

Sheplak, Scott

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**From:** Robbins, Gary W [grobbins@co.pinellas.fl.us]  
**Sent:** Thursday, July 19, 2007 8:04 AM  
**To:** Sheplak, Scott  
**Subject:** Progress Energy Florida, Inc, d/b/a Florida Power Corporation - Higgins Plant: 1030012-005-AV  
**Attachments:** Higgins 1030012 Demo 102006.doc

I have reviewed the renewal application, and offer the following comments:

1. Besides renewal, this application also is notifying DEP of the permanent shutdown of Emission Units 001, 002, and 003 on October 20, 2006. These units have been in "Long Term Reserve Shutdown" since January 24, 1994. The facility filed appropriate asbestos removal and demolition forms. The boilers and the building were demolished by implosion. A copy of the article about the demolition is attached.
2. The facility contact changes from Michael W. Lentz to Gus Schaefer.
3. In the facility's requested changes to the permits:
  - A. They are asking that condition C.4 be amended to read:  
 "C.4. Methods of Operation - Fuels. Only new low sulfur No. 2 fuel oil shall be fired in ~~the combustion turbine(s)~~ these units."  
 To be more specific, shouldn't it read:  
 "C.4. Methods of Operation - Fuels. Only new low sulfur No. 2 fuel oil shall be fired in the ~~combustion turbine~~ diesel engines(s)".
  - B. Under B.14., they are requesting the associated compliance table (2.1) reflect the testing duration should be 30 minutes for the peaking turbines, since the pte for PM is less than 100 tons/year. I would go further, and change the condition to remove the reference (and the uncertainty) to the 60 minute test. The condition should also indicate when highest emissions are expected (start-up).  
 "B.14. Applicable Test Procedures.  
 (a) Required Sampling Time.  
 2. Opacity Compliance Tests. The required sampling time for EPA Method 9 is thirty (30) minutes since the emissions units have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. The highest expect opacity is at start-up. Exceptions to these requirements are as follows:
    - c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.
4. In attachment CTP-3, the facility describes their start-up, shutdown plan. In this plan they are suppose to describe their best operational practices. They must follow these practices for the excess emission not to be considered a violation. The information submitted does not provide sufficient detail. They simple say they may switch from automatic to local control and best operation practices are adhered to. They do not specify what the best operational practices are, or what the duration of time is necessary (the rule provides up to 2 hours, but the 2 hours is not automatic), or under what circumstances they will shut the unit(s) down.
5. The facility submitted a compliance plan for emission units 005 and 007. They were unable to perform VE tests on fuel oil due to unspecified operational problems. It is not completely clear if the units are not operational, or just unable to operate on fuel oil. The compliance plan requirements, per the instructions state:  
**"Compliance Report and Plan** - Provide a report indicating the compliance status of each emissions unit addressed in this application for air permit with respect to each applicable requirement and, for any instance of

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noncompliance, provide a description of the actions that will be taken to achieve compliance, including a compliance schedule with enforceable milestones. The compliance plan must be at least as stringent as that contained in any judicial consent decree or administrative order to which the Title V source is subject and provide for submission of certified progress reports no less frequently than quarterly.”

- A. They provide a vague repair timeline of late 2007 or early 2008. It certainly seems that the facility should be able to give a more definitive repair date. The conditions they propose are not very enforceable. No justification for the extended repair time is provided.
  - B. Also, the 90 days to test after the repair also seems too long. Shouldn't 30 days be sufficient?
  - C. The compliance plan does not propose a schedule for submission of certified progress reports.
6. The facility was last inspected on 7/26/06 and was considered in compliance. There are no open enforcement cases.

*Gary Robbins  
Pinellas County  
Environmental Management, Air Quality Division  
Environmental Program Coordinator  
Air Quality Division*