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May 2, 1991

RECEIVED

MAY 2 1991

DER-BAQM

Clair H. Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental  
Regulation  
2600 Blair Stone Road, Room 338  
Tallahassee, Florida 32399-2400

Re: Florida Power & Light Company  
Lauderdale Power Plant  
Permit No. AC 06-179848

Dear Clair:

As you will recall, the Department issued the referenced air construction permit for Florida Power & Light Company's Lauderdale Power Plant on October 30, 1990. The permit authorizes certain modifications to the existing fuel oil handling and storage facilities at the Lauderdale Plant and imposes restrictions that ensure total emissions of volatile organic compounds from the Plant will be less than 100 tons per year. The current expiration date for the permit is June 1, 1991.

I am writing on behalf of FPL to request that the permit expiration date be extended to October 1, 1991. This additional time will allow completion of the modifications authorized under the permit and will extend the deadline for submission of FPL's application for an operation permit until July 1, 1991. Of course, the Plant will remain subject to the conditions in the construction permit until an operation permit is issued.

Clair H. Fancy, P.E.  
May 2, 1991  
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Please do not hesitate to call me if you or members of your staff have any questions regarding this request.

Sincerely,

A handwritten signature in cursive script, appearing to read "Peter".

Peter C. Cunningham

FPLLaudLtr:gbb

cc: Willard Hanks  
C. D. Henderson  
E. A. Bishop

FACSIMILE COVER SHEET

KBN Engineering and Applied Sciences, Inc.

DATE: 10/16/90

TO: Willard Hanks

ORGANIZATION: FDER - Tallahassee

FAX NUMBER: 487-4938

TELEPHONE NUMBER: 488 4805

FROM: Ken Kosky

TOTAL NUMBER OF PAGES: 2 (including cover page)

MESSAGE/INSTRUCTIONS:

No other comments!

PROJECT NUMBER: 82802

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cc: Project File \_\_\_\_\_ yes \_\_\_\_\_ no

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REVISED MAXIMUM NET VOC EMISSIONS  
FROM LAUDERDALE REPOWERING PROJECT

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Maximum Net VOC Emissions - 71.6 tons/year

Capacity Factors - 47% natural gas and 40% distillate oil

EMISSION CALCULATION:

1) Maximum emissions at 100% capacity factor -

$$\text{VOC emissions from CT on natural gas} = \\ 4 \times 1.27 \frac{\text{lb}}{\text{hr}} \times 4.38 \frac{\text{TPY}}{\text{lb/hr}} = 22.32 \text{ TPY}$$

$$\text{VOC emissions from duct burners on natural gas} = \\ 4 \times 2 \frac{\text{lb}}{\text{hr}} \times 4.38 \text{ TPY/lb/hr} = 35.2 \text{ TPY}$$

$$\text{VOC emissions from CT on distillate oil} = \\ 4 \times 7.8 \text{ lb/hr} \times 4.38 \text{ TPY/lb/hr} = 136.8 \text{ TPY}$$

2) Maximum emissions at revised capacity factors -

$$0.47 \times 22.32 \text{ TPY} + 0.47 \times 35.2 \text{ TPY} + 0.4 \times 136.8 \text{ TPY} = 81.75 \text{ TPY}$$

3) Net VOC Emissions -

$$\text{Repowered Units} = +81.75 \text{ TPY}$$

$$\text{Tank VOC Increase} = +4.80 \text{ TPY}$$

$$\text{Emission Offsets} = \underline{-14.98 \text{ TPY}}$$

$$+71.57 \text{ TPY}$$