



RECEIVED

SEP 16 2003

Progress Energy Florida, Inc  
Bayboro Plant  
160 13<sup>th</sup> Ave., S.  
St. Petersburg, FL 33701

DIVISION OF AIR  
RESOURCE MANAGEMENT

Bruce M. Baldwin  
Vice President  
CT – Operations Department  
(727) 826-4201

September 10, 2003

Mr. Howard Rhodes, Director  
Florida Department of Environmental Protection  
Division of Air Resource Management  
2600 Blair Stone Rd. MS 5500  
Tallahassee, FL 32399-2400

Subject: Alternate Responsible Officials: Title V Air Permits

Dear Mr. Rhodes:

This letter is intended to delegate the alternate "responsible officials" for Title V air permits for Florida Power Corporation d/b/a Progress Energy Florida combustion turbine facilities. All delegations are made in accordance with a corporate procedure, and each person is duly qualified in accordance with applicable statute and regulation. The delegations being made today are noted on Attachment 1. Each facility will submit a Department of Environmental Protection form 62-213.900(8) at a later date.

By copy of this letter, notification of this delegation is provided to individuals newly authorized to sign on behalf of the company. This letter supersedes and negates any previous correspondence relating to the responsible officials for these facilities. Delegations for Progress Energy facilities not referenced in this letter and provided to you previously are not changed.

Very truly yours,

Bruce M. Baldwin  
Vice President – Combustion Turbine Operations

Attachment

C: Mr. Reginald D. Anderson  
Mr. Ernie L. Bass  
Mr. Paul V. Crimi  
Mr. Martin J. Drango  
Mr. William Dudley  
Mr. Kris Edmondson  
Mr. Wilson B. Hicks, Jr.  
Mr. David R. Karp  
Mr. J. Michael Kennedy  
Mr. Leonard Kozlov (FL-DEP)  
Mr. George Kerst  
Mr. Mike W. Lentz  
Mr. Dennis A. Merrick  
Mr. Scott Sheplak (FL-DEP)  
Mr. Roger B. Zirkle

**Attachment 1**  
**Progress Energy Florida Combustion Turbine**  
**Title V Responsible Officials**

<b>Facility</b>	<b>Current RO: Plant Managers</b>	<b>Alternate: General Manager CT Operations</b>	<b>Alternate: Production Managers - CT</b>	<b>Alternate: DR if applicable</b>
Avon Park	Kris Edmondson	Paul V. Crimi	William Dudley	
Bayboro	Mike W. Lentz	Paul V. Crimi	David R. Karp	
DeBary	Martin J. Drango	Paul V. Crimi	Reginald D. Anderson	J. Michael Kennedy
Higgins	Mike W. Lentz	Paul V. Crimi	David R. Karp	
Hines	Roger B. Zirkle	Paul V. Crimi	George Kerst	J. Michael Kennedy
Intercession City	Kris Edmondson	Paul V. Crimi	William Dudley	J. Michael Kennedy
Rio Pinar	Martin J. Drango	Paul V. Crimi	Reginald D. Anderson	
Tiger Bay	Roger B. Zirkle	Paul V. Crimi	Dennis A. Merrick	J. Michael Kennedy
Turner	Martin J. Drango	Paul V. Crimi	Reginald D. Anderson	
University of Florida Cogen	Wilson B. Hicks, Jr.	Paul V. Crimi	Ernie L. Bass	J. Michael Kennedy



September 11, 2003

RECEIVED

SEP 16 2003

DIVISION OF AIR  
RESOURCE MANAGEMENT

Mr. Michael Cooke, Director  
Florida Department of Environmental Protection  
Division of Air Resource Management  
2600 Blair Stone Rd. MS 5500  
Tallahassee, FL 32399-2400

Subject: Additional Responsible Officials for Title V – Florida Power Corporation d/b/a  
Progress Energy Florida DeBary Plant, Turner Plant and Rio Pinar Plant

Dear Mr. Cooke:

As the Responsible Official for the DeBary Plant, the Turner Plant and the Rio Pinar Plant, I am submitting a Department of Environmental Protection form 62-213.900(8) for each plant to identify additional Responsible Officials.

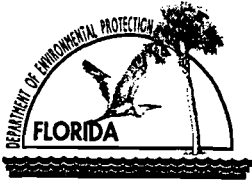
If you have any questions, please contact me at (386) 668-5103.

Very truly yours,

Martin J. Drango, P.E.

Attachments

- c: Mr. Reginald D. Anderson
- Mr. Paul V. Crimi
- Mr. J. Michael Kennedy
- Mr. Leonard Kozlov (FL-DEP)
- Mr. Scott Sheplak (FL-DEP)



# Department of Environmental Protection RECEIVED

## Division of Air Resource Management RESPONSIBLE OFFICIAL NOTIFICATION FORM

SEP 16 2003

DIVISION OF AIR  
RESOURCE MANAGEMENT

**Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.**

**Identification of Facility**

1. Facility Owner/Company Name: Florida Power Corporation d/b/a Progress Energy Florida, Inc.	
2. Site Name: <b>Turner Plant</b>	3. County: Volusia County
4. Title V Air Operation Permit/Project No. <i>(leave blank for initial Title V applications)</i> : 1270020-001-AV	

**Notification Type** *(Check one or more)*

<input type="checkbox"/>	<b>INITIAL:</b>	Notification of responsible officials for an initial Title V application.
<input type="checkbox"/>	<b>RENEWAL:</b>	Notification of responsible officials for a renewal Title V application.
<input checked="" type="checkbox"/>	<b>CHANGE:</b>	Notification of change in responsible official(s).
Effective date of change in responsible official(s) <u>September 10, 2003</u>		

**Primary Responsible Official**

1. Name and Position Title of Responsible Official: Martin J. Drango – Plant Manager North CT Sites	11-20-03 ARMS Updated, B...
2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc. Street Address: 100 Central Ave. Mail Code DB44 City: St. Petersburg State: FL Zip Code: 33701	
3. Responsible Official Telephone Numbers: Telephone: (386) 668-5103 Fax: (407) 646-8370	
4. Responsible Official Qualification <i>(Check one or more of the following options, as applicable)</i> : <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.	

5. Responsible Official Statement:

*I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.*

*Martin J. Drango*  
\_\_\_\_\_  
Signature

*09/11/03*  
\_\_\_\_\_  
Date

**Additional Responsible Official**

1. Name and Position Title of Responsible Official: Reginald D. Anderson, Production Manager – CT
2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc. Street Address: 100 Central Ave. Mail Code DB44 City: St. Petersburg State: FL Zip Code: 33701
3. Responsible Official Telephone Numbers: Telephone: (386)668-5103 Fax: (407) 646-8370
4. Responsible Official Qualification ( <i>Check one or more of the following options, as applicable</i> ): <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.

11-20-03  
ARMS Updated  
Blum

**Additional Responsible Official**

1. Name and Position Title of Responsible Official: Paul V. Crimi, General Manager CT Operations
2. Responsible Official Mailing Address: Organization/Firm: Progress Energy Florida, Inc. Street Address: 100 Central Ave. Mail Code BB1C City: St. Petersburg State: FL Zip Code: 33701
3. Responsible Official Telephone Numbers: Telephone: (727) 826-4224 Fax: (727) 826-4222
4. Responsible Official Qualification ( <i>Check one or more of the following options, as applicable</i> ): <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.

11-20-03  
ARMS Updated  
Blum

*Title Copy*

Florida Department of

**Environmental Protection**

**Memorandum**

TO: Len Kozlov, CD

FROM: Bruce Mitchell *RM*

DATE: January 22, 1997

SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit  
Florida Power Corporation, G.E. Turner: 1270020-001-AV

The Title V operating permit application package for the referenced facility is being processed in Tallahassee. The application was previously forwarded to your office for your files and future reference. Please have someone review the package for completeness and respond in writing by February 21, 1997, if you have any comments. Otherwise, no response is required. If there are any questions, please call the project engineer, Charles Logan, at 904/488-1344 or SC:278-1344. It is very important to verify the compliance statement regarding the facility. Since we do not have a readily effective means of determining compliance at the time the application was submitted, please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. Also, do not write on the documents.

If there are any questions regarding this request, please call me or Scott Sheplak at the above number(s).

RBM/bm

cc: Alan Zahm

*1/22/97 - Title Copy*  
*Charles Logan*  
*Title V Reading File*

## Appendix H-1, Permit History/ID Number Changes

Florida Power Corporation  
G. E. Turner

Facility ID No.: 1270020

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### **Permit History (for tracking purposes):**

E.U.

<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u>	<u>Revised Date(s)</u>
-003	FFSG Unit #3 Stack "A"	AO64-185095	10/31/90	09/25/95	8/14/96	
-004	FFSG Unit #3 Stack "B"	AO64-185095	10/31/90	09/25/95	8/14/96	
-005	Unit #4 - Stack "A"	AO64-185095	10/31/90	09/25/95	8/14/96	
-006	Unit #4 - Stack "B"	AO64-185095	10/31/90	09/25/95	8/14/96	
-009	Peaking Unit #3 Oil Fired Gas Turbine	AO64-176745	07/03/90	01/15/96		
-010	Peaking Unit #4 Oil Fired	AO64-176745	07/03/90	01/15/96		
-011	Peaking Gen. Turbine P1	AO64-176745	07/03/90	01/15/96		
-012	Peaking Gen. Turbine P2	AO64-176745	07/03/90	01/15/96		

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### **(if applicable) ID Number Changes (for tracking purposes):**

From: Facility ID No.: 30ORL640020

To: Facility ID No.: 1270020

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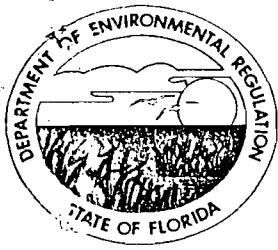
### Notes:

1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.

2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}





# Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767 • 407-894-7555

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary  
Alex Alexander, Deputy Assistant Secretary

## NOTICE OF PERMIT

Florida Power Corporation  
Post Office Box 14042  
St. Petersburg, Florida 33733

Attention: Patsy Y. Baynard,  
Director, Environmental and  
Licensing Affairs

Volusia County - AP  
Turner Power Plant Units 2, 3, and 4

Dear Ms. Baynard:

Enclosed is Permit Number A064-185095, dated 12-26-85, to change the permit conditions, issued pursuant to Section 403.087, Florida Statutes.

Persons whose substantial interest are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing), unless the right to petition has been waived. The petition must conform to the requirements of Chapters 17-103 F.A.C., and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee 32399-2400, within fourteen (14) days of receipt of this notice. Failure to file a petition within that time constitutes a waiver of any right such person has to an administrative determination pursuant to Section 120.57, Florida Statutes.

The petition shall contain the following information; (a) the name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the department's action or proposed action; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action or proposed action.

This Order (Permit) is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraph. Upon the timely filing of a petition this Permit will not be effective until further Order of the Department.

Any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

*10/3* *Alexander*  
A. Alexander  
Deputy Assistant Secretary  
3319 Maguire Boulevard  
Suite 232  
Orlando, Florida 32803

FILING AND ACKNOWLEDGMENT  
FILED, on this date, pursuant to  
Section 120.52, Florida Statutes,  
with the designated Department  
Clerk, receipt of which is hereby  
acknowledged.

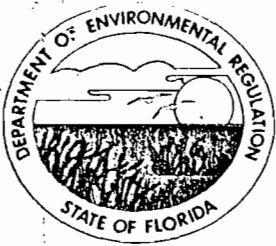
*E. B. Williams*      *12/27/90*  
Clerk                              Date

AA/jtc *J*

Copies furnished to:  
Barry Appleby

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on *12-27-90* to the listed persons, by *D. Jones*.



# Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767 • 407-894-7555

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary  
Alex Alexander, Deputy Assistant Secretary

Permittee:  
Florida Power Corporation  
Post Office Box 14042  
St. Petersburg, Florida 33733

Attention: Patsy Y. Baynard  
Director, Environmental and  
Licensing Affairs

I.D. Number:  
Permit/Certification  
Number: A064-185095  
Date of Issue:  
Expiration Date: 09/25/95  
County: Volusia  
Latitude/Longitude:  
28°52'14"N/81°16'03"W  
UTM: 17-473.39 KmE; 3193.0 KmN  
Project: Turner Power Plant  
Units 2, 3, and 4

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

The permittee can operate Turner Power Plant Units No. 2, 3, and 4 which are fossil fuel steam generators fired by Natural Gas, No. 6 Fuel Oil, or on - specification used oil.

These sources are located at DeBary Drive in Enterprise, Volusia County, Florida.

General Conditions are attached to be distributed to the permittee only.

PERMITTEE:  
Florida Power Corporation  
  
Attention: P.Y. Baynard, Director  
Environmental and Licensing Affairs

I.D. Number:  
Permit/Certification Number:  
AO64-185095  
Date of Issue:  
Expiration Date: 09/25/95

GENERAL CONDITIONS:

16. No objectionable odors will be allowed, as per Rule 17-2.620(2), F.A.C.
17. All unconfined emissions of particulate matter generated at this site shall be adequately controlled (Rule 17-2.610(3), F.A.C.). Area must be watered down should unconfined emissions occur.
18. This permit does not preclude compliance with any applicable local permitting requirements and regulations.

SPECIFIC CONDITIONS:

OPERATING CONDITIONS

1. Each source is permitted to operate 8760 hours/year.
2. Each source will be fired with Natural Gas, No. 6 Fuel Oil, or on - specification used oil.
3. The permitted Heat input rates are as follows:
  - a) Unit No. 2 - Oil - 360 MMBTU/hour  
Natural Gas - 380 MMBTU/hour
  - b) Unit No. 3 - Oil - 820 MMBTU/hour  
Natural Gas - 840 MMBTU/hour
  - c) Unit No. 4 - Oil - 820 MMBTU/hour  
Natural Gas - 840 MMBTU/hour

PERMITTEE:  
 Florida Power Corporation  
 Attention: P.Y. Baynard, Director  
 Environmental and Licensing Affairs

I.D. Number:  
 Permit/Certification Number:  
 AO64-185095  
 Date of Issue:  
 Expiration Date: 09/25/95

SOURCE EMISSION LIMITING STANDARDS AND  
 COMPLIANCE TESTING REQUIREMENTS

4.

Pollutant	Emission Standards [1]	Testing Frequency [2]			Test Method [3]
		Annual	Semi-Annual	Monthly	
Particulate Matter					
- Steady-State	0.1 lb/MMBtu	Units 2,3	Unit 4	-	EPA Method 5 or 17*
- Sootblowing	0.3 lb/MMBtu; Max. 3 hrs.	Units 2,3,4	-	-	EPA Method 5 or 17*
Sulfur Dioxide	2.75 lb/MMBtu	-	-	Units 2,3,4	Fuel Analysis
Visible Emissions					
- Steady-State	20% Opacity 40% Opacity	Unit 2 Units 3,4	- -	- -	DER Method 9
- Sootblowing	60% Opacity for up to 3 hrs in 24 hrs, with up to 4 six - min. periods of up to 100% if unit has an operational opacity CEM	Units 2,3,4	-	-	DER Method 9
- Load Changing	60% Opacity for up to 3 hrs in 24 hrs, with up to 4 six - min. periods of up to 100% if unit has an operational opacity CEM	-	-	-	-
* EPA Method 17 may be used only if the stack temperature is less than 375°					

PERMITTEE:  
Florida Power Corporation  
  
Attention: P.Y. Baynard, Director  
Environmental and Licensing Affairs

I.D. Number:  
Permit/Certification Number:  
AO64-185095  
Date of Issue:  
Expiration Date: 09/25/95

- [1] F.A.C. 17-2.600(5) and F.A.C. 17-2.250(3)
- [2] F.A.C. 17-2.700(2)
- [3] F.A.C. 17-2.700(1)(d)

- a) Turner unit No. 2 shall test particulates (steady-state) and visible emissions annually with a 20% opacity limit, except for one two - minute period per hour during which opacity shall not exceed 40 percent. The required annual testing shall be conducted at yearly intervals and within 30 days after the unit is returned to service.
  - b) Turner Unit No. 3 will conduct a compliance test for steady state particulate emission annually from the date of March 19, 1990.
  - c) Turner Unit No. 4 will conduct two compliance tests for steady-state particulate emissions in each calendar year. One compliance test shall be conducted nominally during February for the first six months of the calendar year and the second compliance test shall be conducted nominally during August for the second six months of the calendar year and at least sixty (60) days after the first test was conducted.
  - d) Turner Units No. 3 and 4 will not exceed visible emissions of forty (40) percent opacity, except as provided in Florida Administrative Code Rule 17-2.250 F.A.C.
5. Testing of emissions should be conducted using No. 6 fuel oil and with the source operating within 90 to 100% of its rated capacity. Testing may be conducted at less than 90% of rated capacity; however, operation is then limited to the tested capacity with this limitation, operation at higher capacities is allowed for a cumulative total of no more than fifteen days for purposes of additional compliance testing to regain rated capacity in the permit, with prior notification to the department.
6. This office (Florida Department of Environmental Regulation, Air Permitting, Orlando) shall be notified at least fifteen (15) days in advance of the compliance tests so that we can witness them (Rule 17-2.700(2)(a)5, F.A.C.).
7. The required test report shall be filed with the department as soon as practical but no later than 45 days after the last sampling run of each test is completed (Rule 17-2.700(7)(a),(b) and (c), F.A.C.).
8. The stack sampling facility must comply with Rule 17-2.700(4) Florida Administrative Code before the next stack test.

PERMITTEE:  
Florida Power Corporation  
Attention: P.Y. Baynard, Director  
Environmental and Licensing Affairs

I.D. Number:  
Permit/Certification Number:  
AO64-185095  
Date of Issue:  
Expiration Date: 09/25/95

9. Excess emissions resulting from startup or shutdown shall be permitted, provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions is minimized.

Excess emissions resulting from malfunction shall be permitted providing

- (1) best operational practices to minimize emissions are adhered to and
- (2) the duration of excess emissions is minimized but in no case exceeds two hours in any 24-hour period unless specifically authorized by the department for longer duration.

REPORTS

10. Each calendar year on or before March 1, submit for each source, an Annual Operations Report DER Form 17-1.202(6) for the preceding calendar year in accordance with Rule 17-4.14, F.A.C.
11. Submit for this source quarterly reports showing the types of fuels used in the operation of this source. Also state the sulfur content of each fuel on a monthly basis.

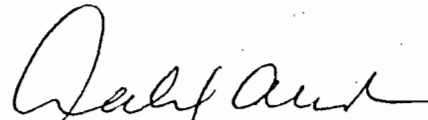
EXPIRATION DATE

12. An operation permit renewal must be submitted at least 60 days prior to the expiration date of this permit (Rule 17-4.09, F.A.C.).

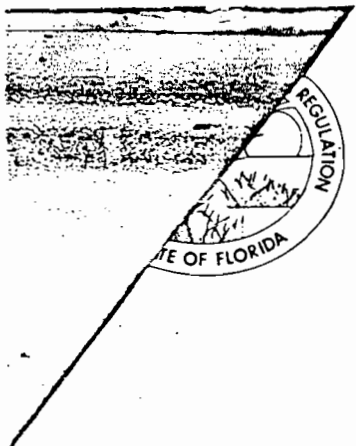
ISSUED

12-26-50

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION



A. Alexander  
Deputy Assistant Secretary  
3319 Maguire Boulevard  
Suite 232  
Orlando, Florida 32803



# Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767 • 407-894-7555

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary  
Alex Alexander, Deputy Assistant Secretary

September 20, 1990

Florida Power Corporation  
Post Office Box 14042  
St. Petersburg, Florida 33733

Attention: Patsy Y. Baynard, Director  
Environmental & Licensing

Volusia County - AP  
Combustion Turbine Peaking Units  
No. 1, 2, 3, and 4 - Turner Plant  
Permit No. AO64-176745  
Change of Conditions

Dear Ms. Baynard:

We are in receipt of your request for a change of the permit conditions. The conditions are changed as follows:

CONDITION

Specific Condition No. 3

FROM

The maximum permitted heat input rates are 322 MMBTU/hr at 59°F for units No. 1 and 2, and 865 MMBTU/hr at 59°F for units No. 3 and 4.

TO

The maximum permitted heat input rates are 278 MMBTU/hr at 59°F for units No. 1 and 2, and 930 MMBTU/hr at 59°F for units No. 3 and 4. At other ambient temperatures, the units will operate in accordance with established performance curves, which will be made available at the site during compliance testing.



Florida Power Corporation  
Patsy Y. Baynard, Director  
Environmental & Licensing  
Permit No. A064-176745  
Change of Conditions

CONDITION

Specific Condition No. 7

FROM

Units No. 3 and 4 must be tested for visible emissions at yearly intervals from the date of August 16, 1989, in accordance with Rule 17-2.700(6)(b)9, (DER Method 9) F.A.C.

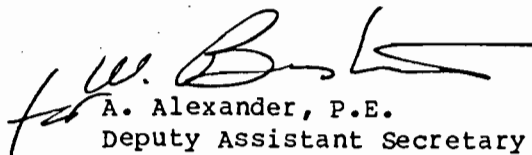
TO


Units No. 3 and 4 must be tested for visible emissions at yearly intervals from the date of January 18, 1990, in accordance with Rule 17-2.700(6)(b)9, (DER Method 9) F.A.C..

All other conditions remain the same.

This letter must be attached to your permit and becomes a part of that permit.

Sincerely,

  
A. Alexander, P.E.  
Deputy Assistant Secretary

AA/azj 



# Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767 • 407-894-7555

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary  
Alex Alexander, Deputy Assistant Secretary

**Permittee:**

Florida Power Corporation  
Post Office Box 14042  
St. Petersburg, Florida 33733

Attention: Patsy Y. Baynard, Director  
Environmental & Licensing

**I. D. Number:**

Permit/Certification

Number: A064-176745

Date of Issue:

Expiration Date: **June 25, 1995**

County: Volusia

Latitude/Longitude:

28°52'17"N/81°15'54"W

UTM: 17-473.44 KmE; 3193.54 KmN

Project: Combustion Turbine

Peaking Units No. 1, 2, 3, and 4-  
Turner Plant

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

The permittee can operate Combustion Turbine Peaking Units No. 1, 2, 3, and 4 which are fired by No. 2 Fuel Oil only. The maximum heat input rates are 322 MMBTU/hour at 59°F for Units No. 1 and 2, and 865 MMBTU/hour at 59°F for Units No. 3 and 4.

These sources are located at the Turner Power Plant on DeBary Drive in Enterprise, Volusia County, Florida.

General Conditions are attached to be distributed to the permittee only.

PERMITTEE:  
Florida Power Corporation  
  
Attention: Patsy Y. Baynard, Director  
Environmental & Licensing

I. D. Number:  
Permit/Certification Number:  
AO64-176745  
Date of Issue:  
Expiration Date: June 25, 1995

**GENERAL CONDITIONS:**

16. No objectionable odors will be allowed, as per Rule 17-2.620(2), F.A.C.
17. All unconfined emissions of particulate matter generated at this site shall be adequately controlled. (Rule 17-2.610(3), F.A.C.) Area must be watered down should unconfined emissions occur.
18. This permit does not preclude compliance with any applicable local permitting requirements and regulations.

**SPECIFIC CONDITIONS:**

OPERATING LIMITS

1. Each source is permitted to operate 8760 hours/year.
2. Each source will be fired with No. 2 Fuel Oil only with a maximum sulfur content of 0.5 percent by weight.
3. The maximum permitted heat input rates are 322 MMBTU/hour at 59°F for units no. 1 and 2 and 865 MMBTU/hour at 59°F for units no. 3 and 4.
4. Each calendar year on or before March 1, submit for each source, an Annual Operations Report DER Form 17-1.202(6) for the preceding calendar year in accordance with Rule 17-4.14, F.A.C.

EMISSION LIMITS

5. The visible emissions for each unit must comply with Rule 17-2.610(2)F.A.C. and the compliance test must be conducted in accordance with Rule 17-2.700(6)(b)9, (DER Method #9) F.A.C.

COMPLIANCE TESTING

6. Units No. 1 and 2 must be tested in accordance with DER Method 9 within 30 days after being placed back in operation and at yearly intervals thereafter.
7. Units No. 3 and 4 must be tested for visible emissions at yearly intervals from the date of August 16, 1989, in accordance with Rule 17-2.700(6)(b)9, (DER Method #9)F.A.C.
8. Oil Analysis by the applicant's fuel supplier may be used to determine compliance with the sulfur limit, if this can be substantiated with purchase order and records of usage.

PERMITTEE:  
Florida Power Corporation

Attention: Patsy Y. Baynard, Director  
Environmental & Licensing

I. D. Number:  
Permit/Certification Number:  
AO64-176745  
Date of Issue:  
Expiration Date: June 25, 1995

9. This office (Florida Department of Environmental Regulation, Air Permitting, Orlando) shall be notified at least fifteen (15) days in advance of the compliance tests so that we can witness them (Rule 17-2.700(2)(a)5, F.A.C.).
10. This plant is required to operate within 90 to 100 percent of permitted capacity during the compliance tests.
11. The type of fuel and the heat input to this source must be entered on the visible emission test report.
12. The required test report shall be filed with the department as soon as practical but no later than 45 days after the last sampling run of each test is completed (Rule 17-2.700(7)(a),(b) and (c), F.A.C.).

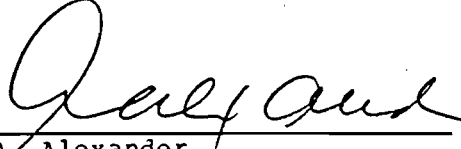
EXPIRATION DATE

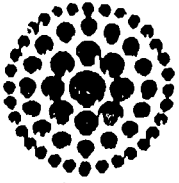
13. An operation permit renewal must be submitted at least 60 days prior to the expiration date of this permit (Rule 17-4.09, F.A.C.).

ISSUED

7-3-50

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

*Amz*  
  
A. Alexander  
Deputy Assistant Secretary  
3319 Maguire Boulevard  
Suite 232  
Orlando, Florida 32803



Florida  
Power  
CORPORATION

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SEP 26 1997

BUREAU OF  
AIR REGULATION

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SEP 25 1997

Dept. of Environmental Protection  
Office of General Counsel

September 25, 1997

Mr. Scott M. Sheplak, P.E.  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RE: Florida Power Corporation, Turner Power Plant  
DRAFT Title V Permit No. 1270020-001-AV

Dear Mr. Sheplak:

On behalf of Florida Power Corporation (FPC), attached are comments regarding the DRAFT Title V permit for the Turner Power Plant as identified above. FPC appreciates the Department's efforts in processing this permit and understands the need to resolve these issues in as timely a manner as possible. In this regard, DEP agreed to grant FPC's Request for Extension of Time to file a Petition for Administrative Hearing until October 10, 1997. If we are unable to reach a resolution of these comments by this time, we would appreciate the opportunity to file a second Request for Extension of Time. Accordingly, please contact me at (813) 866-5158 as soon as you have had a chance to review these comments to set up either a telephone or in-person conference. Thank you again for your consideration of our comments.

Sincerely,

Scott Osbourn,  
Environmental Specialist

cc: W. Jeffrey Pardue, FPC  
Clair Fancy, P.E., DEP  
Charles Logan, DEP  
Ken Kosky, P.E., Golder  
Robert Manning, HGSS

*cc: Bruce Mitchell*

**FLORIDA POWER CORPORATION  
COMMENTS ON DRAFT TITLE V PERMIT  
TURNER POWER PLANT**

**General Comments**

1. FPC understands that Appendix TV-1, Title V Conditions, is being revised. FPC request that its Title V permit reflect the most up-to-date version of this Appendix.
2. FPC understands that DEP will publish the Intent to Issue Title V Air Operation Permit. Because the applicant is ultimately responsible for the publication of the Intent to Issue, FPC requests that DEP provide a copy of the Notice intended to be published, as well as proof of publication.

**Intent to Issue Title V Air Operation Permit**

1. The description states that the FPC's Title V application for the Turner Power Plant was received on "June 13, 1996." The correct submittal date is June 14, 1997.

**Referenced attachments made part of this permit:**

1. Following document ASP Number 97-B-01, a reference should also be made to the Order Correcting Scrivener's Error, dated July 2, 1997.
2. The reference to Figure 1 - Summary Report-Gaseous and Opacity Excess Emission and Monitoring System Performance Report should be deleted because there are no CEMs at this plant and the units are not subject to 40 CFR Part 60.

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

1. Condition 2. The word "not" was apparently inadvertently added, and should be deleted from, the second line of this Condition.
2. Condition 3. For clarity and to make this Condition specific to FPC's Turner Power Plant, FPC requests that Condition 2. be edited as follows:

**~~Except as otherwise provided in this permit for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause . . . .~~**

Also, for clarification and because the reference to Chapter 62-297 in the last sentence of Condition 2. appears to be misplaced, FPC requests Condition 2. be edited as follows: **"For purposes of this Condition, EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C."**

3. Condition 6. In the context of this permit, how does DEP intend to respond to EPA's comments regarding the need to change the phrase "exempt" to "insignificant"?

4. Condition 7. For clarity, FPC requests that the first sentence of this Condition be edited as follows: "The permittee shall ~~not allow no person to store, pump, . . .~~" Also, because this condition is not included in Florida's SIP (based on our research), and to be consistent with other permits issued by DEP, this condition should be marked as "Not Federally Enforceable."

### Section III. Subsection A.

1. In the first line of the description, the reference to the Florida Administrative Code appears to be misplaced, and therefore FPC requests that this sentence be revised as follows: "~~Pursuant to Rule 62-210.300(2)(a)3.d., F.A.C.,~~ SG 2, SG 3, and SG 4 were placed on "Long Term . . . ."

2. Condition A.1. Under paragraph (a), FPC requests the correction of an apparent typographical error as follows: ". . . new No. 6 or lighter grades of fuel oils, and . . . ."

Also, the second sentence of paragraph (a), as well as all of paragraphs (b) and (c) of Condition A.1. apparently are intended to prevent annual lead emissions associated with used oil from exceeding the PSD applicability threshold for that pollutant. These new provisions should be deleted; because there is no regulatory authority for their inclusion. The rule citation and AO referenced by DEP as authority do not provide justification for placing conditions on the utilization of used oil. FPC's existing permit, and prior DEP interpretations, did not place such conditions on FPC's utilization of used oil. The co-firing of used oil does not trigger PSD applicability because the units were capable of accommodating used oil prior to January 6, 1975.

3. Condition A.8. For clarification, this Condition should be revised as follows: "Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured in accordance with Condition A.19. ~~by applicable compliance methods.~~

4. Condition A.11. The rule citation for this Condition is incorrect and should be deleted.

5. Condition A.21. The ASTM methods should be updated as follows to reflect the current methods: ". . . ASTM D4292-90 (1995), or both . . . ."

6. Condition A.25. For clarity, the first clause in paragraph (a)2. of this Condition ("When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method") should be deleted because the permit specifies the required compliance method.

7. Condition A.27. This Condition should be revised because there is no need for an annual testing requirement for units that are on stand-by. At a minimum, clarification should be provided that an annual test is not required for sulfur dioxide (which is based on fuel sampling analysis) if the unit operates less than a certain time period per year. Conditions A.28. and A.29 currently provide such an exemption for the testing requirements for visible emissions and particulate matter. The same clarification should be provided for Condition A.31.

8. Condition A.33. There is no direct authority for the inclusion of the provisions contained in this Condition. Neither FPC's existing operating permit nor the rule citations provided by DEP as authority include such conditions. In fact, certain draft provisions contained in Condition A.33. directly conflict with FPC's existing permit conditions and prior DEP interpretations that this facility was capable of accommodating this fuel prior to January 6, 1975, and therefore is exempt from PSD applicability for such activities. Therefore, FPC requests that this Condition be deleted.

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

1. Condition B.7. CTP's 1 and 2 are existing units and therefore the excess emissions provisions under Rule 62-210.700(2) and (3), F.A.C. are applicable. FPC is still in the process of researching whether CTP's 3 and 4 meet the criteria for "existing units."

2. Condition B.13. FPC requests that this condition be revised in accordance with DEP guidance titled DARM-EM-05, dated November 22, 1995, and thereby allow the capacity to be determined based on heat input/temperature curves.

3. Condition B.21. The ASTM methods should be updated as follows to reflect the current methods: ". . . ASTM D4292-90 (1995), or both . . . ."

### **Section IV. Acid Rain Part**

1. Condition 1. The reference to the Acid Rain application form should be to the form submitted by FPC for the Turner Plant, rather than generically to DEP's form.

2. Condition 4. Because this Condition applies to all requirements at the site, this Condition should be moved to the "facility-wide" section of the permit.

### **Table 1-1, Air Pollutant Allowables and Terms**

1. In accordance with the comments above, the reference in footnote 1 to the limit on used oil utilization should be deleted.

### **Tables 1-2, Summary of Air Pollutant Standards and Terms**



1. In accordance with the comments above, this Table should be deleted.

**Table 2-1, Compliance Testing Requirements**

1. The EPA test method for PM on SG 2, 3, and 4 should be revised to include methods 17, 5B, or 5F.

**Appendix E-1. list of Exempt Emissions Units and/or Activities**

1. The word "citrosolv" is misspelled. The following units/activities should be deleted from the this list because the emissions, if any, are trivial: the hazardous waste building, the lube oil storage building, and portable unleaded gasoline tank.

**Appendix U-1. List of Unregulated Emissions Units and/or Activities**

1. The surface coating and solvent cleaning activities should be moved to Appendix E-1. Also, the reference to helper cooling towers should be deleted because this site does not contain them. The reference to "emergency generator" should be made plural.



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

Scott  
claim  
for  
Howard  
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BUREAU OF  
AIR REGULATION

MAR 10 1999

DIVISION OF AIR  
RESOURCES MANAGEMENT

4APT-ARB

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.

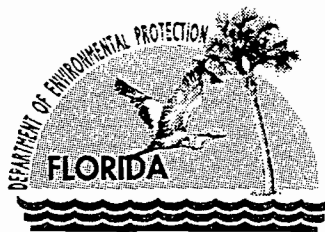
We commend your staff for facilitating the resolution of the permit issues. If you have any questions about this letter, please contact Ms. Carla E. Pierce, Chief, Operating Source Section at (404)562-9099.

Sincerely,

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

3/16/99 cc - Bruce Mitchell  
Scott Sheplek

*File*



Jeb Bush  
Governor

# Department of Environmental Protection

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.

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

*Printed on recycled paper.*

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.:

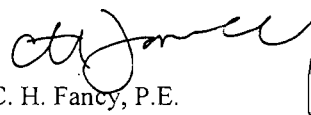
We will replace "Operating Source Section" with "Air & EPCRA Enforcement Branch, Air Compliance Section".

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



Lawton Chiles  
Governor

# Department of Environmental Protection

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

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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

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DIVISION OF AIR  
RESOURCES MANAGEMENT

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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).

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

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.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

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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 07 1998  
DIVISION OF AIR  
RESOURCES MANAGEMEN

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

DEC 08 1998

BUREAU OF  
AIR REGULATION

Dear Mr. Rhodes:

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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 )
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<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 )