 279.65 & 66; 40 CFR 761.20(3)(b); and, Rule 62-4.070(3), F.A.C.]

B.21. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify PCDEM in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by PCDEM.

[Rule 62-210.700(6), F.A.C.]

C.7. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by PCDEM for longer duration.

[Rule 62-210.700(1), F.A.C.]

C.18. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with PCDEM on the results of each such test.
- (b) The required test report shall be filed with PCDEM as soon as practical but no later than 45 days after the last sampling run of each test is completed.

[Rule 62-297.310(8), F.A.C.]

E.18. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, the owner or operator shall notify the PCDEM, if a generator is located in Pinellas County, in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the PCDEM.

[Rule 62-210.700(6), F.A.C.]

4.R: This specific condition was carried over from the current operating permits for the three emissions units. The condition states that for the purpose of the annual operating report, particulate matter emissions are calculated using the particulate matter stack test results and the other pollutants are estimated using emission factors and fuel usage. Since there are no required stack tests for the other pollutants cited in the condition, the Department fails to see how stack test results are used to calculate emissions of the other pollutants. The condition will remain unchanged.

5.R: The Department agrees with the comment and will change specific conditions **A.41.** and **D.15.**, as follows:

From:

A.41. E.U. ID No. -001 Operation and Maintenance Plan. The General Electric Services, Inc. Model 1-BAB1.2X37(9)36.0-434-4.3P electrostatic precipitator shall be operated and maintained in accordance with the Operation and Maintenance (O&M) Plan, dated 10/04/93 and on file with the Department. The O&M Plan documentation logs shall be maintained for a minimum of five years and made available for inspection upon request. At a minimum, the O&M Plan shall include:

1. The operating parameters of the control device
2. A timetable of routine weekly, bi-weekly, or monthly observations of the pollution control device.
3. A list of the type and quantity of the required spare parts which are stored on the premises for the pollution control device.
4. A record log which shows at a minimum when maintenance was performed, what maintenance was performed, and by whom.

[Rule 62-296.700(6), F.A.C.; and Pinellas County Ordinance No. 89-70, Subpart 2.230, as amended]

D.15. Not Federally Enforceable. Operation and Maintenance Plan. The permittee shall follow the Operation and Maintenance (O&M) Plan received June 4, 1993 and on file with the PCDEM. The O&M Plan documentation logs shall be maintained for a minimum of five years and made available for inspection upon request. At a minimum, the O&M Plan shall include:

1. The operating parameters of the control device
2. Timetable for routine maintenance of the pollution control device as specified by the manufacturer.
3. A timetable of routine weekly, bi-weekly, or monthly observations of the pollution control device.
4. A list of the type and quantity of the required spare parts which are stored on the premises for the pollution control device.
5. A record log which shows at a minimum when maintenance was performed, what maintenance was performed, and by whom.

[Pinellas County Ordinance No. 89-70, Section 3, Subpart 2.230(1) & (2), adopted January 2, 1990]

To:

A.41. E.U. ID No. -001 Operation and Maintenance Plan. The General Electric Services, Inc. Model 1-BAB1.2X37(9)36.0-434-4.3P electrostatic precipitator shall be operated and maintained in accordance with the Operation and Maintenance (O&M) Plan, dated 10/04/93 and on file with the Department. The O&M Plan documentation logs shall be maintained for a minimum of five years and made available for inspection upon request. At a minimum, the O&M Plan shall include:

- 1. The operating parameters of the control device
2. A timetable of routine weekly, bi-weekly, or monthly observations of the pollution control device.
3. A list of the type and quantity of the required spare parts which are stored on the premises for the pollution control device.
4. A record log which shows at a minimum when maintenance was performed, what maintenance was performed, and by whom.

[Rule 62-296.700(6), F.A.C.; and Pinellas County Ordinance 97-05, Section 22, Sec. 58-128]

D.15. Not Federally Enforceable. Operation and Maintenance Plan. The permittee shall follow the Operation and Maintenance (O&M) Plan received June 4, 1993 and on file with the PCDEM. The O&M Plan documentation logs shall be maintained for a minimum of five years and made available for inspection upon request. At a minimum, the O&M Plan shall include:

1. The operating parameters of the control device
2. Timetable for routine maintenance of the pollution control device as specified by the manufacturer.
3. A timetable of routine weekly, bi-weekly, or monthly observations of the pollution control device.
4. A list of the type and quantity of the required spare parts which are stored on the premises for the pollution control device.
5. A record log which shows at a minimum when maintenance was performed, what maintenance was performed, and by whom.

[Pinellas County Ordinance 97-05, Section 22, Sec. 58-128]

6.R: See response **A.2.R:**, above.

7.R: See response **A.2.R:**, above.

B. Letter from Mr. Scott Osbourn, Florida Power Corporation dated November 11, 1997, and received on November 24, 1997.

General Comments

1.R: The Department agrees with the comment. See the following section where this comment is addressed.

2.R: The Department acknowledges the comment. A copy of the public notice and the proof of publication has been sent to the attention of Mr. Scott Osbourn.

3.R: The Department agrees with the comment and the following change is made to the Table of Contents:

From:

III. Emissions Unit(s) and Conditions

- A. Emissions Units -001 No. 1 Unit, Fossil Fuel Fired Steam Generator..... 6 - 21
with Electrostatic Precipitator
- 002 No. 2 Unit, Fossil Fuel Fired Steam Generator
- 003 No. 2 Unit, Fossil Fuel Fired Steam Generator

To:

III. Emissions Unit(s) and Conditions

- A. Emissions Units -001 No. 1 Unit, Fossil Fuel Fired Steam Generator..... 6 - 21
with Electrostatic Precipitator
- 002 No. 2 Unit, Fossil Fuel Fired Steam Generator
- 003 No. 3 Unit, Fossil Fuel Fired Steam Generator

4.R: The Department agrees with the comment. See the following section where this comment is addressed.

Section II. Facility-wide Comments

5.R: The Department agrees with the comment and the following changes are made to Section II., Facility-wide Conditions:

From:

2. Not federally enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.; and, Pinellas County Ordinance 97-05, Section 33, Sec. 58-178]

To:

2. Not federally enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.; and, Pinellas County Ordinance 97-05, Section 33, Sec. 58-178]

6.R: The request to change condition 3 of the Facility-wide Conditions is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

7.R: Pursuant to rule change, the term “exempt” will be changed to “insignificant” where appropriate throughout the permit.

8.R: The request to change condition 7 of the Facility-wide Conditions is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

Section III. Subsection A.

9.R: The Department disagrees with the comment. The Department has addressed the issue of the electrostatic precipitator in a letter dated June 24, 1996 which references “PSD Applicability Determination - Bartow Unit No. 1 PSD” , so no change will be made.

10.R: The requested change is not consistent with other permits issued by this office, so no change will be made.

11.R: The Department acknowledges the comment. In response, the Department will add the following permitting note:

Add:

{Permitting Note: 40 CFR 761.20, dated March 18, 1996, defines “quantifiable level” of PCBs as 2 parts per million.}

In addition, the Federal rule was incorrectly cited and will be changed from 40 CFR 271.20(e)(3) to 40 CFR 761.20(e)(3).

12.R: The Department agrees with the comment and as a result of the comment, condition **A.6.** is changed as follows:

From:

A.6. Visible Emissions - Soot Blowing and Load Change. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit’s rated capacity and which occurs at a rate of 0.5 percent per minute or more.

Visible emissions above 60 percent opacity shall be allowed for not more than 4, six (6) - minute periods, during the 3-hour period of excess emissions allowed under this subparagraph, for boiler cleaning and load changes, at units which have installed and are operating, or have committed to install or operate, continuous opacity monitors.

[Rules 62-210.700(3) and 62-296.702(2)(b), F.A.C.]

To:

A.6. Visible Emissions - Soot Blowing and Load Change. Visible emissions resulting from boiler cleaning (soot blowing) and load change shall be permitted provided the duration of such excess emissions shall not exceed 3 hours in any 24-hour period and visible emissions shall not exceed 60 percent opacity, and providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of the excess emissions shall be minimized.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

Visible emissions above 60 percent opacity shall be allowed for not more than 4, six (6) - minute periods, during the 3-hour period of excess emissions allowed under this subparagraph, for boiler cleaning and load changes, at units which have installed and are operating, or have committed to install or operate, continuous opacity monitors.

Particulate matter emissions shall not exceed an average of 0.3 lbs. per million Btu heat input during the 3-hour period of excess emissions allowed by this subparagraph.

[Rules 62-210.700(3) and 62-296.702(2)(b), F.A.C.]

13.R: The request to change condition **A.7.** is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

14.R: The request to change condition **A.9.** is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

15.R: The Department feels that the used oil conditions are consistent with the other permits issued by this office.

16.R: The operating permit for this emissions unit specifies that an opacity monitor is required for determining compliance with the opacity standard. The condition will remain as noticed.

17.R: The Department agrees with the comment. Specific condition **A.19.** will be changed as follows:

From:

A.19. Visible emissions. The test method for visible emissions shall be:

a. E.U. ID Nos. -001, -002 and -003 EPA Method 9, incorporated in Chapter 62-297, F.A.C.

b. E.U. ID No. -001 Continuous opacity monitor.

[Rule 62-296.702(3)(a)1., F.A.C.; and, AO 52-233149]

To:

A.19. Visible emissions. The test method for visible emissions shall be:

a. E.U. ID Nos. -001, -002 and -003 EPA Method 9, incorporated in Chapter 62-297, F.A.C.

b. E.U. ID No. -001 Continuous opacity monitor.

[Rule 62-296.702(3)(a), F.A.C.; and, AO 52-233149]

18.R: The request to change condition **A.26.** is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

19.R: The request to change condition **A.28.** is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

20.R: The request to change condition **A.32.** is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

21.R: The requirements in condition **A.39.** were established by the compliance authority and will remain.

22.R: The facility is within the area of influence of a particulate matter maintenance area and this applicable requirement will remain.

23.R: See response **B.9.R.;** above.

Section III. Subsection B.

24.R: The Department assumes the comment addresses condition **B.17.** rather than condition **A.26.** See response **B.18.R.;** above.

25.R: The request to change conditions **B.18.** and **B.20.** is not consistent with other permits issued by this office, and the conditions as written are clear, so no changes will be made.

Section III. Subsection C.

26.R: The request to change condition **C.1.** is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

27.R: The Department agrees with the comment and the following change will be made:

From:

C.9. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery. See specific condition **C.12.**
[Rule 62-213.440, F.A.C.]

To:

C.9. Not federally enforceable. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery. See specific condition **C.12.**
[Rule 62-213.440, F.A.C.]

28.R: The process variable required to be determined is heat input. The condition is an applicable requirement.

29.R: This language is contained in the emissions units' current operating permits. Since the applicant did not request capacity to be defined as 95 to 100 percent of the peak heat input rate, as specified in the guidance document, the condition will remain as noticed.

30.R: The Department assumes the comment addresses condition **C.14.** rather than condition **A.26.** See response **B.18.R.:**, above.

31.R: See response **B.21.R.:**, above.

Section III. Subsection D.

32.R: The applicant had previously requested that particulate matter emissions not exceed 1.0 pound per hour and 0.35 ton per year, see condition **D.4.**, in order to escape the requirements of RACT for particulate matter. This limits the transfer of flyash to 700 hours per year. The condition will remain as noticed.

33.R: The request to change condition **D.4.** is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

34.R: The process rate is described in condition **D.1.** The condition will remain as noticed.

35.R: The request to change condition **D.7.** is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

36.R: The request to change condition **D.8.** is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.

37.R: See response **B.18.R.:**, above.

38.R: The request to change conditions **D.11.**, **D.12.**, **D.13.** and **D.14.** is not consistent with other permits issued by this office, and the conditions as written are clear, so no changes will be made.

Section III. Subsection E.

39.R: The Department disagrees that condition **E.22.** contains no requirements requiring compliance. This condition supports a source obligation made by the permittee to escape PSD review. However, in order to make this subsection more consistent with the other permits which address the three relocatable diesel generators, the following changes are made:

From:

Subsection E. This section addresses the following emissions unit(s).

| <u>E.U.</u> | <u>Brief Description</u> |
|-----------------------|---------------------------------------|
| <u>ID No.</u> -XXX | Relocatable Diesel Fired Generator(s) |

These relocatable emissions units are Caterpillar Model 3508-DITA 820 kilowatt diesel generators. The maximum heat input is 25.74 million Btu per hour (MMBtu/hour) while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum rating of 2460 kilowatts. Emissions from the generators are uncontrolled. The generators may be relocated at any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Higgins Plant, Shore Drive, Oldsmar, Pinellas County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. The future FPC Polk County Site, County Road 555, 1 mi. southwest of Homeland, Polk County.

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

E.1. Permitted Capacity. The maximum operation heat input rate for each generator shall not exceed 25.74 million Btu per hour.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

E.3. Methods of Operation - Fuels. Only new low sulfur No. 2 fuel oil shall be fired in the combustion turbine(s).

[Rule 62-213.410, F.A.C.]

E.4. Hours of Operation. The hours of operation expressed as "engine-hours" shall not

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, AO 09-205952.]

E.5. Visible Emissions. Visible emissions from each generator

[Rule 62-296.320(4)(b)1., F.A.C.; and, AO 09-205952.]

E.6. Sulfur Dioxide - Sulfur Content. The sulfur content of the new No. 2 fuel oil shall not exceed 0.50 percent, by weight.

[Requested in initial Title V permit application dated June 12, 1996; and, AC 09-202080.]

E.13. Operating Rate During Testing. Testing of emissions shall be conducted with the generator(s) operating at 90 to 100 percent of the maximum fuel firing rate of 186.3 gallons per hour. If it is impracticable to test at permitted capacity, an emissions unit may be tested [Rules 62-297.310(2), F.A.C.; and, Permit AO 09-205952.]

E.17. After each relocation, each generator shall be tested within 30 days of startup for opacity and the fuel shall be analyzed for the sulfur content. See specific conditions B.6, B.9, and B.12. [Rules 62-4.070(3) and 62-297.310(7)(b),F.A.C.; and, AO 09-205952.]

E.21. To demonstrate compliance with specific condition E.6., records of the sulfur content, [Rule 62-297.310(8), F.A.C.; and, AO 09-205952.]

E.22. Specific conditions in construction permit AC 09-202080, limiting [Rule 62-212.400(2)(g), F.A.C.; and, AC 09-202080 and AO 09-205952.]

To:

Subsection E. This section addresses the following emissions unit(s).

| Facility ID No. | E. U. ID No. | Brief Description |
|------------------------|---------------------|---|
| 7775047 | -001 | Three relocatable diesel fired generators, rated at 0.82 MW, 8.58 mmBtu/hr while being fueled by 62.1 gallons of new number 2 fuel oil per hour, with emissions exhausted through a 15 ft. stack. |

These relocatable emissions units are Caterpillar Model 3508-DITA 820 kilowatt diesel generators. The generators may be relocated to any of the following facilities:

1. Crystal River Plant, Powerline Road, Red Level, Citrus County.
2. Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
3. Higgins Plant, Shore Drive, Oldsmar, Pinellas County.
4. Bayboro Plant, 13th Ave. & 2nd St. South, St. Petersburg, Pinellas County.
5. Wildwood Reclamation Facility, State Road 462, 1 mi. east of U.S. 301, Wildwood, Sumter County.
6. The future FPC Polk County Site, County Road 555, 1 mi. southwest of Homeland, Polk County.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. Each generator has its own stack. This section of the permit is only applicable when the generator(s) is(are) located at the Bartow Facility.}

E.1. Permitted Capacity. The maximum heat input rate for each generator shall not exceed 8.58 million Btu per hour. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

E.3. Methods of Operation - Fuels. Only new No. 2 fuel oil with a maximum sulfur content of 0.5% by weight shall be fired in the diesel generator(s).

[Rule 62-213.410, F.A.C. and, AC 09-202080.]

E.4. Hours of Operation. The hours of operation expressed as “engine-hours” shall not

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, AC 09-202080.]

E.5. Visible Emissions. Visible emissions from each generator

[Rule 62-296.320(4)(b)1., F.A.C.; and, AC 09-202080.]

Monitoring of Operations

E.6. Fuel Sulfur Analysis. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor or permittee upon each fuel delivery. See specific conditions **E.12.** and **E.21.**

[Rule 62-213.440, F.A.C.]

E.13. Operating Rate During Testing. Testing of emissions shall be conducted with the generator(s) operating at 90 to 100 percent of the maximum fuel firing rate of 62.1 gallons per hour, for each generator. If it is impracticable to test at permitted capacity, an emissions unit may be tested.....

[Rule 62-297.310(2), F.A.C.; and, AC 09-202080.]

E.17. After each relocation, each generator shall be tested within 30 days of startup for opacity and the fuel shall be analyzed for the sulfur content. See specific conditions **E.3.**, **E.9.**, and **E.12.**

[Rules 62-4.070(3) and 62-297.310(7)(b),F.A.C.; and, AO 09-205952.]

E.21. To demonstrate compliance with specific condition **E.3.**, records of the sulfur content,

[Rule 62-297.310(8), F.A.C.; and, AC 09-202080.]

E.22. Specific conditions in construction permit AC 09-202080, limiting

[Rule 62-212.400(2)(g), F.A.C.; and, AC 09-202080.]

Section IV. Acid Rain Part.

40.R: Condition A.1.a refers to the application by referencing the date of FPC’s application, so no change will be made.

41.R: The requested deletion of condition A.5. is not consistent with other permits issued by this office, so the condition will not be deleted.

42.R: The request to move condition A.4. to the facility-wide section of the permit is not consistent with other permits issued by this office, so the condition will not be moved.

Appendix U-1, List of Unregulated Emissions Units and/or Activities.

43.R: The list of unregulated emissions units and/or activities was compiled from information submitted in the permit application. If the applicant feels there is duplication or the information submitted was incorrect, the Department will require a statement from the responsible official which identifies the items needing correction and a certification that the information is accurate. Otherwise the appendix will remain as noticed.

Permit Summary Tables, Table 1-1.

44.R: The Department will make all necessary corrections to Tables 1-1 and 2-1 to reflect the changes made in responding to the comments from both PCDEM and FPC.

C. Title V permitting formats were updated due to recent rule changes and after considering comments received from the electric utilities. This permit reflects these changes. A brief summary of the changes is below.

1. Recent rule changes changed “exempt activities” to “insignificant activities.” Rules 62-213.430(6), F.A.C. and 62-210, F.A.C., reflecting this change went into effect November 13, 1997.

a. The department inserted a condition in Appendix TV-1 clarifying that a Title V source can add an “insignificant activity” at its facility in accordance with the criteria under Rule 62-213.430(6), F.A.C., and include it in the Title V permit’s list of “insignificant activities” at the next renewal, in accordance with Rule 62-213.430(6), F.A.C. See condition number 40.

b. Appendix E-1 has been changed to Appendix I-1, and the language of this appendix was revised to refer to insignificant emissions units where appropriate.

c. Appendix U-1 has been revised to refer to insignificant emissions units instead of exempt emissions units.

2. Several changes were made to Appendix TV-1 to reflect the rule changes discussed above, and to properly identify conditions that are not federally enforceable.

a. The following additional rules have been marked as “not federally enforceable”:

62-4.030, F.A.C., General Prohibition, (see condition number 1.)

62-4.220, F.A.C., Operation Permit for New Sources, (see condition number 14.)

62-210.300(5), F.A.C., Notification of Startup, (see condition number 19.)

b. Appendix TV-1, now carries a version date of “12/02/97”.

3. Since the issuance of the PROPOSED permit was delayed by extensions of time to file for hearing past the first of the year, the following dates are changed, as follows:

From: **Effective Date:** January 1, 1998
 Renewal Application Due Date: July 5, 2002
 Expiration Date: December 31, 2002

To: **Effective Date:** January 1, 1999
 Renewal Application Due Date: July 5, 2003
 Expiration Date: December 31, 2003

D. Document(s) on file with the permitting authority:

- Letter received October 17, 1997, from Mr. Gary Robbins.
- Letter received November 24, 1997, from Mr. Scott Osbourn.

III. Conclusion.

The permitting authority hereby issues the PROPOSED Permit No.: 1030011-002-AV, with any changes noted above.



March 24, 1998

RECEIVED

MAR 30 1998

**BUREAU OF
AIR REGULATION**

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

Dear Ms. Carter:

RE: Florida Power Corporation, Bartow Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit,*
Draft Permit No. 1030011-002-AV

On October 6, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until March 31, 1998. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including April 30, 1998.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (813) 866-5158.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Pardue", enclosed within a hand-drawn oval.

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

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

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

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC

3/30/98 cc: Scott Sheplak
Ed Svec

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

RECEIVED

APR 10 1998

BUREAU OF
AIR REGULATION

FLORIDA POWER CORPORATION,

Petitioner,

vs.

OGC CASE NO. 97-1835

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

:/

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, Florida Power Corporation, to grant an extension of time to file a petition for an administrative hearing on Application No. 1030011-002-AV. See Exhibit 1.

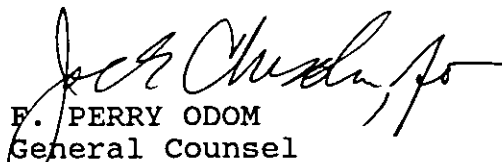
Respondent, State of Florida Department of Environmental Protection, has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until April 30, 1998, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Mail Station 35, Department of Environmental Protection, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 6th day of April, 1998, in
Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


F. PERRY ODOM
General Counsel

Douglas Building, MS #35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (904) 488-9314


CERTIFICATE OF SERVICE

I CERTIFY that a true copy of the foregoing was mailed
to:

W. Jeffrey Pardue, C.E.P.
Director
Florida Power Corporation
3201 Thirty-fourth Street South
St. Petersburg, FL 33733

on this 9th day of April, 1998.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


W. DOUGLAS BEASON
Assistant General Counsel
Florida Bar No. 379239

Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (904) 488-9730