



October 11, 2002

RECEIVED

OCT 16 2002

Scott M. Sheplak, P.E.  
Bureau of Air Regulation  
State of Florida  
Department of Environmental Protection  
2600 Blair Stone Road  
Mail Station #5505  
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

**Re: Additional Comment to Ft. Myers Power Plant Draft Title V Permit; 0710002-012-AV;**

Dear Scott,

In addition to FPL's letter of 10/3/2002 regarding comments to the Draft Title V permit referenced above, the following additional comment for change is requested:

- Due to EPA's interpretation of permit *notes*, FPL requests that the *Permitting note* in Specific Condition No. C.5. Permitted Capacity, on page 16., be incorporated as a new paragraph C.5.c.

The affected page with the requested change is included as an attachment.

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

Very Truly yours,

A handwritten signature in black ink, appearing to read 'Kevin Washington', is written over the typed name.

Kevin Washington  
Senior Environmental Specialist  
Florida Power and Light Company

Attachments: 1

**C.3. Modifications.** Except as provided under 40 CFR 60.14(e) and (f), any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies shall be considered a modification within the meaning of section 11 of the Act. Upon modification, an existing facility shall become an affected facility for each pollutant to which a standard applies and for which there is an increase in the emission rate to the atmosphere.  
[40 CFR 60.14(a)]

**C.4. Operating Procedures.** Operating procedures shall include good operating practices and proper training of all operators and supervisors. The good operating practices shall meet the guidelines and procedures as established by the equipment manufacturers. All operators (including supervisors) of air pollution control devices shall be properly trained in plant specific equipment.  
[Rule 62-4.070(3), F.A.C.; and 0710002-004-AC]

{Permitting Note: In addition to the requirements listed below, these emissions units are also subject to the standards and requirements contained in the Acid Rain Part of this permit (see Section IV).}

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

**C.5. Permitted Capacity.**

- a. **CTs.** The maximum heat input rates, based on the lower heating value (LHV) of the fuel to each combustion turbine at compressor inlet conditions of 59°F, 60% relative humidity, 100% load, and 14.7 psia shall not exceed 1,760 million Btu per hour (mmBtu/hr). This maximum heat input rate will vary depending upon turbine inlet conditions and the combustion turbine characteristics. Manufacturer's curves corrected for site conditions or equations for correction to other compressor inlet conditions shall be provided to the Department of Environmental Protection (DEP) within 45 days of completing the initial compliance testing. [Design, Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]
- b. **Direct Fired Heaters (DFHs).** The maximum heat input rate, based on the lower heating value (LHV) of the fuel to the DFHs at ambient conditions of 59°F, 60% relative humidity, 100% load, and 14.7 psia shall not exceed 132 mmBtu per hour.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; 40 CFR 60.332(b); and 0710002-004-AC].

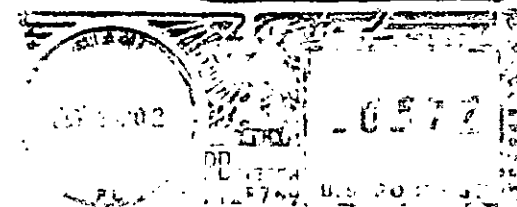
- c. ~~{Permitting note:—The heat input limitations referenced in C.5.a. and C.5.b. above have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 95 to 100 percent of the unit's rated capacity (or to limit future operation to 105 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. Regular record keeping is not required for heat input. Instead, the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.}~~

**C.6. Emissions Unit Operating Rate Limitation After Testing.** See specific condition C.40.C.40.  
[Rule 62-297.310(2), F.A.C.]

Kevin Washington  
FPL Environmental Services  
700 Universe Blvd.  
Juno Beach, FL 33408

ADDRESS SERVICE  
IMPROVED

REGISTERED  
FIRST CLASS



Scott M. Sheplak  
Bureau of Air Regulation  
State of Florida  
Department of Environmental Protection  
2600 Blair Stone Road  
Mail Station #5505  
Tallahassee, FL 32399-2400



FPL

Florida Power & Light Company, P. O. Box 430, Fort Myers, FL 33902

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SEP 23 2002

BUREAU OF AIR REGULATION

September 20, 2002

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
7000 0520 0012 7034 9347

Mr. Scott Sheplak  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
MS 5505  
Tallahassee, FL 32399-2400

Re: Title V Air Operation Permit Renewal Application  
Fort Myers Plant  
Facility ID: 0710002 ORIS Code: 0612

Dear Mr. Sheplak;

Enclosed please find an Affidavit of Publication for the Fort Myers Plant  
Title V Air Permit renewal as required under Rule 62-110.106(5), F.A.C.

If you have any questions, please contact Bernie Tibble at (239) 693-  
4390.

Sincerely,

B. P. Tibble

Environmental Specialist

CC: Kevin Washington JES/FPL

9/24/02 cc: Jonathan Holton

**NEWS-PRESS**

Published every morning - Daily and Sunday SEP 23 2002  
Fort Myers, Florida

**Affidavit of Publication**

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BUREAU OF AIR REGULATION

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 Permit Renewal for Florida  
Power & Light**

in the \_\_\_\_\_ Court  
was published in said newspaper in the issues of

**September 18, 2002**

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*

Sworn to and subscribed before me this

18<sup>th</sup> day of **September 2002** 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*

Print Name \_\_\_\_\_

My commission Expires:



Brenda Leighton  
MY COMMISSION # CC808905 EXPIRES  
February 14, 2003  
BONDED THRU TROY FAIN INSURANCE, INC.

TITLE V AIR  
OPERATION PERMIT  
RENEWAL  
STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL  
PROTECTION  
DRAFT Permit Project  
No.: 0710002-012-AV  
Renewal of Title V Air  
Operation Permit No.  
0710002-001-AV  
Fort Myers Plant  
Lee County  
The Department of  
Environmental Protec-  
tion (permitting au-  
thority) gives notice of  
its intent to issue a  
Title V Air Operation  
Permit Renewal for the  
Florida Power & Light  
Company for the Fort  
Myers plant located at  
10650 State Road 80,  
Fort Myers, Lee County.  
This is a renewal of  
Title V Air Operation  
Permit No. 0710002-001-  
AV. The applicant's  
name and address are:  
Mr. William Relchel,  
Plant General Manager,  
Florida Power & Light  
Company, P-O  
Box 14000, Juno Beach,  
FL 33408.  
The permitting au-  
thority will issue the  
PROPOSED Permit,  
and subsequent FINAL  
Permit, in accordance  
with the conditions of  
the DRAFT Permit un-  
less a response re-  
ceived in accordance  
with the following pro-  
cedures results in a dif-  
ferent decision or sig-  
nificant change of  
terms or conditions.  
The permitting au-  
thority will accept writ-  
ten comments concern-  
ing the proposed  
DRAFT Permit Issu-  
ance action for a pe-  
riod of 30 (thirty) days  
from the date of pub-  
lication of this Notice.  
Written comments  
should be provided to  
the Department's Bu-  
reau of Air Regulation,  
2600 Blair Stone Road,  
Mail Station #5505, Tal-  
lahassee, Florida 32399-  
2400. Any written com-  
ments filed shall be  
made available for  
public inspection. If  
written comments re-  
ceived result in a sig-  
nificant change in this  
DRAFT Permit, the  
permitting authority  
shall issue a Revised  
DRAFT Permit and re-  
quire, if applicable, an-  
other Public Notice.  
A person whose sub-  
stantial interests are  
affected by the pro-  
posed permitting deci-  
sion may petition for  
an administrative hear-  
ing in accordance with  
Sections 120.569 and  
120.57 of the Florida  
Statutes (F.S.). The pe-  
tition must contain the  
information set forth  
below and must be  
filed (received) in the  
Office of General Coun-  
sel of the Department  
of Environmental Pro-  
tection, 3900 Common-  
wealth Boulevard, Mail  
Station #5531, Talahas-  
see, Florida 32399-3000  
(Telephone: 850/488-  
9730; Fax: 850/487-4938).  
Petitions filed by any  
persons other than  
those entitled to writ-  
ten notice under Sec-  
tion 120-60(3), F.S.,  
must be filed within  
fourteen days of publi-  
cation of the public no-  
tice or within fourteen  
days of receipt of the  
notice of intent, which-  
ever occurs first. Under  
Section 120.60(3),  
F.S., however, any per-  
son who asked the per-  
mitting authority for  
notice of agency action  
may file a petition  
within fourteen days of  
receipt of that notice,  
regardless of the date  
of publication. A pe-  
titioner shall mail a copy  
of the petition to the  
applicant at the ad-  
dress indicated above.

Unless the petitioner demonstrates to the

Unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

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:

**Permitting Authority:**  
Department of Environmental Protection,  
Bureau of Air Regulation,  
111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301.  
Telephone: 850/488-0114  
Fax: 850/922-6979

**Affected District/Local Program:**

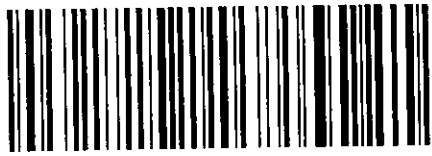
Department of Environmental Protection,  
South District Office,  
2295 Victoria Avenue,  
Fort Myers, Florida 33902-3381.  
Telephone: 941/332-6975  
Fax: 941/332-6969

The complete project file includes the DRAFT Permit, the application for renewal, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/921-9532, for additional information.  
Sep 18 No. 26911

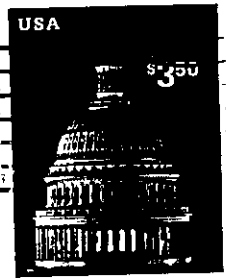


Florida Power

**CERTIFIED MAIL**



7000 0520 0012 7034 9347



Mr. Scott Sheplak  
Florida Department of Environmental  
Protection  
2600 Blair Stone Road  
MS 5505  
Tallahassee, FL 32399-2400

32399+2400

