Progress Energy

September 16, 2009

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Mr. Jonathan Holtom, P.E.
Title V Program Administrator
Division of Air Resource Management
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, FL 32301

RE: Comments on Draft/Proposed Title V Air Operation Renewal Permit
Project No: 1030013-006-AV
Florida Power Corporation d/b/a Progress Energy Florida, Inc.
Bayboro Power Plant
Facility ID: 1030013

Dear Mr. Holtom:

Comments on the draft/proposed Title V Air Operation Renewal Permit for the Florida Power Corporation d/b/a Progress Energy Florida, Inc. (PEF) Bayboro Power Plant are below. Requested changes are shown in red with strikethrough for deletion and underline for insertion.

Draft/Proposed Title V Air Operation Permit Renewal: 1030013-006-AV

1. *Responsible Official:* David Karp is not responsible for the Bayboro Plant and is no longer the Responsible Official (RO). Mr. David Burney, Superintendent of Operations & Results is now the primary Responsible Official (RO) for the Bayboro Power Plant. Please make this change throughout the permit.

2. *Section I, Subsection B – Summary of Emission Units – Unregulated Emission Units and Activities:* It has come to our attention that the actual volumes of Waste Oil Tank (EU No. 007) and Lube Oil Storage Tank (EU No. 008) are 12,446 and 550 gallons respectively. Please make this correction.

Unregulated Emissions Units and Activities	
007	Waste Oil Tank – ~~12,000~~ 12,446 gallons
008	Lube Oil Storage Tank – ~~500~~ 550 gallons

Progress Energy Florida, Inc.
P.O. Box 14042
St. Petersburg, FL 33733

3. *Section III, Subsection A - Facility Description:* In an effort to remain consistent with the third sentence in the Facility Description, the third sentence of the Permitting Note should be changed. The recommended change is as follows:

   Each ~~CT~~ combustion turbine engine stack has a height of 40', exit diameter of 27.9' exit temperature of 900 °F and the actual volumetric flow measurement is 530,271 actual cubic feet per minute (acfm).

4. *Section III, Subsection A – Emission Limitations and Standards:* In the Permitting Note, there is a reference to averaging time applied to Condition A.6. Condition A.6 restricts the sulfur content of the fuel oil combusted; however there is no averaging time associated with this permit condition. The recommended change is as follows:

   {Permitting Note: Unless otherwise specified, the averaging ~~times~~ time for Specific ~~Conditions~~ Condition A.5. ~~and A.6. are~~ is based on the specified averaging time of the applicable test method.}

5. *Section III, Subsection A, Specific Condition A.9 – Test Methods:* In an effort to remain consistent with the second sentence in Condition A.14, the second sentence of this condition should be changed. The requested change is as follows:

   The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rules 62-204.800, and 62-297.440, F.A.C. In addition, any ASTM method (or later editions) referenced in Rule 62-297-440(1) F.A.C., or in 40 CFR 60.335(b)(10) is acceptable. No other methods may be used unless prior written approval is received from the Department.

6. *Section III, Subsection A, Specific Condition A.16 – Fuel Analysis:* In an effort to remain consistent with Condition A.15, PEF requests clarification of the last sentence of this condition. The requested change is as follows:

   An audit sample analysis is not required in any calendar year for which the permittee provided fuel analysis that included the fuel properties included in Parts a, b and c of this condition, and ~~to~~ demonstrated compliance with the fuel oil sulfur limitation

7. *Section III, Subsection B, Specific Condition B.1 – Permitted Capacity:* The requested clarification is in the table column titled "Gallons/hour" of this condition. The "Gallons/hour" limiting value should reflect that the fuel usage rate is per generator as noted for the heat input value in the column labeled "MMBtu/hr". Therefore the requested clarification is as follows:

Unit No.	MMBtu/hr	Gallons/hour	Fuel Type
012	8.58 (each generator)	62.1 (each generator)	New No. 2 Fuel Oil

8. *Section III, Subsection B, Specific Condition B.4 – Hours of Operation:* The requested clarification would clearly define "engine-hours" as the summation of the hours of operation of the 3 diesel generators. Therefore, the requested clarification is as follows:

> The total hours of operation expressed as "engine-hours" shall not exceed 2,970 hours in any consecutive 12-month period. The total hours of operation expressed as "engine-hours" shall be the summation of the individual hours of operation of each generator.

9. *Section III, Subsection B, Specific Condition B.8 – Test Methods:* In an effort to remain consistent with the second sentence in Condition B.13, the requested change is in the second sentence of this condition and is as follows:

> The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rules 62-204.800, and 62-297.440, F.A.C. In addition, any ASTM method (or later editions) referenced in Rule 62-297-440(1) F.A.C., or in 40 CFR 60.335(b)(10) is acceptable. No other methods may be used unless prior written approval is received from the Department.

10. *Section III, Subsection B, Specific Condition B.11 – Compliance Tests Prior to Renewal:* The requested change is to address the possible scenario in which the generators are not relocated to the site in the previous 5-year-permit cycle. Therefore the requested change is as follows:

> Compliance Tests Prior to Renewal. Except as provided for in condition **TR7.** of Appendix TR, Testing Requirements, this emissions unit shall be tested for the following pollutant prior to obtaining a renewed operation permit: VE. However, no VE is required if the units have not been relocated to the site during the 5 years prior to the submission of the Title V Operating Permit Renewal Application.

11. *Section III, Subsection B, Specific Condition B.15 – Testing after Relocation:* The requested change is an effort to clarify when testing is required. The requested change is as follows:

> 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 to demonstrate compliance with the permit limits in this section. If the generators do not burn liquid fuel for more than 400 hours, VE testing is not required (See Condition No. B.10).

12. *Section IV, CAIR Part Form, Table:* Emissions units (EU) -001, -002, -003 and 004 are regulated under the Clean Air Interstate Rule and the EPA Unit ID Number has already been established/assigned to these units by the Clean Air Market Division for the CAIR Program. The requested changes are reflected in the table below.

E.U. ID No.	E.U. ID No.	Brief Description
-001	~~TBE~~ 1A & 1B	Bayboro Peaking Unit #1 Gas Turbine
-002	~~TBE~~ 2A & 2B	Bayboro Peaking Unit #2 Gas Turbine
-003	~~TBE~~ 3A & 3B	Bayboro Peaking Unit #3 Gas Turbine
-004	~~TBE~~ 4A & 4B	Bayboro Peaking Unit #4 Gas Turbine

~~"TBE" - to be established~~

Thank you for your assistance in finalizing the Bayboro Title V Air Operation Renewal Permit. If you have any questions, you may contact me by telephone at (727) 820-5962 or by e-mail at Chris.Bradley@pgnmail.com.

Sincerely,

Chris Bradley

Chris Bradley
Sr. Environmental Specialist
Progress Energy Florida, Inc.

Cc: Susan Machinski, E.I - DEP, South District