FINAL DETERMINATION

PERMITTEE

Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Office of Permitting and Compliance
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Title V Air Operation Permit Renewal No. 0710002-018-AV

Fort Myers Plant

NOTICE AND PUBLICATION

The Department distributed an Intent to Issue a Title V Air Operation Permit Renewal on August 14, 2012. The applicant published the Public Notice of Intent to Issue Air Permit in the News-Press on August 22, 2012. The Department received the proof of publication on August 24, 2012. The intent package included a draft/proposed permit document. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

COMMENTS

No comments on the draft/proposed permit document were received from the Department's South District Office, the public at large or EPA Region 4.

Comments were received from the applicant in an email memorandum dated September 12, 2012. These comments follow below, with the corresponding Departmental response.

Comment 1: The applicant requested that the following permitting note be added after Specific Condition **B.23.**:

"{Permitting Note: The requirements for the NO_X CEMS which are installed and maintained in accordance with 40 CFR 75 are at least as stringent as the requirements of 40 CFR 60, and are an acceptable alternative to this condition.}"

Department response: This request is acceptable and the permit was changed.

Comment 2: The applicant requested that the following language be added to Specific Condition **B.4.**:

"In the unusual case when the hot water heat exchanger is not available, the direct fired heater may be used for combined cycle operation until the hot water heat exchanger is available."

Department response: This request is acceptable and the permit was changed.

Comment 3:

"Paragraph [Specific Condition] **C.24.** in the draft Title V Air Operation Permit renewal contains newly incorporated language for EU's 027-028 for DLN Tuning/FSNL Testing. Since EU's 018-023 undergo the same tuning and testing, FPL requests the same language be added for these emission units.

DLN Tuning / FSNL Testing. CEMS data collected during initial or other major DLN tuning sessions and during manufacturer required Full Speed No Load (FSNL) trip tests shall be excluded from the CEMS compliance demonstration provided the tuning session is performed in accordance with the manufacturer's specifications. A

"major tuning session" would occur after a combustor change-out, a major repair or maintenance to a combustor, or other similar circumstances. Prior to performing any major tuning session, the permittee shall provide the Compliance Authority with an advance notice of at least one working (business) day that details the activity and proposed tuning schedule. The notice may be by telephone, facsimile transmittal, or electronic mail. [Rules 62-4.160(2), 62-4.070(1) & (3), F.A.C.]"

Department response: This request is acceptable and the permit was changed. Specific Condition **B.19.** was added to the permit.

Comment 4:

"Page 19 provides a description of EU's 027-030. The stack height description for the direct fired natural gas heaters needs to be revised to 21-foot stacks for accuracy."

Department response: This request is acceptable and the permit was changed.

Comment 5:

"FPL requests Specific Condition **B.23.** in the draft Title V Air Operation permit renewal to allow the utilization of EPA Methods 5 or 17 for particulate matter testing. Both methods are valid EPA Methods incorporated at 62-297.401, F.A.C."

Department response: This request is acceptable and the permit was changed. Note that the specific condition was renumbered **B.24**.

Comment 6:

"FPL requests Specific Condition **C.34.** in the draft Title V Air Operation permit renewal to allow the utilization of EPA Methods 5 or 17 for particulate matter testing. Both methods are valid EPA Methods incorporated at 62-297.401, F.A.C."

Department response: This request is acceptable and the permit was changed.

Comment 7:

"FPL requests specific condition **C.34.** in the draft Title V Air Operation permit renewal to allow the utilization of EPA Methods 18 or 25A for VOC testing. Both methods are valid EPA Methods incorporated at 62-297.401, F.A.C.. The current draft permit does not include any methods for VOC testing."

Department response: This request is acceptable and the permit was changed.

Comment 8:

The applicant requested the following language replace the wording of Specific Condition **A.13.**:

"Nitrogen Oxides Testing. Provided operation is no more than 320 hours/year/turbine on oil, NO_X emissions for the combustion turbines shall be tested every five (5) years by EPA Method 20 or Method 7E tests, on any representative unit in the bank of combustion turbines. Tests shall be conducted while burning 100% light distillate oil."

Department response: Although the applicant requested the change to align this facility's permit language with other FP&L facility permits, Specific Condition **A.13.** was not changed because the language conflicts with Specific Condition **20** of the underlying air construction permit. Implementing this change would require an air construction permit.

CONCLUSION

The final action of the Department is to issue the permit with the minor administrative changes indicated above.