



Progress Energy

RECEIVED

AUG 20 2003

BUREAU OF AIR REGULATION

August 13, 2003

Mr. Scott M Sheplak, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation
Mail Station: #5505
2600 Blair Stone Road
Tallahassee, Florida 32399

Dear Mr. Sheplak:

Re: Progress Energy Florida Bartow Plant – Unit 1 Electrostatic Precipitator
Operation and Maintenance Plan Information

The Department and the Pinellas County Department of Environmental Management have previously reviewed Progress Energy Florida's Title V permit application concerning the Bartow facility's electrostatic precipitator. Progress Energy Florida subsequently received a letter from the Department, dated June 11, 2003, requesting additional information to be included in the electrostatic precipitator's operation and maintenance plan.

As suggested in the Department's letter, I request that the Title V Permit be revised in the name of Progress Energy Florida, Inc.

Enclosed please find the revised operation and maintenance plan incorporating the Department's and County's comments.

Please contact Matt Lydon (727) 826-4152 if you have any questions.

Sincerely,

Brenda Brickhouse
Bartow Plant Manager

Cc: Wayne Martin, PCDEM

**PROGRESS ENERGY FLORIDA
BARTOW PLANT UNIT #1 ELECTROSTATIC PRECIPITATOR
OPERATION AND MAINTENANCE PLAN
August 2003**

DESCRIPTION

This cold-side precipitator is a two-chambered Buell unit built in 1982. The unit was designed to treat a gas volume of 488,000 acfm at 300° F under negative pressure. As of October 2002, this unit was rebuilt. There are two mechanical and five electrical fields in the direction of gas flow. There are 30 gas passes per chamber, formed by 36' high collecting plates 11" apart. Plates in the third (outlet) mechanical fields of each chamber are 12' wide, while those in the second (center) field are 9' wide. The first field is vacant. The discharge electrodes are RDE-1 rigid electrodes with emitter pins on 3" centers.

Electrical power is supplied through five dual-bushing transformer/rectifier sets, each of which is controlled by a BHA, SQ-300 automatic voltage controller, rated at 480 V, 240 A primary and 45 kV, 1800 mA secondary.

Cleaning of the precipitator internals is accomplished by a total of 154 BHA manufactured EGR impact rappers controlled by a BHA, PRC-100 Rapper controls. Collected ash is shed into 12 hoppers, which are equipped with Dynatrol hopper level detector probes and Chromalox heaters.

EQUIPMENT SPECIFICATIONS

Original Manufacturer – General Electric Environmental Services, Inc.

Rebuild Manufacturer – BHA Group, Inc.

Precipitator: Model 1-BAB1.2x37(9)36.0-434-4.3P

Number of Electrical Fields	5
Number of Bus Sections	14
Number of Gas Passes	60
Plate Height	36'
Emitting Electrodes	rigid electrode
Automatic Voltage Controller	BHA SQ-300
Electrode Cleaning Methods:	
Emitting System	impact rappers
Collecting System	impact rappers
Electrode Cleaning Controller	PRC-100

DESIGN PARAMETERS

Fuel Type	No. 6 Fuel Oil
Flue Gas Volume	488,000 acfm
Gas Velocity	4.07 fps
Normal Flue Gas Exit Temperature	300° F
Fly Ash Removal Efficiency for No. 6 Fuel Oil	98%

PROCESS PARAMETERS

Plant operators monitor and may adjust the following Bartow Plant Unit 1 parameters at least once per day to assure efficient plant operations:

- Pressures (furnace, superheat, and reheat)
- Temperatures (superheat, reheat, and fuel)
- Flows (steam, feedwater, and fuel); and
- Unit load

RAPPER FREQUENCY AND DURATION

- Rapper frequency, plate – 8 half cycles
- Rapper duration, plate – 1 rap – cycle time 8:27:330 (plates 4)
- Rapper duration, plate – 1 rap – cycle time 13:27:330 (plates 5)
- Rapper duration, plate – 1 rap – cycle time 35:14:660 (plates 6&7)
- Rapper duration, plate – 1 rap – cycle time 49:34:660 (plates 8&9)
- Rapper duration, plate – 1 rap – cycle time 60:07:330 (plates 10)

Please Note: These rapper parameters are NOT set parameters.

OPERATIONAL CHECKS

The following parameters are checked and recorded each day of precipitator operation:

- Transformer/rectifier primary voltage (110 to 300 V)
- Secondary voltage – 50 kV
- Transformer/rectifier primary current (20 to 80 A AC)
- Transformer/rectifier secondary current (0.07 to 0.54 A DC)
- Transformer/rectifier spark rates (0 to 30 sparks/min.)

Other parameters, listed below, are monitored during precipitator operation but not recorded. These parameters are alarmed locally (in the precipitator control room) and there is continuous monitoring by an alarm to the main control room, as a 'Precipitator Trouble' alarm.

Precipitator Control Room:

Checks for Alarms:

- Transformer/rectifier low voltage – Alarms at 50V and 10 kV
- Transformer/rectifier over current – Alarms at 300A and 22502 MA
- Transformer/rectifier high oil temperature – Alarms at 50 deg. C
- Control cubicle fan failure

- Insulator heater system failure
- Rapper control cabinet loss of power
- Purge system airflow failure
- Purge system fan failure
- Control room high temperature
- Hopper heaters low temperature
- Hopper ash level high

Other Checks:

- Check for rapper faults on WinRap program on precipitator controls computer
- Check that transformer control cubical fans are in operation.
- Check for transformer/rectifier trips on local switch cabinet.
- Check AVC (WinDac) precipitator controls computer for abnormal conditions daily.
- Check for leaks through doors, manholes, etc. on the 2nd, 4th, and 8th floors at least monthly.

MAINTENANCE PLAN

The majority of precipitator maintenance is done during planned unit outages. Planned outages generally occur every two years. Unplanned unit outages occur due to some type of failure or operational problem with either the precipitator or the steam unit. Unplanned unit outages required due to steam unit performance may also be an opportunity to perform precipitator maintenance. Whether an unplanned outage is necessitated by precipitator performance will depend on the type and significance of precipitator equipment failure. Such a decision depends on the engineering judgement of responsible Progress Energy personnel.

Outage related maintenance work may include the following:

- Complete precipitator cleaning and inspection, depending on time lapse since last complete inspection.
- Inspection and repair as needed of transformer rectifiers.
- Inspections and repair as needed of hoppers and hopper heaters.
- Cleaning of transformer/rectifier set, support and rapper insulators.
- Replace gaskets on doors and manholes as needed
- Weld repair of plates as needed to repair areas of corrosion.
- Properly align rigged electrodes, plates, and frames internally.

Maintenance activities are documented on several forms. Attached are samples of a Trouble Report form and the computerized maintenance planned or completed report format from the Productivity Measurement System.

SPARE PARTS

The following is a list of major items stocked. There are many other small parts not listed such as clips, fuses, lighting fixtures, etc. Quantities and spare parts carried vary with time of year, determination of need as equipment ages and economic reorder quantities (i.e.: pricing in quantities).

PART	QUANTITY
Hopper heater	29
Insulator shaft - Alumina	2
Insulator support	7
SQ-300 AVC controller	1
EGR rapper assembly	1
EGR rapper coil assembly	2
EGR rapper gaskets	6
Adjusting Bolt	2
Rapper Boot Seals	5
Rapper boot seal clamps	15
Insulator shaft – Porcelain	1
Heater element	5
Rapper steering diode assembly	1
Fuses	6
PRC-100 rapper Triac board	1
PRC-100 rapper power module	1
PRC-100 rapper IFB board	1

PROGRESS ENERGY - BARTOW STEAM PLANT

ESP WORK LOG (Work orders history)

Passport Information Portal - Query Results

For Information Only. PassPort is the Application of Record.

WORK ORDERS AND WORK ORDER TASKS (Facility: BAR --- Date: 8/11/2003 4:18:57 PM)

Wo_Facility	Wt_Unit	Wo_Work_Order_Nb	Wt_System_Code	Wt_Wo_Tsk_Status	Wo_Description	Wo_Planner	Wo_Start_Date	Wt_Completion_Date
BAR	1	439137	BA	85	U1/EL/PRECIP RAPPER B164 IN ALARM "SHORT"	BETSAE	20030728	20030811
BAR	1	443208	BA	50	K/M/U1/PRECIP. VENT LINE IS PLUGGED	HENDEL	20030808	20030808
BAR	1	437336	BA	85	PRECIPITATOR RAPPER SYSTEM TROUBLE SYSTEM CURRENT IS TO HI	BETSAE	20030724	20030807
BAR	1	427545	BA	85	M/U1 RECONFIGURE 90 DEGREE FILTER BAG DUMPSTER ATTACHMENT	BOYDRO		20030801
BAR	1	413916	BA	85	M/W12 GAS RECIRC DMPRS	BOYDRO		20030801
BAR	1	427311	BA	85	M/W2 CLN ASH TRANS PIPE	BOYDRO		20030729
BAR	1	437535	BA	85	K/U1 INSTALL LINERS IN BLUE ASH BOX'S	BOYDRO		20030725
BAR	1	422269	BA	85	I&C /U1 #1 AND #1A IK'S NEED AIR ISOLATION VALVES	PAULDA	20030617	20030725
BAR	1	361359	BA	85	M/U1 PRECIP STEEL RUSTED OUT "A" OUTLET STRUCTURE	BOYDRO		20030725
BAR	1	427544	BA	85	M/U1 PRECIP FLEX HOSE TO FLYASH DUMPSTER KINKED	BOYDRO	20030629	20030721
BAR	1	294067	BA	85	M/W48 FLYASH AIR TK MAINT	BOYDRO		20030717
BAR	1	294067	BA	85	M/W48 FLYASH AIR TK MAINT	BOYDRO		20030717
BAR	1	409028	BA	50	M/U1 ASH TRANSPORT PIPE COLLAPSED IN TWO AREAS	BOYDRO		20030716
BAR	1	431204	BA	85	K/M/U1/PRECIP.---T-108 WILL NOT PRESSURIZE- INSPECT	HENDEL	20030709	20030715
BAR	1	433367	BA	85	EL/U1 PRECIPITATOR	BETSAE		20030714
BAR	1	409288	BA	85	I/PRECIP/WORK ON PC LOGIC	PAULDA	20030516	20030710
BAR	1	421469	BA	85	M/W2 CLN ASH TRANS PIPE	FISHER		20030708
BAR	1	423275	BA	85	J/U1 REMOVE ASH FROM BLUE BOX "D"	BOYDRO		20030707
BAR	1	409020	BA	85	I/U1/PRECIP INSTRUMENT AIR FILTERS NEED TO BE CHANGED	PAULDA		20030707
BAR	1	410269	BA	85	M/W2 CLN ASH TRANS PIPE	BOYDRO		20030702
BAR	1	409028	BA	50	M/U1 ASH TRANSPORT PIPE COLLAPSED IN TWO AREAS	BOYDRO		20030701
BAR	1	421855	BA	85	I/U1 T-109 TRANSPORT AIR REGULATOR BLOWING OUT VENT	PAULDA		20030626
BAR	1	369420	BA	85	M/U1 FLYASH DUMPSTER CONTAINMENT AREA, REPLACE BULLARD	BOYDRO	20030204	20030626
BAR	1	424757	BA	85	K/M/U1/ FLYASH DUMPSTER YVACUUM" VENT LINE TO BOILER.	HENDEL	20030623	20030623
BAR	1	380793	BA	85	M/W12 1A&1B ID FAN DMPRS	BOYDRO		20030623
BAR	1	416042	BA	85	M/W2 CLN ASH TRANS PIPE	BOYDRO		20030620
BAR	1	404521	BA	85	M/W2 CLN ASH TRANS PIPE	BOYDRO		20030617
BAR	1	361359	BA	85	M/U1 PRECIP STEEL RUSTED OUT "A" OUTLET STRUCTURE	BOYDRO		20030617
BAR	1	409034	BA	85	I/U1 T-109 TRANSPORT AIR REGULATOR BLOWING OUT VENT	PAULDA	20030515	20030616
BAR	1	380794	BA	85	M/W12 GAS RECIRC DMPRS	BOYDRO		20030610
BAR	1	417005	BA	85	M/U1 "A" A/H HIGH DIFF. NEEDS WASHING	BOYDRO		20030609
BAR	1	402375	BA	85	M/U1 INSTALL REMAINING CASTELL-KEY LOCKS.	BOYDRO		20030609

Facility: BAR BARTOW PLANT
 WR Originator: SAVAGM SAVAGE JR. M F
 Unit : 1 Project :
 W/O Type: CO TSK PRI: 4 W/O Dspln: K
 Planner : HENDEL HENDERSON L L
 W/O Title : K/M/U1/PRECIP. VENT LINE IS PLUGGED
 W/O Task Title: K/M/U1/PRECIP. VENT LINE IS PLUGGED
 Task Dspln : K Due By: 08/08/03

Work Order Package
 (Single work order)
 00443208 01

Rpt : TIPMC11
 Date: 08/11/03

Page: 1



Work Order Task Written To

Facility : BAR Unit : 1 Sys: BA PMT:
 Equipment : PIP BA1BA3020000000 Component:
 Work Item : Eqt. List: Review Reqd:
 Equip. Tag: BA1-PRECIPITATOR-PIPING Alt:
 Catalog ID: Job Type : CO UCR:A UTC :
 Name : BA1 PRECIPITATOR PIPING
 Location :
 Crew :
 Resource Type: PERS Resource Code: FINT Qty: 1 Duration:
 Cost Centr: 60953D Activity : User Def:
 Percentage: 100.000 Acct No. : 00 20016145 W0300
 CPM Proj : NONSCHED Network Reference:

Work Order Task Instructions

PRECIP.--VENT LINE TO THE BOILER IS PLUGGED.
 PLEASE INVESTIGATE AND RETURN TO SERVICE ASAP.

Rework/Approval

Deficiency Tag No.: Loc: Tag Removed:
 ReWork Job : Comments:

Task Requirements

FAC.	REG/REQ	VALUE	COMMENTS
BAR	ASBESTOS		
BAR	CLR REQ		
BAR	FIRE PROT		
BAR	HOTWRK PMT		
BAR	INSU		
BAR	NDE REQ		
BAR	PMT		
BAR	SCAFFOLD		
BAR	SECURITY		
BAR	WELD DOC		

Facility: BAR BARTOW PLANT
 W/O Originator: SAVAGM SAVAGE JR. M F
 Unit : 1 Project :
 W/O Type: CO TSK PRI: 4 W/O Dspln: K
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 Task Dspln : K Due By: 08/08/03

Work Order Package

00443208 01

Rpt : TIPMC11
 Date: 08/11/03

Page: 2



Authorization

Start Permission : _____ Date: _____

Failure/Action Taken/As Found

Failure Category Code (F/NF) _____
 Action Taken Category Code: _____
 As Found Sub Category Code: (1-5) _____

Deficiency Tag Loc:

Deficiency Marker or Tag: _____
 Removed (Y/N) _____

Work Completion Signatures

Name	Function/Dept.	Date
_____	_____	_____
_____	_____	_____
_____	_____	_____

Comments: _____
 (rework?) _____

Rework Reason/Cause

	(Y/N)
CT COMPONENT FAILED	—
I W INCOMPLETE WORK FROM MAINTENANCE	—
N/A NON APPLICABLE	—

Date: _____
 Comments: _____

Facility; BAR BARTOW PLANT

WR Originator: SAVAGM SAVAGE JR.

M F

Unit : 1 Project :

V/O Type: CO TSK PRI: 4 W/O Dspln: K

Planner : HENDEL HENDERSON L L

V/O Title : K/M/U1/PRECIP. VENT LINE IS PLUGGED

V/O Task Title: K/M/U1/PRECIP. VENT LINE IS PLUGGED

Task Dspln : K

Due By: 08/08/03

BEST AVAILABLE COPY

Work Order Package

00443208 01

Rpt : TIPMC11

Date: 08/11/03



Page: 3

Completion Comments on Work Performed

Completion Comments Required : Y

Comments:

Comments:

Comments:

Continued on Additional Sheets? : _____

Florida Department of
Environmental Protection

Memorandum

TO: Trina Vielhauer
THRU: Scott Sheplak *js 11/7*
FROM: Edward Svec
DATE: November 4, 2003
SUBJECT: Progress Energy Florida
Title V Permit Revision
1030011-008-AV


Attached for approval and signature is the intent to issue a Title V permit revision for the P. L. Bartow Plant. This permit revision incorporates the terms and conditions of air construction permit, No. 1030011-007-AC, for an enhancement to the Unit 1 electrostatic precipitator and incorporates revisions to Unit 1's Operation and Maintenance Plan. The Statement of Basis contains a more detailed explanation of the changes.

November 4, 2003 is day 76 of the 90 day timeclock.

Attachments

/es

Florida's PROPOSED Permit Electronic Notification Cover Memorandum

TO: Gracy Danois, U.S. EPA Region 4
CC: Jeaneanne Gettle, U.S. EPA Region 4
THRU: Scott Sheplak, P.E., Bureau of Air Regulation
FROM: Edward J. Svec, Permit Engineer 
DATE: November 13, 2003
RE: U.S. EPA Region 4 DRAFT Title V Operation Permit Revision Review

The following DRAFT Title V Revision operation permit(s) and associated documents have been posted on the DEP World Wide Web Internet site for your review. The DRAFT Revision permit is to incorporate the recent changes to an ESP authorized by permit 1030011-007-AC at Progress Energy Florida's Bartow Plant. Please provide any comments via Internet E-mail, to Scott Sheplak, at "Sheplak_S@dep.state.fl.us".

<u>Applicant Name</u>	<u>County</u>	<u>Method of Transmittal</u>	<u>Electronic File Name(s)</u>
Progress Energy Florida Bartow Power Plant	Pinellas	INTERNET	1030011Rd.zip

This zipped file contains the following electronic files:

sob.doc
1030011Rd.doc
1030011Ri.doc
10300111.xls
10300112.xls
1030011g.doc
1030011u.doc
1030011h.doc



RECEIVED
JUN 18 2004
DIVISION OF AIR
RESOURCE MANAGEMENT

June 10, 2004

Mr. Michael Cooke, Director
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Rd. MS 5500
Tallahassee, FL 32399-2400

Subject: Additional Responsible Officials for Title V – Bartow Plant.

Dear Mr. Cooke:

As the Responsible Official for the P. L. Bartow Plant, I am submitting a Department of Environmental Protection form 62-213.900(8) to identify additional Responsible Officials.

If you have any questions, please contact me at 727/827-6105.

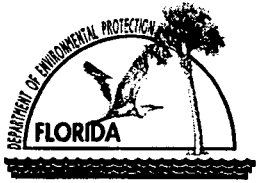
Very truly yours,

A handwritten signature in black ink, appearing to read 'Harry K. Sideris'.

Harry K. Sideris
Plant Manager

Attachment

c: Mr. Charles M. Gates
Mr. J. Michael Kennedy
Mr. Leonard Kozlov (FL-DEP)
Mr. Scott Sheplak (FL-DEP)
Mr. Tony Salvatorezza



Department of Environmental Protection

Division of Air Resource Management

RESPONSIBLE OFFICIAL NOTIFICATION FORM

Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.

Identification of Facility

1. Facility Owner/Company Name: Florida Power Corporation d/b/a Progress Energy Florida, Inc.	
2. Site Name: P.L. Bartow Plant	3. County: Pinellas
4. Title V Air Operation Permit/Project No. (leave blank for initial Title V applications): 1030011-008-AV	

Notification Type (Check one or more)

<input type="checkbox"/>	INITIAL:	Notification of responsible officials for an initial Title V application.
<input type="checkbox"/>	RENEWAL:	Notification of responsible officials for a renewal Title V application.
<input checked="" type="checkbox"/>	CHANGE:	Notification of change in responsible official(s). Effective date of change in responsible official(s) <u>May 6, 2004</u>

Primary Responsible Official

1. Name and Position Title of Responsible Official: Harry K. Sideris – Plant Manager
2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc./Bartow Plant Street Address: 1601 Weedon Island Dr. City: St. Petersburg State: FL Zip Code: 33702
3. Responsible Official Telephone Numbers: Telephone: 727/827-6111 Fax: 727/827-6102
4. Responsible Official Qualification (Check one or more of the following options, as applicable): [✓] For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. [] For a partnership or sole proprietorship, a general partner or the proprietor, respectively. [] For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. [] The designated representative at an Acid Rain source.

5. Responsible Official Statement:

I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.

Harry Siders

Signature

6/10/04

Date

Additional Responsible Official

1. Name and Position Title of Responsible Official: Charles M. Gates, General Manager Operations South
2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc./Crystal River Plant (Fossil) Street Address: 15760 W. Progress Line Rd. City: Crystal River State: FL Zip Code: 34428
3. Responsible Official Telephone Numbers: Telephone: 352/563-4335 Fax: 352-563-4727
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

Additional Responsible Official

1. Name and Position Title of Responsible Official: Anthony Salvatorezza, Superintendent - Operations & Results Fossil Generation Department
2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc./Bartow Plant Street Address: 1601 Weedon Island Dr. City: St. Petersburg State: FL Zip Code: 33702
3. Responsible Official Telephone Numbers: Telephone: 727/827-6240 Fax: 727/827-6102
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

Additional Responsible Official

1. Name and Position Title of Responsible Official: J. Michael Kennedy, DR
2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc./Environmental Services Street Address: 100 Central Ave. Mail Code: BB1A City: St. Petersburg State: FL Zip Code: 33701
3. Responsible Official Telephone Numbers: Telephone: 727/826-4334 Fax: 727/826-4216
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input checked="" type="checkbox"/> The designated representative at an Acid Rain source.



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BUREAU OF AIR REGULATION

June 10, 2004

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Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Rd. MS 5500
Tallahassee, FL 32399-2400

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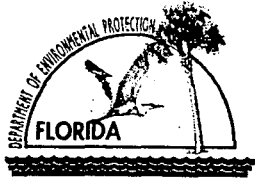
Very truly yours,

Harry K. Sideris
Plant Manager

Attachment

c: Mr. Charles M. Gates
Mr. J. Michael Kennedy
Mr. Leonard Kozlov (FL-DEP)
~~Mr. Scott Sheplak (FL-DEP)~~
Mr. Tony Salvatorezza

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fu.



Department of Environmental Protection

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Division of Air Resource Management RESPONSIBLE OFFICIAL NOTIFICATION FORM

BUREAU OF AIR REGULATION

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Harry Sanders

Signature

6/10/04

Date

Additional Responsible Official

1. Name and Position Title of Responsible Official: Charles M. Gates, General Manager Operations South
2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc./Crystal River Plant (Fossil) Street Address: 15760 W. Progress Line Rd. City: Crystal River State: FL Zip Code: 34428
3. Responsible Official Telephone Numbers: Telephone: 352/563-4335 Fax: 352-563-4727
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

Additional Responsible Official

1. Name and Position Title of Responsible Official: Anthony Salvatorezza, Superintendent - Operations & Results Fossil Generation Department
2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc./Bartow Plant Street Address: 1601 Weedon Island Dr. City: St. Petersburg State: FL Zip Code: 33702
3. Responsible Official Telephone Numbers: Telephone: 727/827-6240 Fax: 727/827-6102
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

Additional Responsible Official

1. Name and Position Title of Responsible Official: J. Michael Kennedy, DR
2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc./Environmental Services Street Address: 100 Central Ave. Mail Code: BB1A City: St. Petersburg State: FL Zip Code: 33701
3. Responsible Official Telephone Numbers: Telephone: 727/826-4334 Fax: 727/826-4216
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input checked="" type="checkbox"/> The designated representative at an Acid Rain source.

Svec, Ed

From: Gary Robbins [grobbins@co.pinellas.fl.us]
Sent: Tuesday, November 25, 2003 2:00 PM
To: Svec, Ed
Subject: Re: Fwd: DRAFT Permit Revision #1030011-008-AV - PROGRESSENERGY FLORIDA - P.L. BARTOW PLANT

I have reviewed the draft permit, and my comments follow. An edited version of the draft permit is attached.

1. I revised the language in the facility description, regarding the proposed changes to the ESP (authorized under 103011-007-AC), to present tense. (See edited permit)
2. Condition A.9 limits sulfur dioxide emissions to 2.75 pounds per million BTU, when burning liquid fuel. Condition A.10. only limits new No. 6 and on-specification used oil to 2.5 percent by weight sulfur. What about the other fuel oils?
3. Modify condition A.37 to read: "**A.37. Not Federally Enforceable.** Submit to the Air Section of PCDEM each calendar year on or before March 1, a completed "Annual Operating Report for Air Pollutant Emitting Facility" form for the preceding calendar year. "

I suggest removing the emission factors. Emissions factors and methodologies change from time to time, and Pinellas will work with Florida Power on proper calculation methods.

4. Modified condition A.40. to comply with the most current County Code for O&M Plans. (See edited permit)

A.40. E.U. ID No. -001 Operation and Maintenance Plan. The rebuilt 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 PROGRESS ENERGY FLORIDA BARTOW PLANT UNIT #1 ELECTROSTATIC PRECIPITATOR OPERATION AND MAINTENANCE PLAN dated August 2003 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. Time table for the routine maintenance of the pollution control device as specified by the manufacturer.
3. A list of the type and quantity of the required spare parts which are stored on

12/3/2003

the premises for the pollution control device.

4. A record log which shows at a minimum when maintenance and observations were performed, what maintenance and observations were performed, by whom, and acceptable parameter ranges for each operational check.

[Rule 62-296.700(6), F.A.C.; and, Pinellas County Code, Section 58-128]"

5. In condition A.20., the permit mentions the use of Method 19 for PM emission determinations. While this is a direct quote from 62-296 F.A.C., I don't believe this is an appropriate Method for this source. This test method is found in Appendix A-7 to Part 60 of the CFR. The CFR states that "Specific uses of these test methods are described in the standards of performance contained in the subparts, beginning with Subpart D." These utility boilers are not subject to these subparts, so Method 19 is not appropriate. Do you agree? In a recent test, the test results came in approximately 25-30% lower using Method 19.

6. Shouldn't the permit be specific on what continuous emission monitors are required to be operated, the calibration and maintenance of the monitors, and reporting requirements of the monitors?