



October 1, 1997

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BUREAU OF
AIR REGULATION

Mr. Scott M. Sheplak, P.E.
State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Draft Permit No. 0110037-004-AV
FPL Lauderdale Plant Initial Title V 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 address them with you on Monday, October 6th at 9am via conference call.

Permit Placard Page - The facility mailing address has changed to:

Florida Power & Light Company
4300 SW 42nd Avenue
Ft. Lauderdale, FL 33314

Facility Description (page 2) - The second sentence should read: "Each combined-cycle unit consists of two combustion turbines (CT's) which each exhaust through a separate heat recovery ~~heat~~ **steam** generator (HRSG)." The fifth sentence should read: "Each combined-cycle unit has a net **summer continuous** capability of 430 MW".

In addition, in Subsection B, the Fuel Oil Storage Tank #'s 2, 3 and 5 may contain either diesel fuel or Jet A or a mixture of the two. We suggest the description be changed to "light distillate oil" which should be generic enough to cover everything we handle.

Combined-Cycle Combustion Turbine Specific Conditions

Section III, Subsection A - After the list of Emission Unit ID's, the descriptive paragraph, fourth sentence should read: "Unit 4 and Unit 5 each have a net **summer continuous** capability of 430 MW."

Specific Condition A.7. (page 8) - In the table provided, the Emission Limitations heading should only apply to the lb/hr/CT column and to the 4CTs (TPY) column. The concentration column should be labelled "Basis", and not be included in the Emissions Limitations category, in accordance with the initial PSD permit for the facility.

Specific Condition A.7. (page 9) - Sulfuric acid mist emissions ~~Sulfur dioxide~~ emissions are based on a maximum.....

Specific Condition A.8. (page 9) - The following allowable emissions, determined by BACT, are tabulated for PSD and inventory purposes:

Specific Condition A.16. (page 10) - Since the combustion turbines are new sources, are they subject to 62-210.700(2)?

Specific Condition A.19 and A.20. (page 11) - The operating rate during testing should be 95-100% of the target value at the ambient temperature during testing, pursuant to Department guidance, and a recent modification to the PSD permit (please refer to Attachment A for details).

Specific Condition A.22 (page 12) - The Department has approved the steam-to-fuel monitoring systems currently utilized at the Lauderdale site, as meeting the requirements of 40 CFR 60.334(a).

Specific Condition A.23(2). (page 12) - Please note that the Lauderdale site has an approved Customized Fuel Monitoring Schedule which should be referenced in this Specific Condition.

Specific Condition A.25. (page 12) - The reference to 40 CFR 60 Appendix F should be stricken, based on earlier conversations between the department and FPL. A sentence requiring the performance of an annual RATA should be inserted instead.

Specific Condition A.26. and A.27. (page 13) - This Specific Condition is superfluous and may be removed. The Lauderdale site does not currently have Continuous Opacity Monitors, due to being fired predominantly on natural gas (opacity monitors were not required under the Acid Rain rules for emission units qualifying as "gas-fired units").

Specific Condition A.28(2). (page 14) - This Specific Condition does not apply, because the Lauderdale combined cycle units do not have opacity monitors.

Specific Condition A.32. (page 15) - This Specific Condition does not apply, because the Lauderdale combined cycle units do not have opacity monitors.

Simple-Cycle Combustion Turbine Specific Conditions

Specific Condition B.1. (page 19) - The heat input to each combustion turbine needs to be discussed.

Specific Condition B.3. (page 19) - We request that the term "light distillate oil" be used instead of "No. 2 fuel oil".

Specific Condition B.14. (page 21) - It appears that this Specific Condition and Specific Condition 22 are contradictory. We request that this Specific Condition be deleted in lieu of the language in Specific Condition 22.

Specific Condition B.16. (page 21) - This language appears to have been copied from the opacity testing language for the GT's in Specific Condition 14, which we are requesting to be deleted. The simple-cycle gas turbines have extremely low capacity factors (recently < 5%); furthermore not all the exhaust stacks are equipped for NOx sampling. FPL has historically

demonstrated compliance by sampling representative units once every five years. We suggest permit language as follows:

"NOx emissions for the combustion turbines shall be tested every five (5) years by EPA Method 20 tests as described in 40 CFR 60, Appendix A (July 1, 1996) on any representative unit in each bank of the combustion turbines. Tests shall be conducted both while burning 100% natural gas and 100% distillate oil."

Specific Condition B.18. (page 22) - FPL has historically demonstrated compliance on a representative unit in each bank of twelve combustion turbines. We suggest the following change to the Specific Condition:

"The VOC emission factors for the combustion turbines shall be confirmed every five (5) years by EPA Method 25A tests as described in 40 CFR 60, Appendix A (July 1, 1996) on any representative unit in each bank of the combustion turbines. Tests shall be conducted both while burning 100% natural gas and 100% No. 2 fuel oil."

Specific Condition B.19. (page 22) - The heat input to each combustion turbine needs to be discussed.

Specific Condition C.2. (page 26) - Actual meteorological conditions are not captured at the Lauderdale site. We request that the word "representative" be inserted in front of the word "meteorological" so that we may use data obtained from the nearest airport or other nearby sources.

Table 1-1, Air Pollutant Standards and Terms - In the table provided, the Emission Limitations heading should only apply to the lb/hr/CT column and to the 4CTs (TPY) column. The Standards column should be labelled "Basis", and not be included in the Emissions Limitations category, in accordance with the initial PSD permit for the facility.

Table 2-1, Compliance Requirements - In the table, for SO₂, the testing frequency is listed as "daily" for the sulfur content of fuel. This should read "upon receipt of distillate oil", in accordance with 40 CFR 60.334(b)(1)

Thank you for your prompt attention to the issues raised in this correspondence. I look forward to discussing these issues with you on the afternoon of September 30th. Please do not hesitate to contact me at (561) 691-7058 if I may be of further assistance.

Very truly yours,



Richard Piper
Sr. Environmental Specialist
Florida Power & Light Company

10/9/97 cc: Scott Sheplep
Tom Cascio

Broward Daily Business Review

Published Daily except Saturday, Sunday and
Legal Holidays
Fort Lauderdale, Broward County, Florida.

STATE OF FLORIDA
COUNTY OF BROWARD:

Before the undersigned authority personally appeared J. Mitchell, who on oath says that she is the Administrative Assistant of the Broward Daily Business Review 1/k/a Broward Review, a newspaper published at Fort Lauderdale, in Broward County, Florida; that the attached copy of advertisement, being a Legal Advertisement of Notice in the matter of

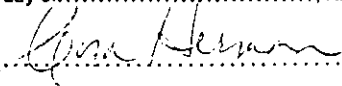
PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

XXXXXXX

In the Court,
was published in said newspaper in the issues of
Sep 25, 1997

Affiant further says that the said Broward Daily Business Review is a newspaper published at Fort Lauderdale, in said Broward County, Florida, and that the said newspaper has heretofore been continuously published in said Broward County, Florida, and has been entered as second class mail matter at the post office in Fort Lauderdale in said Broward County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.


Sworn to and subscribed before me this
25 day of September, A.D. 1997



(SEAL)
J. Mitchell personally known to me.

SPECIAL NOTARY SEAL
CORA BERLIAN
NOTARY PUBLIC STATE OF FLORIDA
COMMISSION NO. 0065487
MY COMMISSION EXPIRES MAR. 18, 1998

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION Title V DRAFT

Permit No. 0110037-001-AV
Lauderdale Plant
Broward County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Florida Power & Light Company for the Lauderdale Plant located at P.O. Box 155, Dania, Broward County. The applicant's name and address are: Florida Power & Light Company, Environmental Services Department, P.O. Box 14000, Juno Beach, Florida 33408.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant 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 Permit, 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 administrative hearing is filed pursuant to Sections 120.569 and 120.57, 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 administrative 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 Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida

32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). 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, whichever 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 determination (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 approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition shall 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 proposed 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 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 proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed 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 designed 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 affected 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 requirements 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 Administration'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 petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment 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 Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 410 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
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 904/488-1344
Fax: 850/922-6979
Affected Local Program:
Broward County Department of Natural Resource Protection
Air Quality Division
218 Southwest First Avenue
Fort Lauderdale, Florida 33301
Telephone: 954/519-1220
Fax: 954/519-1495

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible 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.

9/25 B97-4-092501

Date: 9/11/97 3:17:40 PM
From: Elizabeth Walker TAL
Subject: New posting
To: See Below

There is a new posting available on Florida's website.

0110037002AV LAUDERDALE
 FLORIDA POWER & LIGHT Draft

The notification letter is encoded and attached. If you have any questions let me know.

Thanks,
Elizabeth