

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



December 19, 2000

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DEC 21 2000

BUREAU OF AIR REGULATION

Mr. C. H. Fancy, P.E., Chief Bureau of Air Regulation
Florida Department of Environmental Protection
Bureau of Air Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Attention: Mr. A. A. Linero, P.E., Administrator of New Source Review Section

RE: COMMENTS TO DRAFT PERMIT
FLORIDA POWER & LIGHT COMPANY
TWO 170 MW SIMPLE CYCLE GAS TURBINES
DEP FILE NO. 0710002-009-AC (PSD-FL-298)

Dear Al:

This correspondence is submitted to provide comments to the Draft Permit for the above referenced project. The comments on the Draft Permit are presented below.

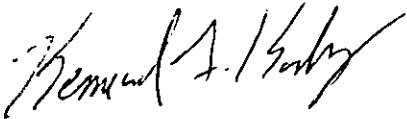
Section III. Specific Condition 8. Gas-Fired Heaters: The maximum heat input for the gas fired heaters will be 24 mmBtu/hr as stated in the permit application. In addition, the ambient conditions are not applicable to the heat input to the heaters. The conditions should be worded as follows: "The maximum heat input rate is 24 mmBtu/hr and the only fuel shall be natural gas."

Section III. Specific Conditions 16. d. and 19. d. Gas-Fired Heaters: Since both gas-fired heaters are identical and the emission rates are relatively low, it is requested that the Department consider a requirement of testing on only one of these two units or identical unit at the plant site. With the Repowering Project there will also be gas-fired heaters when the units are operated in simple cycle mode. In addition, it is requested that once compliance is demonstrated that the Department considers only requiring a compliance test prior to obtaining an operation permit. This suggestion is consistent with Rule 62-297.310(7)4.b. F.A.C., which only requires testing if the emission unit has the potential to emit 100 tons/year or more. If acceptable to the Department, the following sentence is offered for consideration and could be added at the end of each condition: "An initial compliance test shall be conducted on one of the gas heaters or another identical gas heater at the plant site, which is selected at random. If compliance is demonstrated, testing is not required on the remaining gas heaters associated with this permit. Thereafter, compliance testing shall be performed on one of the gas heaters or another identical gas heater (selected at random) prior to obtaining renewal of an air operating permit."

The opportunity to provide these comments is appreciated. Please call if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.



Kennard F. Kosky, P.E.
Principal

KFK/jkw

cc: Rich Piper, FPL
Bernie Tibble, FPL
Teresa Heron, FDEP-BAR

C. Carlson

P:\Projects\1999\9937\9937613a\02\# 02ltr.doc

D. Knowles, SP

EPA

NPS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

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BUREAU OF AIR REGULATION

4 APT-ARB

A. A. Linero, P.E.
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: Preliminary Determination and Draft PSD Permit for FPL - Fort Myers Plant
(PSD-FL-298) located in Lee County, Florida

Dear Mr. Linero:

Thank you for sending the preliminary determination and draft prevention of significant deterioration (PSD) permit for FPL - Fort Myers Plant dated October 26, 2000. The preliminary determination is for the proposed construction and operation of two simple cycle combustion turbines (CTs) with a total nominal generating capacity of 340 MW to be located near Tice, FL. The combustion turbines proposed for the facility are General Electric (GE), frame 7FA units. The CTs will primarily combust pipeline quality natural gas with No. 2 fuel oil combusted as backup fuel. As proposed, the CTs will be allowed to fire natural gas up to 8,760 hours per year and fire No. 2 fuel oil a maximum of 500 hours per year. The CTs will be allowed to operate in high power modes (power augmentation or peaking) for a maximum of 500 hours/year. Total net emissions increases from the proposed project are above the thresholds requiring PSD review for volatile organic compounds (VOC).

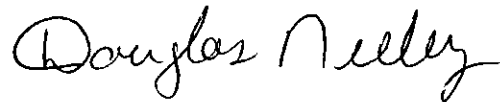
Based on our review of the PSD permit application, preliminary determination and draft PSD permit, we have the following comments:

1. We suggest you verify the independence of this simple cycle combustion turbine project from the previous combined cycle combustion turbine project already permitted, but not yet under construction, at the FPL - Fort Myers Plant. As part of the verification, please assess whether hazardous air pollutant emissions from the combined cycle and simple cycle combustion turbines should be added together to evaluate the potential applicability of 112(g) case-by-case maximum achievable control technology requirements.
2. The "Direct Annual Costs" section of the catalytic oxidation cost analysis lists an "Inventory Cost" (capital recovery for 1/3 catalyst) of \$28,548/year. This figure is included in the economic analysis in addition to the "Catalyst Cost" of \$224,667/year, which is already included in the "Direct Annual Costs" section of the economic analysis. Additionally, The Annualized Total Direct Capital figure of \$176,070/year includes the capital recovery of the

initial catalyst cost (\$780,000) which is listed in the Direct Capital Costs section. Information should be provided in order to evaluate the need for both costs and verify that catalyst costs and capital recovery of the catalyst are not being double-counted.

Thank you for the opportunity to comment on the FPL - Fort Myers Plant preliminary determination and draft PSD permit. If you have any questions regarding these comments, please direct them to either Katy Forney at 404-562-9130 or Jim Little at 404-562-9118.

Sincerely,

A handwritten signature in cursive script that reads "Douglas Neeley".

R. Douglas Neeley

Chief

Air and Radiation Technology Branch

Air, Pesticides and Toxics

Management Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8960

DEC 01 2000

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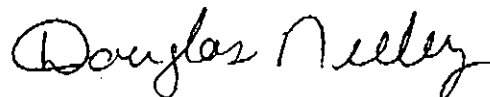
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2

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Sincerely,



R. Douglas Neeley
Chief

Air and Radiation Technology Branch
Air, Pesticides and Toxics
Management Division

cc: J. P. [unclear]
C. [unclear]
V. [unclear], SD
K. [unclear], [unclear]
NPS



P.O. Box 430, Ft. Myers, FL 33902-0430

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BUREAU OF AIR REGULATION

November 6, 2000

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7000 0520 0012 3152 5186

Mr. A. A. Linero
New Source Review Section
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

**RE: FORT MYERS PLANT
SIMPLE CYCLE GE FRAME 7A COMBUSTION TURBINES**

Dear Mr. Linero;

Enclosed please find the **Affidavit of Publication of the Intent to Issue an Air Construction Permit** for the Florida Power & Light Company Fort Myers Plant. This notice was published in the Fort Myers News-Press on November 3, 2000. If you have any questions, please contact me at (941) 693-4390. Thank You!

Sincerely,

Bernie Tibble
Bernie Tibble

cc: J. Nelson
C. Carlson
D. Knowles, SD
B. Waley, EPA
J. Bennett, NPS

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NOV 09 2000

BUREAU OF AIR REGULATION

NEWS-PRESS

Published every morning - Daily and Sunday
Fort Myers, Florida

Affidavit of Publication

STATE OF FLORIDA
COUNTY OF LEE

Before the undersigned authority, personally appeared
Kieanna Henry
who on oath says that he/she is the
Asst. Legal Clerk of the News-Press, a daily newspaper,
published at Fort Myers, in Lee County, Florida; that the
attached copy of advertisement, being a
Legal Notice
in the matter of DEP Air Construction Permit to Fla
Power & Light
in the _____ Court
was published in said newspaper in the issues of
November 3, 2000

Affiant further says that the said News-Press is a paper of
general circulation daily in Lee, Charlotte, Collier, Glades
and Hendry Counties and published at Fort Myers, in said
Lee County, Florida and that said newspaper has heretofore
been continuously published in said Lee County; Florida, each
day, and has been entered as a second class mail matter at
the post office in Fort Myers in said Lee County, Florida, for a
period of one year next preceding the first publication of the
attached copy of the advertisement; and affiant further says
that he/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.

Kieanna Henry (signature)

Sworn to and subscribed before me this

3rd day of Novmeber 2000 by

Kieanna Henry

personally known to me or who has produced

as identification, and who did or did not take an oath.

Notary Public Brenda Leighton (signature)

Print Name _____

My commission Expires:



Brenda Leighton
MY COMMISSION # 00808903 Expires
February 14, 2003
EXTENDED THROUGH TRAINING COURSE

PUBLIC NOTICE OF
INTENT TO ISSUE AIR
CONSTRUCTION
PERMIT
STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION
DEP File No. 0710002-
009-AC (PSD-FL-298)
Florida Power & Light
Fort Myers Plant
340 Megawatt Simple
Cycle Project
Lee County

The Department of
Environmental Protec-
tion (Department)
gives notice of its in-
tent to issue an air
construction permit un-
der the requirements
for the Prevention of
Significant Deteriora-
tion (PSD) of Air Quali-
ty to Florida Power &
Light Company (FPL).
The permit is to con-
struct two 170 mega-
watt (MW) natural gas
and distillate fuel oil-
fired combustion tur-
bine-electrical genera-
tors with 80-foot stacks
and natural gas heaters
at the Fort Myers Plant
near Tice, Lee County.
A Best Available Con-
trol Technology
(BACT) determination
was required only for
emissions of volatile or-
ganic compounds
(VOC) pursuant to
Rule 62-212.400, F.A.C.
The applicant's name
and address are Flori-
da Power & Light, Fort
Myers Plant, Post Of-
fice Box 430, Fort My-
ers, Florida 33902.

The new units will be
nominal 170 MW Gener-
al Electric PG7241FA
combustion turbines-
electrical generators
operating in simple cy-
cle. Each unit will be
permitted to operate 8,760
hours per year while firing
natural gas. Within the 8,760
hours, each unit will be
permitted to burn max-
imum 0.05 percent sul-
fur distillate fuel oil for
500 hours and to oper-
ate in high power
modes (peaking or
power augmentation)
for 500 hours.

The BACT emission
limits for VOC are 1.5
parts per million, dry
(ppmvd), when burn-
ing gas and 3.5 ppmv
wet, when burning fuel
oil. A BACT determina-
tion was not required
for the other key pollut-
ants such as nitrogen
oxides (NOx), carbon
monoxide (CO), partic-
ulate matter
(PM/PM10), sulfuric
acid mist (SAM), and
sulfur dioxide (SO2).
Emissions of the non-
BACT pollutants will be
controlled to low levels
by use of inherently
clean fuels, combustion
techniques such as Dry
Low NOx, or wet injec-
tion.

The maximum poten-
tial annual emissions in
tons per year (tpy) are
summarized below. Be-
cause of an ongoing
repowering project in-
volving shut down of
existing residual oil-
fired units, there will
be net contemporane-
ous emission reduc-
tions for all pollutants
except VOC and CO.
PSD review was re-
quired only for VOC.
Pollutants; Project In-

AFFIDAVIT OF PUBLICATION

NEWS-PRESS
"Serving Southwest Florida Since 1884"

creases (tpy); Contemporaneous Changes (tpy); Net Changes (tpy)

PM/PM10: 91, 293, -202
SAA: 4, -494, -890
SO2: 91, -20, 400, -20, 309
NOX: 741, -5, 217, -4, 476
VOC: 26, 36, 62
CO: 280, 238, 42

Ambient air pollutant concentration increases caused by the simple cycle project, in respect of the re-powering project, will be less than the applicable significant impact levels.

The Department will issue the FINAL permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments and requests for public meetings concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of 'Public Notice of Intent to Issue Air Construction Permit.' Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

This Fort Myers Project is not subject to review under Section 403.506, F.S. (Power Plant Siting Act), because it provides for no expansion in steam generating capacity.

The Department 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., before the deadline for filing a petition.

The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station # 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any per-

the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding. In accordance with the requirements set forth above:

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:
Florida Department of Environmental Protection, Bureau of Air Regulation, 111 S. Magnolia Drive, Suite 4, Tallahassee, Florida, 32301 Telephone: (850)488-0114 Fax: (850)922-6979

Florida Department of Environmental Protection, South District Office, 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33902-2549 Telephone: (941)332-6975 Fax: (941)332-6969

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information. The Department's technical evaluations and Draft Permit can be viewed at www.dep.state.fl.us/