

Scott

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AIR REGULATION

**THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

In the Matter of an  
Application for Permit by:

OGC CASE NO. \_\_\_\_\_

Florida Power Corporation,  
Higgins Plant

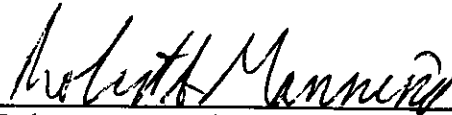
DRAFT Permit No.: 1030012-001-AV  
Pinellas County, Florida

**NOTICE OF WITHDRAWAL OF REQUEST  
FOR EXTENSION OF TIME**

The Florida Power Corporation (FPC), by and through undersigned counsel, hereby withdraws its Request for Extension of Time to file a petition for formal administrative proceedings in accordance with Chapter 120, Florida Statutes. FPC filed its last Request for Extension of Time on November 6, 1997, in response to the "Intent to Issue Title V Air Operation Permit" (Permit No. 1030012-AV) for the Higgins Plant located in Pinellas County, Florida, to negotiate certain changes in the draft proposed Title V air operation permit with the Department of Environmental Protection (Department). Based on the FPC comment letter dated October 27, 1997, and subsequent discussions with Department representatives, FPC and the Department have come to an agreement on the issues involving the above-referenced draft Title V permit. The agreement between FPC and the Department is contained in the correspondence from the Department dated November 13, 1997 and November 21, 1997, copies of which are attached to this Notice. Therefore, FPC hereby withdraws its Request for Extension, conditioned upon the Department's issuance of the Final Permit in accordance with the Department's agreement with FPC.

Respectfully submitted this 24 day of November, 1997.

HOPPING GREEN SAMS & SMITH, P.A.

A handwritten signature in cursive script that reads "Robert A. Manning". The signature is written in dark ink and is positioned above a horizontal line.

Robert A. Manning, Fla. Bar No. 0035173  
123 South Calhoun Street  
Post Office Box 6526  
Tallahassee, FL 32314  
(904) 222-7500

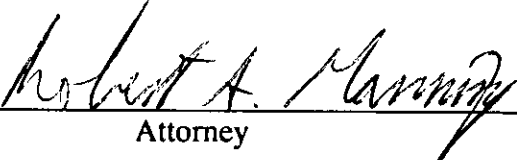
Attorney for Florida Power Corporation

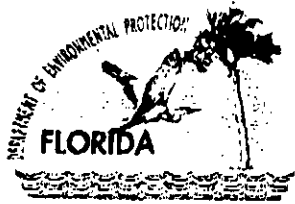
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following  
by U.S. Mail on this 24 day of November, 1997:

Clair H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2600

Jeffrey Brown  
Office of General Counsel  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2600

  
\_\_\_\_\_  
Attorney



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

November 21, 1997

Mr. W. Jeffrey Pardue, C.E.P.  
Director of Environmental Services  
Florida Power Corporation  
3201 34th Street South  
St. Petersburg, Florida 33711

Re: Proposed Title V Permit No.: 1030012-001-AV  
Higgins Power Plant

Dear Mr. Pardue:

As per a telephone conversation with Robert Manning yesterday, the following changes have been made to the subject proposed permit;

1. Condition B.19 will be deleted.
2. The last part of the Figure 1 description on the placard page will be deleted.
3. The "not" in the first line of condition 2 in Section II will be deleted.
4. The verbiage "specified in condition A.18." will be added to the end of condition A.7.
5. Condition C.24 will be revised to read as follows:

**C.24.** Florida Power Corporation shall notify the Department's district office and the local air program (when applicable) of where the diesel generator(s) is presently located and where the diesel generator(s) is to be relocated, in writing, at least 15 days prior to the date on which any diesel generator(s) is to be relocated. The notification shall specify the following;

- a. which generator(s), by serial number, is being relocated,
- b. which location the generator(s) is being relocated from and which location it is being relocated to, and
- c. the approximate startup date at the new location.

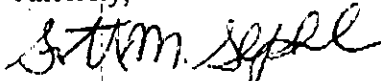
[Rule 62-4.070(3), F.A.C.; and, Anclote Power Plant Permit AC 09-202080]

A copy of the public notice will be faxed to you as soon as we receive it and a copy of the Pinellas

Mr. W. Jeffrey Pardue  
Proposed Permit, 1030012  
Higgins Power Plant  
November 21, 1997  
Page 2 of 2

County comments have been faxed to Robert Manning. If you should have any questions, please contact Mr. Charles S. Logan at 850/488-1344.

Sincerely,



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

/CSL

Enclosures

copy furnished to:

Mr. Jerry Kissel, FDEP/SWD

Mr. Gary Robbins, Pinellas County DEM

Mr. W. Jeffery Pardue, C.E.P., Florida Power Corporation

Mr. Kennard F. Kosky, P.E., Golder Associates, Inc.

Ms. Carla E. Pierce, USEPA, Region 4 (INTERNET E-mail Memorandum)

Ms. Yolanda Adams, USEPA, Region 4 (INTERNET E-mail Memorandum)

Mr. Robert Manning, Hopping, Green, Sam, and Smith

November 13, 1997

Mr. W. Jeffrey Pardue, C.E.P.  
Director of Environmental Services  
Florida Power Corporation  
3201 34th Street South  
St. Petersburg, Florida 33711

Re: Proposed Title V Permit No.: 1030012-001-AV  
Higgins Power Plant

Dear Mr. Pardue:

One copy of the "PROPOSED PERMIT DETERMINATION" the Higgins Power Plant located at 998 East Shore Drive, Oldsmar, Pinellas County, is enclosed. This letter is only a courtesy to inform you that the DRAFT permit has become a PROPOSED permit.

An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is <http://www.dep.state.fl.us/air>.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED permit is made by the USEPA within 45 days, the PROPOSED permit will become a FINAL permit no later than 55 days after the date on which the PROPOSED permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED permit, the FINAL permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Mr. Charles S. Logan at 850/488-1344.

Sincerely,

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

/CSL

Enclosures

copy furnished to:  
Mr. Jerry Kissel, FDEP/SWD  
Mr. Gary Robbins, Pinellas County DEM  
Mr. W. Jeffrey Pardue, C.E.P., Florida Power Corporation

Mr. Kennard F. Kosky, P.E., Golder Associates, Inc.  
Ms. Carla E. Pierce, USEPA, Region 4 (INTERNET E-mail Memorandum)  
Ms. Yolanda Adams, USEPA, Region 4 (INTERNET E-mail Memorandum)

## PROPOSED PERMIT DETERMINATION

Florida Power Corporation  
Higgins Power Plant  
PROPOSED Permit No.: 1030012-001-AV  
Page 1 of 8

### **I. Public Notice.**

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" to Florida Power Corporation for the Higgins Power Plant located at 998 East Shore Drive, Oldsmar, Pinellas County was clerked on September 9, 1997. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in The Tampa Tribune on September 24, 1997. The DRAFT Title V Air Operation Permit was available for public inspection at the Pinellas County Department of Environmental Management, the Department's Southwest District Office in Tampa, and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" has not been received.

### **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 one respondent 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. Scott H. Osbourn with FPC dated October 27, 1997, and received on October 29, 1997.

#### General Comments:

1. The permit will be updated to reflect the most recent version of Appendix TV-1.
2. FPC will be provided a copy of the Notice intended to be published and proof of publication.
3. Reference to the Order Correcting Scrivener's Error, dated July 2, 1997, will follow the reference to ASP Number 97-B-01.
4. All references to and Figure I, Summary Report-Gaseous and Opacity Excess Emission and Monitoring System Performance Report, have been deleted.

#### Section I. Facility Information, Subsection A:

The correct date the Title V permit application was received is June 14, 1996.



## **Section II. Facility-wide Conditions**

### **1. Condition 2, Page 3 of 48:**

The word "not" will be deleted from the second line of this condition.

### **2. Condition 3, Page 3 of 48:**

This condition will be changed to read as follows:

**3. General Particulate Emission Limiting Standards. General Visible Emissions Standard.** Except for a particulate matter or opacity limit set forth in or established elsewhere in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9, shall be used to determine compliance with this condition.

[Rule 62-296.320(4)(b)1. & 4., F.A.C.]

### **3. Condition 6, Page 3 of 48:**

The phrase "exempt" remains unchanged.

### **4. Condition 7, Page 3 of 48:**

Verbiage in the first line will be changed to read "The permittee shall not store, pump" instead of "The permittee shall allow no person to store, pump". Also, the verbiage "Not federally enforceable" will begin the condition.

### **5. Condition 9, Page 4 of 48:**

This condition resulted from a request by EPA to establish when day one begins. The citation should be adequate.

### **6. Condition 12, Page 5 of 48:**

The phrase "presently located at the Anclote Power Plant" will be deleted.

## **Section III. Subsection A Conditions**

### **1. Introduction:**

Rule 62-210.300(3)(a)3.d., F.A.C., references units subject to long term shutdown and applicable requirements. The first line of the description will be changed as follows:

SG 1, SG 2, and SG 3 were all placed on "Long Term Reserve Shutdown" on January 24, 1994 (Rule 62-210.300(2)(a)3.d., F.A.C.)

**2. Condition A.1., Page 5 of 35:**

This condition will be corrected to read as follows:

**A.1. Methods of Operation. Fuel(s).**

- a. Startup & Shutdown: The only fuels allowed to be burned are new #6 or lighter grades of fuel oils. On-specification used oil shall only be burned if the PCB's are less than 2 ppm and may be blended with new #2 fuel oil. The maximum sulfur content is 2.5 percent, by weight.
- b. Normal: The only fuels allowed to be burned are new #6 or lighter grades of fuel oils and on-specification used oil. The maximum sulfur content is 2.5 percent, by weight.
- c. The maximum annual cumulative amount of on-specification used oil, whether generated on or off-site, that can be burned in these emissions units shall not exceed 5 percent of the total permitted heat input for emissions units SG 1, SG 2, and SG 3.
- d. The heat inputs in condition A.2. are based on the following fuel consumption rates while firing No. 6 fuel oil and natural gas. These rates may vary depending on the heating values of the fuels:

Emissions Unit	Hours/year	Fuel Oil(s)	Natural Gas
SG 1	8760	3,654 gallons/hour	0.50 MMSCF/hour
SG 2	8760	3,486 gallons/hour	0.49 MMSCF/hour
SG 3	8760	3,654 gallons/hour	0.50 MMSCF/hour

[Rule 62-213.410, F.A.C.; and AO's 52-216382, 52-216383, & 52-216384; and Title V application received on June 14, 1996.]

**3. Condition A.2., Page 7 of 48:**

As requested the unit numbers have been corrected to SG 1, SG 2, and SG 3.

**4. Condition A.7., Page 8 of 48:**

The condition will be revised as follows:

**A.7. Particulate Matter.** Particulate matter emissions during normal operations shall not exceed 0.1 pound per million Btu heat input [(54.8 lb/hr & 240 TPY for SG 1 & SG 3, based on 548 MMBtu/hr.) and ( 52.3 lb/hr & 229 TPY for SG 2), based on 523 MMBtu/hr.] as measured by test methods referenced in condition A.18.

[Rule 62-296.405(1)(b), F.A.C.]

**5. Condition A.8., Page 8 of 48:**

The condition will be revised as follows:

**A.8. Particulate Matter - Soot Blowing and Load Change.** Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input [164.4 lb/hr for SG 1 & SG 3(based on 548 MMBtu/hr.) and 156.9 lb/hr(based on 523 MMBtu/hr.) for SG 2] during the 3-hours in any 24-hour

period of excess emissions allowed for boiler cleaning (soot blowing) and load change.  
[Rule 62-210.700(3), F.A.C.]

**6. Condition A.9., Page 8 of 48:**

The condition will be change to reference the "test methods in condition A.19" instead of applicable compliance methods.

**7. Condition A.10., Page 8 of 48:**

The verbiage "For the purpose of Title V Annual Emissions Fee's," will be added at the beginning of the sentence referencing sulfur content of gas. The submittal date will be changed to June 14, 1996.

**8. Condition A.24., Page 12 of 48:**

The verbiage "When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method" will be deleted.

**9. Condition A.26., Page 13 of 48:**

Provisions for compliance testing exemptions are provided for in A.26, A.27, and A.28. No changes are necessary. The same response applies to A.30.

**10. Condition A.32 and A.33, Page 18 of 48:**

These conditions will be designated "Not Federally Enforceable".

**11. Condition A.34., Page 18 of 48:**

The citations for this condition provide the authority for its inclusion and this condition will remain. Condition A.34.b has been revised to read as follows:

b. Quantity Limited: The maximum cumulative annual amount of on-specification used oil that can be burned at this facility shall not exceed 5 % of the total allowable heat input for SG 1, SG 2, and SG 3.

h. The word "copy" will be changed to "summary".

**12. Condition A.35., Page 21 of 48:**

This condition applies while the permit is valid. The information for the facility while it is not operating will have to be documented, even if it is zero. No change will be made.

### **Section III. Subsection B Conditions**

**1. Condition B.4., Page 23 of 48:**

The verbiage in B.4.b will be revised to read as follows:

b. The heat inputs in condition B.1 are based on the following fuel consumption rates while firing new No. 2 fuel oil and natural gas. These rates may vary depending on the heating values of the fuels:

**2. Condition B.7., Page 24 of 48:**

This condition applies to combustion turbines and not boilers. Therefore, Rules 62-210.700(2) and (3) do not apply. No change is necessary.

**3. Condition B.13., Page 25 of 48:**

As requested, this condition will be revised to read as follows:

**B.13. Operating Rate During Testing.**

Testing of emissions shall be conducted with the emissions unit operating at capacity. Capacity is defined as 95 - 100 percent of the manufacturer's rated heat input achievable for the average ambient (or conditioned) air temperature during the test. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than capacity. In such cases, the entire heat input vs. inlet temperature curve will be adjusted by the increment equal to the difference between the design heat input value and 105 percent of the value reached during the test, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by this permit. Data, curves, and calculations necessary to demonstrate the heat input rate correction at both design and test conditions shall be submitted to the Department's local office with the compliance test report.

**4. Condition B.17., Page 27 of 48:**

The first line of this condition will be revised to read as follows:

**B.17. Malfunction Reporting.** In the case of excess emissions resulting from malfunctions as defined in conditions B.7 and B.8, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C.

**5. Condition B.19., Page 28 of 48:**

This condition is applicable and prescriptive in that it will provide you with values for your Annual Title V Emissions Fee's. The condition will not be deleted.

### **Section III. Subsection C Conditions**

#### **1. Introduction:**

The description will be revised to read as follows:

The relocatable diesel generator(s) will have a maximum (combined) heat input of 25.74 MMBtu/hour while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum (combined) rating of 2460 kilowatts. Emissions from the generator(s) are uncontrolled. These conditions were requested in the Initial Title V Permit Application for the Anclote Power Plant received June 14, 1996. The generators may be relocated at any of the following facilities:

#### **2. Conditions C.1, C.5, C.6, C.14, C.16, C.20, C.21, C.23, C.24, Pages 29 through 48:**

The permit date is changed to June 14, 1996. The Anclote AC and AO are appropriately referenced. No change is necessary.

#### **3. Condition C.15., Page 32 of 48:**

The verbiage "When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method" will be deleted.

#### **4. Condition C.21., Page 34 of 48:**

The first line of this condition will be revised to read as follows:

To demonstrate compliance with specific condition C.5, records shall indicate the daily hours of operation for each diesel generator, the daily hours of operation expressed as "engine- hours", and a cumulative total hours of operation expressed as "engine hours" for each month.

#### **5. Condition C.23., Page 34 of 48:**

This condition will not be deleted and the entire condition will be placed under the heading of Source Obligation.

#### **6. Condition C.24., Page 35 of 48:**

Pinellas County DEM must be provided the same notification if this source is removed from or relocated to Pinellas County. No change is necessary.

### **Section III. Acid Rain Part**

#### **1. Condition 1, Page 36 of 48:**

Compliance with provisions in the DEP form is referenced so the form date is appropriate. The date the acid rain application was received is stated on the placard page of this permit. No change will be made.

**2. Condition 4, Page 37 of 48:**

This condition will be moved to the facility wide section and conditions renumbered accordingly.

**Table & Appendix**

**1. Table 1-1, Page 38 of 48:**

The footnote referencing lead emissions is deleted and replaced with a reference to the condition limiting the burning of OSUO to 5 percent of the total heat input.

**2. Table 1-2, Page 39 of 48:**

The first asterisk will not be deleted but will be revised to address the limit on burning OSUO to 5 percent of the total heat input. The reference to Rule 62-212.400(2)(f)1, F.A.C. has been deleted.

**3. Table 1-4 & 2-2, Page 41 & 43 of 48:**

The notes in the tables is revised to read "The above unit(s) are permitted to be located at seven facilities."

**4. Appendix E-1, Page 32 of 35:**

The spelling of citrosolv is corrected.

**5. Appendix U-1, Page 33 of 36:**

Surface Coating and Solvent Cleaning will be moved to Appendix E-1 and reference to the Helper Cooling Towers will be deleted.

**B.** Letter from Mr. Gary Robbins with Pinellas County DEM dated September 29, 1997, and received on October 2, 1997.

1. The numbering of emissions units or sources are changed accordingly.
2. There is no specific rule authority for and the requested condition would conflict with existing conditions presently in the permit. The condition will not be added.

3. Condition A.33 is directly from specific condition No. 18 of the current permit (AO52-216382). No change will be made.
4. The verbiage addition requested would make the statement grammatically incorrect. No change will be made.
5. It is not appropriate to address a frequency issue in the Title V permit. No change will be made.
6. This issue is addressed in responses (#3 of Section III, Subsection B Conditions above) to FPC comments.

### **III. Conclusion.**

The permitting authority will issue the PROPOSED Permit No.: 1030012-001-AV, with any changes noted above.