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JUN 23 2004

BUREAU OF AIR REGULATION

June 14, 2004

Trina Vielhauer
Chief - Bureau of Air Regulation
State of Florida
Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5505
Tallahassee, FL 32399-2400

Re: Request to Modify Title V Permit; Lauderdale Plant, 0110037- 003-AV

Dear Mrs. Vielhauer,

FPL requests a modification to the permit referenced above.

FPL requests this modification as a portion of the agreement with the Division of Air Resources Management regarding Broward DPEP's withdrawal of the Lauderdale Plant Notice of Violation 03-0009.

FPL requests that Specific Condition A.31 regarding the reporting of excess emissions required under 40 CFR 60.7(c) be modified as follows:

From:

A.31. For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions that shall be reported are defined as follows:

- a. *Nitrogen oxides.* Any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with the permitted nitrogen oxide standard by the initial performance test required in 40 CFR 60.8 or any period during which the fuel-bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by the fuel-bound nitrogen allowance used during the initial performance test. Any one-hour period in which less water is applied than the system-calculated water demand is deemed to be an hour in which the average water-to-fuel ratio falls below the water-to-fuel ratio determined to demonstrate compliance. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, gas turbine load, and nitrogen content of the fuel during the period

of excess emissions, and the graphs or figures developed under 40 CFR 60.335(a). [40 CFR 60.334(c)(1)]

To:

A.31. For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions that shall be reported are defined as follows:

- a. *Nitrogen oxides.* Any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with the permitted nitrogen oxide standard by the initial performance test required in 40 CFR 60.8 or any period during which the fuel-bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by the fuel-bound nitrogen allowance used during the initial performance test. Any one-hour period in which less water is applied than the system-calculated water demand is deemed to be an hour in which the average water-to-fuel ratio falls below the water-to-fuel ratio determined to demonstrate compliance. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, gas turbine load, and nitrogen content of the fuel during the period of excess emissions, and the graphs or figures developed under 40 CFR 60.335(a). [40 CFR 60.334(c)(1)]

{Permitting Note: In practice, the CT NO_x control systems calculate the amount of steam required at a given load, not the water-to-fuel ratio required at a given load. The curve of steam demand versus CT load was developed as part of the initial performance testing. The initial performance testing demonstrated compliance with the "permitted nitrogen oxide standard" of Specific Condition A.7 of this permit}

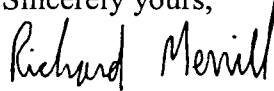
- b. *CEMS in lieu of Water-to-Fuel Ratio (Optional).* The NO_x CEMS may be used in lieu of the water-to-fuel ratio monitoring system for purposes of reporting excess emissions in accordance with 40 CFR 60.334(c)(1) and Specific Condition A.31.a. of this permit. The permittee shall notify the compliance authority prior to beginning or ending the use of this option. Under this option, for purposes of excess emissions reporting only, any one-hour period during which the CEMS indicates NO_x emissions in excess of the permitted nitrogen oxide standards shall be deemed to be periods when the water-to-fuel ratio was below that determined to be in compliance with the permitted nitrogen oxide standard.

{Permitting Note: One-hour periods during which the CEMS indicates NO_x emissions in excess of the permitted nitrogen oxide standards shall not be deemed violations of the permitted nitrogen oxides standards. The permitted nitrogen oxide standards are based on a three-hour average that corresponds to the length of the nitrogen oxide stack test method.}

For the purpose of reports required under 40 CFR 60.7(c), FPL intends to forego the use of the steam-to-fuel ratio in determining reportable excess emissions as described in Specific Condition A.31.a, and intends to use the Continuous Emissions Monitor as the basis for reporting excess emissions as described in A.31.b.

Thank you for your assistance in this matter, and, if you should have any questions, please do not hesitate to contact me at (954) 797-1582 or Kevin Washington at (561) 691-2877.

Sincerely yours,



Richard Merrill
Lauderdale Plant General Manager
Florida Power and Light Company

Cc:

Daniela Banu – Broward DPEP

Florida Power and Light Co., 4300 SW 42nd Ave. Ft. Lauderdale, FL 33314



June 14, 2004

Daniela Banu
Air Division
Broward County Department of Planning and Environmental Protection
218 S.W. 1st Avenue
Fort Lauderdale, FL 33301

RE: Florida Power & Light Company Lauderdale Power Plant
DPEP Notice of Violation NOV #03-0009

Dear Mrs. Banu:

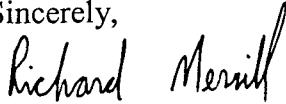
Florida Power & Light Company ("FPL") wishes to rescind its letter of May 13, 2003 to the Broward County Department of Planning and Environmental Protection ("DPEP"). The letter was a request to withdraw a telephone notification and the quarterly report for Fourth Quarter 2002.

This rescision of FPL's May 13th letter comes as a portion of the agreement reached with the FDEP Division of Air Resources Management enabling Broward DPEP to withdraw the Lauderdale Plant Notice of Violation NOV #03-0009. It is FPL's understanding that the rescision of its May 13, 2003 letter, does not expose FPL to further enforcement action by DPEP regarding the alleged excess emissions of NOx during November 2002, nor its reporting of same.

In future Quarterly Reports, FPL intends to forego the use of the steam-to-fuel ratio in determining reportable excess emissions and intends to use the Continuous Emissions Monitor as the basis for reporting excess emissions.

Thank you for your consideration in this matter. If you have any questions or require additional information, please feel free to contact me at (954) 797-1582, or Kevin Washington at (561) 691-2877.

Sincerely,

Handwritten signature of Richard Merrill in cursive script.

Richard Merrill
Lauderdale Plant General Manager
Florida Power & Light Company

CC:

Clifford Bittle
Art Pennetta
Michelle Voss
Trina Vielhauer