

Memorandum

Florida Department of Environmental Protection

TO: Howard L. Rhodes

THRU: Trina L. Vielhauer
A. A. Linero *aa* 4/21

FROM: Teresa Heron

DATE: April 21, 2003

SUBJECT: FPL Ft. Myers 340 MW Simple Cycle Combustion Turbine Project
Representative Compliance Stack Test
DEP File No. 0710002-013-AC and PSD-FI-298

Attached is the final permit modification package for the Ft. Myers Representative Compliance Stack Test for the Simple Cycle Turbines and Heaters Project.

FPL is in the process of testing for compliance with the permit emission limits for Units 3A and 3B along with two direct-fired gas heaters. This permit modification is to allow particulate tests conducted on one of two new and identical combustion turbines to suffice as a compliance demonstration for both. The units use inherently clean natural gas and very low sulfur fuel oil with only minute amounts of ash. Very long tests are required to collect sufficient samples to weigh. The emission limits are not based on a BACT determination and the company will still conduct separate tests for all other pollutants (CO, NO_x, VOC, opacity) as required by the permit.

The gas heaters are rated at less than 100 million Btu and are not governed by any specific New Source Performance Standard. FPL proposes to use the results of carbon monoxide and nitrogen oxides tests on one as representative of both.

We recommend your approval of the attached letter approving FPL request.

AAL/th

Attachments

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

In the Matter of an Application for Permit by:

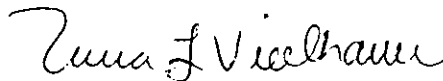
Mr. William Reichel, General Manager
FPL Fort Myers Plant
Post Office Box 430
Fort Myers, Florida 33905

DEP File No. 0710002-013-AC
340 MW Simple Cycle Combustion Turbine Project
Representative Compliance Stack Tests
Lee County

Enclosed is the Final Permit Number 0710002-013-AC to modify this permit to allow the natural gas testing of the first CT Unit (3B) to be representative of both units for PM emissions. In addition, this permit modification also considers the submittal of the test results of one of the two identical direct-fired natural gas heaters to be representative of both heaters. These units are located at the FPL Fort Myers Plant near Tice, Lee County. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit 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.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

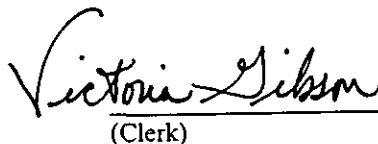
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT MODIFICATION (including the FINAL permit modification) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 4/22/03 to the person(s) listed:

William Reichel, FPL*
Kevin Washington, FPL
Ron Blackburn, DEP SD
Jim Little, EPA

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

 April 22, 2003
(Clerk) (Date)

FINAL DETERMINATION
Florida Power & Light Company
Fort Myers Power Plant
340 Megawatt Simple Cycle Project
Representative Compliance Stack Tests
DEP File No. 0710002-013 (PSD-FL-298)

The Department distributed a public notice package on April 2, 2003 for the Revision of Testing Requirements for the New Combustion Turbines and Gas Heaters. The Public Notice of Intent to Issue was published in Fort Myers News-Press on April 4, 2003.

No comments were received by the Department pursuant to the public notice.

The Final action of the Department is to issue the permit modification as noted during the Public Notice period.



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

April 21, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William Reichel, General Manager
FPL Fort Myers Plant
Post Office Box 430
Fort Myers, Florida 33905

Re: DEP File No. 0710002-013-AC (PSD-FL-298)
340 MW Simple Cycle Combustion Turbine (SCCT) Project -Two GE Frame 7FA CT

Dear Mr. Reichel:

The Department acknowledges receipt of Mr. Kevin Washington's letter dated March 31, 2003 asking the Department to accept the natural gas testing of the first CT Unit (3B) to be representative of both units for PM emissions. In addition, FPL is also asking the Department to accept the test results of one of the two identical direct-fired natural gas heaters to be representative of both heaters.

The request is acceptable and the referenced permit is hereby modified as follows:

SECTION III – Specific Condition 16

- d. *Gas Fired Heaters*: NO_x emission limit from each gas heater shall not exceed 0.10 lb/mmBtu to be demonstrated by stack test as required in Specific Condition 25 to 30. **Compliance shall be demonstrated by representative stack test on one unit.**

SECTION III – Specific Condition 18

Particulate Matter (PM/PM₁₀): PM/PM₁₀ emissions shall not exceed 10 lb/hr when operating on natural gas and shall not exceed 17 lb/hr when operating on fuel oil. [Rule 62-4.070 (3) F.A.C]. Stack test shall be conducted as required in Specific Condition 25 to 30. **Compliance shall be demonstrated by representative stack test on one unit.**

SECTION III – Specific Condition 19

- d. *Gas Fired Heaters*: CO emission limit from each gas heater shall not exceed 0.075 lb/mmBtu to be demonstrated by stack test as required in Specific Condition 25 to 30. **Compliance shall be demonstrated by representative stack test on one unit.**

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal.

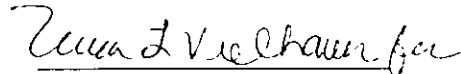
"More Protection, Less Process"

Printed on recycled paper.

The notice must be filed within thirty (30) days after this order is filed with the clerk of the Department.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Executed in Tallahassee, Florida.


Howard L. Rhodes, Director
Division of Air Resources
Management

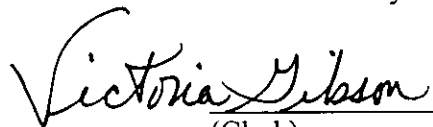
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Permit Modification was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 4/22/03 to the person(s) listed:

William Reichel, FPL*
Kevin Washington, FPL
Ron Blackburn, DEP SD
Jim Little, EPA

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52, Florida Statutes,
with the designated Department Clerk, receipt of
which is hereby acknowledged.


Victoria Gibson April 22, 2003
(Clerk) (Date)

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:

Mr. William Reichel
 General Manager
 Florida Power & Light Company - Fort Myers Plant
 Post Office Box 430
 Fort Myers, FL 33905

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

MARY K. RUSSELL 4/25/03

C. Signature

x Mary K. Russell

- Agent
- Addressee

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

7001 0320 0001 3692 6433

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

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

(Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 3692 6433



Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To: William Reichel
 Street, Apt. No., or P.O. Box: Box 430
 City, State, ZIP+4: Ft. Myers, FL 33905

PS Form 3800, January 2001

See Reverse for Instructions