



December 9, 2008

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BUREAU OF AIR REGULATION

Trina Vielhauer – Chief
Bureau of Air Regulation
Division of Air Resources Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

RE: Request To Modify FPL Lauderdale Plant PSD Permit – PSD –FL-145

Dear Trina: *Project No. : 0110037-006-AC*

During the recent Title V permit renewal process for our Lauderdale Plant, FPL and the Department became aware of the need to modify Lauderdale Plant’s existing PSD permit in order to conform it to several Title V permit changes that have been made or are requested.

The first change is to modify the language of PSD Permit Specific Condition 10.f. regarding VOC testing. The PSD permit requires Initial and Annual (I, A) testing of VOC. In 2000, at FPL’s request, the Department made a change to the existing Title V permit (0110037-001-AV) to delete the requirement of annual VOC testing. The deletion of annual VOC testing was carried into the subsequent Title V permit renewal in 2003. It was learned during the most recent Title V renewal process that the PSD permit must be modified in order to avoid modifying each subsequent Title V permit with respect to the suspension of annual VOC testing. Therefore, FPL requests that PSD Condition 10.f. be modified from: *25A for VOC (I, A)* to: *25A or 18 for VOC (I, and at permit renewal)*. (1)

The second change is a request to modify PSD Permit Specific Condition 12 which requires continuous monitoring of the steam injection rate by an installed, operated and maintained system according to 40 CFR 60 Subpart GG . The steam injection system was installed to control NOx and to demonstrate compliance via the steam to fuel ratio. The recent proposed Title V permit (0110037-005-AV) identifies the CEM as the compliance method for NOx, therefore, the requirement to operate and maintain a continuous steam injection system in longer necessary. FPL requests that PSD Permit Condition 12 be changed from: (2)

“Continuous monitoring of the steam injection rates shall be installed operated and maintained in accordance with 40 CFR 60, Subpart GG, for each combined cycle unit.”

To: NOx CEMS shall be used to demonstrate compliance with the NOx limits. The NOx CEMS are subject to the monitoring requirements of 40 CFR 60.13

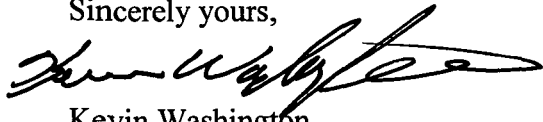
The third requested change is with respect to full load testing. In July 1996 the PSD permit was amended by new Specific Condition 23 which defined capacity for full load testing "*as 95% to 100% of the manufacturer's rated heat input achievable at the average ambient (or conditioned) air temperature during the test*". FPL requests the PSD Permit be changed to reflect that permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit [Rule 62-297.310(2) as included in Appendix TR of the Proposed Title V permit (0110037-005-AV)].

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Attached are the Responsible Official's signature page and the P.E. Certification page.

Thank you for consideration of this request. We look forward to the Department's assistance. If you have any questions or would like to discuss this matter further, please contact me at (561) 691-2877.

Sincerely yours,




Kevin Washington
Principal Environmental Specialist – FPL

Attachments: (2)

Cc: Jonathan Holtom

Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Dwayne Harper
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address - Organization/Firm: Florida Power & Light Company - Lauderdale Plant Street Address: 4300 SW 42 AV City: Ft. Lauderdale State: FL Zip Code: 33314
4. Application Responsible Official Telephone Numbers... Telephone: (954) 797-1582 ext. Fax: (954) 797-1579
5. Application Responsible Official Email Address: dwayne.harper@fpl.com
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i> Signature  Date <u>12/9/2008</u>

Professional Engineer Certification

1. Professional Engineer Name: Edward Preast Registration Number: 33225
2. Professional Engineer Mailing Address... P.O. Box 14000 Organization/Firm: Florida Power & Light Company Street Address: 800 Universe Blvd. City: Juno Beach State: Florida Zip Code: 33408
3. Professional Engineer Telephone Numbers... Telephone: (561) 691- 2679 ext. Fax: (561) 691- 7049
4. Professional Engineer E-mail Address: ed_prest@fpl.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> <i>Edward Preast</i> Signature (seal) 12/9/2008 Date

