



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

Scott  
claim  
for  
Howard  
3/15

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BUREAU OF  
AIR REGULATION DIVISION OF AIR  
RESOURCES MANAGEMENT

Mr. Howard L. Rhodes, Director  
Division of Air Resources Management  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 30365

SUBJ: Proposed Title V Permit for FPC - Turner Power Plant

Dear Mr. Rhodes:

The purpose of this letter is to acknowledge the receipt of the State of Florida's proposed changes to the Florida Power Corporation - Turner Power Plant proposed title V permit which was the subject of a U.S. Environmental Protection Agency (EPA) title V objection on December 4, 1998. EPA Region 4 has completed its review of the proposed changes to the permit and believes that the State has adequately addressed each of the issues enumerated in the objection. Therefore, EPA considers the objection to be resolved. Once the State's proposed changes are incorporated into the permit, the State may proceed with permit issuance.

We commend your staff for facilitating the resolution of the permit issues. If you have any questions about this letter, please contact Ms. Carla E. Pierce, Chief, Operating Source Section at (404)562-9099.

Sincerely,

Winston A. Smith  
Director  
Air, Pesticides & Toxics  
Management Division

3/16/99 cc - Bruce Mitchell  
Scott Sheplek

*File*



# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

March 1, 1999

Mr. Winston A. Smith, Director  
Air, Pesticides and Toxics Management Division  
United States Environmental Protection Agency  
Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-8909

Re: Proposed Changes to the PROPOSED Title V Permit for the Florida Power Corporation Turner Power Plant to Satisfy EPA Objections  
Title V Permit No.: 1270020-001-AV

Dear Mr. Smith:

This letter is to document changes that the Department proposes to satisfy EPA Region 4's objections to Florida's PROPOSED Title V Permit for the Florida Power Corporation Turner Power Plant. The objection was detailed in a letter from EPA Region 4 dated December 8, 1998, in which EPA indicated the primary basis for the objection was that the permit does not meet the periodic monitoring requirements of 40 CFR 70.6(a)(3)(i). Also, the objection letter requested a change in the EPA Region 4 address and to correct the Acid Rain ORIS code identification number.

The change proposed in this letter results primarily from a February 18, 1999 letter sent to Mr. Scott M. Sheplak from Mr. Scott Osbourn with Florida Power Corporation and a phone discussion with Ms. Gracy R. Danois of your staff. The letter provided the highest individual unit's historical annual hours of operation and the visible emissions test results while firing fuel oil since 1992 in order to help us respond to and resolve the objection; and, the phone conversation enabled us to identify the changes that could be made to the Statement of Basis and the permit that would allow Florida to issue the FINAL Title V Permit for this plant.

Please review the following proposed changes to the Statement of Basis and the referenced permit. If you concur with our changes, we will issue the FINAL Permit with these changes. The following items and changes are presented in the same order as listed in the December 8, 1998 letter cited above.

- I. EPA Objection Issue
- 1. Periodic Monitoring.

We will add the following proposed paragraph to the Statement of Basis to show that the highest individual emissions unit's historical annual hours of operation and the visible emissions test results while firing fuel oil provide justification for retaining the existing appropriate visible emissions testing frequency, which is required when an individual emissions unit exceeds 400 hours per federal fiscal year of operation while firing fuel oil, and to consider this approach as satisfying periodic monitoring.

Mr. Winston A. Smith  
Response Letter to EPA Region 4 Objection Letter on a PROPOSED Title V Permit  
Florida Power Corporation: Turner Power Plant  
Title V Permit No.: 1270020-001-AV  
Page 2 of 2

The Department has determined that the appropriate visible emissions (VE) testing frequency for the four combustion turbines is a VE test upon exceeding 400 hours of operation on fuel oil in any given federal fiscal year (October 1 through September 30). This frequency is justified by the low historical operational use of fuel oil for these units and the previous VE tests which documented compliance while firing fuel oil. The maximum hours of operation on fuel oil for any single combustion turbine at the Turner facility were 208 hours in 1992, 124 hours in 1993, 161 hours in 1994, 203 hours in 1995, 190 hours in 1996, 126 hours in 1997, and 573 in 1998. Moreover, no Method 9 tests since 1992 on these four units have resulted in an opacity measurement greater than 6%, about 25% of the applicable standard.

II. General Comments

1. Section II. Facility-wide Condition No. 11.:

We will replace "Operating Source Section" with "Air & EPCRA Enforcement Branch, Air Compliance Section".

2. Section IV.

We will change the Acid Rain ORIS Code from "8049" to "629".

All parties involved have been expeditiously seeking resolution of these issues. We feel that EPA's concerns have been adequately addressed and we look forward to issuing the FINAL Title V permit. Please advise as soon as possible if you concur with the specific changes detailed above. Please call me at 850/921-9503 if you have any questions. You may also contact Mr. Scott M. Sheplak, P.E., at 850/921-9532, if you need any additional information.

Sincerely,



C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

Attachment

CF/bm

cc: Howard L. Rhodes  
Scott M. Sheplak  
Bruce Mitchell  
Pat Comer, Esq.  
Gracy R. Danois, EPA  
Scott Osbourn, FPC  
Robert Manning, Esq., HGSS

Barbara file



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

January 8, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: EPA Objection to PROPOSED Title V Permit No. 1270020-002-AV  
Facility Name: Turner Power Plant

Dear Mr. Pardue:

On December 8, 1998, the Department received a timely written objection from the United States Environmental Protection Agency to the referenced proposed permit. A copy of EPA's objection is attached.

In accordance with Section 403.0872(8), Florida Statutes (F.S.), the Department must not issue a final permit until the objection is resolved or withdrawn. Pursuant to Section 403.0872(8), F.S., the applicant may file a written reply to the objection within 45 days after the date on which the Department serves the applicant with a copy of the objection. The written reply must include any supporting materials that the applicant desires to include in the record relevant to the issues raised by the objection. The written reply must be considered by the Department in issuing a final permit to resolve the objection of EPA. Please submit any written comments you wish to have considered concerning the objection to Mr. Scott M. Sheplak, P.E., at the above letterhead address.

Pursuant to 40 CFR 70.8(c)(4), the Department will have to resolve the objection by issuing a permit that satisfies EPA within 90 days of the objection, or EPA will assume authority for the permit.

If you should have any other questions, please contact Mr. Scott M. Sheplak, P.E., at 850/921-9532.

Sincerely,

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

CHF/bm

Enclosure

cc: Len Kozlov, CD w/enclosure  
Pat Comer, OGC w/enclosure  
Douglas Neeley, USEPA w/o enclosure  
Carla Pierce, USEPA w/o enclosure

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION 4  
 ATLANTA FEDERAL CENTER  
 61 FORSYTH STREET  
 ATLANTA, GEORGIA 30303-8960

DEC 04 1998

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Howard L. Rhodes, Director  
 Air Resources Management Division  
 Florida Department of Environmental Protection  
 Mail Station 5500  
 2600 Blair Stone Road  
 Tallahassee, Florida 32399-2400

DEC 04 1998  
 DIVISION OF AIR  
 RESOURCES MANAGEMENT

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DEC 04 1998

SUBJ: EPA's Review of Proposed Title V Permit  
 Florida Power Corporation  
 Turner Power Plant  
 Permit No. 1270020-001-AV

BUREAU OF  
 AIR REGULATION

Dear Mr. Rhodes:

The purpose of this letter is to provide comments to the Florida Department of Environmental Protection (DEP) on the proposed title V operating permit for Florida Power Corporation, Turner Power Plant, which was posted on DEP's web site on October 21, 1998. Based on the Environmental Protection Agency's (EPA's) review of the proposed permit and the supporting information for this facility, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. § 70.8(c) (see also Florida Regulation 62-213.450), to the issuance of the title V permit for this facility. The basis of EPA's objection is that the permit does not fully meet the periodic monitoring requirements of 40 C.F.R. § 70.6(a)(3)(i).

Section 70.8(c) requires EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information) if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 C.F.R. Part 70. Section 70.8(c)(4) and Section 505(c) of the Act further provide that if the State fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA and EPA will act accordingly. Because the objection issues must be fully addressed within the 90 days, we suggest that the revised permit be submitted in

## Enclosure

U.S. EPA Region 4 Objection  
Proposed Part 70 Operating Permit  
Florida Power Corporation  
Turner Power Plant  
Permit no. 1270020-001-AV

### I. EPA Objection Issue

Periodic Monitoring: The permit does not require sufficient periodic monitoring to ensure compliance with the applicable opacity standard. The permit for FPC-Turner only requires an annual one hour Method 9 visible emissions reading. In most cases, this does not constitute adequate periodic monitoring to ensure continuous compliance with the opacity standard. The permit must require the source to conduct visible emissions observations on a daily basis when burning fuel oil, or a technical demonstration must be included in the statement of basis explaining why the State has chosen not to require any additional visible emissions testing. The demonstration needs to identify the rationale for basing the compliance certification on data from a short-term test performed once a year.

### II. General Comments

1. Section II, condition 11: Replace "Operating Source Section" with "Air & EPCRA Enforcement Branch, Air Compliance Section."
2. Section IV: The ORIS code indicated on the phase II part is not consistent with the table of affected sources prepared by the Acid Rain Division (Section 10, "Phase II Permit Writers Guide"). The ORIS code indicated in the guide is 629. The code identified in the permit appears to be the one for the Intercessions City Plant (as per the Phase II permit application). Please correct this or notify us if our records are incorrect.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

DEC 04 1998

copy: Scott  
Grove original

claim  
at Howard  
RECEIVED 12/7

4APT-ARB

Howard L. Rhodes, Director  
Air Resources Management Division  
Florida Department of Environmental Protection  
Mail Station 5500  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

DEC 07 1998  
DIVISION OF AIR  
RESOURCES MANAGEMENT

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DEC 08 1998

BUREAU OF  
AIR REGULATION

SUBJ: EPA's Review of Proposed Title V Permit  
Florida Power Corporation  
Turner Power Plant  
Permit No. 1270020-001-AV

Dear Mr. Rhodes:

The purpose of this letter is to provide comments to the Florida Department of Environmental Protection (DEP) on the proposed title V operating permit for Florida Power Corporation, Turner Power Plant, which was posted on DEP's web site on October 21, 1998. Based on the Environmental Protection Agency's (EPA's) review of the proposed permit and the supporting information for this facility, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. § 70.8(c) (see also Florida Regulation 62-213.450), to the issuance of the title V permit for this facility. The basis of EPA's objection is that the permit does not fully meet the periodic monitoring requirements of 40 C.F.R. § 70.6(a)(3)(i).

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advance in order that any outstanding issues may be addressed prior to the expiration of the 90-day period.

Pursuant to 40 C.F.R. § 70.8(c), this letter and its enclosure contain a detailed explanation of the objection issue and the changes necessary to make the permit consistent with the requirements of 40 C.F.R. Part 70. The enclosure also contains general comments applicable to the permit.

If you have any questions or wish to discuss this further, please contact Ms. Carla E. Pierce, Chief, Operating Source Section at (404) 562-9099. Should your staff need additional information they may contact Ms. Gracy R. Danois, Florida Title V Contact, at (404) 562-9119, or Ms. Lynda Crum, Associate Regional Counsel, at (404) 562-9524.

Sincerely,



Winston A. Smith  
Director  
Air, Pesticides & Toxics  
Management Division

Enclosure

cc: Mr. W. Jeffrey Pardue, Director  
Environmental Services Dept.  
Florida Power Corporation



## Enclosure

U.S. EPA Region 4 Objection  
Proposed Part 70 Operating Permit  
Florida Power Corporation  
Turner Power Plant  
Permit no. 1270020-001-AV

### I. EPA Objection Issue

Periodic Monitoring: The permit does not require sufficient periodic monitoring to ensure compliance with the applicable opacity standard. The permit for FPC-Turner only requires an annual one hour Method 9 visible emissions reading. In most cases, this does not constitute adequate periodic monitoring to ensure continuous compliance with the opacity standard. The permit must require the source to conduct visible emissions observations on a daily basis when burning fuel oil, or a technical demonstration must be included in the statement of basis explaining why the State has chosen not to require any additional visible emissions testing. The demonstration needs to identify the rationale for basing the compliance certification on data from a short-term test performed once a year.

### II. General Comments

1. Section II, condition 11: Replace "Operating Source Section" with "Air & EPCRA Enforcement Branch, Air Compliance Section."
2. Section IV: The ORIS code indicated on the phase II part is not consistent with the table of affected sources prepared by the Acid Rain Division (Section 10, "Phase II Permit Writers Guide"). The ORIS code indicated in the guide is 629. The code identified in the permit appears to be the one for the Intercessions City Plant (as per the Phase II permit application). Please correct this or notify us if our records are incorrect.

## ELECTRONIC TRANSMISSION

Date: November 18, 1998

To: Scott Sheplak, FDEP - Tallahassee

From: Gracy R. Danois, EPA Region 4

Subject: Initial Comments on Proposed Title V Permit  
Florida Power Corporation - Turner Plant  
Permit no. 1270020-001-AV

Below are initial comments from EPA Region 4 on the above referenced source. Our comments are divided into two categories: 1) Significant Comments and 2) General Comments. Significant comments are defined as those comments that would trigger an objection under 40 CFR Part 70. Given that EPA has several significant comments on this proposed permit, we would like to attempt resolution of all issues in order to avoid a formal objection on this permit. If resolution of our significant comments is not achieved, EPA Region 4 will issue an objection to the proposed permit pursuant to 40 CFR 70.8(c) on or before day-45 of the review period. For purposes of this permit review, day-45 is defined as December 2, 1998.

Another option available to you is withdrawal of the proposed permit from EPA review. If you choose to utilize this option, you must submit to EPA a written request that the permit be withdrawn including a statement that a proposed permit will be resubmitted for EPA review at a later date. Your written request to withdraw the proposed permit must be submitted to our office by no later than December 2, 1998.

1) Significant Comments

a. The permit does not require sufficient periodic monitoring to ensure compliance with the applicable opacity standard. The permit for FPC-Turner only requires an annual one hour Method 9 visible emissions reading. In most cases, this does not constitute adequate periodic monitoring to ensure continuous compliance with the opacity standard. We recommend that the source be required to conduct visible emissions observations on a daily basis when burning fuel oil, or that a technical demonstration is included in the statement of basis explaining why the State has chosen not to require any additional visible emissions testing.

2) General Comments

a. Section II, condition 11: Replace "Operating Source Section" with "Air & EPCRA Enforcement Branch, Air Compliance Section."

b. The ORIS code indicated on the phase II part is not consistent with the table of affected sources prepared by the Acid Rain Division (Section 10, "Phase II Permit Writers Guide"). The ORIS code indicated in the guide is 629. The code identified in the permit appears to be the one for the Intercessions City Plant (as per the Phase II permit application). Please correct this or notify us if our records are incorrect.

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 21-Oct-1998 04:46pm  
**From:** Mary Fillingim TAL  
FILLINGIM\_M  
**Dept:** Air Resources Management  
**Tel No:** 850/488-0114

**To:** See Below  
**Subject:** Updated Permit Posting #1270020

There is a Proposed Permit posted on Florida's website.

1270020001AV  
FPC-TURNER PLANT

Proposed

If you have any questions, please feel free to contact me.

Thanks, \_Mary

## Distribution:

<b>To:</b> adams yolanda	( adams.yolanda@epamail.epa.gov@in )
<b>To:</b> pierce carla	( pierce.carla@epamail.epa.gov@in )
<b>To:</b> Barbara Boutwell TAL	( BOUTWELL_B )
<b>To:</b> Scott Sheplak TAL	( SHEPLAK_S )
<b>To:</b> Terry Knowles TAL	( KNOWLES_T )
<b>To:</b> danois gracy	( danois.gracy@epamail.epa.gov@in )
<b>To:</b> Elizabeth Walker TAL	( WALKER_E )
<b>CC:</b> Bruce Mitchell TAL	( MITCHELL_B )

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 09-Oct-1998 07:50am  
**From:** Mary Fillingim TAL  
FILLINGIM\_M  
**Dept:** Air Resources Management  
**Tel No:** 850/488-0114

**To:** See Below  
**Subject:** New Posting #1270020

There is a new posting on Florida's website.

1270020001AV  
FPC-TURNER PLANT

Proposed

The notification letter is encoded and attached. If you have any questions, please feel free to contact me.

Thanks,  
Mary

## Distribution:

<b>To:</b>	adams yolanda	( adams.yolanda@epamail.epa.gov@in )
<b>To:</b>	pierce carla	( pierce.carla@epamail.epa.gov@in )
<b>To:</b>	Barbara Boutwell TAL	( BOUTWELL_B )
<b>To:</b>	Scott Sheplak TAL	( SHEPLAK_S )
<b>To:</b>	Terry Knowles TAL	( KNOWLES_T )
<b>To:</b>	danois gracy	( danois.gracy@epamail.epa.gov@in )
<b>To:</b>	Elizabeth Walker TAL	( WALKER_E )
<b>CC:</b>	Bruce Mitchell TAL	( MITCHELL_B )