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PERMITTEE

Florida Power and Light Company (FPL)
700 Universe Blvd
Juno Beach, FL 33408

Authorized Representative:
Mr. David Williams, Plant General Manager

Air Permit No. 0850001-032-AC
(PSD-FL-146H/PSD-FL-327F)
Minor Air Construction Permit Revision
Martin Power Plant
Excess Emissions Revision
Martin County

PROJECT

This is the final air construction permit, which revises several specific conditions of previously issued air construction permit Nos. PSD-FL-146 and 0850001-020-AC/PSD-FL-327C (previously revised permit Nos. 0850001-010-AC/PSD-FL-327 and.0850001-016-AC/PSD-FL-327B), for the combined cycle combustion turbine systems, Units 3 and 4 (two "2-on-1" sets, which consist of four General Electric combustion turbines (CT) with matched unfired heat recovery steam generators (HRSG)), and Unit 8 (one "4-on-1" set, which consists of four General Electric CT with gas-fired HRSG providing steam to a single steam turbine driven electrical generator).

The revised permit conditions are related to excess emissions provisions for the gas turbines during periods of startup and shut down, excess emissions while conducting Dry Low NO_X (DLN) tuning, as well as Full Speed No Load (FSNL) trip test, which is recommended by the equipment manufacturer following a major overhaul and/or maintenance outage. The FPL Martin Plant is an electric utility categorized under Standard Industrial Classification No. 4911. The existing facility is located 21900 Southwest Warfield Boulevard in Martin County, Florida. The UTM coordinates are Zone 17, 542.68 km East and 2992.65 km North.

This final permit is organized into the following sections: Section 1 (General Information) and Section 2 (Permit Revisions).

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit.

Executed in Tallahassee, Florida.

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Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

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CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit Revision) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. David Williams, Plant General Manager, FPL: david.williams@fpl.com
Mr. Jeffrey Zuczek, FPL: jeffrey.zuczek@fpl.com
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Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

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FACILITY DESCRIPTION

FPL operates the existing Martin Power Plant, which is an electric utility. The existing facility consists of the following emissions units:

Emissions Units 001 and 002: Two oil and natural gas fired conventional fossil fuel steam electric generating stations (Units 1 and 2); the maximum capacity of each steam turbine driven electrical generator is 863.3 megawatts (MW).

Emissions Units 003 - 006: Two oil and natural gas fired combined cycle combustion turbine systems (two "2-on-1" sets) (Units 3 and 4), each gas turbine is nominally rated at 170 MW, with a matched unfired heat recovery steam generator (HRSG). Each pair of the gas turbines (3A/3B and 4A/4B) shares a common steam turbine driven electrical generator rated at 160 MW each. The total generating capacity of each 2-on-1 turbine system is approximately 500 MW.

Emissions Units 011, 012, 017 and 018: Collectively regulated as Unit 8, this unit consists of four oil and natural gas fired combined-cycle combustion turbines system (one "4-on-1" set). Each of the four gas combustion turbines (8A, 8B, 8C and 8D) is nominally rated at 170 MW, with a matched 495 million British thermal units per hour (MMBtu/hr) gas-fired HRSG, and a single 470 MW steam turbine driven electrical generator that serves all four CT/HRSG systems, and associated support equipment. Nitrogen oxides (NO_X) emissions are controlled by using Dry Low NO_X (DLN) combustors for natural gas and steam injection for fuel oil firing. A selective catalytic reduction (SCR) system, in combination with the other NO_X controls, further reduces NO_X emissions during combined cycle operation. The total generating capacity of this combined cycle combustion turbine system is approximately 1,150 MW.

There is also a solar thermal facility on-site that produces steam, which is used in the Unit 8 HRSGs, thus reducing fossil fuel use when adequate sunlight is available.

This facility also includes one auxiliary boiler, emergency generators, four hurricane emergency shelter stationary spark ignition engines, two storage oil tanks, a mechanical cooling tower, and four electrical fuel line heaters, to heat up the natural gas fuel prior to introduction into the CT when needed. Also included in this permit are additional unregulated emissions units identified as facility-wide particulate matter (PM) and volatile organic compounds (VOC) emissions.

This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to a National Ambient Air Quality Standard (NAAQS).

FACILITY REGULATORY CLASSIFICATION

Standard Industrial Classification (SIC) Code: 4911 - Electrical Generation.

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

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PROPOSED PROJECT

This permit addresses the following emissions units at this facility.

EU ID No.	Brief Description
003	Combustion Turbine with Heat Recovery Steam Generator (CT 3A)
004	Combustion Turbine with Heat Recovery Steam Generator (CT 3B)
005	Combustion Turbine with Heat Recovery Steam Generator (CT 4A)
006	Combustion Turbine with Heat Recovery Steam Generator (CT 4B)
007	Auxiliary Boiler (for EUs 003 to 006)
011	Combustion Turbine with Heat Recovery Steam Generator (CT 8A)
012	Combustion Turbine with Heat Recovery Steam Generator (CT 8B)
017	Combustion Turbine with Heat Recovery Steam Generator (CT 8C)
018	Combustion Turbine with Heat Recovery Steam Generator (CT 8D)

MODIFIED PERMIT CONDITIONS

For the current project, the applicant has requested an air construction permit revision to change several of the underlying construction permit conditions related to the excess emissions provisions for the gas combustion turbines during periods of startup, shutdown, malfunctions, DLN tuning, and Full Speed No Load (FSNL) testing (which is recommended by the equipment manufacturer following a major overhaul). The revised language provides FPL with more flexibility and consistency with the provisions contained in air construction permits for similar emissions units at other FPL facilities. Also, FPL requested that annual and renewal carbon monoxide (CO) tests be utilized as a surrogate in lieu of the required annual and renewal Volatile Organic Compounds (VOC) tests for the gas combustion turbines, and to eliminate conditions pertaining to fuel oil firing for the Auxiliary Boiler EU 007. In addition to these changes, FPL requested that the certification of CO monitors be allowed to use quality assurance procedures conforming to the requirements of 40 CFR 60 Part 75.

APPLICABLE STANDARDS AND REGULATIONS

1. Existing Permits. This permit does not authorize any new construction or increases in allowable operating limitations or emissions limits. This permit supplements all existing valid air permits. Except as specified below, the permittee shall continue to comply with all applicable conditions from valid air construction and operation permits. The proposed project involves no physical changes and no obvious operational changes to the facility. It does not involve any maintenance, repair or replacement tasks. [Rule 62-4.070(3), F.A.C.]

The following conditions of previous permits are revised as indicated below. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text. All changes are emphasized with yellow highlight for ease of location.

PERMIT BEING MODIFIED: PSD-FL-146

Affected Emissions Units: EU Nos. 003 - 006
(the remainder of the permit remains unchanged as a result of this permitting action)

2. To establish excludable periods of excess emissions from the CEMS compliance averages related to periods of startup, shutdown and fuel switching for these units, the Excess Emission language for Emission Units 003-006, Specific Condition 4.e. in permit No. PSD-FL-146, which was subsequently revised by Site Certification No. PA89-27A, has been deleted and replaced by the following updated conditions. Also, the DLN tuning / FSNL testing condition has been added as Specific Condition 4.f., as follows:

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4. The maximum allowable emissions from each CT, in accordance with the BACT determination, shall not exceed the following, at 40° F (except during periods of startup and shutdown).

   (Table and Notes a. – d. No Change)

   ~~e. The excess emissions authorized under Rule 62-210.700(1), F.A.C., shall be extended an additional two hours (for a total not to exceed four hours) for a cold turbine start for the first CT of a CCunit. The second CT of each CC unit shall comply with established emission limits in accordance with Rule 62-210.700(1), F.A.C.~~

   e. Excess Emissions Allowed. As specified in this condition, excess emissions resulting from startup, shutdown, fuel switches, and documented malfunctions are allowed provided that operators employ the best operational practices to minimize the amount and duration of emissions during such incidents. For each gas turbine/HRSG system, excess emissions of NO_X from startup, shutdown, fuel switches or malfunction shall be excluded from the CEMS data in any 24-hour period for the following conditions (these conditions are considered separate events and each event may occur independently within any 24-hour period):

   (1) *Steam Turbine Cold Startup.* For cold startup of the steam turbine system, excluded emissions from both gas turbine/HRSG systems in the 2-on-1 combined cycle system, combined, shall not exceed eight hours in any 24-hour period. A cold "startup of the steam turbine" is defined as startup of the 2-on-1 combined cycle system following a shutdown of the steam turbine lasting at least 48 hours.

   {Permitting Note: During a cold startup of the steam turbine, each gas turbine/HRSG system in the 2-on-1 combined cycle system is sequentially brought on line at low load to gradually increase the temperature within the steam-electrical turbine in order to prevent thermal metal fatigue. Note that shutdowns and documented malfunctions are separately regulated in accordance with the requirements of this condition.}

   (2) *Gas Turbine/HRSG System Cold Startup.* For cold startup of an individual gas turbine/HRSG system, excluded emissions shall not exceed four hours in any 24-hour period. "Cold startup of a gas turbine/HRSG system" is defined as a startup after the pressure in the high-pressure (HP) steam drum falls below 450 pounds per square inch gauge (psig) for at least a one-hour period.

   (3) *Gas Turbine/HRSG System Warm Startup.* For warm startup of an individual gas turbine/HRSG system, excluded emissions shall not exceed two hours in any 24-hour (with the additional provision of a limit of 2 warm startup periods per 24 hours per gas turbine/HRSG system, in which case excluded emissions shall not exceed four hours total for the 2-on-1 combined cycle system). "Warm startup of a gas turbine/HRSG system" is defined as a startup after the pressure in the high-pressure (HP) steam drum is above 450 psig.

   (4) *Gas Turbine/HRSG System Shutdown.* For shutdown of the gas turbine/HRSG operation, excluded emissions from any individual gas turbine/HRSG system shall not exceed two hours in any 24-hour period.

   (5) *Shutdown Combined Cycle Operation.* For shutdown of the entire 2-on-1 combined cycle operation, excluded emissions from both gas turbine/HRSG systems, combined, shall not exceed three hours in any 24-hour period.

   (6) *Fuel Switching.* For fuel switching, excluded emissions shall not exceed two hours in any 24-hour period for each fuel switch and no more than four hours in any 24-hour period for any gas turbine/HRSG system.

   (7) *Documented Malfunction.* For each gas turbine/HRSG system, excess emissions of NO_X resulting from documented malfunctions shall not exceed two hours in any 24-hour period. A "documented malfunction" means a malfunction that is documented within one working day of detection by contacting the Compliance Authority by telephone, facsimile transmittal, or electronic mail.

f. 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) & 62-210.700(5), F.A.C.; and, Application No. 0850001-032-AC]

3. To remove oil firing as a potentially allowable method of operation in order to classify the Auxiliary Boiler EU 007 as a "gas 1 unit" pursuant to 40 CFR 63, Subpart DDDDD, Specific Condition 7 of permit No. PSD-FL-146 is revised as follows:

7. The ~~A~~auxiliary steam boiler~~s~~ and diesel generators shall operate only during startup and shutdown of the combined cycle units, periodic maintenance testing, and for emergency power generation, respectively. The auxiliary steam boiler shall only be fired with natural gas. NO_X emissions for the auxiliary steam boiler~~s~~ shall not exceed 0.1 lb/MMBtu ~~for natural gas firing or 0.2 lb/MMBtu for oil firing~~. NO_X emissions for the diesel generators shall not exceed 10.0 grams/hp-hr.

Sulfur dioxide emissions limitations for the auxiliary steam boiler~~s~~ and diesel generators are established by firing natural gas or limiting the light distillate fuel oil's sulfur content of the oil fired in the diesel generators to 0.3 percent on an annual basis.

4. To allow CO testing results to serve as an indicator of proper combustion which assures that the VOC emissions limit is being met, Specific Condition **10.f.** of the original air construction permit No. PSD-FL-146 related to the VOC testing requirements has been revised as follows to specify that the VOC testing is only required if the annual CO test indicates an exceedance of the CO standard.

10. Initial (I) compliance tests shall be performed on each combustion turbine using both fuels. The stack test for each combustion turbine shall be performed within 10% of the maximum heat rate input for the tested operating temperature. Annual (A) compliance test shall be performed on each combustion turbine with the fuel(s) used for more than 400 hours in the preceding 12-month period. Tests shall be conducted using EPA reference methods in accordance with the November 2, 1989, version of 40 CFR 60 Appendix A:

f. 18 for VOC (I, Annual and renewal testing is only required if the annual CO test indicates an exceedance of the CO standard.)

PERMIT BEING MODIFIED: 0850001-020/PSD-FL-327C (previously modified permit Nos. 0850001-010-AC/PSD-FL-327 and 0850001-016-AC/PSD-FL-327B), Specific Conditions **16., 18., and 24.a.**

Affected Emissions Units: EU Nos. 011, 012, 017 and 018
(the remainder of the permit remains unchanged as a result of this permitting action)

5. To establish excludable periods of excess emissions from the CEMS compliance averages related to periods of startup, shutdown and fuel switching for these units, the Excess Emission language for Emission Units 011, 012, 017 and 018., Specific Condition **16** has been revised as follows:

16. Excess Emissions Allowed: As specified in this condition, excess emissions resulting from startup, shutdown, ~~oil-to-gas~~ fuel switches, and documented malfunctions are allowed provided that operators employ the best operational practices to minimize the amount and duration of emissions during such incidents. ~~A "documented malfunction" means a malfunction that is documented within one working day of detection by contacting the Compliance Authority by telephone, facsimile transmittal, or electronic mail.~~ For each gas turbine/HRSG system, excess emissions of NO_X and CO resulting from startup, shutdown, fuel switches or documented malfunctions shall ~~not exceed~~ be excluded from the CEMS data

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~~two hours~~ in any 24-hour period ~~(or shall not exceed 8 hours per 4-unit site, with the additional provisions of a limit of 2 startup periods per 24 hours per unit) except for the following specific cases.~~ for the following conditions (these conditions are considered separate events and each event may occur independently within any 24-hour period):.

a. *Steam Turbine Cold Startup*: For cold startup of the steam turbine system, excluded excess emissions from any gas turbine/HRSG system shall not exceed eight ~~(8)~~ hours in any 24-hour period. Cold startup of the steam turbine system shall be completed within twelve hours. A cold "startup of the steam turbine system" is defined as startup of the 4-on-1 combined cycle system following a shutdown of the steam turbine lasting at least 48 hours. *{Permitting Note: During a cold startup of the steam turbine system, each gas turbine/HRSG system in the 4-on-1 combined cycle system is sequentially brought on line at low load to gradually increase the temperature of the steam-electrical turbine ~~and~~ in order to prevent thermal metal fatigue. Note that shutdowns and documented malfunctions are separately regulated in accordance with the requirements of this condition.}*

b. *Gas Turbine/HRSG System Cold Startup*: For cold startup of an individual gas turbine/HRSG system, ~~excess~~ excluded emissions shall not exceed four ~~(4)~~ hours in any 24-hour period. "Cold startup of a gas turbine/HRSG system" is defined as a startup after the pressure in the high-pressure (HP) steam drum falls below 450 pound per square inch gauge (psig) for at least a one-hour period.

c. *Gas Turbine/HRSG System Warm Startup*: For warm startup of a gas turbine/HRSG system, excluded emissions shall not exceed two hours in any 24-hour period (with the additional provision of a limit of 2 warm startup periods per 24 hours per gas turbine/HRSG system, in which case excluded emissions shall not exceed eight hours total for the 4-on-1 combined cycle system). "Warm startup of a gas turbine/HRSG system" is defined as a startup after the pressure in the high-pressure (HP) steam drum is above 450 psig.

d. *Gas Turbine/HRSG System Shutdown*: For shutdown of the gas turbine/HRSG system operation, excluded emissions from any individual gas turbine/HRSG system shall not exceed two hours in any 24-hour period.

e. *Shutdown Combined Cycle Operation*: For shutdown of the ~~steam turbine system~~ entire 4-on-1 combined cycle system, excluded ~~excess~~ emissions from any gas turbine/HRSG system shall not exceed three hours in any 24-hour period.

f. *Fuel Switching*: For fuel switching ~~(oil-to-gas or gas-to-oil)~~, ~~excess~~ excluded emissions shall not exceed 2 hours in any 24-hour period for each fuel switch and no more than four hours in any 24-hour period for any gas turbine/HRSG system.

g. *Documented Malfunction*: For each gas turbine/HSRG system, excess emissions of NO_X and CO resulting from documented malfunctions shall not exceed two hours in any 24-hour period. A "documented malfunction" means a malfunction that is documented within one working day of detection by contacting the Compliance Authority by telephone, facsimile transmittal, or electronic mail.

Ammonia injection shall begin as soon as operation of the gas turbine/HRSG system achieves the operating parameters specified by the manufacturer. As authorized by Rule 62-210.700(5), F.A.C., the above conditions allow excess emissions only for specifically defined periods of startup, shutdown, and documented malfunction of the gas turbines. [0850001-010-AC (PSD-FL-327); Rules 62-212.400(BACT) and 62-210.700, F.A.C.; 0850001-020-AC (PSD-FL-327C); and, Application No. 0850001-032-AC/PSD-FL-146H/PSD-FL-327F]

6. To provide excludable periods of excess emissions from the CEMS compliance averages due to excess emissions related to full speed no load trip tests, the DLN tuning / FSNL testing condition for Emission Units 011, 012, 017 and 018, Specific Condition **18** has been revised as follows:

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18. 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 completion of initial construction, 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. [Design; Rule 62-4.070(3), F.A.C.; Permit No. 0850001-010 (PSD-FL-327); and, Application No. 0850001-032-AC/PSD-FL-146H/PSD-FL-327F]

7. To allow flexibility to certification procedures for the CO monitors by allowing the use of quality assurance procedures conforming to the requirements of 40 CFR 60 Part 75 for Emissions Unit 8 (EU's 011, 012, 017 and 018), Specific Condition **24(a)** of air construction permit No. 0850001-010-AC, has been revised as follows:

a. *CO Monitors.* The CO monitor shall be certified pursuant to 40 CFR 60, Appendix B, Performance Specification 4 or 4a. Quality assurance procedures shall conform to the requirements of 40 CFR 60, Appendix F, or Part 75, and the Data Assessment Report of Section 7 shall be made each calendar quarter, and reported semiannually to the Compliance Authority. The RATA tests required for the CO monitor shall be performed using EPA Method 10 in Appendix A of 40 CFR 60 and shall be based on a continuous sampling train. The CO monitor span values shall be set appropriately considering the allowable methods of operation and corresponding emission standards.

PERMIT BEING MODIFIED: 0850001-010/PSD-FL-327, Specific Condition **22.**

Affected Emissions Units: EU Nos. 011, 012, 017 and 018
(the remainder of the permit remains unchanged as a result of this permitting action)

8. To allow CO emissions recorded by the CEMS to serve as an indicator of proper combustion which assures that the VOC emissions limit is being met, Specific Condition 22. of the original air construction permit No. 0850001-010-AC/PSD-FL-327 related to the VOC testing requirements has been revised as follows to specify that the annual or renewal VOC testing is only required if the CO CEMS data indicates an exceedance of the CO standard.

22. Annual and Renewal Compliance Tests: During each federal fiscal year (October 1st to September 30th), each gas turbine shall be tested to demonstrate compliance with the emission standards for visible emissions. Annual testing to determine the ammonia slip shall be conducted while firing the primary fuel. NO_X emissions recorded by the CEMS shall be reported for each ammonia slip test run. CO emissions recorded by the CEMS shall be reported for the visible emissions observation period. ~~{Permitting Note:~~ After initial compliance with the VOC standards is demonstrated, annual and renewal compliance tests for VOC emissions are not required unless the CO CEMS data indicates an exceedance of the CO standard. Compliance with the continuously monitored CO standards shall indicate efficient combustion and low VOC emissions.~~}~~ [Rules 62-212.400 (BACT) and 62-297.310(7)(a)4, F.A.C.; and, Application No. 0850001-032-AC]

9. To authorize the use of continuous monitoring in lieu of stack tests for demonstrating compliance with the SO_2 and NO_X emissions limits for units 1 and 2 (EU's 001 and 002), the following condition is created:

Alternate Compliance for NO_X and SO_2.

a. *NO_X.* No stack tests are required if CEMS show compliance with NO_X emissions limits.

b. *SO_2.* Annual and renewal stack tests are not required as long as results of fuel sampling and analysis demonstrate compliance with SO_2 emissions limits.

The Department will retain the authority to require EPA test methods, referenced above if it has reason to believe that exceedences of the NO_X and SO_2 emissions limiting standard are occurring. Results of an

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approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with SO_2 standards. [Rules 62-4.040 & 62-297.401, F.A.C.; and, Application No. 0850001-032-AC]

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