

Date: 11/5/96 7:31:52 AM  
From: Alvaro Linero TAL  
Subject: Re: Florida Power Amendment Request  
To: Alan Zahm ORL  
CC: John Brown TAL  
CC: Martin Costello TAL  
CC: Charles Logan TAL

Our office has received an amendment request regarding the Debary Plant, permit AO64-233544 which had construction permit AC64-191015 issued in Tally.

The company wants a permit condition deleted and claims it is not in the construction permit. There is a notice of violation regarding this condition since the records have not been kept.

19. "The permittee shall maintain monthly records, in a permanent form suitable for inspection, documenting the sulfur content of all fuel burned. The records shall contain, at a minimum, the pounds per hour and pounds per MMBtu heat input. Compliance with SO2 shall be based on the monthly report. The records shall contain sufficient detail to allow the Department to determine whether or not the emissions were properly computed. All recorded data shall be maintained on file for a period of at least two years. The permittee shall submit a monthly summary of the averages for fuel sulfur content and sulfur dioxide emissions on a quarterly basis, within 30 days following each calendar quarter."

As this condition is not in the AC, our office can delete it. However the AC does contain hourly emission limits referenced in Table 1 and not in a specific condition. It would appear that this table should be in the operate permit. And wouldn't this table go into the Title V permit also?

Please explain what conditions of Table 1 are to be placed in the existing permit before we delete specific condition 19.

I would be happy to fax the request, just ask.

\*\*\*\*\*REPLY\*\*\*\*\*

Alan. According page 5 of the construction permit dated October 18, 1991, Specific Condition 1 states that "the maximum allowable emissions from these sources shall not exceed the emission rates listed in Table 1." Obviously Table 1 is an applicable requirement.

I should caution (before you incorporate Table 1 into the operating permit) that Table 1 has been modified. One example is an amendment dated August 30, 1993. It specifically reduced PM/PM10 limits from 0.025 to 0.015 lb/million Btu and sulfuric acid mist from 76 lb/hr to 69 lb/hr. You would need to review at least all changes in construction permits to make sure you got it right. I am copying the Title V Program to let them know about this in case they did not.

On the matter of recordkeeping, have a look at the Construction Permit Specific Condition 16 and 40CFR60.334 (in Subpart GG - CTs) before deleting the condition.



# Department of Environmental Protection

Lawton Chiles  
Governor

Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803-3767

Virginia B. Wetherell  
Secretary

## FAX TRANSMITTAL



TO:

NAME: Alvaro Linero

AGENCY: DEP Darm

TELEPHONE NO. (FAX NO.):                     

NUMBER OF PAGES  
(INCLUDING COVER PAGE): 3

FROM:

NAME: Alan Zahn

PROGRAM: DEP Central

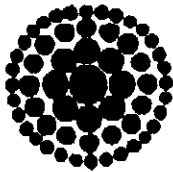
(Orlando Fax Telephone No. (407) 897-5963 SC 342-5963  
(Orlando Telephone No. (407) 893-3333 /3334 SC 325-3333/3334)

SENDER'S NAME: Alan Zahn

COMMENTS: Request for Operating Permit Amendment

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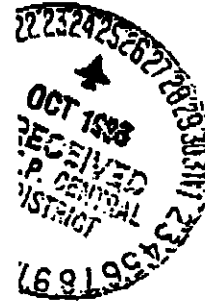




**Florida Power Corporation**

CS AS 10-25  
Jill be on this  
Llu

CS AS File



October 22, 1996

Mr. L. T. Kozlov  
Administrator, Air Programs  
Florida Department of Environment  
3319 Maguire Boulevard, Suite 2  
Orlando, FL 32803-3767

Dear Mr. Kozlov:

Re: Request for Operation Permit Amendment, FPC DeBary Facility  
DEP Permit Number AO64-233544

On October 14, 1996, representatives of Florida Power Corporation (FPC) met with Ms. Caroline Shine and Mr. Anatolly Sobolevskiy regarding recent inspection findings. One of the findings concerned the failure to submit quarterly reports as required by Specific Condition 19 of the permit referenced above. This condition is reproduced below.

- 19. *The permittee shall maintain monthly records, in a permanent form suitable for inspection, documenting the sulfur content of all fuel burned. The records shall contain, at a minimum, the pounds per hour and pounds per MMBtu heat input. Compliance with SO<sub>2</sub> shall be based on the monthly report. The records shall contain sufficient detail to allow the Department to determine whether or not the emissions were properly computed. All recorded data shall be maintained on file for a period of at least 2 years. The permittee shall submit a monthly summary of the averages for fuel sulfur content and sulfur dioxide emissions on a quarterly basis, within 30 days following each calendar quarter.*

This condition is confusing and it requires information that has no relevance to the permitted emission limits. For example, the permit does not contain a lb/MMBtu limit, so the requirement to provide reports containing this information is unnecessary. Specific Conditions 2 and 17 correspond to language contained in the construction permit, requiring that the weighted 12-month rolling average sulfur content not exceed 0.30%, and that records of the sulfur content from fuel delivery receipts be kept. The language contained in Specific Condition 19 does not appear in the construction permit for the DeBary facility. In addition, FPC submits quarterly excess emissions reports in accordance with 40 CFR Part 60, Subpart GG.

Because Specific Conditions 2 and 17 provide enough information to determine compliance with sulfur dioxide emission limits, FPC requests that Specific Condition 19 be deleted from the operation permit. Ms. Shine and Mr. Sobolevskiy indicated their initial concurrence with this request at the October 14 meeting.

See Table

Mr. L. T. Kozlov  
October 22, 1996  
Page Two

Specific Condition 11 contains the date by which annual compliance testing is to be performed. In order to better reflect the optimum time period for testing this facility, FPC requests that the date in Specific Condition 11 be changed to March 1.

Thank you for your consideration of these requested changes. Please contact Mr. Mike Kennedy at (813) 866-4344 if you have any questions.

Sincerely,



W. Jeffrey Pardue, C.E.P.  
Director

cc: Ms. Caroline Shine, DEP Central District

Date: 10/30/96 10:41:42 AM  
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*Message from Alan*

*Reply from AL*