

**Friday, Barbara**

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**To:** Mary\_Archer@fpl.com; KKosky@Golder.com; WongP@miamidade.gov

**Cc:** Bull, Robert

**Subject:** FINAL Title V Permit Renewal - FP&L - Turkey Point Nuclear Plant #0250003-004-AV

Find attached the zip file for subject FINAL Permit Renewal for your information and files.


If I may be of further assistance, please feel free to contact me.

Barbara J. Friday  
Planner II  
Title V Section  
Bureau of Air Regulation  
(850)921-9524  
[Barbara.Friday@dep.state.fl.us](mailto:Barbara.Friday@dep.state.fl.us)

12/18/2003

## MEMORANDUM

TO: Michael G. Cooke

FROM: Trina Vielhauer 

DATE: December 3, 2003

SUBJECT: FINAL Permit No. **0250003-004-AV**  
Florida Power and Light Company  
**Turkey Point Nuclear Plant**

The subject of this permit is for the renewal of Title V Air Operation Permit No. 0250003-004-AV.

The Nuclear Plant consists of two nuclear generating units with a combined capacity of 1,332 megawatts, nine diesel emergency generators, and miscellaneous diesel engines. The two nuclear generating units which are regulated by the NRC are not included in this application. Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Compliance Assurance Monitoring (CAM) *does not apply* to these emissions units.

No comments received concerning the DRAFT Title V Permit that was clerked on August 6, 2003. *No comments* were received from U.S. EPA, Region 4, concerning the PROPOSED Title V Permit that was posted on the Department's web site on October 7, 2003.

I recommend your signature.

Attachment

TV/rlb



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

## NOTICE OF FINAL PERMIT

In the Matter of an  
Application for Permit by:

Vincent Laudato  
Responsible Official  
Florida Power and Light Company  
9760 SW 344<sup>th</sup> Street  
Florida City, FL 33035

FINAL Permit No.: 0250003-004-AV  
Turkey Point Nuclear Plant

Enclosed is FINAL Title V Air Operation Permit Number 0250003-004-AV for the operation of the Turkey Point Nuclear Plant located at 9760 SW 344<sup>th</sup> Street, Florida City, Dade County, issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit revision pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION**

Trina Vielhauer, Chief  
Bureau of Air Regulation

"More Protection, Less Process"

Printed on recycled paper.

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Vincent Laudato  
 Responsible Official  
 Florida Power and Light Company  
 9760 SW 344th Street  
 Florida City, Florida 33035

2. Article Number

(Transfer from service label) 7001 1140 0002 1577 9854

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X 

Agent

Addressee

B. Received by (Printed Name)

VINCE LAUDATO

C. Date of Delivery

1/19/04

D. Is delivery address different from item 1?  Yes

If YES, enter delivery address below:  No

3. Service Type

Certified Mail  Express Mail

Registered  Return Receipt for Merchandise

Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

U.S. Postal Service  
**CERTIFIED MAIL RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE  
 Vincent Laudato, Responsible Official

7001 1140 0002 1577 9854

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark Here

Sent To

Vincent Laudato, Responsible Official

Street, Apt. No.;  
 or PO Box No. 9760 SW 344th Street

City, State, ZIP+4  
 Florida City, Florida 33035

PS Form 3800, January 2001

See Reverse for Instructions

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL permit) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 12/18/03 to the person(s) listed, or as otherwise noted: E-mail

Vincent Laudato, Responsible Official, Turkey Point Nuclear Plant  
Mary Archer, Florida Power and Light Company  
Kennard F. Kosky, P.E., Golder Associates, Inc.  
Patrick Wong, Dade County DERM, AWQD  
U.S. EPA, Region 4

12/18/03 cc: Robley Bull  
Leadley Sile  
Christa Sile

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency Clerk, receipt of which is hereby acknowledged.

Robley Bull 12/18/03  
(Clerk) (Date)

## STATEMENT OF BASIS

Florida Power & Light  
Turkey Point Nuclear Plant  
Facility ID No. 0250003  
Dade County

Title V Air Operation Permit Renewal  
**FINAL Permit No. 0250003-004-AV**

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, 62-214, 62-296, and 62-297. The above named permittee is hereby authorized to perform the work or operate the facility shown in the application and approved drawings, plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

The Turkey Point Title V Source is composed of two separate co-located power plants: the Fossil Plant and the Nuclear Plant. As discussed in DEP Form No. 62-210.900(1), facilities which have emissions units subject to regulation by the Nuclear Regulatory Commission (NRC) may submit a separate application for those units. Therefore this permit, No. 0250003-004-AV, addresses only the (non-nuclear) operations at the Nuclear Plant. The operations at the Fossil Plant are addressed in a separate Title V permit, No. 0250003-005-AV.

The Nuclear Plant consists of two nuclear generating units with a combined capacity of 1,332 megawatts, nine diesel emergency generators, and miscellaneous diesel engines. The two nuclear generating units which are regulated by the NRC are not included in this application.

Emissions unit 005 consists of four Electro-Motive (GM) Model 20-645-E4 emergency diesel generators. The generators are referred to by facility personnel as units 3A, 3B, 4A, and 4B. The generators supply backup power to the nuclear power plant auxiliary equipment. These units fire low sulfur (0.5%) diesel fuel. Units 3A and 3B commenced operation in November, 1972, while units 4A and 4B commenced operation in 1991. CAM does not apply.

Emissions unit 006 consists of five other diesel emergency generators used for the plant's security system, wastewater treatment and water supply, and meteorological assessment. These generators also fire low sulfur (0.5%) diesel fuel. CAM does not apply.

Emissions unit 007, consists of the following miscellaneous diesel plant equipment:

- (6) Service Air compressor diesel engines;
  - (3) hydrolazer diesel engines;
  - (2) instrument air compressor diesel engines;
  - (1) standby steam generator feed pump diesel engine;
  - (1) service water diesel pump.
- CAM does not apply.

Also included in this permit are miscellaneous insignificant emissions units and activities.

Based on the Title V Permit Renewal application received May 12, 2003, this Title V Source is a major source of hazardous air pollutants (HAPs).

Florida Power & Light  
Turkey Point Nuclear Plant  
**Facility ID No.:** 0250003  
Dade County

Title V Air Operation Permit Renewal  
**FINAL Permit No.:** 0250003-004-AV  
Renewal of Title V Air Operation Permit No.: 0250003-002-AV

Permitting Authority:

State of Florida  
Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation  
Title V Section

Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Telephone: 850/488-0114  
Fax: 850/922-6979

Compliance Authority:

Dade County Department of Environmental Resources Management  
33 Southwest Second Avenue, Suite 900  
Miami, Florida 33130-1540

Telephone: 305/372-6925  
Fax: 305/372-6954

Title V Air Operation Permit Renewal  
**FINAL Permit No.:** 0250003-004-AV  
Renewal of Title V Air Operation Permit No.: 0250003-002-AV

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Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

**Permittee:**

Florida Power & Light Company  
Turkey Point Nuclear Plant  
9760 S.W. 344th Street  
Florida City, Florida 33035

**FINAL Permit No.:** 0250003-004-AV  
**Facility ID No.:** 0250003  
**SIC Nos.:** 49, 4911  
**Project:** Title V Air Operation Permit Renewal

This permit is for the operation of the Turkey Point Nuclear Plant, and to renew Title V Air Operation Permit No. 0250003-002-AV. This facility is located 10 miles east of Florida City on Palm Drive, Dade County; UTM Coordinates: Zone 17, 567.2 km East and 2813.2 km North; Latitude: 25° 26' 09" North and Longitude: 80° 19' 52" West.

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

**Referenced attachments made a part of this permit:**

Appendix U-1, List of Unregulated Emissions Units and Activities  
Appendix I-1, List of Insignificant Emissions Units and Activities  
APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)  
TABLE 297.310-1, CALIBRATION SCHEDULE (version dated 10/07/96)  
APPENDIX TV-4, TITLE V CONDITIONS (version dated 02/12/02)

**Effective Date:** January 1, 2004  
**Renewal Application Due Date:** July 5, 2008  
**Expiration Date:** December 31, 2008

A handwritten signature in cursive script, appearing to read "Michael G. Cooke".

Michael G. Cooke, Director,  
Division of Air Resource Management

MGC/sms/bb

## Section I. Facility Information

### Subsection A. Facility Description

The Turkey Point Title V Source is composed of two separate co-located power plants: the Fossil Plant and the Nuclear Plant. This permit, No. 0250003-004-AV, addresses only the (non-nuclear) operations at the Nuclear Plant. The operations at the Fossil Plant are addressed in a separate Title V permit, No. 0250003-005-AV.

The Nuclear Plant consists of two nuclear generating units with a combined capacity of 1,332 megawatts, nine diesel emergency generators, miscellaneous diesel engines, and miscellaneous unregulated and insignificant emissions units and/or activities. This permit does not address the two nuclear generating units which are regulated by the Nuclear Regulatory Commission (NRC).

Based on the initial Title V permit renewal application received May 12, 2003, this Title V Source is a major source of hazardous air pollutants (HAPs).

### Subsection B. Summary of Emissions Unit ID No.s and Brief Descriptions

#### E.U. ID

<u>No.</u>	<u>Brief Description</u>
-005	(4) 2.5 MW Diesel Emergency Generators
-006	(5) Other Diesel Emergency Generators
-007	Miscellaneous Diesel Plant Equipment
-008	Unregulated Emissions Units and/or Activities (See Appendix U-1)

*Please reference the Permit No., Facility ID No., and appropriate Emissions Unit ID No(s) on all test report submittals, applications, and other correspondence.*

### Subsection C. Relevant Documents

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms  
Table 2-1, Summary of Compliance Requirements  
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers  
Appendix H-1, Permit History  
Statement of Basis

These documents are on file with the permitting authority:

Title V Permit Renewal Application received May 12, 2003

## Section II. Facility-wide Conditions

### The following conditions apply facility-wide:

1. APPENDIX TV-4, TITLE V CONDITIONS, is a part of this permit. {Permitting note: APPENDIX TV-4, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}

2. Not Federally Enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.  
[Rule 62-296.320(4)(b)1. & 4., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA).

a. The permittee shall submit its risk management plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions, or updates to submittals, should be sent to

RMP Reporting Center  
Post Office Box 3346  
Merrifield, VA 22116-3346  
Telephone: 703/816-4434

and,

b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C. [40 CFR 68]

5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit. [Rule 62-213.440(1), F.A.C.]

6. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.  
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]

7. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.  
[Rule 62-296.320(1)(a)]

**8. Not Federally Enforceable.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

1. Paving of roads, parking areas and equipment yards;
2. Landscaping and planting vegetation;
3. Use of thick poly-flaps over doorways to prevent any sandblasting material from leaving the sandblast facility. The facility also constructs temporary sandblasting enclosures when necessary in order to perform sandblasting on fixed plant equipment.
4. Maintenance of paved areas;
5. Regular mowing of grass and care of vegetation;
6. Limiting access to plant property by unnecessary vehicles;
7. Bagged chemical products are stored in weather-tight buildings until they are used. Spills of powdered chemical products are cleaned up as soon as possible.
8. Vehicles are restricted to slow speeds on the plant site.

[Rule 62-296.320(4)(c)2., F.A.C.]

**9.** When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440. F.A.C.]

**10. Statement of Compliance.** The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C. [Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-4, TITLE V CONDITIONS)}

**11.** The permittee shall submit all compliance related notifications, and reports required of this permit to:

Dade County Department of Environmental Resources Management (DERM)  
33 Southwest Second Avenue, Suite 900  
Miami, Florida 33130-1540  
Telephone: 305/372-6925  
Fax: 305/372-6954

Note: if acceptable to the agency, applicable correspondence may be submitted by electronic mail.

**12.** Any reports, data, notification, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency  
Region 4  
Air, Pesticides, & Toxics Management Division  
Operating Permits Section  
61 Forsyth Street  
Atlanta, Georgia 30303  
Telephone: 404/562-9099  
Fax: 404/562-9163

**13. Certification by Responsible Official (R.O.).** In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, that statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.

[Rule 62-213.420(4), F.A.C.]

### Section III. Emissions Units and Conditions

#### E.U. ID    Brief Description

##### No.

-005	(4) 2.5 MW Diesel Emergency Generators
-006	(5) Other Diesel Emergency Generators
-007	Miscellaneous Diesel Plant Equipment

Emissions unit -005 consists of four Electro-Motive (GM) Model 20-645-E4 emergency diesel generators. The generators are referred to by facility personnel as units 3A, 3B, 4A, and 4B. The generators supply backup power to the nuclear power plant auxiliary equipment. These units fire low sulfur (0.5%) diesel fuel. Units 3A and 3B commenced operation in November, 1972, while units 4A and 4B commenced operation in 1991.

Emissions unit -006 consists of five other diesel emergency generators used for the plant's security system, wastewater treatment, and meteorological assessment. These generators also fire low sulfur (0.5%) diesel fuel.

Emissions unit -007, consists of the following miscellaneous diesel plant equipment:

- (6) Service Air compressor diesel engines;
- (3) hydrolazer diesel engines;
- (2) instrument air compressor diesel engines;
- (1) standby steam generator feed pump diesel engine;
- (1) service water diesel pump

{Permitting note: These units are regulated under Reasonably Available Control Technology (RACT) - Requirements for Major VOC- and NO<sub>x</sub>-Emitting Facilities Rule 62-297.570, F.A.C. Note: these emissions units exceed the fuel usage limits to qualify for exemption under Rule 62-210.300(3)(a).20. and 21., F.A.C.}

#### Essential Potential to Emit (PTE) Parameters

**A.1. Permitted Capacity.** The maximum heat input to each generator in emissions unit -005 shall not exceed 24.89 MMBtu per hour. Heat input may be determined by using fuel flow meters in conjunction with the Btu content of the fired fuel. The maximum heat input to each generator in emissions unit -006 shall not exceed 4.08 MMBtu per hour. Emissions unit -007 heat input shall not exceed 5.85 MMBtu per hour.

[Rules 62-4.160(2) & 62-210.200 (PTE), F.A.C.]

**A.2. Emissions Unit Operating Rate Limitation After Testing.** See specific condition A.13.

[Rule 62-297.310(2), F.A.C.]

**A.3. Methods of Operation - Fuels.** The only fuel authorized to be burned is new diesel fuel. The sulfur content shall not exceed 0.5 percent by weight.  
[Rules 62-4.160(2), 62-210.200, and 62-213.440(1), F.A.C.; applicant requested per Title V application.]

**A.4. Annual Hours of Operation.** The units may operate continuously, i.e., for 8,760 hours per year.  
[Rule 62-210.200, F.A.C.]

### **Emission Limitations and Standards**

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

{Permitting Note: Unless otherwise specified, the averaging time(s) for Specific Condition A.5 is based upon specified averaging time of the applicable test method.}

**A.5. Nitrogen Oxides.** NO<sub>x</sub> emissions shall not exceed 4.75 lb. per million Btu heat input. These limits shall apply at all times except during periods of startup, shutdown, or malfunction.  
[Rule 62-296.570(4)(b)7. and (c), F.A.C.]

### **Excess Emissions**

**A.6.** Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department or DERM for longer duration.  
[Rule 62-210.700(1), F.A.C.]

**A.7.** Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.  
[Rule 62-210.700(2), F.A.C.]

**A.8.** Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.  
[Rule 62-210.700(4), F.A.C.]

### **Test Methods and Procedures**

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**A.9. NO<sub>x</sub> Emissions:** For units that are not equipped with a continuous emissions monitoring system (CEMS) for NO<sub>x</sub>, compliance with the emission limits shall be demonstrated by annual emission testing in accordance with applicable EPA Reference Methods from Rule 62-297.401, F.A.C., or other methods approved by the Department in accordance with the requirements of Rule 62-297.620, F.A.C., except as otherwise provided in Rule 62-296.570(4)(b), F.A.C. Annual emission testing shall be conducted during each federal fiscal year (October 1 - September 30). *Annual compliance testing while firing oil is unnecessary for units operating less than 400 hours in the current federal fiscal year.* Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision.

For small diesel engines (heat input less than 5 million Btu per hour) operating 400 hours per year or more, compliance shall be demonstrated by a stack test on at least one representative engine for each group of identical engines within the facility.  
[Rules 62-296.570(4)(a)3., and 62-297.310(7)(a)3., F.A.C.]

**A.10.** The test method for NO<sub>x</sub> shall be EPA Method 7 or 7E, incorporated and adopted by reference in Chapter 62-297, F.A.C.  
[Rules 62-296.570(4)(a)3. and 62-297.401(7), F.A.C.]

**A.11. Determination of Process Variables.**

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

**A.12. Required Number of Test Runs.** For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic



mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

**A.13. Operating Rate During Testing.** Testing of emissions shall be conducted with each emissions unit operating at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

**A.14. Calculation of Emission Rate.** The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

**A.15. Applicable Test Procedures.**

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. (Not applicable.)

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) (Not applicable.)

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.

(e) (Not applicable.)

[Rule 62-297.310(4), F.A.C.]

**A.16. Required Stack Sampling Facilities.** When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1; Stack Sampling Facilities, attached to this permit. Additionally, the permittee of an emissions unit that is not required to conduct a compliance test on at least an annual basis may use permanent or temporary stack sampling facilities. If the permittee chooses to use temporary sampling facilities on an emissions unit, and DERM elects to test the unit, such temporary facilities shall be installed on the emissions unit within five days of a request by DERM and remain on the unit until the testing is complete.

[Rule 62-297.310(6), F.A.C.]

**A.17. Frequency of Compliance Tests.** The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

1. (Not applicable.)
2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid fuel for more than 400 hours other than during startup.
3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
  - a. Did not operate; or
  - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
  - a. Visible emissions, if there is an applicable standard;
  - b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
  - c. Each NESHAP pollutant, if there is an applicable emission standard.
5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.
6. (Not applicable.)
7. (Not applicable.)
8. (Not applicable.)
9. (See Specific Condition A.22.)
10. An annual compliance test conducted for visible emissions shall not be required for units exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62-210.300(4), F.A.C.

(b) Special Compliance Tests. When the Department or DERM, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the

emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department or DERM, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7)(a)2., 3., 4., 5., 10., (b) & (c), F.A.C.; SIP approved]

**A.18.** By this permit, annual and permit renewal compliance testing for NOx emissions is not required for these emissions units while burning diesel fuel for less than 400 hours in each generator or engine in the current federal fiscal year.

[Rules 62-297.310(7)(a)3. and 4., F.A.C.]

#### **Recordkeeping and Reporting Requirements**

**A.19.** In the case of excess emissions resulting from malfunctions, the permittee shall notify the Dade County Department of Environmental Resources Management in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Dade County Department of Environmental Resources Management.

[Rule 62-210.700(6), F.A.C.]

**A.20.** Submit to the Dade County Department of Environmental Resources Management a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the permittee of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years.

[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

#### **A.21. Test Reports**

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department and Dade County Department of Environmental Resources Management on the results of each such test.

(b) The required test report shall be filed with the Department and Dade County Department of Environmental Resources Management as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department and Dade County Environmental Resources Management to determine if the test was properly conducted and the test results properly

computed. The test report other than for an EPA or DEP Method 9 test, shall provide the following information, as appropriate:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

**A.22.** The owner or operator shall notify the Department or DERM, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

[Rule 62-297.310(7)(a)9., F.A.C.]

## Appendix H-1: Permit History

**Florida Power and Light  
Turkey Point Nuclear Station**

**FINAL Permit No.: 0250003-004-AV  
Facility ID No.: 0250003**

E.U. ID No.	Description	Permit No.	Effective Date	Expiration Date	Project Type <sup>1</sup>
All	Facility	0250003-002-AV	1/1/1999	12/31/2003	Initial
All	Facility	0250003-004-AV	1/1/2004	12/31/2008	Renewal

<sup>1</sup> Project Type (select one): Title V: Initial, Revision, Renewal, or Admin. Correction; Construction (new or mod.); or, Extension (AC only).

## Appendix I-1, List of Insignificant Emissions Units and Activities

Florida Power & Light  
Turkey Point Nuclear Station  
Page 1 of 4

FINAL Permit No.: 0250003-004-AV

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62.210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

### **Brief Description of Emissions Unit and Activities**

1. Internal combustion engines in boats, aircraft and vehicles used for transportation of passengers or freight.
2. Cold storage refrigeration equipment, except for any such equipment located at a Title V source using an ozone-depleting substance regulated under 40 CFR Part 82.
3. Vacuum pumps in laboratory operations.
4. Equipment used for steam cleaning.
5. Belt or drum sanders having a total sanding surface of five square feet or less and other equipment used exclusively on wood or plastics or their products having a density of 20 pounds per cubic foot or more.
6. Equipment used exclusively for space heating, other than boilers.
7. Laboratory equipment used exclusively for chemical or physical analyses.
8. Brazing, soldering or welding equipment.
9. One or more emergency generators located within a single facility provided:
  - a. None of the emergency generators is subject to the Federal Acid Rain Program; and
  - b. Total fuel consumption by all such emergency generators within the facility is limited to 32,000 gallons per year of diesel fuel, 4,000 gallons per year of gasoline, 4.4 million standard cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.
10. One or more heating units and general purpose internal combustion engines located within a single facility provided:
  - a. None of the heating units or general purpose internal combustion engines is subject to the Federal Acid Rain Program; and
  - b. Total fuel consumption by all such heating units and general purpose internal combustion engines within the facility is limited to 32,000 gallons per year of diesel

**Appendix I-1, List of Insignificant Emissions Units and Activities**

- fuel, 4,000 gallons per year of gasoline, 4.4 million standard cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.
11. Fire and safety equipment.
  12. Surface coating operations within a single facility if the total quantity of coatings containing greater than 5.0 percent VOCs, by volume, used is 6.0 gallons per day or less, averaged monthly, provided:
    - a. Such operations are not subject to a volatile organic compound Reasonably Available Control Technology (RACT) requirement of Chapter 62-296, F.A.C.; and
    - b. The amount of coatings used shall include any solvents and thinners used in the process including those used for cleanup.
  13. Surface coating operations utilizing only coatings containing 5.0 percent or less VOCs, by volume.
  14. Degreasing units using heavier-than-air vapors exclusively, except any such unit using or emitting any substance classified as a hazardous air pollutant.
  15. Bakery ovens and confection cookers when the products are edible and intended for human consumption.
  16. Laundry dryers, extractors or tumblers for fabrics cleaned with only water solutions of bleach or detergents.
  17. Portable air curtain incinerators except any air curtain incinerator intended to be continuously operated at one site for more than six months or at any Department- permitted landfill for any length of time; provided:
    - a. Only land clearing debris or clean dry wood is burned;
    - b. Pit width, length, and side walls are properly maintained so that combustion of the waste within the pit is maintained at an adequate temperature and with sufficient air recirculation to provide enough residence time and mixing for complete combustion and control of emissions. Pit width shall not exceed twelve (12) feet, and vertical side walls shall be maintained;
    - c. No waste is positioned to be burned above the level of the air curtain in the pit;
    - d. Visible emissions do not exceed 40 percent opacity except for up to 30 minutes during periods of startup and shutdown;
    - e. The air curtain incinerator is located at least 300 feet away from any occupied building if it has refractory- lined walls and forced underdraft air or otherwise at least 1,000 feet away from any occupied building; and
    - f. The burning is ignited after 9:00 a.m. and extinguished at least one hour before sunset, except that, in the case of an air curtain incinerator with refractory-lined walls and forced underdraft air which is located at least 1,000 feet away from any off-site occupied building, the burning may commence at sunrise, and the air curtain incinerator may be charged until sunset provided it does not create a nuisance.
  18. Turbine Lube Oil system components.
  19. Activities and/or emission sources regulated by the Nuclear Regulatory Commission pursuant to the Atomic Energy Act.



**Appendix I-1, List of Insignificant Emissions Units and Activities**

Insignificant Activities

Reactor Power Operation	Refueling Water Tank	Pressurizer
Fuel Pool Cooling	Reactor Drain Tank	Letdown Heat Exchanger
Safety Injection Tanks	RCP Seal Injection	Reactor Refueling
Misc. Primary System Cooling	Contaminant Cleanup	Laundry Drain Tank
Contaminant Purge	Equipment Drain Tank	Plant Vent
Waste Hold-up Tanks	PCP Oil Collection Tank	Waste Ion Exchange and Filters
Volume Control Tank	Spent Resin Tank	Hol-up Tanks
Surge Tank	Primary Water Tank/Degas	Gas Decay Tanks
Boric Acid Storage Tank	Control Room kitchen vents	Aux Building Exhaust
Control Room Toilet Vents	Chemical Add Tank	Lead Acid Battery Room Vents
High Pressure Safety Injection	Health Physics Office Vent	Low Pressure Safety Injection
Laundry Rooms Vents	Containment Spray	Resin Transfer Operations
Chemical Hot Labs	RCS Sample System	PASS Sample System
Demineralizer Water Tank	Fuel Pool	Chemistry/HP Counting Rooms
Fuel Building Exhaust	Diesel Oil Storage Tanks	Dry Storage Warehouse
Offices/ computer rooms	Electrical Generator CO <sub>2</sub>	Electrical Generator H <sub>2</sub>
Turbine Switch Gear	Transformer Cooling Fans	Transformer Maintenance
Atmospheric Dumps	Safety Relief Valves	Auxiliary Steam
Steam Jet Air Ejector	Water Box Priming	Gland Steam Recovery Tank
Condensate Polisher	Chemical Addition Tanks	Wet Lay-up System and Tank
System Generator Blowdown	Chemistry Cold Lab	Chemistry Operations Offices
Chemistry Store Room	Turbine Lube Oil Tank	Oily Water Separators
Satellite Accumulation Drum	Used Oil Collection	Screen Wash Collection Pit
Raw Water Storage Tank	Resin and Charcoal Vessels	Neutralization Basin
Neutralization Tank	Sulfuric Acid Tank	Sodium Hydroxide Tanks
Brine Heating Tank	Degasifier	AC Shop Vents
Equipment	Gas house	Nitrogen Dewar / Trailer
Hydrogen tube Trailer	Hydrolazing	Pesticide Application
Lawn Maintenance	Open Material Stockpiles	Storm Basins
Temporary Trailer Offices	Port-a-johns	Feed Pump Seal Leakoff/Tank
Ranger Hut Vents	Machine Stop Vents	Sewage Plant gases
Sludge Tankers	Maintenance Building Vents	Covered Work Area Vents
Cafeteria Vents	ANPO Vents	Fire House Materials
Break Area Vents	Carpenter Shop/Office Vents	Weld Test Shop Vents
Speakout Vents	HP Support Office Vents	Shop Vents
Backfit QC Building Vents	Paint Building Vents	Oil Storage Building Vents
Switchyard Transformer Vents	Fitness Center Vents	Picnic Pavillion Vents
Gun Range	Day Care Center Vents	'Slime Sucker' pumps @ L.U.

Insignificant Activities Cont.

Operations Support Center Vents  
Backfit Maintenance Building Vents  
Security Building Vents  
Radioactive Source Building Vents  
Haz Waste Storage Building Vents  
Liquid Radwaste Monitoring Tanks  
Waste Gas Compressors  
Lube Oil Vapor Extractor System  
Turbine Cooling Water System  
Steam Generator Wet Lay-up  
Water Treatment Plant control building  
Use of spray cans and solvents for routine Maintenance

Warehouse offices Vents  
Steam Generator Sludge Lancing  
HP/FFD/Site Med/Sec Office Vents  
Nuclear Administration Building Vents  
Aerosol Can Puncturing  
Boric Acid Make-up Tanks  
CVCS Ion Exchange and Filters  
DEH System Reservoir  
Excitor Cooling System  
Flammable Liquid Storage Cabinets  
Condenser Storage Tank and Degasifier

**Appendix U-1, List of Unregulated Emissions Units and Activities**

Florida Power & Light Company

FINAL Permit No.: 0250003-004-AV

Turkey Point Nuclear Station

Unregulated Emissions Units and Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The emissions units and activities listed below are neither ‘regulated emissions units’ nor ‘insignificant emissions units’.

**E.U. ID No.      Brief Description of Emissions Unit and Activity**

008	Lube oil vapor extractor system
	Turbine lube oil tank
	Sulfuric Acid Tank
	Open material stockpiles
	Wastewater treatment plant gases
	Paint building vents
	Hazardous waste storage building vents
	Aerosol can puncturing
	Miscellaneous Diesel Driven Pumps
	Slime Sucker pumps
	Chemical add tanks
	Gun Range
	70,000 gallon No. 2 light oil tank
	40,400 gallon No. 2 light oil tank
	4,000 gallon unleaded fuel tank
	(4) 2,000 gallon diesel fuel storage tanks
	(2) 4,000 gallon diesel oil storage tanks
	200 gallon unleaded fuel tank
	Unleaded gasoline dispensing facilities with monthly throughput of less than 2,000 gallons
	Fugitive emissions, Particulate matter and VOC's