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Florida Power & Light Company, P.O. Box 088801, North Palm Beach, FL 33408-8801



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Per Mr. Fancy  
March 28, 1996

Mr. Clair Fancy, Chief  
Bureau of Air Permitting  
State of Florida Department of Environmental Protection  
2600 Blair Stone Road, MS 48  
Tallahassee FL 32399-2400

Re: **FPL Lauderdale Plant**  
**Modification to PSD Permit #PSD-FL-145 and Site Certification #PA 89-6636**

Dear Clair:

This correspondence is to request a modification to the subject PSD permit to incorporate the language in a recent Division of Air Resources Management Guidance Document. A check in the amount of \$250 is included pursuant to Rule 62-4.050(4)(q)5.

Please note that pursuant to the pending modification to the Lauderdale Site Certification, slated to occur the first week of April, 1996, FPL requests that these changes also be automatically incorporated into the Conditions of Certification (PA 89-6636) for the Lauderdale facility, in accordance with that pending modification.

**DARM Guidance Document**

The DEP Division of Air Resources Management (DARM) issued a guidance document on December 1, 1995 entitled "Rate of Operation During Compliance Testing for Combustion Turbines". Contained within that memo is language which is required to be inserted in air operating permits, if a permittee desires to utilize ambient temperature curves for compliance testing purposes. Accordingly, FPL hereby requests that the following Specific Condition be inserted in the Lauderdale PSD permit (new Specific Condition #23) and Site Certification (new Specific Condition #11.A.23):

**"Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 95-100 percent of the manufacturer's rated heat input achievable for the average ambient (or conditioned) air temperature during the test. If it is impracticable to test at capacity, then sources may be tested at less than capacity. In such cases, the entire heat input vs. inlet temperature curve will be adjusted by the increment equal to the difference between the design heat input value and 105 percent of the value reached during the test. Data, curves, and calculations necessary to demonstrate the heat input rate correction at both design and test conditions shall be submitted to the Department with the compliance test report."**

If you have any questions regarding this modification request, please do not hesitate to contact me at (407) 625-7661.

Very truly yours,

A handwritten signature in black ink, appearing to read "Richard Piper". The signature is written in a cursive style with a large initial "R".

Richard Piper  
Environmental Specialist  
Florida Power & Light Company

cc: Hamilton Oven    FDEP - Tallahassee  
    Joe Kahn        FDEP - West Palm Beach