



# Progress Energy

RECEIVED

APR 11 2005

BUREAU OF AIR REGULATION

April 8, 2005

Mr. Al Linero P.E.  
Division of Air Resource Management  
2600 Blair Stone Road MS 5500  
Tallahassee, Florida 32399-2400

Re: Progress Energy - Higgins Power Plant - Facility ID - 1030012

Dear Mr. Linero:

Project No.: 1030012-004-AV

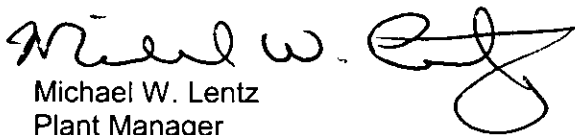
The Progress Energy would like to update the Title V permit to include additional ASTM methods for testing sulfur in the fuel (please see the attached application). We would appreciate having the permit updated by letter (the new wording to be incorporated in the permit during the next renewal process). The requested wording is included in the attached application.

As requested by Teresa Heron we have included the Statement of Compliance for 2004.

If you have any questions please feel free to contact Dave Meyer at (727) 820-5295. Thank you very much for your help in this matter.

*I, the undersigned, am the responsible official as defined in Chapter 62-210.200, F.A.C., of the Title V source for which this document is being submitted. I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate, and complete.*

Sincerely,



Michael W. Lentz  
Plant Manager

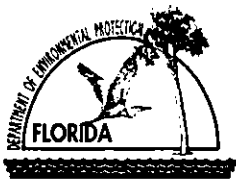
Attachments.



bcc: Gus Schaefer, BT11 (Plant Files)  
D. K. Meyer, CX1B (ESS Files)

Scott Osbourn, P.E.  
Golder  
5100 West Lemon St. Suite 114  
Tampa Fl. 33609





# Department of Environmental Protection

## Division of Air Resource Management

### APPLICATION FOR AIR PERMIT - LONG FORM

#### I. APPLICATION INFORMATION

**Air Construction Permit** – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

**Air Operation Permit** – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

**Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option)** – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

#### Identification of Facility

1. Facility Owner/Company Name: Progress Energy Florida, Inc.	
2. Site Name: Higgins Power Plant	
3. Facility Identification Number: 1030012	
4. Facility Location... Street Address or Other Locator: 998 East Shore Drive City: Oldsmar County: Pinellas Zip Code: 34677	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

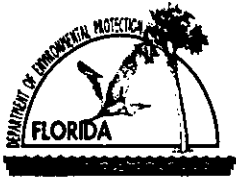
#### Application Contact

1. Application Contact Name: Dave Meyer, P.E., Senior Environmental Specialist	
2. Application Contact Mailing Address... Organization/Firm: Progress Energy Florida Street Address: 100 Central Ave CX1B City: St. Petersburg State: FL Zip Code: 33701	
3. Application Contact Telephone Numbers... Telephone: (727) 820-5295 ext. Fax: (727) 820-5229	
4. Application Contact Email Address: dave.meyer@pgnmail.com	

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Project Number(s):	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	





# Department of Environmental Protection

## Division of Air Resource Management

### APPLICATION FOR AIR PERMIT - LONG FORM

#### Purpose of Application

This application for air permit is submitted to obtain: (Check one)

#### **Air Construction Permit**

☐ Air construction permit.

#### **Air Operation Permit**

☐ Initial Title V air operation permit.

☒ Title V air operation permit revision.

☐ Title V air operation permit renewal.

☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.

☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

#### **Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)**

☐ Air construction permit and Title V permit revision, incorporating the proposed project.

☐ Air construction permit and Title V permit renewal, incorporating the proposed project.

**Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:**

☐ I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

#### Application Comment



Applicant requests permit revisions to incorporate pertinent ASTM fuel sulfur content test methods, as follows:

***Current Version***

**B.12.** The fuel sulfur content, percent by weight, provided by the vendor or permittee for each delivery of liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition.

[Rules 62-213.440 and 62-297.440, F.A.C.]

***Requested Revisions***

**B.12.** The fuel sulfur content, percent by weight, provided by the vendor or permittee for each delivery of liquid fuels shall be evaluated using either ASTM D1552-90 or later editions, ASTM D2622-94, ASTM D4294-90, or both ASTM D4057-88 and ASTM D129-91, or the latest edition. In addition, any ASTM method (or later editions) referenced in 62-297.440(1), F.A.C. or in 40 CFR 60.335(b)(10) is acceptable.

[Rules 62-213.440 and 62-297.440, F.A.C.]



**Scope of Application**

<b>Emissions Unit ID Number</b>	<b>Description of Emissions Unit</b>	<b>Air Permit Type</b>	<b>Air Permit Proc. Fee</b>
N/A			

**Application Processing Fee**

Check one: ☐ Attached - Amount: \$\_\_\_\_\_ ☒ Not Applicable



**Owner/Authorized Representative Statement**

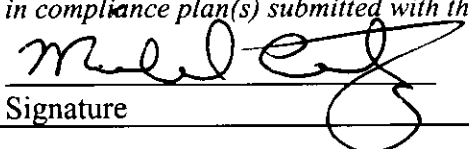
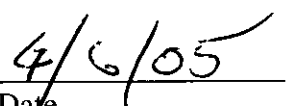
**Complete if applying for an air construction permit or an initial FESOP.**

1. Owner/Authorized Representative Name :
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
4. Owner/Authorized Representative Email Address:
5. Owner/Authorized Representative Statement:  <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.</i>  _____ Signature  _____ Date



**Application Responsible Official Certification**

**Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."**

1. Application Responsible Official Name: Michael W. Lentz
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: Progress Energy Florida Street Address: P.O. Box 14042 BA 44 City: St. Petersburg State: FL Zip Code: 33733-4042
4. Application Responsible Official Telephone Numbers... Telephone: (727) 827-6235 ext. Fax: (727) 827-6102
5. Application Responsible Official Email Address:
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature  Date

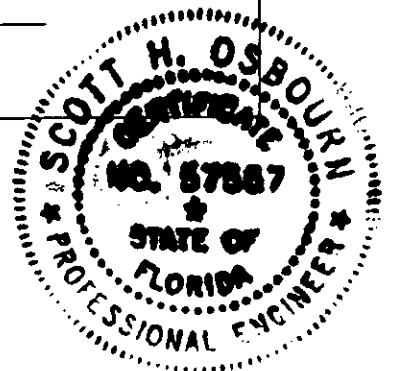


### Professional Engineer Certification

1. Professional Engineer Name: Scott Osbourn Registration Number: 57557
2. Professional Engineer Mailing Address... Organization/Firm: Golder Associates Inc. ** Street Address: 5100 West Lemon St., Suite 114 City: Tampa State: FL Zip Code: 33609
3. Professional Engineer Telephone Numbers... Telephone: (813) 287-1717 ext. 211 Fax: (813) 287-1716
4. Professional Engineer Email Address: <a href="mailto:sosbourn@golder.com">sosbourn@golder.com</a>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input checked="" type="checkbox"/> , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature _____ Date <u>4/4/05</u> (seal)

\* Attach any exception to certification statement.

\*\* Board of Professional Engineers Certificate of Authorization No. 00001670





Higgins - Air Comp.



February 17, 2005

Mr. Gary Robbins  
Pinellas County Department of Environmental Management  
300 South Garden Avenue  
Clearwater, FL 34616


Dear Mr. Robbins:

Re: Annual Statement of Compliance  
Florida Power Higgins Facility  
Facility ID No. 1030012

As required by Rule 62-213.440(3)(a)(2), Florida Power submits the attached Annual Statement of Compliance for the above-referenced facility.

Please contact Gus Schaefer at (727) 409-3989 if you have any questions or would like additional information.

Sincerely,

  
Michael W. Lentz  
Plant Manager

cc: Ms. Roselyn Hughes, EPA Region IV



bcc: Mike Lentz BA44  
Scott Stenger CX1B

File: Higgins Air Correspondence





# Department of Environmental Protection

## Division of Air Resources Management

### STATEMENT OF COMPLIANCE - TITLE V SOURCE

Facility Owner/Company Name: Progress Energy Florida, Inc.

Site Name: Higgins Plant County: Pinellas

Title V Air Operation Permit No.: 1030012-002-AV \_\_\_\_\_

REPORTING PERIOD	REPORT DEADLINE*
January 1 through December 31 of 2004 (year)	March 1, 2005

\*See Rule 62-213.440(3)(a)2, F.A.C.

#### COMPLIANCE STATEMENT (Check only one of the following three options)

\_\_\_\_ A. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, and there were no reportable incidents of deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above.

X B. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part; however, there were one or more reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each incident of deviation, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

\_\_\_\_ C. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, EXCEPT those identified in the pages attached to this report. For each item of noncompliance, the following information is included:

1. Emissions unit identification number.
2. Specific permit condition number.
3. Description of the requirement of the permit condition.
4. Basis for the determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e., recorded at least every 15 minutes, or intermittent).
5. Beginning and ending dates of periods of noncompliance.
6. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented.
7. Dates of any reports previously submitted identifying this incident of noncompliance.



## STATEMENT OF COMPLIANCE - TITLE V SOURCE

### RESPONSIBLE OFFICIAL CERTIFICATION

I, the undersigned, am the responsible official as defined in Chapter 62-210.200, F.A.C., of the Title V source for which this document is being submitted. With respect to all matters other than Acid Rain program requirements, I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate, and complete.

Michael W. Lentz  
(Signature of Title V Source Responsible Official)

2/14/05  
(Date)

Name: Michael W. Lentz

Title: Plant Manager

### DESIGNATED REPRESENTATIVE CERTIFICATION (only applicable to Acid Rain source)

I, the undersigned, am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

J. Michael Kennedy  
(Signature of Acid Rain Source Designated Representative)

2/14/05  
(Date)

Name: J. Michael Kennedy

Title: Permitting and Compliance Mgr.

*{Note: Attachments, if required, are created by the responsible official or the designated representative, as appropriate, and should consist of the information specified and any supporting records. Additional information may also be attached by the responsible official or designated representative when elaboration is required for clarity. This report is to be submitted to both the compliance authority (DEP district or local air program) and the U.S. EPA (U.S. EPA Region 4, Air and EPCRA Enforcement Branch, 61 Forsyth Street, Atlanta GA 30303).}*



Progress Energy Florida  
Higgins Combustion Turbines - January 1, 2004 thru June 30, 2004  
Malfunction Events

During the first two quarters of calendar year 2004, no deviations occurred for Unit No. 1  
No. 2, No. 3, and No. 4.

<u>Date</u>	<u>Time</u>	<u>Duration</u>	<u>Parameter</u>	<u>Description</u>
-------------	-------------	-----------------	------------------	--------------------

None to report for the first two quarters of 2004

This event occurred with respect to the following permit condition:

The No. 2 fuel oil at Higgins was analyzed for Sulfur content using ASTM Method D 1552-95 and is referenced in Rule 62-297.440(1)(m). This ASTM method for Sulfur determination is an approved method but was not included in our current permit, Permit Condition:B.12. Progress Energy will request by separate letter to the Florida Department of Environmental Protection that ASTM Method D 1552-95 be added to the Higgins Title V air permit.

Permit Condition:B.12. The fuel sulfur content, percent by weight, provided by the vendor or permittee for each delivery of liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition.

[Rules 62-213.440 and 62-297.440, F.A.C.]



Progress Energy Florida  
Higgins Combustion Turbines - July 1, 2004 thru December 31, 2004  
Malfunction Events

During the second two quarters of calendar year 2004, no deviations occurred for Unit No. 1, No. 2, No. 3, and No. 4.

<u>Date</u>	<u>Time</u>	<u>Duration</u>	<u>Parameter</u>	<u>Description</u>
-------------	-------------	-----------------	------------------	--------------------

None to report for the second two quarters of 2004

This event occurred with respect to the following permit condition:

The No. 2 fuel oil at Higgins was analyzed for Sulfur content using ASTM Method D 1552-95 and is referenced in Rule 62-297.440(1)(m). This ASTM method for Sulfur determination is an approved method but was not included in our current permit, Permit Condition:B.12. Progress Energy has requested by separate letter to the Florida Department of Environmental Protection that ASTM Method D 1552-95 be added to the Higgins Title V air permit.

Permit Condition:B.12. The fuel sulfur content, percent by weight, provided by the vendor or permittee for each delivery of liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition.

[Rules 62-213.440 and 62-297.440, F.A.C.]





# Progress Energy

January 12, 2005

Mr. Jim Pennington  
Division of Air Resource Management  
2600 Blair Stone Road MS 5500  
Tallahassee, Florida 32399-2400

Dear Mr. Pennington:

Re: Higgins Combustion Turbine Plant fuel oil testing standard  
FDEP Permit No. 1030012-002-AV

~~1030012-003-AE~~ 1030012-004-AV

I would like to add "ASTM D 1552-90 or latest edition" to the list of acceptable fuel oil test methods listed in Section III B.12 and C.13 of our Higgins Title V permit referenced above:

**B.12.** The fuel sulfur content, percent by weight, provided by the vendor or permittee for each delivery of liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition.  
[Rules 62-213.440 and 62-297.440, F.A.C.]

**C.13.** The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s).  
[Rules 62-213.440 and 62-297.440, F.A.C.]

ASTM D 1552 is referenced in Rule 62-297.440(1)(m).

If you have any questions, please contact Scott Stenger at (727) 826-4130.

I hereby certify that, based on the information and belief formed after reasonable inquiry, the statements and information in the attached documents are true, accurate and complete.

Sincerely,

  
Mike Lentz  
Plant Manager

RECEIVED

JAN 20 2005

BUREAU OF AIR REGULATION