



November 21, 1997

Mr. Scott M. Sheplak, P.E.  
State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Proposed Permit No. 0710002-001-AV  
FPL Ft. Myers Plant Initial Title V Permit

Dear Mr. Sheplak:

As we discussed on Friday 11/21/97 two items were noted concerning the proposed permit received on November 17, 1997.

**Page 21 - B.13.(a)4.b.** - We understand this is from the rule. It does add some confusion concerning testing, if it cannot be removed please consider the addition of language such as: "...see Permit limiting standards and applicable test methods as listed in specific conditions **A.19, A.20, A.21.**"

**Page 21 - B.13.(a)8.** This appears to contradict specific condition B.14 on page 22. Removal of the condition is suggested or the addition of a comment at the end of the condition would help clarify: "Units are permitted under 62-210.300 FAC; Please see specific conditions **B.13.(a)3.a.& b., B.14.**"

Please give me a call with any questions or if you require further information (561-691-7057).

Happy Holidays, sincerely,

Mary J. Archer  
Environmental Specialist

12/1/97 cc: Scott Sheplak  
Tom Cabaro

**RECEIVED**

DEC 01 1997

BUREAU OF  
AIR REGULATION

Date: 11/10/97 8:41:35 AM  
From: Elizabeth Walker TAL  
Subject: New posting  
To: See Below

There is a new posting available on the Florida website

0710002001AV  
FT MYERS POWER PLANT

Proposed

If you have any questions, please let me know.

Thanks,  
Elizabeth

To: adams yolanda  
To: pierce carla  
To: Barbara Boutwell TAL  
To: Scott Sheplak TAL  
To: Terry Knowles TAL  
To: gates kim  
CC: Tom Cascio TAL



October 8, 1997

Mr. Scott M. Sheplak, P.E.  
State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Draft Permit No. 0710002-001-AV  
GT Heat Input information  
FPL Ft. Myers Plant Initial Title V Permit

Dear Mr. Sheplak:

As we discussed on Monday 10/6/97 two items were needed to support the 895 heat input value for the Ft. Myers Gts. Enclosed for the gas turbines are: 1.) a statement confirming no modification to the Gts 2.) a table indicating calculations from the GE curves for heat input.

Please give me a call with any questions or if you require further information (561-691-7057).

Sincerely,

A handwritten signature in cursive script, appearing to read 'Mary J. Archer'.

Mary J. Archer  
Environmental Specialist

10/16/97 cc: Tom Cascio

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OCT 14 1997

BUREAU OF  
AIR REGULATION



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

October 8, 1997

Ms. Mary Archer  
Florida Power & Light Company  
Environmental Services

Dear Mary;

This correspondence is to affirm that the gas turbine units at Fort Myers Plant have not been modified in order to increase the capacity from the original design.

A handwritten signature in cursive script that reads "J. R. Trelles".

J. R. Trelles  
Gas Turbine System Leader  
Fort Myers Plant

Heat Input vs Ambient Temperature							Heat Input vs Ambient Temperature				Using the GT Correction Curves CF9					
GFM							GFM				PPN					
Based on Actual Data			Based on Design Data		PPN		Ambient	Peak	Base	Base	Peak	MW	HR	Heat Input	H	
Ambient	Peak	Base	Peak	Base	Base	Peak	Temp	Heat Input	Heat Input	Heat Input	Heat Input	Correction	Correction	correction	H	
Temp	Heat Input	Heat Input	Heat Input	Heat Input	Heat Input	Heat Input	deg F	Btu/hr	Btu/hr	Btu/hr	Btu/hr					
deg F	Btu/hr	Btu/hr	Btu/hr	Btu/hr	Btu/hr	Btu/hr										
20	8.1706E+08	8.9499E+08	8.0611E+08	7.3592E+08	1.0424E+09	1.0766E+09	20	8.0611E+08	7.3592E+08	1.0424E+09	1.0766E+09	20	1.1670	0.9678	1.1294	1.0
40	7.6273E+08	8.3548E+08	7.6418E+08	6.9764E+08	9.8995E+08	1.0224E+09	40	7.6418E+08	6.9764E+08	9.8995E+08	1.0224E+09	40	1.0814	0.9815	1.0614	1.0
50	7.3567E+08	8.0584E+08	7.4478E+08	6.7993E+08	9.6574E+08	9.9742E+08	50	7.4478E+08	6.7993E+08	9.6574E+08	9.9742E+08	50	1.0385	0.9906	1.0288	9.7
59.0	7.1137E+08	7.7923E+08	7.2580E+08	6.6260E+08	9.4500E+08	9.7600E+08	59.0	7.2580E+08	6.6260E+08	9.4500E+08	9.7600E+08	59	1.0000	1.0000	1.0000	9.4
75	6.8833E+08	7.3208E+08	6.9387E+08	6.3345E+08	9.1037E+08	9.4023E+08	75	6.9387E+08	6.3345E+08	9.1037E+08	9.4023E+08	75	0.9315	1.0197	0.9498	8.9
80	6.5491E+08	7.1738E+08	6.8479E+08	6.2516E+08	8.9006E+08	9.1926E+08	80	6.8479E+08	6.2516E+08	8.9006E+08	9.1926E+08	85	0.8887	1.0339	0.9188	8.6
95	6.1478E+08	6.7341E+08	6.3797E+08	5.8242E+08	8.5091E+08	8.7883E+08	95	6.3797E+08	5.8242E+08	8.5091E+08	8.7883E+08	95	0.8458	1.0496	0.8878	8.3
NOTES:																
<b>PPN</b>																
1. The above heat input is per each GT																
2. The reference heat input used was based on the Westinghouse letter to Dave Stephens - CTE/PE/96/433 dated 10/8/96.																
3. The heat input at temperatures different then the reference (59 deg F) were calculated using the Westinghouse heat rate and output correction curves CF996 AND CF992, respectively.																
<b>GFM</b>																
1. The above heat input is per each GT																
2. The reference heat input used was based on the GE curve 416HB1290, 5/15/72.																
3. The heat input at temperatures different then the reference (59 deg F) were calculated using the GE heat rate and output correction curve 416ha1291 (5/15/72), respectively.																
4. The heat input calculated from actual data was determined at various temperatures and curve fitted. This actual data was taken with the unit at base load operating conditions.																
5. The heat input for peak operation was based on the % increase in heat input from base to peak to peak calculated from the design data (9.538%)																



October 3, 1997

Mr. Scott M. Sheplak, P.E.  
State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**RECEIVED**

OCT 09 1997

BUREAU OF  
AIR REGULATION

Re: Draft Permit No. 0710002-001-AV  
FPL Ft. Myers Plant Initial Title V Permit

Dear Mr. Sheplak:

After reviewing the subject draft Title V permit, FPL has identified several issues which need to be addressed. Please contact me at your earliest convenience to discuss them.

Page 11 - **Specific Condition A.21.** - Vendor receipts for oil are provided when oil is received at the Boca Grand Fuel Oil Terminal facility. Occasionally fuel is received at the fuel oil terminal which is greater than 2.5% sulfur and is blended to obtain a sulfur content of 2.5% or less. FPL suggests the following language to ensure compliance of the standard and maintain the flexibility of the fuel terminal to take advantage of blending operations. "...demonstrate compliance by accepting a fuel sulfur limit that will be verified by vendor receipt following each fuel delivery at the Boca Grand Fuel Oil Terminal facility with the following exception: In cases where No. 6 fuel oil is received with a sulfur content exceeding 2.5% and blending is required to obtain a fuel mix equal to the applicable percent sulfur limit, an analysis of a fuel sample representative of fuel from the fuel storage tank(s) will be performed prior to loading of barges destined for the Ft. Myers Power Plant to ensure a sulfur content equivalent to the permit emission limitation. Percent sulfur content for these analyses will be maintained at the power plant facility." (62-4.070(3)F.A.C.)

Page 18 - **B.1. Permitted Capacity,** -FPL engineering has reviewed recent operating data for the PFM gas turbines and determined the maximum heat input at various site conditions using the General Electric correction curves supplied with the equipment. This analysis has shown that the units may consume 895 million btu per hour at their original peak firing temperature rating. FPL requests the permitted capacity be changed to 895 MMBtu/hr for each gas turbine.

page 2

**Page 22 - B.14.13.a4.b.** - FPL requests this requirement be removed as other regulated pollutants are covered else where or are not applicable to this facility.

**Page 22 - B.14.** FPL appreciates the reduction of testing requirements to three gas turbines. We do respectfully request the methodology for selection of three units from a two bank set of GTS.

I would like to thank you for the time you have dedicated to resolving these issues. Please give me a call with any questions or if you require further information (561-691-7057).

Sincerely,



Mary J. Archer  
Environmental Specialist

10/9/97 cc: Scott Sheplak  
Tom Cassio

**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 \_\_\_\_\_  
Brenda Leighton

who on oath says that he/she is the \_\_\_\_\_  
Legal Coordinator of the News-Press, a

daily newspaper, published at Fort Myers, in Lee County, Florida, that the  
 attached copy of advertisement, being a \_\_\_\_\_  
notice of intent

in the matter of Title V Air Operation Permit  
to Florida Power & Light

in the \_\_\_\_\_ Court

was published in said newspaper in the issues of \_\_\_\_\_  
September 23, 1997

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.

*Brenda Leighton*

Sworn to and subscribed before me this \_\_\_\_\_  
23rd day of \_\_\_\_\_

September 19 97 by

Brenda Leighton

who is personally known to me or who has produced \_\_\_\_\_

as identification, and who did or did not take an oath \_\_\_\_\_

Notary Public: Janet E. Cobb  
 Print Name: \_\_\_\_\_

My Commission Expires: \_\_\_\_\_

CLASS-16  Janet E. Cobb  
 MY COMMISSION # CG602535 EXPIRES  
 November 19, 2000  
 BONDED THRU TROY FAIR INSURANCE, INC.

**PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION**  
**Title V DRAFT Permit No. 0710002-001-AV Fort Myers Plant, Lee County.**  
 The Department of Environmental Protection, the permitting authority, gives notice of its intent to issue a Title V Air Operation Permit to Florida Power & Light Company for the Fort Myers Plant located at 10650 State Road 80, Fort Myers, Lee County. The applicant's name and address are: Florida Power & Light Company, Environmental Services Department, P.O. Box 14000, Juno Beach, Florida 33408.  
 The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.  
 The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice. The permitting authority 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. Mediation under Section 120.573, F.S., will not be available for this proposed action.  
 A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.568 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information:  
 (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;  
 (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;  
 (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;  
 (d) A statement of the material facts disputed by the petitioner, if any;  
 (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;  
 (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and  
 (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.  
 Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application will have the right to petition to become a party to the proceeding. In accordance with the requirements set forth above, in addition to the above, pursuant to 42 United States Code (U.S.C.) - Section 7661(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. - Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or 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 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 410 M Street, SW, Washington, DC 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: 850/488-1344; Fax: 850/922-6979  
 Affected District Program: Department of Environmental Protection, South District, 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33901; Telephone: 941/332-6975; Fax: 941/332-6969

The complete project file includes the DRAFT Permit application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplek, P.E., at the above address, or call 850/488-1344, for additional information. Sep 23 No. 22026





**RECEIVED**

SEP 16 1997

BUREAU OF  
AIR REGULATION

September 12, 1997

Mr. Scott M. Sheplak, P.E.  
State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: **Draft Permit No.**  
**FPL Ft. Myers Plant Initial Title V Permit**

0710003-001-14V

Dear Mr. Sheplak:

After reviewing the subject draft Title V permit, FPL identified several issues which we addressed in our September 9, 1997, conference call with your Department. Thank you for the time to discuss our concerns with you. Listed below are the issues and perceived agreement. Please contact me to discuss any issues which you recall as contrary to the description listed in the following.

### **Section III. Emission Units and Conditions**

Page 2 & 6 - **Subsection A Facility Description**: megawatt descriptions are nominal and do not impose a limit on either unit.

Page 6 - In **the Essential Potential to Emit (PTE) Parameters** section, the permitted heat input for units 2 is incorrect; the heat input for the various liquid fuels should be 4,000 mmBtu / hour. FPL has supplied a letter requesting the consistency of heat input values for "sister" units. Also please specify the method of heat input calculation as determined by hourly fuel usage and the higher heat value of the oil as determined by the as-fired fuel analysis.

Page 7 - **Specific Condition A.3. Methods of Operation** The use of fuel additives will be addressed in the permit. Accordingly the following language is suggested:

**Additives: Fuel additives are authorized to be added to the boiler units as needed to enhance combustion and facilitate furnace cleaning, in a manner consistent with Best Operational Practices.**

**Page 7 - Specific Condition A.6.- Visible Emissions - SootBlowing & Load Change -** This title would better describe the activities if changed to read “Visible Emissions - Boiler cleaning & Load Change” which better describes the intent of the allowance. The Department prefers to keep this description, understanding the rule implies to cover more than “sootblowing”.

Rule 62-210.700(3), F.A.C. also allows for “Visible emissions above 60% allowed for not more than four 6-minute periods, during the three hour period of excess emissions.” We request this addition to the permit. The Department feels the rule provides this allowance and it is not necessary to list in the permit.

**Page 10 - Specific Condition A.20. Particulate Matter -** Orsat analysis is specifically mentioned to determine oxygen measurement, FPL & the Department agree that use of an oxygen analyzer also be addressed.

**Page 11 - Specific Condition A.22.a. - Fuel Sampling & Analysis -** note in A 22.a. analysis of the composite as-fired sample will be completed on a monthly basis instead of following each fuel delivery. All fuel receipts at the power plant facility will contain a maximum of 2.5% sulfur oil.

**Page 11 - Specific Condition A.22.b. -** Please change the frequency of recorded information to “Record monthly the amount of each....”.

**Page 11 - Specific Condition A.22.c. -** addresses SO2 compliance: This facility has agreed to a fuel sulfur content of 2.5% which assures compliance with the limit at all times, Page 8.A.9.b. Receipts of oil shipped to the power plant will serve as the compliance documentation for SO2.

**Page 16 - Specific Condition A.34 -** The rule listed at the end of the condition appears to contain a typo. It should read 62-296.405(1) j.

**Page 18 - B.2 Methods of Operations - Fuels, -** A permit change was faxed to your Department concerning this addition. On-specification used oil is an authorized fuel for these emissions units per permit change received November 21, 1996. The specific condition requires: An analysis will be provided for compliance with 40 CFR 279 (a) and (b), plus an analysis of PCBs will be performed to provide verification of a less than 2 ppm level.

**Page 19 - B.6. Nitrogen Oxides -** FPL & the Department agree this condition should be removed. The area is in attainment for all criteria pollutants and was at the time of the standard insertion FPL believes there is no basis for this additional standard in the permit, plus, the burden of additional testing. This factor was for use in calculation of emissions for fees determination and has not been verified by actual testing.

**Page 20 - B.11.** FPL & the Department agree this condition should be removed, Please see **Page 19 - B.6. Nitrogen Oxides** comment above.

**Page 20 - B.12. Operating Rate During Testing** - FPL requests the use of a capacity curve which address ambient temperature be deemed acceptable for determination of maximum operation rate. The operating capacity of these units is greatly effected by the ambient temperature. The Department agreed this would be an acceptable method of determining heat input adjustments considering ambient temperatures. FPL will provide the Department with curves for heat input adjustment.

**Page 22 - B.14. (a) 8.** FPL & the Department agree testing of one representative Gt for each six GTs which have not accrued greater than 400 hours of operation per year for 5 years is acceptable.

Please correct Tables to agree with the above information. (Copies attached)

I would like to thank you again for the time you have dedicated to resolving these issues. Please give me a call with any questions or if you require further information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary J. Archer".

**Mary J. Archer**  
Environmental Specialist

**Table 2-1, Summary of Compliance Requirements**

Florida Power and Light Company  
Fort Myers Plant

DRAFT Permit No.: 0710002-001-AV  
Facility ID No.: 0710002

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.		Brief Description					
-001		Fossil Fuel Fired Steam Generator					
-002		Fossil Fuel Fired Steam Generator					
Pollutant Name or Parameter	Fuels	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
Sootblowing or Load Changing	Oil	EPA Method 5 or 17 ***	Annual	1-Oct			A.20
Sulfur Dioxide	Oil	Fuel Analysis	Daily			Yes	A.21
Nitrogen Oxides	Oil		Continuous			Yes	A.17
Carbon Dioxide	Oil		Continuous			Yes	A.17
Volumetric Flow Rate	Oil		Continuous			Yes	A.17
Opacity Steady State	Oil	DEP Method 9	Annual	1-Oct	1 Hour	Yes	A.18
Sootblowing or Load Changing	Oil	DEP Method 9	Annual	1-Oct	1 Hour		A.18
Arsenic	Used Oil	Fuel Analysis	Batch				A.16
Cadmium	Used Oil	Fuel Analysis	Batch				A.16
Chromium	Used Oil	Fuel Analysis	Batch				A.16
Lead	Used Oil	Fuel Analysis	Batch				A.16
PCB	Used Oil	Fuel Analysis	Batch				A.16
Total Halogens	Used Oil	Fuel Analysis	Batch				A.16
Flash Point	Used Oil	Fuel Analysis	Batch				A.16

E.U. ID No.		Brief Description					
-003 to -014		Combustion Turbines					
Pollutant Name or Parameter	Fuels	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
Nitrogen Oxides	Oil	EPA Method 7, 7A, 7B, 7C, 7D, or 7E	Annual (Pairs)	1-Oct			B.11

*delete*

Notes:  
 \* Frequency base date is used for planning purposes only; see Part 60.207-310, F.A.C.  
 \*\* CMS (Continuous Compliance Monitoring System)  
 \*\*\* EPA Method 5 only for particulate emissions; see also Part 60.207-310, F.A.C.

Table 1-1. Summary of Air Pollutant Standards and Terms

Florida Power and Light Company  
Fort Myers Plant

DRAFT Permit No.: 0710002-001-AV  
Facility ID No.: 0710002

E.U. ID Nos.		Brief Description							
-003 to -014		Combustion Turbines							
Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
Visible Emissions	oil	8760	< 20% Opacity					Rule 62-298.320(4)(b)1., F.A.C.	8.5
Nitrogen Oxides	oil	8760	0.70 lb/MMBtu	595			2606.1	Rule 62-204.240(5), F.A.C.	8.6
<p><b>Notes:</b></p> <p>* The "Equivalent Emissions" listed are for informational purposes only.      ** Values computed using the ratio of 3/21 for soot blowing/steady state per 24 hour day.</p>									

*delete*



**FPL  
ENVIRONMENTAL SERVICES DEPARTMENT  
PO BOX 14000  
JUNO BEACH, FLORIDA 33408**

**DATE:** September 9, 1997

**SEND TO:**

**NAME:** Scott Sheplak

**COMPANY:** FDEP

**FAX NUMBER:** 904 922-6979

**PHONE NUMBER:** \_\_\_\_\_

-----  
-----

**FROM:** RICH PIPER

**PHONE NUMBER:** (561) 691-7058

**FAX NUMBER:** (561) 691-7070

**NUMBER OF PAGES (INCLUDING COVER SHEET):** 6

**COMMENTS/INSTRUCTIONS:**

Information on Ft. Myers GT Used Oil Firing - Permit Mod.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



# Department of Environmental Protection

Lawton Chiles  
Governor

South District  
2295 Victoria Avenue, Suite 364  
Fort Myers, Florida 33901-3881

Virginia B. Wetherell  
Secretary

## NOTICE OF PERMIT ISSUANCE

November 18, 1996

**CERTIFIED MAIL #P 482 208 821**  
**RETURN RECEIPT REQUESTED**

In the Matter of an Application  
for Permit by:

DEP File No. 0710002  
Lee County - AP

Mary J. Archer  
Environmental Specialist  
Florida Power and Light Company  
Post Office Box 088801  
North Palm Beach, Florida 33408-8801

**RECEIVED**

**NOV 21 1996**

**MANAGER**  
**ENVIRONMENTAL SERVICES**

Enclosed is Permit Number 0710002-003-AO to modify operation permit AO36-223496 issued pursuant to Section(s) 403.087, Florida Statutes.

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of receipt of this Permit. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S..

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code (F.A.C.).

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, F.A.C.. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, 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 Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Fort Myers, Florida.

STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

David M. Knowles  
David M. Knowles, P.E.  
District Air  
Program Administrator



**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT ISSUANCE and all copies were mailed by certified mail before the close of business on November 18, 1996 to the listed persons.

Clerk Stamp

**FILING AND ACKNOWLEDGMENT**

**FILED**, on this date, pursuant to §120.57(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

*[Signature]* 11-18-96  
(Clerk) (Date)

DMK/AEL/jw

Enclosures



# Department of Environmental Protection

Lawton Chiles  
Governor

South District  
2295 Victoria Avenue, Suite 364  
Fort Myers, Florida 33901-3881

Virginia B. Weherell  
Secretary

**PERMITTEE:**  
Florida Power and Light Company  
Post Office Box 088801  
North Palm Beach, Florida 33408-8801

**MODIFICATION TO Permit AO36-**  
Facility I.D.: 0710002 **223496**  
Permit Number: 0710002-003-AO  
Date of Issue: November 18, 1996 **GT'S**  
Expiration Date: February 26, 1998  
County: Lee  
Latitude: 26° 41' 50" N  
Longitude: 81° 46' 56" W  
Project: Add on-specification used oil  
as a fuel type

This permit modification is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rules 62-4, 62-296, and 62-297. 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 Department and made a part hereof and specifically described as follows:

Amend Specific Conditions No. (2) and (4) of operation permit AO36-223496 to permit the use of on-specification used oil as a fuel type in addition to No. 2 distillate fuel oil.

The following specific condition is added to the operating permit:

An analysis will be provided for compliance with 40 CFR 279 (a) and (b), plus an analysis of PCB's will be performed to provide verification of a less than 2 ppm level. On a quarterly basis, for each quarter during which used oil is burned, a report will be submitted with the quantity and analysis of the on-specification used oil burned. All other conditions of the permit will remain the same.

**NOTE:** In the event of an emergency the permittee shall contact the Department by calling (904) 413-9911. During normal business hours, the permittee shall call (941) 332-6975.

Issued this 18th day of November, 1996.

STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

*David M. Knowles*

David M. Knowles, P.E.  
District Air  
Program Administrator

DMK/JRS/jw

5 Pages Attached



August 27, 1997

Mr. W. Douglas Beason, Esquire  
Assistant General Counsel  
Office of General Counsel  
State of Florida Department of Environmental Protection  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

**RE: Ft. Myers Power Plant  
Notice of Intent to Issue Proposed  
DRAFT Permit No.0710002-001-AV  
Lee County, Florida**

Dear Mr. Beason:

On August 21, 1997, Florida Power and Light Company (FPL) received the referenced Notice of Intent to Issue Proposed Permit for its Ft. Myers Power Plant located in Lee County, Florida. The Notice of Intent will be issued by the Department and is signed by G.H.Fancy,P.E., Chief of the Bureau of Air Regulation.

FPL has been working in good faith with the Department to identify and resolve outstanding permit issues regarding FPL Title V facilities over the past several months. The Department and FPL agree that more time is needed to complete the permitting process for this facility. FPL hereby requests, pursuant to Rule 62-103.070, F.A.C., an extension to and including September 17, 1997, in which to file a petition for administrative proceedings. Furthermore, FPL requests public notice be delayed until September 17, 1997.

This request is filed simply as a protective measure to avoid waiver of FPL's right to challenge the permit as issued. Granting of this request will not prejudice either party, but will further their mutual interests and likely avoid the need to initiate formal administrative proceedings.

I hereby certify that I have contacted Mr. Scott Sheplak,P.E., regarding this request, and he has no objection to this request for extension of time.

Accordingly, I hereby request that you formally extend the time for filing of a petition for administrative proceedings to and including September 17, 1997.

Sincerely,

Mary J. Archer  
Environmental Specialist

9/3/97 Tom Cassio  
an FPL Group company

cc: Scott Sheplak, FDEP Tallahassee

**RECEIVED**

SEP 02 1997

BUREAU OF  
AIR REGULATION



CM file

# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

April 25, 1997

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mr. William Reichel  
Plant General Manager  
Florida Power & Light Company  
Environmental Services Department  
P.O. Box 14000  
Juno Beach, Florida 33408

Re: Request for Additional Information Regarding Initial Title V Permit Application  
File No. 0710002-001-AV  
Fort Myers Plant, Lee County

Dear Mr. Reichel:

Your initial Title V permit application for the Fort Myers Plant was "timely and complete" for purposes of the initial Title V application submission (see Rule 62-213.420(1)(a)1. and (b)2., F.A.C.).

However, in order to continue processing your application, the Department will need the below additional information pursuant to Rule 62-213.420(1)(b)3., F.A.C., and Rule 62-4.070(1), F.A.C. The additional information requested is organized by topic.

Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Facility Information.

It appears that a document referenced on page 2 of Section E, PFMFS\_11.txt, is missing. Please provide this information if appropriate.

2. Boiler 1 and Boiler 2.

It appears that documents referenced on page 1 of Section L, PFMU1\_5.txt (boiler 1) and PFMU1\_6.txt (boiler 2), are missing. Please provide this information if appropriate.

We believe the wording "Previously Submitted" should have been entered in the Acid Rain Application - Phase II form information blank instead of "Not Applicable" in Section L.

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1.  Addressee's Address
- 2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. William Reichel  
 Plant General Manager  
 Florida Power & Light Company  
 Environmental Services Department  
 Post Office Box 14000  
 Juno Beach, Florida 33408

4a. Article Number

P 263 584 891

4b. Service Type

- Registered
- Certified
- Express Mail
- Insured
- Return Receipt for Merchandise
- COD

7. Date of Delivery

1 29

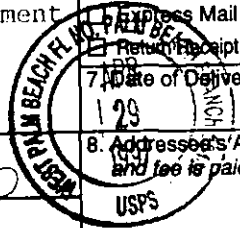
8. Addressee's Address (Only if requested and fee is paid)

5. Received By: (Print Name)

H CORZO

6. Signature: (Addressee or Agent)

X *[Signature]*



Thank you for using Return Receipt Service.

PS Form 3811, December 1994

Domestic Return Receipt

P 263 584 891

US Postal Service  
**Receipt for Certified Mail**

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	Plant General
<i>Wm. Reichel</i>	Manager
Street & Number	Fla. Power & Light Co.
P.O. Box	14000
Post Office, State, & ZIP Code	Juno Beach, FL 33408
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	04-25-97 sh

PS Form 3800, April 1995

Date: 8/20/97 1:33:47 PM  
From: Elizabeth Walker TAL  
Subject: New posting  
To: See Below

There is a new posting available on the Florida website.

FT MYERS POWER PLANT 0710002001AV draft

If you have any questions, please let me know.

Elizabeth