

Department of Environmental Protection

Jeb Bush Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee. Florida 32399-2400

David B. Struhs
Secretary

CERTIFIED MAIL - Return Receipt Requested

June 18, 2001

Mr. Kevin Washington FPL, Environmental Services Department P.O. Box 14000 Juno Beach, Florida 33408

Re: Request for Additional Information Regarding Title V Permit Revision Application

File No.: 0710002-010-AV

FPL - Fort Myers Plant, Lee County

Dear Mr. Washington:

Thank you for providing the replacement page for the Purpose of Application. This was received by electronic mail on June 7 and has been inserted into your submitted copies of the application.

A review has been made of your application for request to revise your current Title V operating permit (permit number 0710002-007-AV) to include the provisions of construction permits 0710002-004-AC and 0710002-008-AC. Since the installation of the HRSGs and the removal of units 001 & 002 are apparently not yet completed, this facility can not be considered to be in full compliance with the terms and conditions of the referenced construction permits.

Since the permit application has not provided sufficient information in order to assure future compliance with the terms and conditions of the issued construction permits, the following information will need to be provided before further action can be taken on this application.

- 1. Please provide test results (or reference results already submitted) showing that the new combustion turbines can meet the permitted allowable emission rates in the combined-cycle mode.
- 2. Please provide confirmation that steam boilers 001 and 002 have been removed from service.
- 3. As an alternative to items 1 and 2, please provide a detailed compliance plan, submitted in accordance with the provisions of Rule 62-213.440(2), F.A.C.

In addition, the following areas of the application need to be clarified:

- 4. In box 4 of the Owner/Authorized Representative or Responsible Official page, a check needs to be placed in the proper area of the certification statement to indicate whether William Reichel is the "Owner/Authorized Representative" or if he is the "Responsible Official", or both.
- 5. Emission Unit Section 7 of 8 is providing information for the gas heater(s). However, it states that the heaters have model 7FA low NO_X burners. Attachment FP-E08-D provides applicable regulations for a package boiler subject to Subpart Db. The Segment (Process/Fuel) Information section refers to external combustion boilers > 100 MMBtu/hr. The Continuous Monitor Information section states that a NO_X CEMs may be used. Please review this entire section and provide the correct information for the emissions units that have been installed.

"More Protection, Less Process"

Mr. Kevin Washington June 18, 2001 Page 2 of 2

6. Emissions Unit Information Section 8 of 8 states that the mist eliminator is a 182 MW General Electric Model 7FA. Please review this entire section and provide the correct information for the emissions unit that has been installed.

The above comments require a written response to the Department within ninety days of receipt of this notice unless additional time is requested pursuant to Rule 62-213.420(1)(b)6., F.A.C.

If you should have any questions, please contact Jonathan Holtom, P.E. at (850) 921-9531, or me at (850) 921-9532.

Sincerely,

Title V Section

SMS/jh

cc: William Reichel, Plant General Manager, FPL - Fort Myers

Edward Preast, P.E., FPL

Richard Cantrell, DEP - SD

6/18/01-Mailed on 6/18/01 cc- Jonathan Hottom Reading Fele

COMPLETE THIS SECTION ON DELIVERY SENDER: COMPLETE THIS SECTION A. Received by (Please Print Clearly B. Date of Det ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse 2th Age so that we can return the card to you. Attach this card to the back of the mailpiece, 2011 Add or on the front if space permits. D. Is delivery address different fro 1. Article Addressed to: If YES, enter delivery address b Mr. Kevin Washington FPL, Environmental Services Department P.O. Box 14000 : Juno Beach, Florida 3. Service Type Certified Mail 33408 Express Mail ☐ Registered ☐ Return Receipt for Merchandise □ C.O.D. ☐ Insured Mail 4. Restricted Delivery? (Extra Fee) Yes 2. Article Number (Copy from service label) 7000 0600 0021 2825 4740 102595-39-M-1789 7. PS Form 3811, July 1999 Domestic Return Repaint

)	U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)		
0 t C t	Article Sent To:		
47	Mr. Kevin Washington		
Γ.	Postage \$		
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1200	Return Receipt Fee (Endorsement Required)		Here
	Restricted Delivery Fee (Endorsement Required)		
0090	Total Postage & Fees \$		
10	Name (Please Print Clearly) (to be completed by mailer)		
2000	Mr. Kevin Washington Street, Apr No., or PO Box No. P.O. Box 14000		
70	City State, ZIP-4 Juno Beach,	Florida	33408
ļ.	PS Form 3800, July 1999		See Reverse for Instructions





RECEIVED

DEC 06 2000

BUREAU OF AIR REGULATION

November 21, 2000

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

Re: Change Request of Title V Permit - 0710002-007-AV: Ft. Myers Power Plant

Dear Scott,

In reference to my letter of October 20, 2000 [Attachment No.1] requesting a change in the NO_x testing frequency of the simple cycle Gas Turbines from annually to five years; rather than opening the permit at this time, FPL would like to hold that request in abeyance until the next permit renewal period, or other appropriate time.

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

Very Truly yours,

William M. Reichel

Plant Manager, Ft. Myers Plant Florida Power and Light Company

Attachments: 1





Florida Power & Light Company, Environmental Services Dept., P.O. Box 14000, Juno Beach, FL 33408

October 20, 2000

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: Permit No. 0710002-007-AV
FPL Ft. Myers Plant Proposed Title V Permit

Dear Mr. Sheplak:

After reviewing the subject Title V permit, FPL has identified a NOx test issue that is described below. This issue was addressed in a change to the Port Everglades Title V permit (see attached) which was approved by the Department.

Page 22 Specific Condition B.14.2. <u>Nitrogen Oxides Testing</u>: FPL requests a change in this period of testing frequency to be consistent with other simple cycle gas turbines within the FPL fleet [Port Everglades and Ft. Lauderdale Plants]. The following language is proposed for this specific condition:

"Provided operation is no more than 400 hours/year/turbine on oil, NOx emissions for the combustion turbines shall be tested every five (5) years by a stack test on any representative turbine in the bank of the combustion turbines. Testing shall be performed each federal fiscal year no later than September 30."

Thank you for your attention to the issues raised in this correspondence. Please do not hesitate to contact Kevin Washington at (561) 691-2877 for further assistance.

Sincerely,

William Reichel

Plant Manager, Ft. Myers Plant Florida Power & Light Company

