



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blairstone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor  
Jeff Kottkamp  
Lt. Governor  
Michael W. Sole  
Secretary

February 4, 2009

*Electronically Sent – Received Receipt Requested.*

[rufus.jackson@pgnmail.com](mailto:rufus.jackson@pgnmail.com)  
Mr. Rufus Jackson, Plant Manager  
Florida Power Corporation dba  
Progress Energy Florida (PEF)  
1601 Weedon Island Drive  
St. Petersburg, Florida 33702

Re: DEP File No. 1030011-011-AC  
PEF P.L. Bartow Power Plant  
Biofuel Test Burn on Steam Unit 1

Dear Mr. Jackson:

On April 3, 2008, you submitted an application (revised November 10, 2008) for an air construction permit to burn liquid biofuel in Steam Unit 1 and existing combustion turbines (CT) at the facility identified above. By agreement with PEF, the Department is presently processing the part of the request related to Steam Unit 1 so that the testing can be accomplished prior to its scheduled permanent shut down in early 2009.

Enclosed are the following documents:

- Written Notice of Intent to Issue Draft Air Construction Permit;
- Public Notice of Intent to Issue Draft Air Construction Permit;
- Technical Evaluation and Preliminary Determination; and
- Draft Air Construction Permit.

The Public Notice of Intent to Issue Draft Air Construction Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact David Read at 850-414-7268.

Sincerely,

Trina Vielhauer, Chief  
Bureau of Air Regulation

Enclosures  
TLV/aal/dlr

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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*In the Matter of an  
Application for Air Permit by:*

Florida Power Corporation dba  
Progress Energy Florida (PEF), Inc.  
1601 Weedon Island Drive  
St. Petersburg, Florida 33702  
*Authorized Representative:* Mr. Rufus Jackson

DEP File No.: No. 1030011-011-AC  
Biofuel Test Burn  
Steam Unit (SU) No. 1  
P.L. Bartow Power Plant  
Pinellas County

**Facility Location:** PEF operates the existing P.L. Bartow Power Plant, which is located in Pinellas County at 1601 Weedon Island Drive, St. Petersburg. The existing facility consists of three residual fuel oil-fired steam electrical generators, four simple cycle combustion turbines, a pipeline heating boiler and relocatable diesel generators.

**Project:** On November 10, 2008 PEF submitted to the Department of Environmental Protection (Department) an application to allow the test burning of a vegetable oil based emulsified biofuel at the existing P.L. Bartow Power Plant. The request was subsequently modified to burn only 12,000 gallons of the biofuel in one of the residual fuel oil-fired steam electrical generators that is presently destined for shut down in the spring of 2009. The Department is evaluating a separate request to burn the biofuel in existing combustion turbines at a later date.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an Air Permit is required to perform the proposed work. The Florida Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite 4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, Mail Station (MS) 5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above. In addition, electronic copies of these documents are available by entering the file number provided above where indicated on the following web site:

<http://www.dep.state.fl.us/air/eproducts/apds/default.asp> .

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Public Notice:** Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments result in a significant change to the Draft Permit, the Permitting Authority will issue a revised Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000 (telephone: 850/245-2241; fax: 850/245-2303). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 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, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

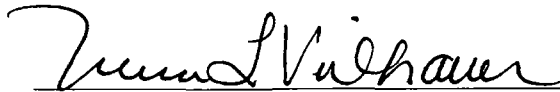
A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

**WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT**

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief  
Bureau of Air Regulation

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 2/4/09 to the persons listed below.

Mr. Rufus Jackson, PEF: [rufus.jackson@pgnmail.com](mailto:rufus.jackson@pgnmail.com)  
Chris Bradley, PEF: [chris.bradley@pgnmail.com](mailto:chris.bradley@pgnmail.com)  
Scott Osbourn, P.E., Golder: [sosbourn@golder.com](mailto:sosbourn@golder.com)  
Mara Nasca, DEPSWD: [mara.nasca@dep.state.fl.us](mailto:mara.nasca@dep.state.fl.us)  
Mayor, City of St. Petersburg: [mayor@stpete.org](mailto:mayor@stpete.org)  
Administrator, Pinellas County: [sspratt@pinellascounty.org](mailto:sspratt@pinellascounty.org)  
Peter Hessling, PCDEM: [phesslin@pinellascounty.org](mailto:phesslin@pinellascounty.org)  
Victoria Gibson, DEP BAR: [victoria.gibson@dep.state.fl.us](mailto:victoria.gibson@dep.state.fl.us) (for read file)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED,**  
on this date, pursuant to §120.52, Florida Statutes,  
with the designated Department Clerk, receipt of  
which is hereby acknowledged.


  
\_\_\_\_\_  
(Clerk)

2/4/09  
(Date)

## Memorandum

# Florida Department of Environmental Protection

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TO: Trina Vielhauer, Bureau of Air Regulation  
THROUGH: Al Linero, Special Projects Section   
FROM: David Read  
DATE: February 3, 2009  
SUBJECT: Florida Power Corporation dba Progress Energy Florida (PEF)  
P.L. Bartow Power Plant Biofuel Test Burn Project No. 1030011-011-AC

This project is not subject to PSD preconstruction review. Attached for your review are the following items:

- Written Intent to Issue Air Permit;
- Public Notice of Intent to Issue Air Permit;
- Technical Evaluation and Preliminary Determination;
- Draft Permit; and
- PE Certification.

This draft permit is to allow the test burning of approximately 12,000 gallons of a vegetable based emulsified biofuel in steam unit (SU) No. 1 at the PEF P.L. Bartow Power Plant. The power plant is located on Weedon Island, St. Petersburg, Florida

I recommend your approval of the attached Draft Permit Package.

Attachments

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF AIR RESOURCE MANAGEMENT, BUREAU OF AIR REGULATION  
DEP File No. 1030011-011-AC  
Florida Power Corporation dba Progress Energy Florida, Inc.  
P.L. Bartow Power Plant Biofuel Test Burn  
Pinellas County

**Applicant:** The applicant for this project is Florida Power Corporation dba, Progress Energy Florida (PEF). The applicant's authorized representative and mailing address is: Mr. Rufus Jackson, Plant Manager, Florida Power Corporation dba, Progress Energy Florida, 1601 Weedon Island Dr., St. Petersburg, Florida 33702.

**Facility and Location:** PEF operates the existing P.L. Bartow Power Plant, which is located in Pinellas County at 1601 Weedon Island Drive, St. Petersburg. The existing facility consists of three residual fuel oil-fired steam electrical generators, four simple cycle combustion turbines, a pipeline heating boiler and relocatable diesel generators.

**Project:** On November 10, 2008 PEF submitted to the Department of Environmental Protection (Department) an application to allow the test burning of a vegetable oil based emulsified biofuel at the existing P.L. Bartow Power Plant. The request was subsequently modified to burn only 12,000 gallons of the biofuel in one of the residual fuel oil-fired steam electrical generators (Steam Unit No. 1) that is presently destined for shut down in the spring of 2009. The Department is evaluating a separate request to burn the biofuel in existing combustion turbines at a later date.

The project is a field test to determine the feasibility with regard to pollutant emissions and operational considerations of burning this biofuel. PEF plans to use the biofuel as a replacement for the No. 2 fuel oil currently used as a startup fuel or as a supplement (10 percent by volume) to the No. 6 fuel oil currently used during normal operations in the steam units at the plant or at similar steam units located elsewhere.

PEF projects the following changes in emissions (to be confirmed through testing) from burning the biofuel compared to the permitted No. 2 and 6 fuel oils:

- Less sulfur dioxide (SO<sub>2</sub>) emissions;
- Less particulate matter (PM/PM<sub>10</sub>) emissions;
- Less or equal nitrogen oxides (NO<sub>x</sub>) emissions;
- Similar or slightly greater carbon monoxide (CO) and volatile organic compounds (VOC) emissions; and
- Less or equal visible emissions (plume opacity).

Based on the required analyses, the Department has reasonable assurance that the proposed project will not cause or significantly contribute to a violation of any ambient air quality standard.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit modification is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite 4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, Mail Station (MS) 5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit Modification, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above. In addition, electronic copies of these documents are available by entering the file number provided above where indicated on the following web site:

(Public Notice to be Published in the Newspaper)

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

<http://www.dep.state.fl.us/air/eproducts/apds/default.asp> .

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments result in a significant change to the Draft Permit, the Permitting Authority will issue a revised Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

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A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue an Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available for this proceeding.

# TECHNICAL EVALUATION

Florida Power Corporation dba  
Progress Energy Florida (PEF)  
P.L. Bartow Power Plant Unit 1

Biofuel Test Burn

*Pinellas County*

DEP File No. 1030011-011-AC



Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation

February 4, 2009



**TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION**

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**I. APPLICATION INFORMATION**

**A. APPLICANT NAME AND ADDRESS**

Florida Power Corporation dba  
Progress Energy Florida (PEF)  
1601 Weedon Island Dr.  
St. Petersburg, Florida 33702

*Authorized Representative:*  
Tom Lawery, Plant Manager

**B. PROCESSING SCHEDULE**

- The Florida Department of Environmental Protection (Department) received a construction permit application (DEP File No. 1030011-011-AC) on March 25, 2008 requesting that Florida Power Corporation dba Progress Energy Florida, Inc. (PEF) be allowed to test burn a E-Grass based liquid biofuel in combustion turbines (CT) and/or steam units (SU) at the P.L. Bartow Power Plant.
- The Department held a meeting on April 9, 2008 to discuss the application with representations of PEF.
- The Department deemed the application complete on April 24, 2008.
- PEF requested and provided various waivers to the Department's processing clock and submitted a revised application on November 10, 2008. In the revised application a vegetable based biofuel produced by New Generation Biofuels (NGB) called SuperClassic (SC) was added to the test burn request.
- The Department sent a request for additional information (RAI) with regard to the revised application to PEF on December 10, 2008.
- PEF responded to the RAI on December 23, 2008. In the response PEF requested that the test burning of the E-grass biofuel be removed from the application with only the test burning of the SC biofuel remaining in the field test.
- The Department deemed the revised application complete on January 20, 2009.
- On January 23, 2009, PEF requested by email that the test of the SC biofuel be limited to 12,000 gallons in SU No. 1 at the Bartow facility, with the testing of the SC biofuel in a CT at the facility occurring at a later date under a different permit (DEP File No. 1030011-014-AC).
- A draft permit package was issued by the Department on February 4, 2009.

**C. FACILITY LOCATION**

The P.L. Bartow Power Plant is located on Weedon Island on the eastside of St. Petersburg in Pinellas County as shown in Figure 1. Figure 2 is a picture showing the stacks for the three residual fuel oil fired steam electrical generators (also called steam units).

**D. FACILITY CLASSIFICATION CODE (SIC)**

Industry Group No.	49	Electric, Gas, and Sanitary Services
Industry No.	4911	Electric Services

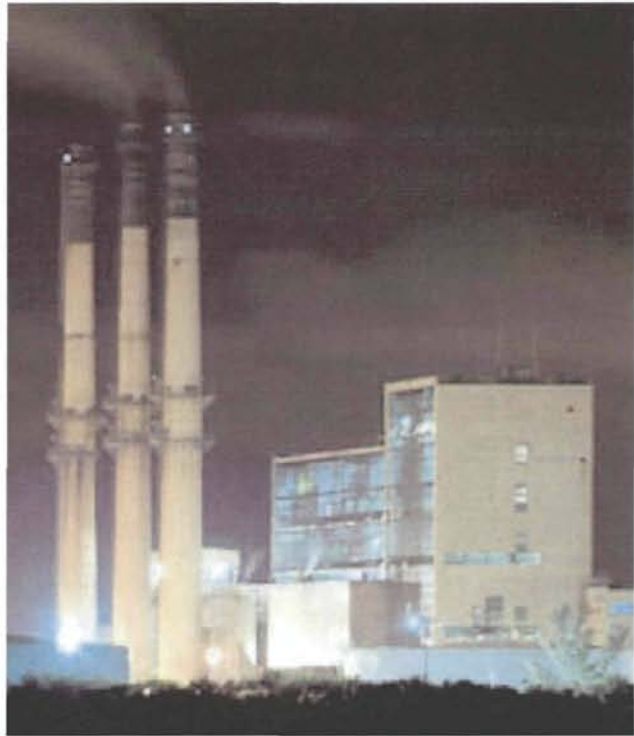


Figure 1. Location of Weedon Island. Figure 2. Steam Units at P.L. Bartow Plant.

**E. REGULATORY CATEGORIES**

SU 1, 2 and 3 are older residual fuel oil fired units that were built prior to the existence of EPA and Department standards. They comprise part of a major stationary source with respect to the rules for the Prevention of Significant Deterioration (PSD) and operate pursuant to a facility Title V operation permit. The units are also subject to the Title IV Acid Rain Program and the Clean Air Interstate Rule (CAIR). SU 1, 2 and 3 will be permanently shut down in the spring of 2009 in conjunction with the startup of a natural gas-fueled combined cycle unit.

**II. PROPOSED PROJECT**

**A. BASIC DESCRIPTION**

PEF will test 12,000 gallons of a vegetable based biofuel in SU 1. The biofuel is called SuperClassic (SC) and was developed by New Generation Biofuels (NGB). According to information provided in the application, NGB SC biofuel is formulated from processed palm, canola or recycled vegetable oils.

**B. CHARACTERISTICS OF NGB SC**

NGB SC is designed for use in applications where No. 2 diesel, other distillates or biodiesel are used. This particular biofuel is an emulsion. NGB SC is manufactured using a process that is different than biodiesel and glycerin is not generated during its production. A product data sheet for the SC biofuel is summarized below in Table 1. More information on NGB can be found at their web site: [www.newgenerationbiofuels.com/index.php](http://www.newgenerationbiofuels.com/index.php)

**TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION**

**Table 1. SC Biofuel Specifications (source: PEF).**

Test	Units	Test Method	Typical	Min.	Max.
Flash Point	°F	D93		114	
	°C			45.56	
Water & Sediment	% Vol.	D1796 or D2709	0.1		1.0
Moisture <sup>(a)</sup>	% Vol.	---	20 to 30		
Kinematic Viscosity <sup>(b)</sup>	cSt	D445	34.5		60.0
Ash	% mass	D482			0.001
Sulfated Ash	% mass	D874			0.001
Sulfur	ppm	D5453	0		<1
Copper Strip Corrosion	---	D130			1b
Pour Point	°F	D97	-0.4	5	-11
	°C		-18	-15	-24
Carbon Residue <sup>(c)</sup>	% mass	D4530	0.05		
Total Acid Number	mg KOH/g	D664	0.04		
Oxidation Stability	hours	EN 14112	2.3		
Phosphorus Content	ppm	D4951 or IAC 027	<1.0		6.0
Sodium + Potassium	ppm	EN 14538 or IAC 027	<1.0		3.0
Calcium & Magnesium	ppm	EN 14538 or IAC 027	<1.0		3.0
Iodine Number	---	AOCS Cd 1d-62	67.5		
Lubricity @ 60 °F <sup>(d)</sup>	mm	D6079	0.170		
Vapor Press. @ 100 °F	psi	D323 proc. A	0.7		
Ultimate Analysis (CHONS)	% mass	D5291	C=55.7 H=11.6 O=32.67 N=<0.3 S=0		
Gravity @ 60 °F	Degrees API	D4052	21.06		
Specific Gravity 60 °F	---	AOCS Cc 10a-25	0.9339		
Lead	ppm	IAC 027 mod. B			<0.1
Copper	ppm	IAC 027 mod. B			<0.1
Vanadium	ppm	IAC 027 mod. B			<0.05
Heat of Combustion <sup>(e)</sup>	Btu/gal	D240			~91,500

- (a) From material safety data sheet provided by NGB for the SC biofuel contained in Appendix A of revised application.
- (b) At 40 °F in centistokes (mm<sup>2</sup>/s).
- (c) 100 percent of sample.
- (d) Wear scar diameter.
- (e) From response to RAI: Higher Heating Value (HHV) of SC biofuel with a density of 7.69 lb/gal, this corresponds to a Lower Heating Value (LHV) of approximately 87,000 Btu/gallon.

**C. PROJECT DESCRIPTION**

Testing of SC biofuel will be conducted in late February to mid March 2009 in SU No. 1 that is destined for permanent shut down on March 21, 2009. The fuel will be delivered by tanker truck and maintained in the same tank. The total amount of biofuel tested will be 12,000 gallons, which is equivalent to approximately two tanker trucks. The biofuel will be fed from the tank utilizing an electrically powered pump skid. No changes will be made in the service of any of the existing tanks at the facility.

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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Following is the sequence of biofuel introduction to SU 1:

1. **Phase I:** Two igniter lances located on the 2<sup>nd</sup> burner level will be utilized to inject the SC biofuel into the furnace. The SU will be brought up to load using conventional light-off procedures. Once the No. 6 burner levels are operating at a stable condition, the SC biofuel system will be valved in and the SC biofuel will be injected into the existing No. 6 fuel oil flame. A visual inspection will be made to ensure the biofuel is fully combusting. It is anticipated that the duration during of this test phase will be approximately 4 hours with a total SC biofuel usage of approximately 1,200 gallons.
2. **Phase II:** If Test Phase I is successfully completed, Test Phase II will commence. In this test phase, the objective is to determine if the SC biofuel will ignite using the pilot spark designed to light No. 2 fuel oil. Lower burners will be service during the test phase. The SC biofuel will be introduced to the furnace while the pilot spark is operated. A successful test burn will be one that lights the fuel and maintains stable flame conditions. Visual flame inspection will be performed and existing flame detection equipment will be used to determine if a flame profile is detected.
3. **Phase III:** Upon successful completion of Test Phase II, the third test phase will attempt igniting the No. 6 oil burner using the SC biofuel as the ignition fuel. The furnace will be brought up to load using conventional methods with the exception of the two 2<sup>nd</sup> level burners, which will utilize SC biofuel injected through the igniter lance as its ignition source. Stable main burner flame utilizing No. 6 fuel oil will determine the success of this test phase. Upon main burner ignition, the SC biofuel injection can be discontinued and the SU operated as needed.

### III. REQUESTED PERMIT DETAILS

In summary, PEF has requested the following major conditions in the AC for the test burning of the SC biofuel at the P.L. Bartow Power Plant:

- To test burn the SC biofuel in SU No. 1 at the Bartow facility;
- Test the SC biofuel as a replacement for No. 2 fuel oil used as a startup fuel;
- Test the SC biofuel as a supplemental fuel (10 percent by volume) to the No. 6 fuel oil currently used during normal operation of the SU; and
- To limit the use of the biofuel during the test burn to two tanker trucks (~12,000 gallons), with testing completed by March 21, 2009 when SU No. 1 is scheduled to be permanently shut down.

### IV. EFFECTS ON EMISSIONS

Following is PEF's review of the expected effects on emissions:

#### A. SULFUR DIOXIDE (SO<sub>2</sub>)

Because of the sulfur content of the biofuel is nearly zero, emissions of SO<sub>2</sub> will decrease compared with use of the residual fuel oil (< 2.5% sulfur) or even the distillate oil used to assist with startup.

#### B. PARTICULATE MATTER (PM/PM<sub>10</sub>)

Because of the low ash content, PM/PM<sub>10</sub> emissions during the test burn should be less than the values when the SU is burning No. 2 (starter) distillate fuel or No. 6 (operational) residual fuel oil. The low sulfur and low metals will reduce emissions of sulfuric acid mist and acid smut fallout, other factors being equal. Unit 1 is the only one of three residual fuel oil-fired units located at the site that has an electrostatic precipitator (ESP) for PM/PM<sub>10</sub> control.

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## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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### C. NITROGEN OXIDES (NO<sub>x</sub>)

According to PEF, (NO<sub>x</sub>) emissions while burning the biofuel should be less than NO<sub>x</sub> emissions while burning No. 6 residual fuel oil. The reason is that the fuel bound nitrogen (FBN) content of the SC biofuel is at the low range of No. 6 fuel oil (<=3,000 ppm). At the same time, the relatively high moisture content (20 to 30 %) of the SC biofuel should act as an inhibitor to thermal NO<sub>x</sub> formation.

Although the FBN of the biofuel is greater than the FBN of No. 2 (starter) distillate oil, PEF expects comparably less emissions when using the biofuel because it is the thermal NO<sub>x</sub> that dominates emissions from such furnaces.

The Department does not necessarily agree with the claims above, but these would be proven during an actual test.

### D. CARBON MONOXIDE (CO) AND VOLATILE ORGANIC COMPOUNDS (VOC)

According to PEF, carbon monoxide (CO) and volatile organic compounds (VOC) emissions may be slightly higher but well below significant emissions rates (SER) when burning the SC biofuel due to the higher moisture content of the bio-fuel which could affect combustion efficiency. Data obtained during testing should allow all these estimates to be verified.

### E. VISIBLE EMISSIONS (OPACITY)

Visible emissions (VE) as measured by plume opacity are often quite high from the existing units. The testing of biofuel should not have adverse effects on the present VE characteristics of the unit.

## V. PARAMETERS MONITORED DURING TESTING

### A. OPERATIONAL PARAMETERS

Igniter nozzle tip inspections will be performed at the end of each test phase to ensure no coking occurred during the test burns. A visual inspection of the furnace walls will also be performed to verify that no visual residue remains in the furnace.

### B. EMISSIONS MONITORING

Continuous Emission Monitoring (CEM) equipment for SO<sub>2</sub>, NO<sub>x</sub>, and opacity will be used to measure emissions during each test phase.

## VI. PRELIMINARY DETERMINATION

The department does not necessarily agree with all the applicant's assumptions with regard to pollution emissions reductions that will occur when firing the biofuel. However the Department believes the applicant can conduct the testing within the permitted operational and emission limitations of the existing Title V permit based on the biofuel material properties provided by PEF in their revised application and response to the department's RAI.

The use of 12,000 gallons of biofuel in SU No. 1 prior to its permanent shut down will not increase emissions significantly when compared with the thresholds for PSD review.

Additional details of this analysis may be obtained by contacting David Read by phone at (850) 414-7268, by email at [David.Read@dep.state.fl.us](mailto:David.Read@dep.state.fl.us) or by mail at the Department's Bureau of Air Regulation, Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida, 32399-2400.

# DRAFT PERMIT

## PERMITTEE:

Florida Power Corporation dba  
Progress Energy Florida (PEF)  
1601 Weedon Island Street  
St. Petersburg, Florida 33702

*Authorized Representative:*  
Mr. Rufus Jackson, Plant Manager

DEP File No. 1030011-011-AC  
P. L. Bartow Power Plant  
Steam Unit (SU) No. 1  
SIC No. 4911  
Biofuel Test Burn  
Expires December 31, 2009

## PROJECT AND LOCATION

This permit authorizes PEF to test burn in Steam Unit (SU) No. 1 at the P.L. Bartow Power Plant approximately 12,000 gallons of a vegetable oil based emulsified biofuel. The P.L. Bartow Power Plant is located at 1601 Weedon Island Drive, St. Petersburg, Pinellas County, Florida. The UTM coordinates are Zone 17, 342.4 km East and 3,082.6 km North.

## STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the work specified in accordance with the conditions of this permit and as described in the application, approved drawings, plans and other documents on file with the Florida Department of Environmental Protection (Department). This permit supplements all other air construction and operation permits for the subject emissions unit and does not alter any requirements from such previously issued air permits.

## CONTENTS

- Section 1. Facility Information
- Section 2. Administrative Requirements
- Section 3. Emissions Unit (EU) Specific Conditions
- Section 4. Appendix GC

\_\_\_\_\_  
Joseph Kahn, Director  
Division of Air Resource Management.

\_\_\_\_\_  
(Date)

## SECTION I. FACILITY INFORMATION (DRAFT)

### FACILITY DESCRIPTION

Progress Energy Florida operates the Bartow Plant, which is an existing power plant (SIC No. 4911). The plant currently consists of:

- Three fossil fuel fired steam generating units designated as Units 1, 2 and 3 that produce 120, 120 and 225 megawatts (MW) of electrical power respectively;
- Four simple cycle units designated as Gas Combustion Turbine Peaking Units Nos. P-1, P-2, P-3 and P-4 each of which has a nominal capacity of 56 MW; and
- Miscellaneous unregulated/insignificant emissions units including a pipeline heating boiler and relocatable diesel generators that can be located at various PEF power plants.

(Note: Units 1, 2 and 3 will be retired on March 21, 2009 and replaced with natural gas fired combustion turbines as part of a repowering project)

### EMISSION UNIT

The proposed project affects the following existing emissions unit:

ID No.	Emission Unit Description
001	Unit 1 is a 120 MW fossil fuel fired steam generator unit

### PROJECT

This project will involve the test burning in Unit 1 of approximately 12,000 gallons (two tanker truck loads) of a vegetable oil based emulsified biofuel. The biofuel is called SuperClassic (SC) developed by New Generation Biofuels (NGB).

The project is a field test to determine the feasibility with regard to pollutant emissions and operational considerations of burning this biofuel in Unit 1 prior to the permanent shut down of Unit 1 in the spring of 2009.

During the test, the biofuel will be stored in tanker trucks and then valved into the appropriate burner(s) in Unit 1 using an electrically driven pump skid.

### REGULATORY CLASSIFICATION

- The facility is classified as a major stationary source with respect to the applicability of the rules for the prevention of significant deterioration (PSD).
- The facility is classified as a major source of air pollution with respect to Title V of the Clean Air Act.
- The facility is a major source of hazardous air pollutants.
- The facility operates emissions units that are subject to Title IV of the Clean Air Act and specifically to the Phase II, Federal Acid Rain Program.
- The facility operates emissions units that are subject to the Clean Air Interstate Rule (CAIR).

**SECTION I. FACILITY INFORMATION (DRAFT)**

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**RELEVANT DOCUMENTS**

- The original application that was received on March 25, 2008.
- The revised application that was received on November 10, 2008.
- Additional information that was received on December 23, 2008.
- The draft permit package that was issued by the Department on February 4, 2009.

**DRAFT**



## SECTION II. ADMINISTRATIVE REQUIREMENTS (DRAFT)

### GENERAL AND ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: All documents related to applications for permits to construct, modify or operate this emissions unit shall be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection ("Department"), at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and phone number 850/488-0114. Copies of these documents shall be submitted to the Compliance Authority.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications should be submitted to the Air Quality Division of the Pinellas County Department of Environmental Management Office at 300 South Garden Avenue, Clearwater, Florida 34616.
3. Terminology: The terms used in this permit have specific meanings as defines in the applicable chapters of the Florida Administrative Code (F.A.C.).
4. General Conditions: The owner and operator are subject to, and shall operate under the attached General Conditions listed in *Appendix GC* of this permit. General Conditions are binding and enforceable pursuant to Chapter 403, F.S. [Rule 62-4.160, F.A.C.]
5. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of this project shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
6. Permit Expiration: For good cause, the permittee may request that this air construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation at least sixty (60) days prior to the expiration of this permit. [Rules 62-4.070(4), 62-4.080 and 62-210.300(1), F.A.C.]
7. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
8. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
9. Title V Permit: The project will be conducted prior to the permanent and required shut down of Unit 1 in spring of 2009. No revision of the facility's Title V permit will be required as a result of this project.

**SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)**

**EU 001 – UNIT 1**

This section of the permit addresses the following emissions unit:

ID No.	Emission Unit Description
001	Unit 1 is a front fired, fossil fuel steam generating unit that produces a nominal 120 MW of electrical power. It began commercial service in 1958 and is a Phase II Acid Rain Unit. Authorized fuels include No. 6 fuel oil, distillate oil, and on-specification used fuel oil. The maximum heat input rate is 1220 MMBtu per hour. Particulate matter emissions are controlled by an electrostatic precipitator originally manufactured by General Services, Inc. Stack opacity is continuously monitored and recorded.

**APPLICABILITY OF PREVIOUS PERMITS**

1. Previous Permit Conditions: Unit 1 is subject to conditions from previous air construction or operation permits. They continue to apply except as modified by this permit. In particular, the conditions of the current facility Title V operation permit No. 1030011-009-AV 11 issued on December 27, 2004 continue to apply. [Rule 62-4.210, F.A.C.]

**PROJECT ACTIVITIES**

2. Biofuel Handling and Burning: This permit authorizes use of up to 12,000 gallons of biofuel in Unit 1. The permittee is authorized to receive by tanker truck and to burn up to 12,000 gallons of biofuel at the facility. The biofuel will be fed from the delivered tank utilizing an electrically powered pump skid. [Applicant Request]
3. Cofiring with other Approved Fuels: The permittee is authorized to blend or co-fire the biofuel with any other fuel presently authorized for use in Unit 1. [Applicant Request]

**OPERATING REQUIREMENTS**

4. Use of existing Continuous Emission Monitoring Systems (CEMS): The permittee shall continue to use the existing sulfur dioxide (SO<sub>2</sub>) and nitrogen oxides (NO<sub>x</sub>) CEMS as presently employed. The permittee shall note the periods of time during which biofuel is used and the amount in such a manner that comparisons can be made between SO<sub>2</sub>/NO<sub>x</sub> emissions when using biofuels and SO<sub>2</sub>/NO<sub>x</sub> emissions when not using biofuel.
5. Use of existing Continuous Opacity Monitoring System (COMS): The permittee shall continue to use the existing COMS to monitor visible emissions (VE) as presently employed. The permittee shall note the periods of time during which biofuel is used and the amount in such a manner that comparisons can be made between VE when using biofuels and VE when not using biofuel.
6. Carbon Dioxide (CO) and Volatile Organic Compounds (VOC): In accordance with EPA Method 10, CO tests will be conducted during the biofuel field test. A CO test will be conducted prior to the firing of the biofuel in the SU with the SU firing No. 6 fuel oil at between 90 to 100 percent of the maximum load to determine baseline CO emissions. Then a CO emissions test will be conducted when firing the biofuel as a supplemental (10 percent by volume) fuel to the No. 6 fuel oil at between 90 to 100 percent of the maximum load. No VOC testing is required as CO will serve as a surrogate in this application.

**NOTIFICATIONS AND REPORTS**

7. Notifications: The permittee shall notify the Compliance Authority at least seven days before initiating use of biofuel in Unit 1. The permittee shall also notify the Compliance Authority at least seven days prior to conducting the CO test required by Condition 6. [Rule 62-4.210, F.A.C.]
8. Reports: The permittee shall submit to the Department a report documenting the results of the field test of the biofuel in Unit 1 no later than 45 days after the completion of field test.

## SECTION VI. APPENDICES

### APPENDIX GC – GENERAL CONDITIONS

- G.1. The terms, conditions, requirements, limitations and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 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.
- G.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 or exhibits, specifications or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and 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 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.
- G.4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment 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.
- G.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.
- G.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.
- G.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:
- Have access to and copy and records that must be kept under the conditions of the permit;
  - Inspect the facility, equipment, practices or operations regulated or required under this permit, and
  - 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.
- G.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 description of and cause of non-compliance; and
  - 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.

## SECTION VI. APPENDICES

### APPENDIX GC – GENERAL CONDITIONS

- G.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, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.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.
- G.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.
- G.12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13. This permit also constitutes:
- (a) Determination of Best Available Control Technology (not applicable to project);
  - (b) Determination of Prevention of Significant Deterioration (not applicable to project); and
  - (c) Compliance with New Source Performance Standards (not applicable to project).
- G.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 or 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:
    - 1. The date, exact place, and time of sampling or measurements;
    - 2. The person responsible for performing the sampling or measurements;
    - 3. The dates analyses were performed;
    - 4. The person responsible for performing the analyses;
    - 5. The analytical techniques or methods used; and
    - 6. The results of such analyses.
- G.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.

## Livingston, Sylvia

---

**From:** Bradley, Chris [Chris.Bradley@pgnmail.com]  
**Sent:** Wednesday, February 04, 2009 4:34 PM  
**To:** Livingston, Sylvia  
**Cc:** McDaniel, Kim  
**Subject:** RE: FL Power Corp dba Progress Energy - BARTOW PLANT; 1030011-011-AC

Good afternoon Ms. Livingston –

Please note that PEF is able to view the documents associated with the DEP Project File No. 1030011-011-AC; i.e., draft air construction permit for the combustion of bio-fuel at the P.L. Bartow Plant in Pinellas County.

If you have any questions or additional comments, please contact me.

Best regards,

Chris Bradley  
Sr. Environmental Specialist  
Technical Services/EHSS Section-POG  
Progress Energy Florida, Inc.  
Telephone: 727.820.5962  
Fax: 727.820.5229  
E-mail: [Chris.Bradley@pgnmail.com](mailto:Chris.Bradley@pgnmail.com)

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**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Wednesday, February 04, 2009 4:13 PM  
**To:** Jackson, Rufus  
**Cc:** Bradley, Chris; sosbourn@golder.com; Nasca, Mara; mayor@stpete.org; sspratt@pinellascounty.org; phesslin@pinellascounty.org; Gibson, Victoria; Read, David; Linero, Alvaro; Walker, Elizabeth (AIR)  
**Subject:** FL Power Corp dba Progress Energy - BARTOW PLANT; 1030011-011-AC

Dear Sir/ Madam:

Attached is the official **Notice of Draft Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send". We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

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[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1030011.011.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1030011.011.AC.D_pdf.zip)

**Owner/Company Name:** FLORIDA POWER CORPDBAPROGRESS ENERGY FLA  
**Facility Name:** BARTOW PLANT  
**Project Number:** 1030011-011-AC  
**Permit Status:** DRAFT  
**Permit Activity:** CONSTRUCTION/ COMBUSTION OF BIO-FUEL  
**Facility County:** PINELLAS

## Livingston, Sylvania

---

**From:** Hessling, Peter A [phesslin@co.pinellas.fl.us]  
**Sent:** Wednesday, February 04, 2009 4:16 PM  
**To:** Livingston, Sylvania  
**Subject:** RE: FL Power Corp dba Progress Energy - BARTOW PLANT; 1030011-011-AC

We have received the noted documents.

Peter Hessling  
Air Quality Division Director  
Pinellas Co. Dept. of Envir. Mgt.

---

**From:** Livingston, Sylvania [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Wednesday, February 04, 2009 4:13 PM  
**To:** rufus.jackson@pgnmail.com  
**Cc:** chris.bradley@pgnmail.com; sosbourn@golder.com; Nasca, Mara; mayor@stpete.org; sspratt@pinellascounty.org; Hessling, Peter A; Gibson, Victoria; Read, David; Linero, Alvaro; Walker, Elizabeth (AIR)  
**Subject:** FL Power Corp dba Progress Energy - BARTOW PLANT; 1030011-011-AC

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**Owner/Company Name:** FLORIDA POWER CORPDBAPROGRESS ENERGY FLA  
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**Facility County:** PINELLAS  
**Processor:** David Read/ Al Linero

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Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation

## Livingston, Sylvia

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**From:** Livingston, Sylvia  
**Sent:** Wednesday, February 04, 2009 5:17 PM  
**To:** 'Rlasala@pinellascounty.org'  
**Subject:** FL Power Corp dba Progress Energy - BARTOW PLANT; 1030011-011-AC  
**Attachments:** INTENT1030011-011-AC.pdf

Dear Sir/ Madam:

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**Owner/Company Name:** FLORIDA POWER CORPDBAPROGRESS ENERGY FLA

**Facility Name:** BARTOW PLANT

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**Permit Status:** DRAFT

**Permit Activity:** CONSTRUCTION/ COMBUSTION OF BIO-FUEL

**Facility County:** PINELLAS

**Processor:** David Read/ Al Linero

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Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

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

## Livingston, Sylvia

---

**From:** Livingston, Sylvia  
**Sent:** Wednesday, February 04, 2009 4:13 PM  
**To:** 'rufus.jackson@pgnmail.com'  
**Cc:** 'chris.bradley@pgnmail.com'; 'sosbourn@golder.com'; Nasca, Mara; 'mayor@stpete.org'; 'sspratt@pinellascounty.org'; 'phesslin@pinellascounty.org'; Gibson, Victoria; Read, David; Linero, Alvaro; Walker, Elizabeth (AIR)  
**Subject:** FL Power Corp.dba Progress Energy - BARTOW PLANT; 1030011-011-AC  
**Attachments:** INTENT1030011-011-AC.pdf

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**Owner/Company Name:** FLORIDA POWER CORPDBAPROGRESS ENERGY FLA

**Facility Name:** BARTOW PLANT

**Project Number:** 1030011-011-AC

**Permit Status:** DRAFT

**Permit Activity:** CONSTRUCTION/ COMBUSTION OF BIO-FUEL

**Facility County:** PINELLAS

**Processor:** David Read/ Al Linero

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Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

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



## Livingston, Sylvia

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**From:** Nasca, Mara  
**Sent:** Friday, February 06, 2009 2:27 PM  
**To:** Prickett, Patricia  
**Cc:** Livingston, Sylvia; Zhang-Torres  
**Subject:** FW: FL Power Corp dba Progress Energy - BARTOW PLANT; 1030011-011-AC  
**Attachments:** INTENT1030011-011-AC.pdf

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**From:** Livingston, Sylvia  
**Sent:** Wednesday, February 04, 2009 4:13 PM  
**To:** 'rufus.jackson@pgnmail.com'  
**Cc:** 'chris.bradley@pgnmail.com'; 'sosbourn@golder.com'; Nasca, Mara; 'mayor@stpete.org'; 'sspratt@pinellascounty.org'; 'phesslin@pinellascounty.org'; Gibson, Victoria; Read, David; Linero, Alvaro; Walker, Elizabeth (AIR)  
**Subject:** FL Power Corp dba Progress Energy - BARTOW PLANT; 1030011-011-AC

Dear Sir/ Madam:

Attached is the official **Notice of Draft Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send". We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

**Click on the following link to access the permit project documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1030011.011.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1030011.011.AC.D_pdf.zip)

**Owner/Company Name:** FLORIDA POWER CORPDBAPROGRESS ENERGY FLA  
**Facility Name:** BARTOW PLANT  
**Project Number:** 1030011-011-AC  
**Permit Status:** DRAFT  
**Permit Activity:** CONSTRUCTION/ COMBUSTION OF BIO-FUEL  
**Facility County:** PINELLAS  
**Processor:** David Read/ Al Linero

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## Livingston, Sylvia

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**From:** Jackson, Rufus [Rufus.Jackson@pgnmail.com]  
**Sent:** Friday, February 06, 2009 7:57 AM  
**To:** Livingston, Sylvia  
**Subject:** RE: FL Power Corp dba Progress Energy - BARTOW PLANT; 1030011-011-AC

I have received.

---

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Wednesday, February 04, 2009 4:13 PM  
**To:** Jackson, Rufus  
**Cc:** Bradley, Chris; sosbourn@golder.com; Nasca, Mara; mayor@stpete.org; sspratt@pinellascounty.org; phesslin@pinellascounty.org; Gibson, Victoria; Read, David; Linero, Alvaro; Walker, Elizabeth (AIR)  
**Subject:** FL Power Corp dba Progress Energy - BARTOW PLANT; 1030011-011-AC

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**Owner/Company Name:** FLORIDA POWER CORPDBAPROGRESS ENERGY FLA  
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Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)