

Sun-Sentinel

12/9/97

Attn: Vito Giarrusso

The following affidavit was mailed to Mr. Scott Sheplak. We received the letter back in our office on today. No other information is given other than a copy of the affidavit was also forwarded to you. I'm taking the liberty of forwarding the affidavit to you.

Thank you

Deedrie / Legal Dept

RECEIVED

DEC 19 1997

BUREAU OF
AIR REGULATION

FORT LAUDERDALE, BROWARD COUNTY, FLORIDA
BOCA RATON, PALM BEACH COUNTY, FLORIDA
MIAMI, DADE COUNTY, FLORIDA

STATE OF FLORIDA
COUNTY OF BROWARD/PALM BEACH/DADE
BEFORE THE UNDERSIGNED AUTHORITY PERSONALLY APPEAR

..... WHO ON OATH SAYS THAT
HE/SHE IS A DULY AUTHORIZED REPRESENTATIVE OF THE
CLASSIFIED DEPARTMENT OF THE SUN-SENTINEL, DAILY
NEWSPAPER PUBLISHED IN BROWARD/PALM BEACH/DADE COUNT
FLORIDA THAT THE ATTACHED COPY OF ADVERTISEMENT, BEI

NOTICE

IN THE MATTER OF

TITLE V DRAFT

IN THE CIRCUIT COURT, WAS PUBLISHED IN SAID NEWSPAPER
THE ISSUES OF
C / 10/09, 1 X

AFFIANT FURTHER SAYS THAT THE SAID SUN-SENTINEL IS
NEWSPAPER PUBLISHED IN SAID BROWARD/PALM BEACH/DADE
COUNTY, FLORIDA, AND THAT THE SAID NEWSPAPER HAS HER
BEEN CONTINUOUSLY PUBLISHED IN SAID BROWARD/PALM BEA
COUNTY, FLORIDA, EACH DAY, AND HAS BEEN ENTERED AS S
CLASS MATTER AT THE POST OFFICE IN FORT LAUDERDALE,
BROWARD COUNTY, FLORIDA, FOR A PERIOD OF ONE YEAR NE
PRECEDING THE FIRST PUBLICATION OF THE ATTACHED COPY
ADVERTISEMENT; AND AFFIANT FURTHER SAYS THAT HE/SHE
NEITHER PAID NOR PROMISED ANY PERSON, FIRM OR CORPOR
ANY DISCOUNT, REBATE, COMMISSION OR REFUND FOR THE P
OF SECURING THIS ADVERTISEMENT FOR PUBLICATION IN SA
NEWSPAPER.

[Signature]
.....
(SIGNATURE OF AFFIANT)

SWORN TO AND SUBSCRIBED BEFORE ME
THIS DAY OF OCTOBER
A.D. 1997

[Signature]
.....
(SIGNATURE OF NOTARY PUBLIC)



Kera L. Bezak
MY COMMISSION # CG638935 EXPIRES:
July 20, 2001
BONDED THRU TRDY FAIR INSURANCE, INC

.....
(NAME OF NOTARY TYPED, PRINTED OR STAMPED)

PERSONALLY KNOWN OR

PRODUCED IDENTIFICATION

operation permit to Florida Power and Light Company for
the Port Everglades Plant located at 5100 Eisenhower
Blvd., Fort Lauderdale, Broward County. The applicant's
name and address are: Florida Power and Light Company,
11770 U.S. Highway One, North Palm Beach, FL 33406.
The permitting authority will issue the Title V PRO-
POSED Permit, and subsequent Title V FINAL Permit, in
accordance with the conditions of the Title V DRAFT Per-
mit unless a response received in accordance with the
following procedures results in a different decision or sig-
nificant change of terms or conditions.

The permitting authority will accept written comments
concerning the Proposed Title V DRAFT Permit issuance
action for a period of 30 (thirty) days from the date of
publication of this Notice. Written comments should be
provided to the Department's Bureau of Air Regulation,
2600 Blair Stone Road, Mail Station #5505, Tallahassee,
Florida 32399-2400. Any written comments filed shall be
made available for public inspection. If written comments
received result in a significant change in this DRAFT Per-
mit, the permitting authority shall issue a Revised DRAFT
Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the
attached conditions unless a timely petition for an adminis-
trative hearing is filed pursuant to Sections 120.569 and
120.57, Florida Statutes (F.S.). Mediation under Section
120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the
proposed permitting decision may petition for an adminis-
trative hearing in accordance with Sections 120.569 and
120.57, F.S. The petition must contain the information set
forth below and must be filed (received) in the Office of
General Counsel of the Department of Environmental Pro-
tection, 3900 Commonwealth Boulevard, Mail Station #35,
Tallahassee, Florida 32399-3000 (Telephone: 850/487-
9730; Fax: 850/487-4381). Petitions must be filed within 14
(fourteen) days of publication of the public notice or within
14 (fourteen) days of receipt of the notice of intent, whic-
ever occurs first. A petitioner must mail a copy of the
petition to the applicant at the address indicated above, at
the time of filing. The failure of any person to file a petition
within the applicable time period shall constitute a waiver
of that person's right to request an administrative determi-
nation (hearing) under Sections 120.569 and 120.57, F.S.,
or to intervene in this proceeding and participate as a party
to it. Any subsequent intervention will be only at the dis-
cretion of the presiding officer upon the filing of a motion in
compliance with Rule 28-5.207 of the Florida Administra-
tive Code.

A petition must contain the following information:

(a) The name, address, and telephone number of each
petitioner, the applicant's name and address, the 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 permitting authority's action or pro-
posed action;

(c) A statement of how each petitioner's substantial
interests are affected by the permitting authority's action
or proposed action; (d) A statement of the material
facts disputed by the petitioner, if any; (e) A statement
of the facts that the petitioner contends warrant reversal or
modification of the permitting authority's action or pro-
posed action;

(f) A statement of any person to file a petition
stating that the petitioner contends require reversal or
modification of the permitting authority's action or pro-
posed action; and

(g) A statement of the relief sought by the petitioner,
stating precisely the action that the petitioner wants the
permitting authority to take with respect to the action or
proposed action addressed in this notice of intent.

Because the administrative hearing process is de-
signed to formulate final agency action, the filing of a
petition means that the permitting authority's final action
may be different from the position taken by it in this notice
of intent. Persons whose substantial interests will be af-
fected by any such final decision of the permitting authority
on the application have the right to petition to become a
party to the proceeding, in accordance with the require-
ments set forth above.

In addition to the above, pursuant to 42 United States
Code (U.S.C.) Section 7661d(b)(2), any person may petition
the Administrator of the EPA within 60 (sixty) days of the
expiration of the Administrator's 45 (forty-five) day review
period as established at 42 U.S.C. Section 7661d(b)(1), to
object to issuance of any permit. Any petition shall be
based only on objections to the permit that were raised
with reasonable specificity during the 30 (thirty) day public
comment period provided in this notice, unless the peti-
tioner demonstrates to the Administrator of the EPA that it
was impracticable to raise such objections within the com-
ment period or unless the grounds for such objection arose
after the comment period. Filing of a petition with the
Administrator of the EPA does not stay the effective date
of any permit properly issued pursuant to the provisions of
Chapter 62-213, F.A.C. Petitions filed with the Administra-
tor of EPA must meet the requirements of 42 U.S.C. Sec-
tion 7661d(b)(2) and must be filed with the Administrator of
the EPA at 401 M Street, SW, Washington, D.C. 20460.

A complete project file is available for public inspection
during normal business hours, 8:00 a.m. to 5:00 p.m.,
Monday through Friday, except legal holidays, at:

Permitting Authority
Department of Environmental Protection
Bureau of Air Regulation
1111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-1344
Fax: 850/922-6979
Affected District/Local Program:
Mr. Isidore Goldman, Southeast District Office
400 North Congress Avenue
West Palm Beach, FL 33401
Telephone: 561/681-6600
Fax: 561/681-6790
Ms. Daniela Bang
Broward County Department of Natural Resource Pro-
tection
Air Quality Division
218 Southwest First Avenue
FL Lauderdale, FL 33301
Telephone: 954/519-1202
Fax: 954/519-1493

The complete project file includes the DRAFT Permit,
the application, and the information submitted by the re-
sponsible official, exclusive of confidential records under
Section 403.111, F.S. Interested persons may contact
Scott M. Sheplak, P.E. at the above address, or call
850/488-1344, for additional information.
October 8, 1997

Memorandum

To: Vito Giarrusso, FPL
Sent Via Fax: 561/691-7070

From: Joe Kahn, DEP, Title V Section *JK*

Date: October 21, 1997

Re: FPL Port Everglades Draft Permit Comments
Draft Permit No. 0110036-001-AV

Per our teleconference October 15, 1997 and your comment letter dated October 14, 1997, following are the changes we propose to address your comments. Please look these over and call me with your comments.

The stack height for emissions units 001, 002, 003, and 004 will be changed from 343 ft. to 344 ft throughout the permit.

For emissions unit 005 the total rated capacity will be corrected to 504 MW.

For Facility-wide condition 10 electronic mail has been added as an option for submitting applicable correspondence. It has been noted that the Continuous Emission Monitoring data reported under the Acid Rain section is to be submitted to the Acid Rain Division in Washington.

10. Submittals. All reports, tests, notifications or other submittals required by this permit shall be submitted to the Broward County Department of Natural Resource Protection, Air Quality Division, and copies of those submittals shall be sent to the Department of Environmental Protection, Southeast District Office, Air Section. Certain correspondence may be submitted via electronic mail as appropriate. Certain Acid Rain Reports may be submitted to EPA's Acid Rain Division in Washington. Addresses and telephone numbers are:

...
On pages 7 and 11, the description of emissions units 001, 002, 003 and 004 will not include a reference to ash reinjection once we have received the revised permit application pages.

Conditions A.14 and B.14 have been changed to the following:

A.14./B.14. Operating Conditions During Testing - PM and VE. Compliance testing during sootblowing and steady-state operation for particulate matter and visible emissions shall be conducted at least once annually, if liquid fuel is fired for more than 400 hours. A visible emissions test shall be conducted during one run of each particulate matter test. The owner or operator shall conduct testing while operating under one of the following methods of operation (representative of normal operation to achieve the facility's target SO₂ emission rate of 1.1 lb/mmBtu):

- a. **When Burning 100% Fuel Oil.** Particulate matter and visible emissions tests during sootblowing and steady-state operation shall be performed on such emissions unit while firing solely fuel oil of approximately 1% sulfur by weight (stoichiometrically representative

of sulfur dioxide emissions of the target SO₂ emission rate of 1.1 lb/mmBtu), except that such test shall not be required to be performed during any year that testing is performed in accordance with specific condition **A.14.b/B.14.b**.

- b. When Burning Fuel Oil While Co-firing With Natural Gas. Particulate matter and visible emissions tests during sootblowing and steady-state operation shall be performed on such emissions unit while co-firing oil with the appropriate proportion of natural gas required to maintain SO₂ emissions between 90 to 100% of the target SO₂ emission rate of 1.1 lb/mmBtu heat input (corresponding to 1.0 and 1.1 lb/mmBtu heat input).

Test Required if Target SO₂ Emission Rate Increased. If the owner or operator ~~target~~ increases the target SO₂ emission rate above 1.1 lb/mmBtu, testing while operating under one of the above methods of operation that is representative of the new target SO₂ emission rate shall be conducted within 60 days of increasing the target rate.

{Note: The facility is operated under an informal agreement with Broward County to limit visible emissions to less than 20% opacity, to the extent possible. To achieve this, the facility voluntarily limits sulfur dioxide emissions to 1.1 lb/mmBtu by either firing fuel oil with up to 1% sulfur content, or by co-firing fuel oil and natural gas in a ratio to limit sulfur dioxide emissions to 1.1 lb/mmBtu.}

[Rules 62-4.070(3), 62-213.440, 62-296.405(1)(c)3. and 62-297.310(7)(a)9., F.A.C.]

In condition D.6 the wording "5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile" has been removed.

D.6. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

- ...
4. During each federal fiscal year (October 1 -- September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
- Visible emissions, if there is an applicable standard;
 - Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 100 tons per year or more of any other regulated air pollutant; and
 - Each NESHAP pollutant, if there is an applicable emission standard

The description of "turbine, Unit 5" in Condition D.9 will be changed to "bank of twelve combustion turbines."

Other comments from us that we addressed in the teleconference include the following:

On page S1 of Table 1-1 the equivalent emissions for PM_{SB} should be 377.8 tons per year and has been changed.

On page S3 of Table 1-1 the equivalent emissions for PM_{SB} should be 657 tons per year and has been changed.



Florida Power & Light Company, Environmental Services Dept., P.O. Box 14000, Juno Beach, FL 33408

October 16, 1997

Mr. Joseph Kahn, P.E.
State of Florida
Department of Environmental Protection
Division of Air Resources Management
Title V Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Draft Permit No. 0110036-001-AV
FPL Port Everglades Plant Initial Title V Air
Operation Permit Comments

Dear Mr. Kahn:

Per your telephone conversation with Kathryn Pascale and Vito Giarrusso on 10/15/1997, attached are the revised permit pages, Section B. General Emission Unit Information page 2. for boiler units 1 thru 4.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. Stanton", is written over a circular stamp or seal.

J. Stanton
Plant General Manager
Florida Power & Light Company

RECEIVED

OCT 28 1997

BUREAU OF
AIR REGULATION

Emission Unit Information Section ___ of ___

**B. GENERAL EMISSIONS UNIT INFORMATION
(Regulated and Unregulated Emissions Units)**

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Port Everglades Boiler Unit 1
2. Emissions Unit Identification Number: 001 (No Corresponding ID or Unknown)
3. Emission Unit Status Code: (A or C): A
4. Acid Rain Unit? (Y/N): Y
5. Emissions Unit Major Group SIC Code: 49
6. Emissions Unit Comment (limit to 500 characters): The generator nameplate rating given reflects information provided to the Florida Public Service Commission (PSC) in the 10-Year Site Plan. Actual generator output may exceed the stated value, and may vary seasonally, or with changes in unit efficiency, and with fluctuations in system load demand.

Emissions Unit Control Equipment

A. Control Equipment # : 1

1. Description (limit to 200 characters): Multiple Cyclone with Fly Ash Reinjection
2. Control Device or Method Code: Multiple Cyclone

Emission Unit Information Section ____ of ____

**B. GENERAL EMISSIONS UNIT INFORMATION
(Regulated and Unregulated Emissions Units)**

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Port Everglades Boiler Unit 2
2. Emissions Unit Identification Number: 002 (No Corresponding ID or Unknown)
3. Emission Unit Status Code: (A or C) : A
4. Acid Rain Unit? (Y/N): Y
5. Emissions Unit Major Group SIC Code: 49
6. Emissions Unit Comment (limit to 500 characters): The generator nameplate rating given reflects information provided to the Florida Public Service Commission (PSC) in the 10-Year Site Plan. Actual generator output may exceed the stated value, and may vary seasonally, or with changes in unit efficiency, and with fluctuations in system load demand.

Emissions Unit Control Equipment

A. Control Equipment # : 1

1. Description (limit to 200 characters): Multiple Cyclone with Fly Ash Reinjection
2. Control Device or Method Code: Multiple Cyclone

Emission Unit Information Section ____ of ____

**B. GENERAL EMISSIONS UNIT INFORMATION
(Regulated and Unregulated Emissions Units)**

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Port Everglades Boiler Unit 3
2. Emissions Unit Identification Number: 003 (No Corresponding ID or Unknown)
3. Emission Unit Status Code: (A or C) : A
4. Acid Rain Unit? (Y/N): Y
5. Emissions Unit Major Group SIC Code: 49
6. Emissions Unit Comment (limit to 500 characters): The generator nameplate rating given reflects information provided to the Florida Public Service Commission (PSC) in the 10-Year Site Plan. Actual generator output may exceed the stated value, and may vary seasonally, or with changes in unit efficiency, and with fluctuations in system load demand.

Emissions Unit Control Equipment

A. Control Equipment # : 1

1. Description (limit to 200 characters): Multiple Cyclone with Fly Ash ReInjection
2. Control Device or Method Code: Multiple Cyclone

Emission Unit Information Section ___ of ___

**B. GENERAL EMISSIONS UNIT INFORMATION
(Regulated and Unregulated Emissions Units)**

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Port Everglades Boiler Unit 4
2. Emissions Unit Identification Number: 004 (No Corresponding ID or Unknown)
3. Emission Unit Status Code: (A or C): A
4. Acid Rain Unit? (Y/N): Y
5. Emissions Unit Major Group SIC Code: 49
6. Emissions Unit Comment (limit to 500 characters): The generator nameplate rating given reflects information provided to the Florida Public Service Commission (PSC) in the 10-Year Site Plan. Actual generator output may exceed the stated value, and may vary seasonally, or with changes in unit efficiency, and with fluctuations in system load demand.

Emissions Unit Control Equipment

A. Control Equipment # : 1

1. Description (limit to 200 characters): Multiple Cyclone with Fly Ash Reinjection
2. Control Device or Method Code: Multiple Cyclone

10/15/97 FT. EVERGLADES

VITO GIARUSSO, FPL

CATHERINE PASCAL, FPL RAOUL -, FPL

JOE KANN, SUSAN DEVORE DEP

FPL COMMENTS

- STACK HT. SHOULD BE 344 FT.
- MW CAPACITY SHOULD BE 504 MW
- NEED REVISED PILES TO REMOVE ASH REJECTED
- E-MAIL TO BE ADDED
- FUEL 60% GAS, 40% OIL OR 1% 5 OIL TYPICALLY TO VOLUNTARILY LIMIT SO_2 EMISSION TO 1.1 LB SO_2 /MMBTU

DEP TO DRAFT REVISED LANGUAGE

- D.6 DEP ~~LEAD~~ ACETYLCHOLINE.
- D.9 CHANGE DESCRIPTION
- P. 15 CAPACITY SHOULD BE 504 MW
- FUEL: No. 2 SHOULD BE Δ TO LT. DISTILLATE
DESCR. , C1, C3

DEP COMMENTS

P. 51 OF 8, TABLE 1-1

PM_{5B} EQUIV. EMISS SHOULD BE 377.8 T/Y

P. 53 OF 8

PM_{5B} EQUIV. EMISS SHOULD BE 657 T/Y

PUBLISHED ON 10/8/97.



**FPL
ENVIRONMENTAL SERVICES DEPARTMENT
PO BOX 14000
JUNO BEACH, FLORIDA 33408**

DATE: October 14, 1997

SEND TO:

NAME: Joe Kahn

COMPANY: FDEP

FAX NUMBER: 850 922 6979

PHONE NUMBER: _____

FROM: RICH PIPER

PHONE NUMBER: (561) 691- 7058

FAX NUMBER: (561) 691- 7070

NUMBER OF PAGES (INCLUDING COVER SHEET): 4

COMMENTS/INSTRUCTIONS:

Port Everglades comments



Florida Power & Light Company, Environmental Services Dept., P.O. Box 14000, Juno Beach, FL 33408

October 14, 1997

Mr. Scott Scheplak, P.E.
State of Florida
Department of Environmental Protection
Division of Air Resources Management
Title V Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: **Draft Permit No. 00110036-001-AV**
FPL Port Everglades Plant Initial Title V Air Operation Permit

Dear Mr. Sheplak:

After reviewing the subject draft Title V permit, FPL has identified several issues which need to be addressed. We plan to call you at 2 pm on Wednesday 10/15/97 to discuss them. Listed below are suggested changes to the language in the draft permit.

Section I. Facility Information**Page 2 - Subsection B. Summary of Emissions Unit No(s) and Brief Description(s):**

E.U. ID_No's 001, 002, 003, and 004, stack height should be 344 ft. (Pg. 7 Section III, Subsection A., para. 2)

E.U. ID No. 005, the total capacity rated should be 504 MW. (Pg. 15 Section III, Subsection C, para. 1)

Section II. Facility-wide Conditions

Page 5 - No. 10. Submittals: We propose adding an electronic mail as an additional option for applicable correspondence. Also note that Continuous Emission Monitoring data reported under the Acid Rain section is submitted to the Acid Rain Division in Washington.

Section III. Emissions Unit(s) and Conditions

Pages 7 and 11 - Description of Emission Units 001, 002, 003 and 004 - Each emission unit description includes a reference to ash reinjection. These references should be removed.

Page 10 and 14 - **A.14. and B.14. Operating Conditions During Testing - PM and VE:** The Port Everglades facility currently operates their units under an informal agreement with Broward County in which visible emissions are controlled to less than 20% opacity, to the extent possible. In order to facilitate this, the plant generally fires low-sulfur oil (containing less than or equal to 1% sulfur) when firing 100% oil; and when cofiring oil with gas, they cofire with oil containing up to 2.5% sulfur and maintain their SO₂ emissions at about 1.1 lb / mmBtu. In view of this situation, under condition A.14.a., the facility would end up particulate testing in a non-representative firing mode (e.g. if they only cofire with 2.5% oil, under the current language they would have to demonstrate compliance firing "solely" 100% 2.5% sulfur oil, a situation which never occurred during the previous 12 months). We therefore suggest that paragraph A.14.a. and B.14.a. be changed as follows:

A.14. Operating Conditions During Testing - PM and VE. *Compliance testing during sootblowing and steady-state operation for particulate matter and visible emissions shall be conducted at least once annually, if liquid fuel is fired for more than 400 hours. A visible emissions test shall be conducted during one run of each particulate matter test. Testing shall be conducted under conditions representative of actual unit operation during the previous 12 month period as follows:*

a. When Burning Fuel Oil Up to 2.5% Sulfur. *When only fuel oil containing less than or equal to 2.5% sulfur, by weight, is fired, (or co-fired with natural gas) in an emissions unit, particulate matter and visible emissions tests during sootblowing and steady-state operation shall be performed on such emissions unit while firing solely fuel oil containing at least 90% of the average sulfur content of the fuel oils fired in the previous 12 month period, except that the test may be performed while cofiring such oil with natural gas if it can be demonstrated that testing while cofiring is more representative of actual unit operation during the previous 12 month period. ~~except that a~~ Such test shall not be required to be performed during any year that testing is performed in accordance with specific condition A.14.b..*

Subsection D - Common Conditions

Page 18 - **D.6. Frequency of Compliance Tests (a) 4. b.:** We request removing the wording "5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile;". The maximum potential to emit lead would be under the following unit conditions, burning 100% oil, at full load and for 8,760 hours resulting in 0.59 tons per year, all units included. Acrylonitrile is not emitted from these units.

Page 19 - **D.9. Visible Emissions - Turbines:** The description "turbine, Unit 5" should be changed to "bank of twelve combustion turbines".

Thank you for your prompt attention to the issues raised in this correspondence. Please do not hesitate to contact me at (561) 691-7061 if I may be of further assistance.

Very truly yours,



Vito Giarusso
Sr. Environmental Specialist
Florida Power & Light Company