



November 11, 1997

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BUREAU OF
AIR REGULATION

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

Re: Florida Power Corporation, Bartow Facility
DRAFT Title V Permit No. 1030011-002-AV

Dear Mr. Sheplak:

On behalf of Florida Power Corporation (FPC), attached are comments regarding the DRAFT Title V permit for the Bartow Facility as identified above. FPC appreciates the Department's efforts in processing this permit and understands the need to resolve these issues in as timely a manner as possible. In this regard, DEP agreed to grant FPC's Request for Extension of Time until December 8, 1997. If we are unable to reach a resolution of these comments within this time period, we would appreciate the opportunity to file an additional Request for Extension of Time. Accordingly, please contact me at (813) 866-5158 as soon as you have had a chance to review these comments to set up either a telephone or in-person conference. Thank you again for your consideration of our comments.

Sincerely,

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

Scott H. Osbourn,
Senior Environmental Engineer

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

FLORIDA POWER CORPORATION
COMMENTS ON DRAFT TITLE V PERMIT
BARTOW FACILITY

General Comments

1. FPC understands that Appendix TV-1, Title V Conditions, is expected to be revised within the next few weeks. FPC requests that its Title V permit reflect the most up-to-date version of this Appendix.
2. FPC understands that DEP will publish the Intent to Issue Title V Air Operation Permit. Because the applicant is ultimately responsible for the publication of the Intent to Issue, FPC requests that DEP provide a copy of the Notice intended to be published, as well as proof of publication.
3. On the Table of Contents page, Section III, Emission Unit A -003, the emission unit number should be "No. 3 Unit," instead of "No. 2 Unit."
4. On the placard page, FPC expects the need for the following revisions: (1) the "Effective Date" should be changed to January 1, 1999, (2) the "Renewal Application Due Date" should be changed to July 5, 2003, and (3) the "Expiration Date" should be changed to December 31, 2003.

Section II., Facility-wide Conditions.

1. Condition 2. FPC requests the following revision: "**No person shall not cause, suffer, allow, or permit**"
2. Condition 3. For clarity and to make this Condition specific to FPC's Bartow Facility, FPC requests that Condition 3. be edited as follows:

See JK Sec II.2

~~Except as otherwise provided in this permit for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause~~

Also, because the reference to Chapter 62-297 in the last sentence of Condition 2. appears to be misplaced, FPC requests Condition 2. be edited as follows: "**EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.**"

JK II.2.
JK II.3.

3. Condition 6. In the context of this permit, how does DEP intend to respond to EPA's comments regarding the need to change the phrase "exempt" to "insignificant"?
4. Condition 7. For clarity, FPC requests that the first sentence of this Condition be edited as follows: "**The permittee shall not allow no person to store, pump,**"

Section III. Subsection A.

1. FPC requests that the third sentence in the description to Unit 1 be deleted because there is no federally enforceable requirement mandating the use of an ESP for this unit and the original basis for installing and utilizing the ESP no longer exists. Specifically, FPC originally installed the ESP to control particulate emissions while firing a coal/oil mixture (COM). FPC has not fired COM since 1987 and this fuel was not included as a segment in FPC's Title V application for this source. FPC's construction permit clearly states that the "Use of the precipitator is not required when burning 100% fuel oil" (Condition 1. from AC 52-36102 (issued March 18, 1981)), although subsequent operation permits for the Bartow Unit 1 arguably conflict with this federally enforceable construction permit condition. Based on DARM guidance document DARM PER , "conditions in air operation permits that are extraneous to the conditions that were in the construction permits . . . may be reviewed and corrected in the Title V permit to reflect proper application of the Department's rules." Accordingly, FPC requests that all "extraneous" language in the Title V permit requiring the use of an ESP during periods of firing 100% fuel oil be deleted.

FPC also requests DEP confirmation that prospective nonuse and removal of the ESP cannot trigger PSD or NSPS requirements; if desired, this confirmation can be mutually understood when the above amendments are made to the Title V permit. This conclusion is justified because, as noted above, the ESP was "required" under the construction permit only "to remove particulate matter generated from burning a combination of oil and coal fuel," and the use of the ESP expressly was not required when 100% oil is burned. Therefore, nonuse of the ESP in connection with FPC's return to 100% fuel oil would simply be a return to the circumstances predating the use of the coal/oil fuel, and would be fully consistent with federally enforceable requirements applicable to Unit No. 1. Just as reverting to burning 100% oil without the ESP was permissible (without triggering PSD or NSPS) when the construction permit was originally issued, the same outcome is warranted now.

2. Condition A.1. FPC requests that the reference to No. 6 fuel oil as "new" be deleted because there is no basis for this adjective. FPC understands that No. 2 fuel oil may sometimes need to be referred to as "new" to differentiate it from used oil, but this is not the case for No. 6 oil. Also, FPC requests that the citation to Rules 62-296.405 and 62-296.702 in this Condition be deleted because there is no apparent basis for their inclusion.

3. Condition A.3. FPC requests that this Condition be deleted because it is redundant to Condition A.1. If needed, the narrative condition at the bottom of page 7 could simply be added to Condition A.1. Also, FPC requests that the language "**any quantifiable levels of PCBs**" be deleted everywhere it appears in this permit and replace with the phrase "**PCBs in quantities greater than 2 ppm.**" This clarification is reflected in the cited references to 40 CFR Part 271.

4. Condition A.6. FPC requests that all of Rule 62-210.700(3), F.A.C. be included either in this Condition or in between Conditions A.15. and A.16.

5. Condition A.7. For clarification, FPC requests the following revisions to this Condition: "**Particulate matter emissions shall not exceed the following during steady state operations, as measured in accordance with Condition A.20 by applicable compliance methods:" Also, the allowable TPY figures for particulate should reflect 21 hr/day at 0.1 lb/MMBtu and 3 hr/day at 0.3 lb/MMBtu. These figures would then be 668 TPY for Unit 1, 721.1 TPY for Unit 2, and 1,210.5 TPY for Unit 3.**

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6. Condition A.9. For clarification, FPC requests the following revision: "When burning liquid fuel . . . as measured in accordance with Condition A. 21, by applicable compliance methods."

7. Condition A.11. FPC requests that all Title V permit conditions relating to burning used oil be substantially similar to comparable provisions for FPC's other facilities that burn used oil.

8. Condition A.19. The opacity monitors on the three steam units were required by Part 75 of the Acid Rain rules. The appropriate method for determining compliance with the Department's opacity rules is DEP Method 9. FPC requests that the reference to the use of the opacity monitor for Unit 1 be deleted.

9. Condition A.19. The citation to Rule 62-296.702(3)(a)1., F.A.C. is incorrect. Subparagraph 1. does not exist.

10. Condition A.26. Because this permit specifies the compliance method, FPC requests the following amendment: "**2. Opacity Compliance Tests.** ~~When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, . . .~~"

11. Condition A.28. For clarification and to make this Condition specific to FPC's Bartow facility, FPC requests the following revisions: "(a)4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order or this permit, the applicant owner or operator of each emissions unit shall have a formal compliance test conducted for: a. visible emissions; b. Particulate matter; and c. SO₂. if EPA methods 6, 6A, 6B or 6C are utilized to determine compliance. See Condition A.29." FPC requests that the remainder of paragraph (a)4. be deleted.

12. Condition A.32. The language in paragraph (c) is unclear and appears unwarranted. FPC requests that it be removed.

13. Condition A.39. FPC requests that this Condition be deleted because AP-42 emission factors may change or the mechanism for reporting emissions in the AOR may change. There should be no need for this Condition.

14. Condition A.40. FPC requests that the "Process Parameters" provisions in this Condition be deleted because they are either redundant to other Title V permit conditions or unnecessary. Also, the last sentence of this Condition should be revised as follows: "Records of inspection . . . shall be made available to the Department or PCDEM for inspection upon request."

15. Condition A.41. In accordance with FPC's request to remove the requirement for operation of the ESP for Unit 1, this requirement should be deleted as well.

Section III. Subsection B.

1. Condition A.26. Because this permit specifies the compliance method, FPC requests the following amendment: "**2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method,**"

2. Conditions B.18. and B.20. Because there is only a visible emissions and fuel sulfur content limit on this unit, FPC requests the deletion of the following provisions of Condition B.18.: (1) paragraph (a)2., (a)4.b., (a)4.c., (a)5.; and all of Condition B.20.

Section III. Subsection C.

1. Condition C.1. For clarification and simplification, FPC requests that this Condition simply list "714" as the heat input for each peaking unit for all fuels. Also, specific language should be included in this Condition clarifying that the maximum heat input is based on temperature.

2. Condition C.9. This Condition should be marked "Not Federally Enforceable" because the limit for which it is determining compliance is Not Federally Enforceable.

3. Condition C.10. This Condition should be deleted because there are no standards for which process variables are required to be determined.

4. Condition C.13. This language should reflect the latest DEP guidance regarding the use of heat input curves for compliance testing.

5. Condition A.26. Because this permit specifies the compliance method, FPC requests the following amendment: "**2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method,**"

6. Condition C.19. FPC requests that this Condition be deleted because AP-42 emission factors may change or the mechanism for reporting emissions in the AOR may change. There should be no need for this condition.

Section III. Subsection D.

1. Condition D.3. The 700 hr/yr limitation for the transfer of flyash is inappropriate and should be deleted. The five percent opacity standard provides reasonable assurance that the hourly particulate limit is being attained. An annual limitation on hours is unnecessary. Further, in accordance with all previous comments concerning the ESP, use of the flyash system and all associated limitations will be unnecessary.

2. Condition D.4. For clarification, FPC requests the following language be added to the end of this Condition: "See Condition D.7."

3. Condition D.6. This Condition should be deleted because there are no process variables to determine.

4. Condition D.7. For clarification, FPC requests that the first sentence of this condition be deleted because there is no compliance determination requirement for particulate matter.

5. Condition D.8. For clarification, FPC requests the following revision: "EPA Method 9, incorporated by reference in Chapter 62-297, shall be used to determine opacity compliance pursuant to Chapter 62-297, F.A.C."

6. Condition D.11. Because this permit specifies the compliance method, FPC requests the following amendment: "2. **Opacity Compliance Tests.** ~~When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method,~~"

7. Conditions D.11., D.12., D.13., and D.14. Because there is only a visible emission limit on this unit, FPC requests the deletion of the following provisions in Condition D.11.: paragraphs (b), (c), (d), and (e); all of Condition D.12.; paragraphs (a)4.b., (a)4.c., and (c) in Condition D.13.; and paragraph (c) in Condition D.14.

Section III. Subsection E.

1. The provisions governing the operation of these relocatable generators when they are located at the Bartow facility should be essentially identical to the provisions contained in FPC's Title V permits for Crystal River, Anclote, and Higgins. Also, Condition E.22. should be deleted because there is no requirement for which FPC must comply.

Section IV. Acid Rain Part

1. Condition A.1.a. should reference the actual application that FPC submitted rather than DEP's form number.

2. Conditions A.5. This condition imposes no requirements and therefore should be deleted.

3. Condition A.4. Because this Condition applies to all requirements and units at the Bartow facility, FPC requests that it be moved to the facility-wide section of this permit.

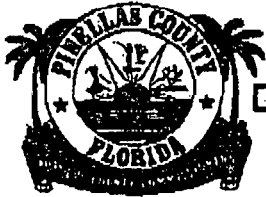
Appendix U-1, List of Unregulated Emissions Units and/or Activities.

1. The listing of the storage tanks in this Appendix appears to contain several duplications. The application listed the same tanks in the list of all exempt/unregulated/trivial units and in the separate list of tanks.

Appendix S. Permit summary Tables

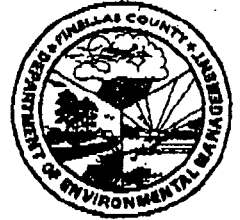
Table 1-1

1. FPC requests that these Tables be revised to reflect the requested revisions in comments above. For example, the annual particulate totals for the three steam units should be revised to reflect soot blowing, as previously commented. Also, a statement should accompany the table to indicate that the emission totals for the combustion turbines are "per turbine".



PINELLAS COUNTY DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

AIR QUALITY DIVISION 300 SOUTH GARDEN AVENUE CLEARWATER, FLORIDA 33766



COMMISSIONERS ROBERT B. STEWART - CHAIRMAN BARBARA SHEEN TODD - VICE CHAIRMAN CALVIN D. HARRIS SALLIE PARKS STEVE SEIBERT

PHONE: (813) 464-4422 FAX: (813) 464-4420 SUNCOM: 570-4422 SUNCOMFAX: 570-4420

October 17, 1997

Ed Svec Department of Environmental Protection 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Re: Florida Power Corporation, Bartow 1030011-002-AV, Draft Permit

Mr. Svec:

This office has reviewed the draft permit (Intent to Issue), for the above mentioned facility. Requested changes are:

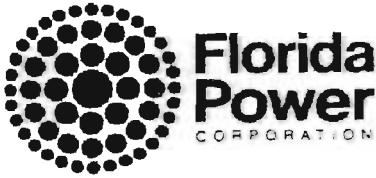
- 1. Change the Pinellas rule cite, for objection odor, on Page 4, Section II, Facility-wide Conditions, to read "Pinellas County Ordinance 97-05, Section 33, Sec. 58-178. This ordinance is being incorporated into Pinellas County Code. If this is done prior to permit issuance, DEP will be given the new cite.
2. Since the Utility Boilers already have established baseline test dates, we recommend that wording be included in condition A.28.4., such as: "Test the Utility Boilers annually, within 60 day prior to:"

Table with 2 columns: Emission Unit, Base Test Date. Rows: EU 001 (March 15 and September 15), EU 002 (September 15), EU 003 (September 15)

- 3. In condition A.35., A.36., B.18., B.21., B.23., C.7., C.15., C.18., D.13., D.14., E.18., E.19., change the references from the Department to PCDEM, or the Department and PCDEM, or the Department or PCDEM, as appropriate. Note: Should PCDEM be added to Appendix A-1, Abbreviations?

add A-1

Ed Svc



October 2, 1997

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BUREAU OF
AIR REGULATION

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

Dear Mr. Sheplak:

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

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

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

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

Sincerely,

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

Scott H. Osbourn
Senior Environmental Engineer

Enclosure

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



Department of Environmental Protection

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SEP 30 1997

Environmental Svcs
Department

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

In the matter of an
Application for Permit by:

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

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

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

Administrative Hearing

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

A petition must contain the following:

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

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

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

Mediation

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

A request for mediation must contain the following information:

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

The agreement to mediate must include the following:

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

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

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

Variance/Waiver

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

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

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

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

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

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

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

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

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


George W. Richardson
Air Permitting Engineer
Southwest District

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

CERTIFICATE OF SERVICE

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

Clerk Stamp

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


Clerk

9/29/97
Date



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

PERMITTEE:

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

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

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

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

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

Facility ID No.: 0004

Emission Unit ID No.:
012-Diesel Generators



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

PERMITTEE:

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

Permit No.: 0170004-006-AO
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 - (3) The Bartow Plant, Weedon Island, St. Petersburg, Pinellas County.
 - (4) The Higgins Plant, Shore Drive, Oldsmar, Pinellas County.
 - (5) The Bayboro Plant, 13th Avenue & 2nd Street South, St. Petersburg, Pinellas County.
 - (6) The Wildwood Reclamation Facility, State Road 462, 1 mile east of US 301, Wildwood, Sumter County.
 - (7) The FPC Polk County Site, County Road 555, 1 mile southwest of Homeland, Polk County.

Facility ID No.: 0004

Emission Unit ID No.:

012-Diesel Generators

PERMITTEE:
Florida Power Corporation

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

Amends Permit No.: A009-205952

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

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

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

PERMITTEE:
Florida Power Corporation

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

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

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

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

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

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

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

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

PERMITTEE:
Florida Power Corporation

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

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

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

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

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

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

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

PERMITTEE:
Florida Power Corporation

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

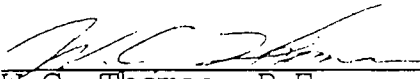
Specific Condition No. 17 continued:

- (B) the annual amount of fuel burned in each diesel generator, by serial number;
- (C) the annual hours of operation of each diesel generator, by serial number;
- (D) the annual hours of operation expressed in "engine-hours", as defined in Specific Condition No. 4;
- (E) a copy of the fuel sulfur content records required by Specific Condition No. 14 for the preceding calendar year;
- (F) annual emissions of particulate, PM_{10} , carbon monoxide, SO_2 , and NO_x based on actual diesel generator operation and fuel usage (provide a copy of the calculation sheets and the basis for calculations);
- (G) any changes in the information contained in the permit application.

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

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

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



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

ATTACHMENT - GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

GENERAL CONDITIONS:

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

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

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

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

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

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

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

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

GENERAL CONDITIONS:

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

13. This permit also constitutes:

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

14. The permittee shall comply with the following:

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

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

c. Records of monitoring information shall include:

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

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



October 20, 1997

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

Dear Ms. Carter:

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

On October 6, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 82-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including November 6, 1997.

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

Sincerely,

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

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

cc: Scott Sheplak, DEP



November 11, 1997

RECEIVED

NOV 24 1997

BUREAU OF
AIR REGULATION

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

Re: Florida Power Corporation, Bartow Facility
DRAFT Title V Permit No. 1030011-002-AV

Dear Mr. Sheplak:

On behalf of Florida Power Corporation (FPC), attached are comments regarding the DRAFT Title V permit for the Bartow Facility as identified above. FPC appreciates the Department's efforts in processing this permit and understands the need to resolve these issues in as timely a manner as possible. In this regard, DEP agreed to grant FPC's Request for Extension of Time until December 8, 1997. If we are unable to reach a resolution of these comments within this time period, we would appreciate the opportunity to file an additional Request for Extension of Time. Accordingly, please contact me at (813) 866-5158 as soon as you have had a chance to review these comments to set up either a telephone or in-person conference. Thank you again for your consideration of our comments.

Sincerely,

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

Scott H. Osbourn,
Senior Environmental Engineer

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

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

FLORIDA POWER CORPORATION
COMMENTS ON DRAFT TITLE V PERMIT
BARTOW FACILITY

General Comments

1. FPC understands that Appendix TV-1, Title V Conditions, is expected to be revised within the next few weeks. FPC requests that its Title V permit reflect the most up-to-date version of this Appendix.

2. FPC understands that DEP will publish the Intent to Issue Title V Air Operation Permit. Because the applicant is ultimately responsible for the publication of the Intent to Issue, FPC requests that DEP provide a copy of the Notice intended to be published, as well as proof of publication.

3. On the Table of Contents page, Section III, Emission Unit A -003, the emission unit number should be "No. 3 Unit," instead of "No. 2 Unit."

4. On the placard page, FPC expects the need for the following revisions: (1) the "Effective Date" should be changed to January 1, 1999, (2) the "Renewal Application Due Date" should be changed to July 5, 2003, and (3) the "Expiration Date" should be changed to December 31, 2003.

Section II., Facility-wide Conditions.

1. Condition 2. FPC requests the following revision: "No person shall ~~not~~ cause, suffer, allow, or permit"

2. Condition 3. For clarity and to make this Condition specific to FPC's Bartow Facility, FPC requests that Condition 3. be edited as follows:

~~Except as otherwise provided in this permit for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause~~

Also, because the reference to Chapter 62-297 in the last sentence of Condition 2. appears to be misplaced, FPC requests Condition 2. be edited as follows: "EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C."

3. Condition 6. In the context of this permit, how does DEP intend to respond to EPA's comments regarding the need to change the phrase "exempt" to "insignificant"?

4. Condition 7. For clarity, FPC requests that the first sentence of this Condition be edited as follows: "The permittee shall not allow ~~no person to store, pump,~~"

Section III. Subsection A.

1. FPC requests that the third sentence in the description to Unit 1 be deleted because there is no federally enforceable requirement mandating the use of an ESP for this unit and the original basis for installing and utilizing the ESP no longer exists. Specifically, FPC originally installed the ESP to control particulate emissions while firing a coal/oil mixture (COM). FPC has not fired COM since 1987 and this fuel was not included as a segment in FPC's Title V application for this source. FPC's construction permit clearly states that the "Use of the precipitator is not required when burning 100% fuel oil" (Condition 1. from AC 52-36102 (issued March 18, 1981)), although subsequent operation permits for the Bartow Unit 1 arguably conflict with this federally enforceable construction permit condition. Based on DARM guidance document DARM PER, "conditions in air operation permits that are extraneous to the conditions that were in the construction permits . . . may be reviewed and corrected in the Title V permit to reflect proper application of the Department's rules." Accordingly, FPC requests that all "extraneous" language in the Title V permit requiring the use of an ESP during periods of firing 100% fuel oil be deleted.

FPC also requests DEP confirmation that prospective nonuse and removal of the ESP cannot trigger PSD or NSPS requirements; if desired, this confirmation can be mutually understood when the above amendments are made to the Title V permit. This conclusion is justified because, as noted above, the ESP was "required" under the construction permit only "to remove particulate matter generated from burning a combination of oil and coal fuel," and the use of the ESP expressly was not required when 100% oil is burned. Therefore, nonuse of the ESP in connection with FPC's return to 100% fuel oil would simply be a return to the circumstances predating the use of the coal/oil fuel, and would be fully consistent with federally enforceable requirements applicable to Unit No. 1. Just as reverting to burning 100% oil without the ESP was permissible (without triggering PSD or NSPS) when the construction permit was originally issued, the same outcome is warranted now.

2. Condition A.1. FPC requests that the reference to No. 6 fuel oil as "new" be deleted because there is no basis for this adjective. FPC understands that No. 2 fuel oil may sometimes need to be referred to as "new" to differentiate it from used oil, but this is not the case for No. 6 oil. Also, FPC requests that the citation to Rules 62-296.405 and 62-296.702 in this Condition be deleted because there is no apparent basis for their inclusion.

3. Condition A.3. FPC requests that this Condition be deleted because it is redundant to Condition A.1. If needed, the narrative condition at the bottom of page 7 could simply be added to Condition A.1. Also, FPC requests that the language "**any quantifiable levels of PCBs**" be deleted everywhere it appears in this permit and replace with the phrase "**PCBs in quantities greater than 2 ppm.**" This clarification is reflected in the cited references to 40 CFR Part 271.

4. Condition A.6. FPC requests that all of Rule 62-210.700(3), F.A.C. be included either in this Condition or in between Conditions A.15. and A.16.

5. Condition A.7. For clarification, FPC requests the following revisions to this Condition: "**Particulate matter emissions shall not exceed the following during steady state operations, as measured in accordance with Condition A.20 ~~by applicable compliance methods:~~**" Also, the allowable TPY figures for particulate should reflect 21 hr/day at 0.1 lb/MMBtu and 3 hr/day at 0.3 lb/MMBtu. These figures would then be 668 TPY for Unit 1, 721.1 TPY for Unit 2, and 1,210.5 TPY for Unit 3.

6. Condition A.9. For clarification, FPC requests the following revision: "When burning liquid fuel . . . as measured in accordance with Condition A. 21, by applicable compliance methods."

7. Condition A.11. FPC requests that all Title V permit conditions relating to burning used oil be substantially similar to comparable provisions for FPC's other facilities that burn used oil.

8. Condition A.19. The opacity monitors on the three steam units were required by Part 75 of the Acid Rain rules. The appropriate method for determining compliance with the Department's opacity rules is DEP Method 9. FPC requests that the reference to the use of the opacity monitor for Unit 1 be deleted.

9. Condition A.19. The citation to Rule 62-296.702(3)(a)1., F.A.C. is incorrect. Subparagraph 1. does not exist.

10. Condition A.26. Because this permit specifies the compliance method, FPC requests the following amendment: "**2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, . . .**"

11. Condition A.28. For clarification and to make this Condition specific to FPC's Bartow facility, FPC requests the following revisions: "(a)4. **During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order or this permit, the applicant owner or operator of each emissions unit shall have a formal compliance test conducted for: a. visible emissions; b. Particulate matter; and c. SO₂, if EPA methods 6, 6A, 6B or 6C are utilized to determine compliance. See Condition A.29.**" FPC requests that the remainder of paragraph (a)4. be deleted.

12. Condition A.32. The language in paragraph (c) is unclear and appears unwarranted. FPC requests that it be removed.

13. Condition A.39. FPC requests that this Condition be deleted because AP-42 emission factors may change or the mechanism for reporting emissions in the AOR may change. There should be no need for this Condition.

14. Condition A.40. FPC requests that the "Process Parameters" provisions in this Condition be deleted because they are either redundant to other Title V permit conditions or unnecessary. Also, the last sentence of this Condition should be revised as follows: "**Records of inspection . . . shall be made available to the Department or PCDEM for inspection upon request.**"

15. Condition A.41. In accordance with FPC's request to remove the requirement for operation of the ESP for Unit 1, this requirement should be deleted as well.

Section III. Subsection B.

1. Condition A.26. Because this permit specifies the compliance method, FPC requests the following amendment: "2. **Opacity Compliance Tests.** ~~When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method,~~"

2. Conditions B.18. and B.20. Because there is only a visible emissions and fuel sulfur content limit on this unit, FPC requests the deletion of the following provisions of Condition B.18.: (1) paragraph (a)2., (a)4.b., (a)4.c., (a)5.; and all of Condition B.20.

Section III. Subsection C.

1. Condition C.1. For clarification and simplification, FPC requests that this Condition simply list "714" as the heat input for each peaking unit for all fuels. Also, specific language should be included in this Condition clarifying that the maximum heat input is based on temperature.

2. Condition C.9. This Condition should be marked "Not Federally Enforceable" because the limit for which it is determining compliance is Not Federally Enforceable.

3. Condition C.10. This Condition should be deleted because there are no standards for which process variables are required to be determined.

4. Condition C.13. This language should reflect the latest DEP guidance regarding the use of heat input curves for compliance testing.

5. Condition A.26. Because this permit specifies the compliance method, FPC requests the following amendment: "2. **Opacity Compliance Tests.** ~~When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method,~~"

6. Condition C.19. FPC requests that this Condition be deleted because AP-42 emission factors may change or the mechanism for reporting emissions in the AOR may change. There should be no need for this condition.

Section III. Subsection D.

1. Condition D.3. The 700 hr/yr limitation for the transfer of flyash is inappropriate and should be deleted. The five percent opacity standard provides reasonable assurance that the hourly particulate limit is being attained. An annual limitation on hours is unnecessary. Further, in accordance with all previous comments concerning the ESP, use of the flyash system and all associated limitations will be unnecessary.

2. Condition D.4. For clarification, FPC requests the following language be added to the end of this Condition: "See Condition D.7."

3. Condition D.6. This Condition should be deleted because there are no process variables to determine.

4. Condition D.7. For clarification, FPC requests that the first sentence of this condition be deleted because there is no compliance determination requirement for particulate matter.

5. Condition D.8. For clarification, FPC requests the following revision: "EPA Method 9, incorporated by reference in Chapter 62-297, shall be used to determine opacity compliance pursuant to Chapter 62-297, F.A.G.

6. Condition D.11. Because this permit specifies the compliance method, FPC requests the following amendment: "**2. Opacity Compliance Tests. ~~When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method,~~**"

7. Conditions D.11., D.12., D.13., and D.14. Because there is only a visible emission limit on this unit, FPC requests the deletion of the following provisions in Condition D.11.: paragraphs (b), (c), (d), and (e); all of Condition D.12.; paragraphs (a)4.b., (a)4.c., and (c) in Condition D.13.; and paragraph (c) in Condition D.14.

Section III. Subsection E.

1. The provisions governing the operation of these relocatable generators when they are located at the Bartow facility should be essentially identical to the provisions contained in FPC's Title V permits for Crystal River, Anclote, and Higgins. Also, Condition E.22. should be deleted because there is no requirement for which FPC must comply.

Section IV. Acid Rain Part

1. Condition A.1.a. should reference the actual application that FPC submitted rather than DEP's form number.

2. Conditions A.5. This condition imposes no requirements and therefore should be deleted.

3. Condition A.4. Because this Condition applies to all requirements and units at the Bartow facility, FPC requests that it be moved to the facility-wide section of this permit.

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

1. The listing of the storage tanks in this Appendix appears to contain several duplications. The application listed the same tanks in the list of all exempt/unregulated/trivial units and in the separate list of tanks.

Appendix S. Permit summary Tables

Table 1-1

1. FPC requests that these Tables be revised to reflect the requested revisions in comments above. For example, the annual particulate totals for the three steam units should be revised to reflect soot blowing, as previously commented. Also, a statement should accompany the table to indicate that the emission totals for the combustion turbines are "per turbine".

Best Available Copy
THE TAMPA TRIBUNE
 Published Daily
 Tampa, Hillsborough County, Florida

State of Florida)
 County of Hillsborough) ss.

Before the undersigned authority personally appeared J. Rosenthal, who on oath says that she is Classified Billing Manager of The Tampa Tribune, a daily newspaper published at Tampa in Hillsborough County, Florida; that the attached copy of advertisement being a

LEGAL NOTICE

in the matter of _____

PUBLIC NOTICE OF INTENT

was published in said newspaper in the issues of _____

NOVEMBER 18, 1997

Affiant further says that the said The Tampa Tribune is a newspaper published at Tampa in said Hillsborough County, Florida, and that the said newspaper has heretofore been continuously published in said Hillsborough County, Florida, each day and has been entered as second class mail matter at the post office in Tampa, in said Hillsborough County, Florida for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, this advertisement for publication in the said newspaper.

J. Rosenthal

 19

Sworn to and subscribed before me, this _____ day
 of _____ DECEMBER, A.D. 1997

Personally Known _____ or Product Identification _____
 Type of Identification Produced _____

(SEAL)

Susie Lee Slato

COMMISSION NUMBER
 CC899424
 MY COMMISSION EXP.
 APRIL 16, 2001



PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
 Title V DRAFT Permit No. 1030011-002-AV
 Bartow Plant
 Pinellas County, FL
 The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Florida Power Corporation for the Bartow Plant located at Weedon Island, St. Petersburg, Pinellas County. The applicant's name and address are: Florida Power Corporation, 3201 34th Street, South, St. Petersburg, Florida 33711.
 The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.
 The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2400 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.
 The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S., Mediation under Section 120.573, F.S., will not be available for this proposed action.
 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 (received) in the Office of General Counsel of the Department of Environmental Protection, 3390 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 904/488-9730; Fax: 904/487-4938). Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.
 A petition must contain the following information:
 (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
 (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
 (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
 (d) A statement of the material facts disputed by the petitioner, if any;
 (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;
 (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and
 (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.
 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 notice of intent. Per-

ests 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.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 401 M Street, SW, Washington, D.C. 20460.

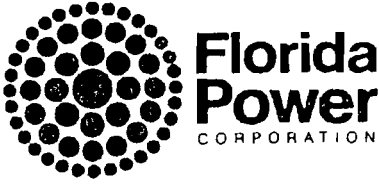
A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority,
Department of Environmental
Protection

Bureau of Air Regulation
111 South Magnolia Drive,
Suite 4100
Tallahassee, Florida 32301
Telephone: 904/488-1344
Fax: 904/922-6779

Affected District/Local Programs
Pinellas County Department
of Environmental
Management
Air Quality Division
300 South Garden Avenue
Clearwater, Florida 34616
Telephone: 813/464-4422
Fax: 813/464-4420

The complete project file includes the DRAET, Permit, the application and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 904/488-1344, for additional information.



3/2
EASvec

February 26, 1998

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

Dear Ms. Carter:

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

On October 6, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until February 27, 1998. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including March 31, 1998.

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

Sincerely,

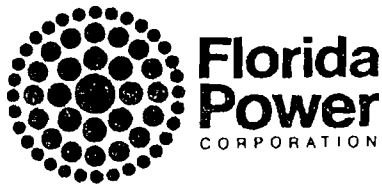
A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue".

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

A handwritten signature in black ink, appearing to read "Robert A. Manning".

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

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC



3/2
EASvec

February 26, 1998

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

Dear Ms. Carter:

RE: Florida Power Corporation, Bartow Plant
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Draft Permit No. 1030011-002-AV

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

Sincerely,

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

A handwritten signature in black ink, appearing to read "Robert A. Manning".

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

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC



Ed. Svec

March 24, 1998

RECEIVED

MAR 30 1998

**BUREAU OF
AIR REGULATION**

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

Dear Ms. Carter:

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

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

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

Sincerely,

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

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

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

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

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC



Department of Environmental Protection

Ed SVEC

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

March 27, 1998

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

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

Dear Mr. Osbourn:

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

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

Sincerely,

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

SMS/es

attachment

copy to:

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

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

PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 1030011-002-AV

Page 1 of 16

I. Public Notice.

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

II. Public Comment(s).

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

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

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

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

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

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

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

From:

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

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

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

.....

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

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

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

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

.....

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

.....

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

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

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

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

C.18. Test Reports.

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

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

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

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

To:

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

9. The owner or operator shall notify the PCDEM, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

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

.....

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

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

.....

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

....

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

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

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

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

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

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

C.18. Test Reports.

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

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

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

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

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

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

From:

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

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

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

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

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

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

To:

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

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

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

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

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

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

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

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

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

General Comments

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

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

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

From:

III. Emissions Unit(s) and Conditions

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

To:

III. Emissions Unit(s) and Conditions

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

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

Section II. Facility-wide Comments

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

From:

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

To:

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

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

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

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

Section III. Subsection A.

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

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

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

Add:

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

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

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

From:

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

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

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

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

To:

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

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

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

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

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

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

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

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

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

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

From:

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

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

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

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

To:

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

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

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

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

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

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

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

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

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

23.R: See response B.9.R:, above.

Section III. Subsection B.

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

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

Section III. Subsection C.

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

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

From:

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

To:

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

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

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

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

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

Section III. Subsection D.

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

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

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

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

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

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

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

Section III. Subsection E.

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

From:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

To:

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

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

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

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

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

E.1. Permitted Capacity. The maximum heat input rate for each generator shall not exceed 8.58 million Btu per hour.

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

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

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

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

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

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

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

Monitoring of Operations

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

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

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

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

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

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

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

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

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

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

Section IV. Acid Rain Part.

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

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

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

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

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

Permit Summary Tables, Table 1-1.

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

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

1. Recent rule changes changed “exempt activities” to “insignificant activities.” Rules 62-213.430(6), F.A.C. and 62-210, F.A.C., reflecting this change went into effect November 13, 1997.
 - a. The department inserted a condition in Appendix TV-1 clarifying that a Title V source can add an “insignificant activity” at its facility in accordance with the criteria under Rule 62-213.430(6), F.A.C., and include it in the Title V permit’s list of “insignificant activities” at the next renewal, in accordance with Rule 62-213.430(6), F.A.C. See condition number 40.
 - b. Appendix E-1 has been changed to Appendix I-1, and the language of this appendix was revised to refer to insignificant emissions units where appropriate.
 - c. Appendix U-1 has been revised to refer to insignificant emissions units instead of exempt emissions units.
2. Several changes were made to Appendix TV-1 to reflect the rule changes discussed above, and to properly identify conditions that are not federally enforceable.
 - a. The following additional rules have been marked as “not federally enforceable”:
 - 62-4.030, F.A.C., General Prohibition, (see condition number 1.)
 - 62-4.220, F.A.C., Operation Permit for New Sources, (see condition number 14.)
 - 62-210.300(5), F.A.C., Notification of Startup, (see condition number 19.)
 - b. Appendix TV-1, now carries a version date of “12/02/97”.
3. Since the issuance of the PROPOSED permit was delayed by extensions of time to file for hearing past the first of the year, the following dates are changed, as follows:

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

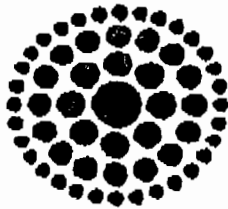
To: **Effective Date:** January 1, 1999
 Renewal Application Due Date: July 5, 2003
 Expiration Date: December 31, 2003

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

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

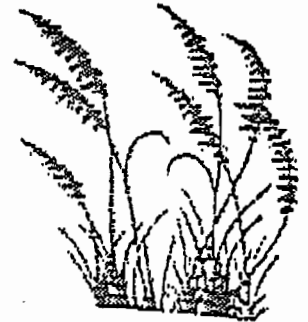
III. Conclusion.

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



Florida Power
CORPORATION

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Environmental Services Department

FAX COVER SHEET

DATE: 5/19/98

TO: Clair Faney

FAX # (850) 922-6779

COMPANY: _____

FROM: Mike Kennedy

PHONE # (913) 866-4344

FAX # _____

NUMBER OF PAGES TRANSMITTED 4

Please call number listed above for any transmission problems.

COMMENTS:

Detailed agenda for our meeting on Friday.
Please copy as needed for other DEP
attendees. Thanks.



FPC MEETING WITH THE DEP BUREAU OF AIR REGULATION**Title V Permit Issues: DeBary, Anclote and Bartow Plants****May 22, 1998 at 10 AM****AGENDA & BACKGROUND**

DeBary Facility Draft Title V Permit: It is FPC's understanding that the majority of issues regarding the DeBary Draft Title V Permit have been resolved, in accordance with FPC's comment letter dated August 20, 1997, and DEP's responses dated October 2, 1997 and October 21, 1997. The remaining contested issues, as detailed in the Petition for Administrative Hearing, are summarized below. These same issues were addressed satisfactorily in FPC's Intercession City Title V permit. As a procedural note, it is FPC's understanding that its Petition on this permit, filed November 4, 1997, has not yet been forwarded to DOAH.

- **Condition B.5** For Units 7 - 10, the unit-specific hours-of-operation limits are inappropriate and should be deleted. These units are regulated collectively and should have an aggregate hour total.
- **Condition B.7 through B.12** The unit-specific tons per year limitations are inappropriate and should be deleted. These units are regulated collectively and should have aggregate ton per year limits per pollutant..

Anclote Facility Draft Title V Permit: The primary issue on the Anclote Draft Title V Permit relates to the use of used oil at this facility, although there are other minor issues detailed in the Petition for Administrative Hearing. Procedurally, FPC and DEP currently have a third joint Motion for Extension of Time pending before DOAH on this matter until May 31, 1998. By letter dated February 2, 1998, FPC stated that it intends to motion for DOAH to relinquish jurisdiction, as soon as it receives confirmation in writing from DEP of the resolution of all of the issues, so that DEP can issue this permit in Proposed and Final form. Finally, as detailed in the February 2 letter, FPC does not believe that it is appropriate to require an additional public notice on this permit.

Bartow Draft Title V Permit: Following is a brief summary of the primary issues involved in the Petition for Administrative Hearing on the Bartow Draft Title V permit. Please refer to FPC's Petition dated April 30, 1998, FPC's comment letter dated November 11, 1997, and DEP's response dated March 27, 1998, for a complete description of the issues.

- **ESP** - There is no applicable requirement, nor underlying permitting rationale, for retaining and utilizing the ESP for Unit No. 1. FPC's 1982 State Air Construction Permit required the use of the ESP only when burning a coal/oil mixture. FPC has not burned this fuel for 11 years, nor is it intended to be burned in the future. Therefore, the inclusion of the requirement in the Title V permit to maintain and utilize the ESP is in error.
- **Condition A.7.** (Same comment for Condition A.9.) Regarding specifying the conditions which indicate the applicable compliance determination methods, other "final" Title V permits issued by DEP include such clarifications (e.g., FPC's Higgins Final Title V Permit).

Regarding the clarification that the PM emission limit applies only during steady state operations, FPC believes that this is a reasonable request. Further the allowable TPY figures should be revised to reflect the higher PM emissions allowed during soot blowing and load changing. At a minimum, Condition A.7. should reference the excess emissions provisions under Condition A.6., A.14. - A.16.

- Condition A.19. There is no need to require the test method for VE for Emission Unit 1 to be based on COMs; the COMs are required by Part 75 only; DEP Method 9 is the appropriate test method for DEP's opacity limit.
- Condition A. 28. Specifying the pollutants for which annual compliance tests are required is consistent with other DEP Title V permits. For example, FPC's Intercession City permit and the City of Vero Beach's final Title V permit contain such clarification.
- Condition A.32(c) It is unnecessary to require the highest concentration of each constituent of the used oil as determined by any analysis to be assumed to be the concentration of the constituent of blended used oil.
- Condition A.39. and C.19 It is inappropriate to specify the emission factors for calculating annual emissions because of the continually changing nature of emission factors.
- Condition A.40. The "process parameters" provisions in this condition should be deleted because they are redundant with other conditions in this Title V permit. Also the last sentence of this condition should be clarified to state who can request to inspect the records.
- Condition A. 41. This condition contains an O&M plan for the ESP. Since the ESP should not be required, the O&M plan is obsolete and should be deleted.
- Condition B.18. and B.20. Paragraphs a.2, a.4.(b), a.4.(c), a.5. and all of Condition B.20. should be deleted because they relate to PM testing for a unit that is subject only to a visible emission and fuel sulfur content limit.
- Condition C.1 It seems unnecessary to identify the heat input of 714 mmbtu/hr eight separate times. It should be simplified as a single heat input for all fuel types. Also, a permitting note should be included indicating that the maximum heat input will vary in accordance with the inlet air temperature (e.g., FPC's Higgins Final Title V permit).
- Condition C.10. This "process variable" condition should be deleted because there are no standards for which process variables are required to be determined.
- Condition C.13. The operating rate during testing should reflect DEP's latest guidance regarding the use of heat input curves for capacity determination purposes during testing.
- Condition D.3. The hourly limit on the transfer of fly ash is inappropriate and should be deleted because the 5% opacity standard provides sufficient reasonable assurance that the hourly PM limit is being attained. Moreover, because the use of the ESP should no longer be required, use of the fly ash system will be unnecessary.

- Condition D.4. For clarification, this condition specifying a PM limit should contain a cross-reference to condition D.7 which states that the testing requirement for the PM limit is waived because the permittee has accepted a 5% opacity limit.
- Condition D.6. This "process variable" condition should be deleted because there are no standards for which process variables are required to be determined.
- Condition D.11 - D.14. Paragraphs (c),(d) and (e) of Condition D.11, all of condition D. 12, paragraphs A.4(b) and (c), B.13(c), and D.14(c), should all be deleted because they refer to specific testing requirements, whereas this unit is only subject to a VE limit.
- Condition A.4 (Under the Acid Rain Part). The Department has agreed in other Title V permits to move this facility-wide condition to the facility-wide section of the Title V permit.
- Appendix U-1. Several of the tanks listed in this appendix for unregulated activities are duplicated and should be corrected.

TITLE V STATUS SUMMARY

May 14, 1998

Plant Site	Action	Date Draft Received (14 day period)	Extension Request Expires	Public Notice Published	Date Proposed	Date Final
Anclote-TV	Petition for Hearing filed 9/4/97. FPC letter to DEP re: Resolution of Petition sent 2/2/98.	8/21/97 (9/4/97)	1/30/98 (for Joint Response per ALJ); requested extensions until 3/31; 5/31	DEP		
Bartow-TV	FPC comments filed 11/11/97. DEP response to comments received 3/27/98; Petition for Hearing filed 4/30/98	10/6/97 (10/20/97)	10/20; 11/6; 12/8; 1/30; 2/27; 3/31; 4/30	DEP		
Crystal River-TV	FPC comments filed 11/12/97. DEP response to comments received 1/13/98. FPC comments filed 2/10/98. DEP response received 3/4/98. FPC comments filed 4/14/98.	9/26/97 (10/10/97)	10/10; 11/6; 12/8; 1/30; 2/27; 3/31; 4/30; 6/1	10/13/97		
DeBary-TV	FPC comments filed 8/25/97. Petition for hearing filed 11/4/97.	7/28/97 (8/11/97)	8/11; 8/25; 9/5; 9/19; 10/3; 10/10; 10/24; 10/31; 11/4	8/20/97		
Higgins-TV	FPC comments filed 10/27/97.	9/11/97 (9/25/97)	9/25; 10/22; 11/6; 11/24	DEP	11/20/97	1/8/98
Intercession City-TV	FPC comments filed 9/17/97; Notice of Withdrawal of Ext.10/10/97.	8/22/97 (9/5/97)	9/5; 9/19; 10/3; 10/10	DEP	10/21/97	1/7/98
Suwannee-TV	FPC comments filed 11/5/97. Additional info submitted 1/8/98 re: Unit 3 high sulfur/ used oil modeling.	9/12/97 (9/26/97)	9/26; 10/24; 11/7; 12/8; 1/30; 2/27; 3/31; 6/1	DEP		
Tiger Bay-TV	SW District has forwarded to Tallahassee. No draft permit issued yet.					
Turner-TV	FPC comments filed 9/25/97.	8/27/97 (9/10/97)	9/10; 9/26; 10/10; 10/24; 11/7; 11/24; 1/30; 2/27; 3/31; 4/30; 6/1	DEP		
Avon Park-TV	FPC comments filed 5/29/97.	5/1/97 (5/15/97)	5/15/97	5/7/97	6/26/97	1/8/98
Rio Pinar-TV	FPC comments filed 8/29/97.	7/18/97 (8/1/97)	8/1/97	8/15/97	9/15/97	12/1/97
Bayboro-TV	SW District has not yet issued draft.					
UF-Cogen-TV	FPC comments filed 8/8/97.	6/27/97 (7/11/97)	7/11; 8/12; 8/29; 9/12; 9/26; 10/10; 10/24; 11/7; 12/1; 1/30; 3/31; 6/1	7/24/97		
UF-Cogen-PSD	FPC accepted new language 9/12/97.	6/27/97 (7/11/97)	5/20; 7/30; 9/2; 9/12	-----	-----	9/12/97
Hines Energy-PSD	Permit issued 2/25/94. FPC submittals to DEP on 6/27/96; 9/9/96; 2/18/96; 4/14/98					
Hines Energy-TV	Applications due w/in 180 days after commencement of operation (12/23/98).					

(SU) U.O. ...
 Start up
 Aug 7 ...

Best Available Copy

Spec #	Plant	Date	Used Amount/ BBLs	Total Amount/ BBLs	Grade	BTU	Lead PB PPM	% Sulfur	% Ash	Supplier
1	Anclote	Aug-96	15,000	15,000	Used Oil	6,000,000	49.0	0.483	0.927	IPC
2	Anclote (SU)	Aug-96	155	155	Used Oil	5,991,510	16.585	0.327	0.5893	GEOTECH
3	Anclote (SU)	Sep-96	155	155	Used Oil	5,822,800	16.861	0.339	0.5987	GEOTECH
4	Anclote	3/97 - 6/97	10,000	10,000	Used Oil	6,048,000	15.825	0.28	0.34	GEOTECH
5	Anclote	Apr-97	18,000	112,682	16% Used Oil Blend*	6547375 Total Blend	43.55 Used Only	0.95 Total Blend	0.166 Total Blend	RIO
6	Anclote (SU)	May-97	317	317	Used Oil	6,115,200	11.0	0.325	0.2871	GEOTECH
7	Anclote	May-97	10,000	10,000	Used Oil	6,000,000	36.9	0.491	0.956	IPC
8	Suwannee 2	May-96	1,400	1,400	Used Oil	5,790,204	23.0	0.45	0.47	SELLERS
9	Suwannee 2	Sep-96	1,500	1,500	Used Oil	6,000,000	49.0	0.483	0.927	IPC
10	Suwannee 2	Nov-96	1,500	1,500	Used Oil	6,000,000	76.0	0.5	0.5	SELLERS
11	Suwannee 2	Mar-97	302	302	Used Oil	6,000,000	24.0	0.5	0.4	SELLERS
12	Suwannee 2	Mar-97	302	302	Used Oil	6,000,000	7.0	0.5	0.4	SELLERS
13	Suwannee 2	Apr-97	289	289	Used Oil	6,000,000	22.0	0.5	0.4	SELLERS
14	Suwannee 2	Apr-97	151	151	Used Oil	6,000,000	74.0	0.5	0.4	SELLERS
15	Suwannee 2	Apr-97	645	645	Used Oil	6,041,874	22.8	0.42	0.48	4 WAY
16	Suwannee 2	Apr-97	825	825	Used Oil	6,074,130	15.2	0.22	0.48	4 WAY
17	Suwannee 2	Apr-97	1,469	4,896	70/30 Used Oil Blend*	6,144,648 Total Blend	31.9 Used Only	2.53 Total Blend	0.13 Total Blend	TEXPAR
18	Suwannee 1	Aug-96	900	1,800	50/50 Used Oil Blend*	6,139,602 Total Blend		1.15 Total Blend	0.76 Total Blend	TEXPAR
19	Suwannee 2	Sep-96	1,000	1,000	Used Oil	5,941,992 Total Blend		0.51 Total Blend	0.62 Total Blend	TEXPAR
20	Suwannee 1	Oct-96	1,200	2,400	50/50 Used Oil Blend*	6,139,602 Total Blend		1.15 Total Blend	0.76 Total Blend	TEXPAR

Spec #	Plant	Date	Used Amount/ BBLs	Total Amount/ BBLs	Grade	BTU	Lead PB PPM	% Sulfur	% Ash	Supplier
21	Suwannee 1	Dec-96	600	1,200	50/50 Used Oil Blend*	6,139,602 Total Blend		1.15 Total Blend	0.76 Total Blend	TEXPAR
22	Suwannee 1	Dec-96	2,500	5,000	50/50 Used Oil Blend*	6,139,602 Total Blend		1.15 Total Blend	0.76 Total Blend	TEXPAR
23	Suwannee 1	12/96-2/97	2,500	5,000	50/50Us ed Oil Blend*	6,139,602 Total Blend		1.15 Total Blend	0.76 Total Blend	TEXPAR
24	Suwannee 2	12/96-3/97	8,196	27321 1-3/97	70/30 Used Oil Blend*	6,685,644 Total Blend		2.9 Total Blend	0.063 Total Blend	TEXPAR
			1,832	6105 12/96						
25	Anclote	6/20/97	18,000	112,657	16% Used Oil Blend*	6,545,529 Total Blend		.98 Total Blend	.11 Total Blend	RIO
26	Suwannee 2	6/97	1,013	1,013	Used Oil	5,816,951	25.7	0.45	0.69	4 WAY
27	Anclote	6/97	10,094	10,094	Used Oil	6,000,000	36.9	0.49	0.956	IPC
28	Suwannee 2	6/97-7/97	2,940	2,940	70/30 Blend*	6,423,570		0.18	0.5	TEXPAR
29	Suwannee 2	7/97	3,054	3,054	Used Oil	6,041,874	22.8	0.42	0.48	4 WAY
30	Anclote	7/97-9/97	3,570	3,570	Used Oil					GEOTECH
31	Anclote	7/97	15,000	15,000	Used Oil	6,000,000	42.7	0.47	0.75	IPC
32	Suwannee 2	7/97-8/97	3,000	10,000	70/30 Blend*	6,400,000		1.93	0.19	TEXPAR
33	Anclote	7/97	642	642	Used Oil	5,922,000	38	0.49	0.46	HOWCO
34	Suwannee 2	8/97	2,814	2,814	Used Oil	6,119,326	22.1	0.48	0.47	4 WAY
35	Anclote	8/97	2,145	2,145	Used Oil	5,994,744	41	0.39	0.693	MFM
36	Suwannee 2	8/97	3,324	3,324	Used Oil	6,000,000	62	0.50	0.4	SELLERS
37	Suwannee 2	8/97	747	747	Used Oil	6,000,000	59	0.50	0.4	SELLERS

Spec #	Plant	Date	Used Amount/ BBLs	Total Amount/ BBLs	Grade	BTU	Lead PB PPM	% Sulfur	% Ash	Supplier
38	Anclote	9/97	2,929	2,929	Used Oil	5,921,622	31.8	0.32	0.5	MFM
39	Suwannee 2	9/97	2,860	2,860	Used Oil	5,765,424	20.6	0.47	0.61	4 WAY
40	Suwannee 2	9/11/97	900	3,000	70/30 Blend*	6,400,000		1.93	0.19	TEXPAR
41	Anclote	10/97 - 11/97	4,169	4,169	Used Oil	6,000,000	11.3	0.47	0.4	GEOTECH
42	Suwannee 2	10/97	3,900	13,000	70/30 Blend* Est	6,435,408		1.80	0.217	TEXPAR
43	Suwannee 2	10/13/97	833	833	Used Oil	5,926,998	24.2	0.55	0.72	4 WAY
44	Anclote	10/7/97	4,991	4,991	Used Oil	6,000,000	23.2	0.489	0.96	IPC
45	Anclote	10/15/97	9,963	9,963	Used Oil	6,000,000	23.2	0.49	0.96	IPC
46	Anclote	10/30/97	2,860	2,860	Used Oil	5,910,366	44.9	0.464	0.45	MFM
47	Anclote	10/29/97	5,092	5,092	Used Oil	6,000,000	23.2	0.49	0.96	IPC
48	Anclote	11/20/97	5,000	5,000	Used Oil	6,000,000	44.7	0.74	0.953	IPC
49	Anclote	12/1/97	5,500	5,500	Used Oil	6,153,000	10	0.33	0.475	GEOTECH
50	Anclote	12/1/97	3,100	3,100	Used Oil	5,973,240	23.14	0.64	0.599	CLIFF BERRY
51	Suwannee	1/5/98	1,000	5,000	80/20 Blend	6,500,000		2.50	0.2	TEXPAR
52	Suwannee	1/5/98	1,600	1,600	Used	5,982,372	9.3	0.67	0.83	4 WAY
53	Anclote	12/28/97	3,000	3,000	Used	5,910,366	44.9	0.464	0.45	MFM
54	Anclote	2/5/98	1,240	1,240	Used	5,880,000	52	0.46	0.4	HOWCO
55	Suwannee	2/10/98	5,000	1,000	80/20 Blend					TEXPAR

* Blended quantities are estimates of used oil portion

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE

TO	_____	DATE	_____
TO	_____	DATE	_____
TO	_____	DATE	_____
TO	_____	DATE	_____

TO: Bill Thomas

FROM: Clair Fancy *(signature)*

DATE: June 9, 1987

SUBJ: Florida Power Corporation (FPC)
Bartow Unit No. 1, AC 52-63210
32102

The construction permit issued to FPC Bartow Unit No. 1, AC 52-63210, dated March 18, 1981, allows for the burning of 100% fuel oil without requiring an ESP on line, and also allows for visible emissions upto 40% opacity. Since the unit can comply with the applicable permitted emission limitations while burning 100% fuel oil and without ESP control, the operating permit may be amended to allow such operation.

However, if FPC intends to dismantle (permanently remove) the ESP, the Department would require a construction permit be issued. This would make compliance federally enforceable. It is understood that burning of coal-oil mix fuel by Bartow Unit No. 1 will no longer be permitted.

PR/ks

FPC MEETING WITH THE DEP BUREAU OF AIR REGULATION**Title V Permit Issues: DeBary, Anclote and Bartow Plants**

May 22, 1998 at 10 AM

AGENDA & BACKGROUND

DeBary Facility Draft Title V Permit: It is FPC's understanding that the majority of issues regarding the DeBary Draft Title V Permit have been resolved, in accordance with FPC's comment letter dated August 20, 1997, and DEP's responses dated October 2, 1997 and October 21, 1997. The remaining contested issues, as detailed in the Petition for Administrative Hearing, are summarized below. These same issues were addressed satisfactorily in FPC's Intercession City Title V permit. As a procedural note, it is FPC's understanding that its Petition on this permit, filed November 4, 1997, has not yet been forwarded to DOAH.

- **Condition B.5** For Units 7 - 10, the unit-specific hours-of-operation limits are inappropriate and should be deleted. These units are regulated collectively and should have an aggregate hour total.
- **Condition B.7 through B.12.** The unit-specific tons per year limitations are inappropriate and should be deleted. These units are regulated collectively and should have aggregate ton per year limits per pollutant..

Anclote Facility Draft Title V Permit: The primary issue on the Anclote Draft Title V Permit relates to the use of used oil at this facility, although there are other minor issues detailed in the Petition for Administrative Hearing. Procedurally, FPC and DEP currently have a third joint Motion for Extension of Time pending before DOAH on this matter until May 31, 1998. By letter dated February 2, 1998, FPC stated that it intends to motion for DOAH to relinquish jurisdiction, as soon as it receives confirmation in writing from DEP of the resolution of all of the issues, so that DEP can issue this permit in Proposed and Final form. Finally, as detailed in the February 2 letter, FPC does not believe that it is appropriate to require an additional public notice on this permit.

Bartow Draft Title V Permit: Following is a brief summary of the primary issues involved in the Petition for Administrative Hearing on the Bartow Draft Title V permit. Please refer to FPC's Petition dated April 30, 1998, FPC's comment letter dated November 11, 1997, and DEP's response dated March 27, 1998, for a complete description of the issues.

- **ESP** - There is no applicable requirement, nor underlying permitting rationale, for retaining and utilizing the ESP for Unit No. 1. FPC's 1982 State Air Construction Permit required the use of the ESP only when burning a coal/oil mixture. FPC has not burned this fuel for 11 years, nor is it intended to be burned in the future. Therefore, the inclusion of the requirement in the Title V permit to maintain and utilize the ESP is in error.
- **Condition A.7.** (Same comment for Condition A.9.) Regarding specifying the conditions which indicate the applicable compliance determination methods, other "final" Title V permits issued by DEP include such clarifications (e.g., FPC's Higgins Final Title V Permit).

Regarding the clarification that the PM emission limit applies only during steady state operations, FPC believes that this is a reasonable request. Further the allowable TPY figures should be revised to reflect the higher PM emissions allowed during soot blowing and load changing. At a minimum, Condition A.7. should reference the excess emissions provisions under Condition A.6., A.14. - A.16.

- Condition A.19. There is no need to require the test method for VE for Emission Unit 1 to be based on COMs; the COMs are required by Part 75 only; DEP Method 9 is the appropriate test method for DEP's opacity limit.
- Condition A.28. Specifying the pollutants for which annual compliance tests are required is consistent with other DEP Title V permits. For example, FPC's Intercession City permit and the City of Vero Beach's final Title V permit contain such clarification.
- Condition A.32(c) It is unnecessary to require the highest concentration of each constituent of the used oil as determined by any analysis to be assumed to be the concentration of the constituent of blended used oil.
- Condition A.39. and C.19 It is inappropriate to specify the emission factors for calculating annual emissions because of the continually changing nature of emission factors.
- Condition A.40. The "process parameters" provisions in this condition should be deleted because they are redundant with other conditions in this Title V permit. Also the last sentence of this condition should be clarified to state who can request to inspect the records.
- Condition A.41. This condition contains an O&M plan for the ESP. Since the ESP should not be required, the O&M plan is obsolete and should be deleted.
- Condition B.18. and B.20. Paragraphs a.2, a.4.(b), a.4.(c), a.5. and all of Condition B.20. should be deleted because they relate to PM testing for a unit that is subject only to a visible emission and fuel sulfur content limit.
- Condition C.1 It seems unnecessary to identify the heat input of 714 mmbtu/hr eight separate times. It should be simplified as a single heat input for all fuel types. Also, a permitting note should be included indicating that the maximum heat input will vary in accordance with the inlet air temperature (e.g., FPC's Higgins Final Title V permit).
- Condition C.10. This "process variable" condition should be deleted because there are no standards for which process variables are required to be determined.
- Condition C.13. The operating rate during testing should reflect DEP's latest guidance regarding the use of heat input curves for capacity determination purposes during testing.
- Condition D.3. The hourly limit on the transfer of fly ash is inappropriate and should be deleted because the 5% opacity standard provides sufficient reasonable assurance that the hourly PM limit is being attained. Moreover, because the use of the ESP should no longer be required, use of the fly ash system will be unnecessary.

- Condition D.4. For clarification, this condition specifying a PM limit should contain a cross-reference to condition D.7 which states that the testing requirement for the PM limit is waived because the permittee has accepted a 5% opacity limit.
- Condition D.6. This "process variable" condition should be deleted because there are no standards for which process variables are required to be determined.
- Condition D.11 - D.14. Paragraphs (c),(d) and (e) of Condition D.11, all of condition D. 12, paragraphs A.4(b) and (c), B.13(c), and D.14(c), should all be deleted because they refer to specific testing requirements, whereas this unit is only subject to a VE limit.
- Condition A.4 (Under the Acid Rain Part). The Department has agreed in other Title V permits to move this facility-wide condition to the facility-wide section of the Title V permit.
- Appendix U-1. Several of the tanks listed in this appendix for unregulated activities are duplicated and should be corrected.

STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

FLORIDA POWER CORPORATION

Petitioner,
vs.

DOAH Case No. 98-002376
DEP OGC Case No. 97-1835

STATE OF FLORIDA, DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Respondent.

MOTION FOR EXTENSION OF TIME TO FILE JOINT RESPONSE
TO INITIAL ORDER

Petitioner Florida Power Corporation (FPC), by and through undersigned counsel, and pursuant to Rule 60Q-2.016(1), Fla. Admin. Code., hereby moves for an Extension of Time to file a Joint Response in the above-styled case until and including September 1, 1998. In support of this Motion, FPC states the following:

1. FPC is in receipt of the Division's Initial Order, which requires the filing of a Joint Response to the Initial Order by June 11, 1998.
2. Representatives of the parties, FPC and the Department of Environmental Protection (DEP), have met on several occasions, most recently on May 22, 1998, and have made substantial progress resolving the primary issues raised in FPC's Petition.
3. Additional discussions between the parties are needed in an attempt to come to an agreement on all of the issues raised in the Petition.

4. FPC believes that extending the time until September 1, 1998 to file a Joint Response to the Initial Order would significantly aid the parties in pursuing their settlement discussions.

5. FPC has conferred with counsel for DEP regarding this Motion. Counsel for DEP stated that they will file a separate response.

Wherefore, FPC respectfully requests that this Motion for Extension of Time to File Joint Response to Initial Order be granted, thereby extending the time for filing a Joint Response until and including September 1, 1998. If this Motion is not granted, FPC requests an additional 10 days from the date of the denial to submit a Joint Response.

Respectfully submitted this 11 day of June, 1998.

HOPPING GREEN SAMS & SMITH, P.A.

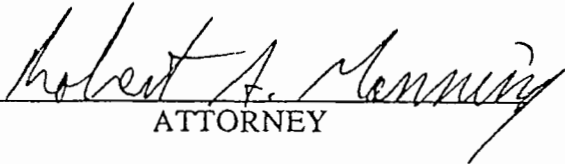
By: Robert A. Manning

James S. Alves
Fla. Bar No. 0443750
Robert A. Manning
Fla. Bar No. 0035173
Post Office Box 6526
Tallahassee, FL 32314
904/222-7500

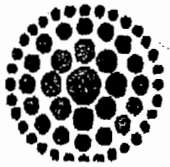
Attorneys for FLORIDA POWER
CORPORATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been mailed to W. Douglas Beason, Esquire, Florida Department of Environmental Protection, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, this 11 day of June, 1998.



ATTORNEY



Florida Power CORPORATION

FAX Transmittal Sheet

FAX #: (727) 826-4216

DATE: 1/22/99

TO: Scott Shaglabz (851) 922-6979

COMPANY: EPER - Air Program

FROM: Scott Osborn

(Phone: (727) 826-4258)

OF PAGES 4

Please notify _____ at (727) 826-_____ for any problems concerning the receipt of this FAX.

COMMENTS:

As we discussed
Scott



cc: D. T. Buell
W. B. Hicks
M. E. Meeks
J. M. Kennedy
S. H. Osbourn
J. L. Tillman
J. A. Gridley
R. A. Glenn

File: Air Corresp for AN/BA/DEP/CR
k:\user\sosbourn\1998\ivresl.doc
927-616000-AIRST/AIRCT

October 12, 1998

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

Dear Mr. Sheplak:

Re: Status of Title V Permits

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

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

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

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

FPC Comments
October 13, 1998
Page 2

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

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

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

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

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

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

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

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

FPC Comments
October 13, 1998
Page 3

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

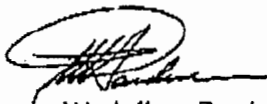
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5. **Periodic Monitoring**

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

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

Sincerely,

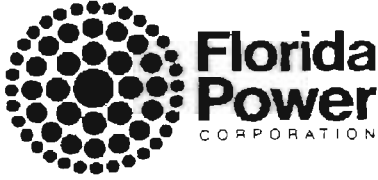


W. Jeffrey Pardue, C.E.P.
Director, Environmental Services
FPC Responsible Official

Attachments

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

Ed Ivec



RECEIVED

OCT 15 1998

BUREAU OF
AIR REGULATION

October 12, 1998

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Florida Department of Environmental Protection
2600 Blair Stone Rd.
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5. **Periodic Monitoring**

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

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

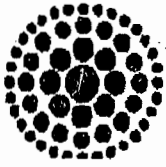
Sincerely,



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

Attachments

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



Florida Power CORPORATION

copy to:

Ed
original to mly

FAX Transmittal Sheet

FAX #: (727) 826-4216

DATE: 1/22/99

TO: Scott Shaglatz (851) 922-6979

COMPANY: EPER - Air Program

FROM: Scott Osborne

(Phone: (727) 826-4258)

OF PAGES 4

Please notify _____ at (727) 826-_____ for any problems concerning the receipt of this FAX.

COMMENTS:

As we discussed

Scott

Bartow most concerned 2/1/99 DOAH dkt RPC needs to show progress. Would like Bartow dkt next week

Scott will be here next Tuesday.



**Florida
Power**
CORPORATION

To: D. T. Buell
W. B. Hicks
M. E. Meeks
J. M. Kennedy
S. H. Osbourn
J. L. Tillman
J. A. Gridley
R. A. Glenn

File: Air Corresp for AN/BA/DEP/CR
k:\users\osbourn\1998\ivresl.doc
927-616000-AIRST/AIRCT

October 12, 1998

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

Dear Mr. Sheplak:

Re: Status of Title V Permits

As you know, a meeting was held on August 26, 1998 between the Department and Mr. Scott Osbourn of my staff. The purpose of the meeting was to resolve several pending Title V issues in order to advance these permits to the "proposed" stage as expeditiously as possible. Based upon the meeting, the following is a brief summary of FPC's understanding and position regarding the status of several of FPC's Title V permits.

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

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

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

FPC Comments
October 13, 1998
Page 2

No AC permit application indicates the permit class

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

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

probably

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

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

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

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

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

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

Clair
Anclote
Barta
Crysl Rini

FPC Comments
October 13, 1998
Page 3

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

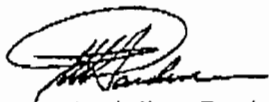
FPC received a revised draft permit from the Department on October 5, 1998, and the issues involved with this permit have largely been resolved. The *Notice of Intent to Issue Title V Permit* was published on October 12, 1998. In order to properly review the revised draft permit, FPC has requested an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

5. **Periodic Monitoring**

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

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

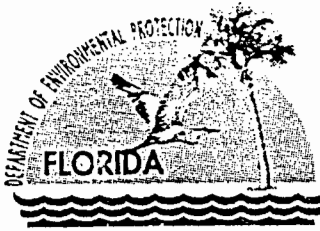
Sincerely,



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

Attachments

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



Jeb Bush
Governor

Ed Svec

Department of Environmental Protection

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

David B. Struhs
Secretary

January 25, 1999

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

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

Dear Mr. Pardue:

We have reviewed your comments contained in a letter dated October 13, 1998 on the Draft Title V permit for the Bartow Plant. The Department's position on the electrostatic precipitator was stated in a letter dated June 24, 1996. The subject of the letter is "PSD Applicability Determination - Bartow Unit No. 1 PSD". This position has not changed. The electrostatic precipitator shall be retained, operated and maintained in accordance with Department rules.

Prior to issuing the PROPOSED Title V permit, the applicable requirements for the modification to the fly ash system will be incorporated.

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

Sincerely,

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

SMS/es

copy to:
Ken Kosky, P.E., Golder Associates
Mr. Bill Thomas, P.E., DEP Southwest District, Air Section
Mr. Gary Robbins, PCDEM, Air Quality Division



bcc: J. M. Kennedy
D. T. Buell
J. A. Gridley

File: Bartow Air Corresp.
k:\user\sosbourn\1999\baresp.doc

February 24, 1999

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

Dear Mr. Sheplak:

Re: FPC's Bartow Facility
DRAFT Title V Permit No. 1030011-002-AV

Florida Power Corporation (FPC) received the Intent to Issue Title V Air Operation Permit and Draft Title V permit for the Bartow facility on October 6, 1997. Following several extensions of time and discussions with the Department, FPC filed a Petition for Administrative Hearing on April 30, 1998 (Petition). In the Petition, FPC maintained that there was no factual or legal basis to require FPC to retain and operate the electrostatic precipitator (ESP) associated with Bartow Unit 1.

In an effort to move the Title V permitting process forward and, provided that permit language is included that clarifies this unique situation, FPC has indicated a willingness to accept a permit that requires that the ESP be retained and used. In a letter dated October 12, 1998, FPC requested that the description/statement of basis for Bartow Unit 1 be revised as follows:

Unit 1 is a Particulate matter emissions are controlled by a General Electric Services, Inc. Model 1-BAB1.2x37(9)36.0-434-4.3P electrostatic precipitator (ESP) consisting of five fields in depth. This ESP was required and designed as part of a unit modification to accommodate the firing of a coal-oil mixture (COM) fuel, which is no longer burned by FPC. [The permittee claims, moreover, because Unit 1 is oil-fired,] this unit is capable of meeting the applicable particulate matter and capacity limits in Conditions A.7 and A.8 without the use of the ESP. Therefore, the provisions of 40 CFR Part 64 do not apply. A Durag Model 281 Continuous Emissions Monitor for opacity with a recorder is used for continual observation of stack opacity. Unit 1 began commercial service in 1958.

*in accordance with 40 CFR
64.24(l)(i)
Control Devices Criterion*

Mr. Sheplak
February 24, 1999
Page 2

FPC would like to have this clarifying language included in order to ensure that the Credible Evidence rule and the Compliance Assurance Monitoring (CAM) rule, to the extent that they may be triggered for Unit 1, are appropriately implemented. Specifically, the final CAM rule (40 CFR Part 64.2(b)(ii), Control Devices Criterion) applies only to pollutant-specific emissions units that rely on a control device to achieve compliance.

Finally, as you had previously requested, enclosed is a copy of the original construction permit (AC 52-36102) for the modification to accommodate COM fuel. Note the language in the Final Determination and Specific Condition 1 that states that use of the ESP is not required when burning 100 percent fuel oil. If the above information is not consistent with your understanding or we need to discuss this issue further, please do not hesitate to contact me at (727) 826-4258.

Sincerely,



Scott H. Osbourn
Senior Environmental Engineer

Enclosure

cc: Clair Fancy, DEP BAR
Robert Manning, HGS&S

Appendix H-1, Permit History/ID Number Changes

Florida Power Corporation
P. L. Bartow

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

Permit History (for tracking purposes):

E.U.

<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date^{1,2}</u>	<u>Revised Date(s)</u>
-001	Bartow Plant Unit #1	AO52-233149	12/29/93	12/28/98		02/19/97
-002	Bartow Plant Boiler #2	AO52-216412	01/26/93	09/16/98		02/19/97
-003	Bartow Plant Boiler #3	AO52-216413	01/27/93	09/16/98		08/16/95 02/19/97
-004	Bartow Pipeline Heater Boiler	AO52-244478	04/18/94	04/18/99		
-005	Gas Turbine Peaking Unit #P-1	AO52-253215	11/23/94	11/01/99		01/13/97
-006	Gas Turbine Peaking Unit #P-2	AO52-253216	11/23/94	11/01/99		01/13/97
-007	Gas Turbine Peaking Unit #P-3	AO52-253217	11/23/94	11/01/99		01/13/97
-008	Gas Turbine Peaking Unit #P-4	AO52-253218	11/23/94	11/01/99		01/13/97
-009	Flyash Storage Silo w/Baghouse	AO52-232464	08/30/93	08/26/98		09/04/98
-xxx	Relocatable Diesel Generator(s)	AO09-205952		03/31/97		

(if applicable) ID Number Changes (for tracking purposes):

From: **Facility ID No.:** 40PNL520011

To: **Facility ID No.:** 1030011

Notes:

1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.

2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

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

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘insignificant emissions units’.

E.U. ID

<u>No.</u>	<u>Brief Description of Emissions Units and/or Activity</u>
-xxx	General Boiler Building - Emergency diesel generator (basement) - 300 gallon fuel oil tank
-xxx	North Terminal - Diesel engine - Cummings 175 hp - 150 gallon No. 2 oil tank
-xxx	South Terminal - Gasoline tank, filling station
-xxx	South Terminal - No. 2 oil storage tank
-xxx	Turbine - Solvent Storage - Navee cleaner storage tank (4X4X4)
-xxx	Gas Turbine 1, 2, 3, and 4 - Lube oil vent with demister
-xxx	Gas Turbine 1, 2, 3, and 4 - Underground 2,600 gallon lube oil storage tank
-xxx	Gas Turbine 1, 2, 3, and 4 - 500 gallon waste oil storage tank
-xxx	Fuel Storage - Tank No. 1, 2 and 3 - 150,000 bbls No. 6 fuel oil
-xxx	Fuel Storage - Tank No. 4 and 5 - 200,000 bbls No. 6 fuel oil
-xxx	Fuel Storage - Tank No. 6 - 100,000 bbls No. 2 fuel oil
-xxx	Fuel Storage - Tank No. 7 and 8 - 259,000 bbls No. 6 fuel oil
-xxx	Flyash Handling System - Flyash disposal
-xxx	General Site - Two, 500 gallon propane gas tanks for Unit 2 and 3 ignitors
-xxx	Tank No. CT#01(2R), CT#02(3R), and CT#03(4R), CT#04(5R) - 5,509 gallons waste oil
-xxx	Tank No. CT#6(11) - 4,118,142 gallons No. 2 fuel oil
-xxx	Tank No. #1(1R) - 1,008 gallons unleaded gasoline
-xxx	Tank No. #2(16) - 34,128 gallons No. 2 fuel oil
-xxx	Tank No. #4(7) - 6,354,768 gallons No. 6 fuel oil
-xxx	Tank No. #12 - 100 gallons diesel - emergency fire pump
-xxx	Tank No. #13 - 200 gallons diesel - emergency generator
-xxx	Tank No. #15(6) - 550 gallons diesel - vehicle
-xxx	Tank No. #16(19) - 65,460 gallons fuel additive
-xxx	Tank No. Boiler Day Tk(15) - 18,675 gallons No. 2 fuel oil
-xxx	Tank No. Terminal #1(9) - 6,329,232 gallons No. 6 fuel oil
-xxx	Tank No. Terminal #2(10) - 8,447,544 gallons No. 6 fuel oil
-xxx	Tank No. Terminal #3(12) - 10,540,740 gallons No. 6 fuel oil
-xxx	Tank No. Terminal #4(13) - 10,542,294 gallons No. 6 fuel oil
-xxx	Tank No. Substation #1 and Substation #2 - 16,002 gallons cable oil

[electronic file name: 1030011u.doc]

Appendix I-1, List of Insignificant Emissions Units and/or Activities.

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62-210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

1. Water Laboratory solvent use and hood-chemical analyses for water
2. Water Laboratory flammable chemical storage cabinet
3. Machine Shop sand blaster, drill press, welding, lathes, hand-held tools, ect.
4. General Boiler Building fire protection equipment
5. North Terminal - Diesel fire pump building flammable liquid cabinet
6. North Terminal - Foam Building Nat. foam XL - 3%; 2,600 gallons
7. South Terminal - Machine Shop sand blaster, drill press, welding, lathes, hand-held tools, ect.
8. Turbine - Fire Protection CO2 fire system
9. Fuel Storage foam fire protection system
10. General Site surface coating <6.0 gallons per day
11. General Site brazing, soldering and welding

Table 1-1, Summary of Air Pollutant Standards and Terms

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.	Brief Description
[-001]	No. 1 Unit, Fossil Fuel Fired Steam Generator with Electrostatic Precipitator
[-002]	No. 2 Unit, Fossil Fuel Fired Steam Generator
[-003]	No. 3 Unit, Fossil Fuel Fired Steam Generator

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
PM [EU-001]	All	8,760	0.1 lb/MMBtu	122.0	534.4			Rules 62-296.405(1)(b), 62-296.700(4)(b) & 62-296.702(2)(a)	A.7.
PM [EU-002]	All	8,760	0.1 lb/MMBtu	131.7	576.9			Rules 62-296.405(1)(b), 62-296.700(4)(b) & 62-296.702(2)(a)	A.7.
PM [EU-003]	All	8,760	0.1 lb/MMBtu	221.1	968.6			Rules 62-296.405(1)(b), 62-296.700(4)(b) & 62-296.702(2)(a)	A.7.
PM [EU-001]	All	8,760	0.3 lb/MMBtu	366.0				Rules 62-210.700(3) & 62-296.700(4)(b)	A.8.
PM [EU-002]	All	8,760	0.3 lb/MMBtu	395.1				Rules 62-210.700(3) & 62-296.700(4)(b)	A.8.
PM [EU-003]	All	8,760	0.3 lb/MMBtu	663.3				Rules 62-210.700(3) & 62-296.700(4)(b)	A.8.
SO ₂ [EU-001]	Liquid	8,760	2.75 lb/MMBtu			5,355.0	14,694.5	Rule 62-296.405(1)(c)1.j.	A9.
SO ₂ [EU-002]	Liquid	8,760	2.75 lb/MMBtu			3,621.75	15,653.26	Rule 62-296.405(1)(c)1.j.	A9.
SO ₂ [EU-003]	Liquid	8,760	2.75 lb/MMBtu			6,080.25	25,631.5	Rule 62-296.405(1)(c)1.j.	A9.
SO ₂	Liquid	8,760	2.5% by weight sulfur					Rule 62-296.405(1)(e)3.	A10.
VE	All	8,760	40% opacity					Rule 62-296.405(1)(a) & OGC Orders 86-1577 & 87-1261	A.5.
VE	All	3 hr/24 hr	60% opacity					Rule 62-210.700(3)	A.6.

Notes:
* The "Equivalent Emissions" listed are for informational purposes only.

[electronic file name: 10300111.xls]

Table 1-1, Summary of Air Pollutant Standards and Terms

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. **Brief Description**
[-004] Bartow-Anclote Pipeline Heating Boiler

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
SO ₂	Liquid	8,760	0.5% by weight sulfur			8.52	37.34	Rule 62-296.406(3)	B.7.
VE	All	8,760	20% except 40% 2 min/hr					Rule 62-296.406(1)	B.5.
VE	All	3 hr/24 hr	60% opacity					Rule 62-210.700(3)	B.6.

Notes:
* The "Equivalent Emissions" listed are for informational purposes only.

[electronic file name: 10300111.xls]

Table 1-1, Summary of Air Pollutant Standards and Terms

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.	Brief Description
[-005]	Gas Turbine Peaking Unit #P-1
[-006]	Gas Turbine Peaking Unit #P-2
[-007]	Gas Turbine Peaking Unit #P-3
[-008]	Gas Turbine Peaking Unit #P-4

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
SO ₂	Liquid	8,760	0.5% by weight sulfur			392.7	1,720.0	AO52-253215A, 253216A, 253217A & 253218A Rule 62-296.320(4)(b)1.	C.6.
VE	All	8,760	20% opacity						C.5.

Notes:
* The "Equivalent Emissions" listed are for informational purposes only.

Table 1-1, Summary of Air Pollutant Standards and Terms

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. **Brief Description**
[-009] Flyash Silo with Baghouse

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
PM		8,760 w/ 700 transferring		1.0	0.35			Applicant request & A052-232464	D.4.
VE		8,760	5% opacity					Applicant request & A052-232464	D.5.

Notes:
* The "Equivalent Emissions" listed are for informational purposes only.

[electronic file name: 10300111.xls]

Table 1-1, Summary of Air Pollutant Standards and Terms

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. **Brief Description**
[-xxx] Relocatable Diesel Fired Generator(s)

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
SO ₂	Liquid	2,970	0.5% by weight Sulfur			14.16	21.02	Applicant request & AC09-202080	E.4. & E.6.
VE	All	2,970	20% opacity					Applicant request & A009-205952	E.5.

Notes:
* The "Equivalent Emissions" listed are for informational purposes only.

[electronic file name: 10300111.xls]

Table 2-1, Summary of Compliance Requirements

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.	Brief Description
[-001]	No. 1 Unit, Fossil Fuel Fired Steam Generator with Electrostatic Precipitator
[-002]	No. 2 Unit, Fossil Fuel Fired Steam Generator
[-003]	No. 3 Unit, Fossil Fuel Fired Steam Generator

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	
						CMS**	See permit condition(s)
VE EU[-001]	All	EPA Method 9	6 months	3/16 & 9/16	60 min	Yes	A.19., A.29.and A.30.
VE EU[-002 & -003]	All	EPA Method 9	Annual	5/28 & 4/28	60 min		A.19.and A.30.
PM EU[-001]	All	EPA Method 17, 5, 5B or 5F	6 months	3/16 & 9/16	1 hr		A.20., A.29.and A.31.
PM EU[-002 & -003]	All	EPA Method 17, 5, 5B or 5F	Annual	5/28 & 4/28	1 hr		A.20.and A.31.
SO ₂	Liquid	EPA Method 6, 6A, 6B, or 6C; or fuel analysis	Annual	w/ PM test	1 hr		A.21.and A.22.
Used oil	On-specification	EPA SW-846	each batch				A.11., A.12., A.13., & A.32.

Notes:
 * The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.
 **CMS [=] continuous monitoring system

[electronic file name: 10300112.xls]

Table 2-1, Summary of Compliance Requirements

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. **Brief Description**
[-004] Bartow-Anclote Pipeline Heating Boiler

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	See permit condition(s)	
						CMS**	
VE SO ₂	All Liquid	DEP Method 9 ASTM Methods	Annual each delivery	31-May	30 min		B.12. & B.13. B.14. & B.15.

Notes:
* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.
**CMS [=] continuous monitoring system

[electronic file name: 10300112.xls]

Table 2-1, Summary of Compliance Requirements

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.	Brief Description
[-005]	Gas Turbine Peaking Unit #P-1
[-006]	Gas Turbine Peaking Unit #P-2
[-007]	Gas Turbine Peaking Unit #P-3
[-008]	Gas Turbine Peaking Unit #P-4

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	Compliance System	
						CMS**	See permit condition(s)
VE SO ₂	All Liquid	EPA Method 9 ASTM Methods	Annual each delivery	1-Feb	30 min		C.11. & C.16. C.12.

Notes:
 * The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.
 **CMS [=] continuous monitoring system

[electronic file name: 10300112.xls]

Table 2-1, Summary of Compliance Requirements

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. **Brief Description**
[-009] Flyash Storage Silo with Baghouse

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	See permit condition(s)	
						CMS**	
PM		EPA Method 5	Renewal	16-Mar	1 hr		D.7.
VE		EPA Method 9	Annual	16-Mar	30 min		D.8.

Notes:
 * The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.
 **CMS [=] continuous monitoring system

[electronic file name: 10300112.xls]

Table 2-1, Summary of Compliance Requirements

Florida Power Corporation
Bartow Plant

PROPOSED Permit No.: 1030011-002-AV
Facility ID No.: 1030011

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. **Brief Description**
[-xxx] Relocatable Diesel Fired Generator(s)

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)

Notes:
 * The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.
 **CMS [=] continuous monitoring system

[electronic file name: 10300112.xls]