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BUREAU OF AIR REGULATION

February 07, 2000

Clair H. Fancy  
Chief - Bureau of Air Regulation  
State of Florida  
Department of Environmental Protection  
2600 Blair Stone Road  
Mail Station #5505  
Tallahassee, FL 32399-2400

**Re: Administrative Change of Title V Permit No.: 0110037-001AV,  
Facility ID No.: 0110037, Lauderdale Combined Cycle Power Plant,  
E.U. ID No. 035, 036, 037, 038**

Dear Mr. Fancy:

This letter is to request an administrative change to the Lauderdale Combined Cycle Plant Title V Permit. The change will bring the Lauderdale Permit into a more consistent alignment with the Title V Permit at the Ft. Myers Plant.

- FPL requests the compliance method for NO<sub>x</sub> change to the Continuous Emission Monitor (CEM) from the steam to fuel ratio tables currently in effect. Refer to: 1) Ft. Myers Air Construction Permit 0710002-004-AC, Page 10 of 13, Section III. Emission Unit(s) Specific Conditions, Compliance Determination, 29. [Attachment No. 1], and 2) FPL letter 03 March 1999, "FPL Title V Permits Administrative Changes FPL Ft Lauderdale Power Plant". [Attachment No. 2].

FPL suggests the following language to the Lauderdale permit to facilitate the change to the CEM as the compliance method for NO<sub>x</sub>:

- Page 11, Test Methods and Procedures, Specific condition A.19. Table - Add footnote: " **\*\*\* CEM system data based on a 30-day rolling average**", and replace "20" with "\*\*\*\*" under the EPA Reference Method column. [Marked up copy attached - Attachment NO. 3]
- Page 13, Continuous Monitoring Requirements, Specific condition A.24. - Delete, "*Continuous monitoring of the steam injection rates...*" Insert language found as Specific condition 29 of the Ft. Myers permit (Attachment No. 1 above), [Marked up copy attached - Attachment No. 4]
- Table 2-1, Compliance Requirements - Under the Compliance Method column for NO<sub>x</sub>, delete "*EPA Method 20*" and replace with "*CEM Data*". In addition, under the Testing Time Frequency column for NO<sub>x</sub>, delete "*Annual*" and replace with "*30-day rolling average*". [Marked up copy attached - Attachment No. 5].

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

Very truly yours,



Rudy Sanchez  
PGBU Broward - General Manager  
Florida Power and Light Company

**Cc: Scott Sheplak**

State of Florida  
Department of Environmental Protection  
2600 Blair Stone Road  
Mail Station #5505  
Tallahassee, FL 32399-2400

**Tom Tittle**

State of Florida  
Department of Environmental Protection  
Southeast Florida District  
400 Congress Ave.  
P.O.Box 15425  
West Palm Beach, Fl. 33416

**Daniela Banu**

Broward County DNRP  
218 SW 1st Ave.  
Ft Lauderdale, Fl. 33301

**Attachments: 5**

Ccs: FPL

K. Pascale  
G. Moncrief  
M. Archer  
J. Hampp  
K. Washington  
File

## AIR CONSTRUCTION PERMIT 0710002-004-AC

## SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

## COMPLIANCE DETERMINATION

27. Compliance with the allowable emission limiting standards shall be determined within 60 days after achieving the maximum production rate at which each unit will be operated, but not later than 180 days following initial operation of the unit, and annually thereafter as indicated in this permit, by using the following reference methods as described in 40 CFR 60, Appendix A (1997 version), and adopted by reference in Chapter 62-204.800, F.A.C.
28. Initial (I) performance tests shall be performed pursuant to 40 CFR Subpart GG. Annual (A) compliance tests shall be performed during every federal fiscal year (October 1 - September 30) pursuant to Rule 62-297.310(7), F.A.C., on each CT as indicated. The following reference methods shall be used. No other test methods may be used for compliance testing unless prior DEP approval is received in writing.
- EPA Reference Method 9, "Visual Determination of the Opacity of Emissions from Stationary Sources" (I, A).
  - EPA Reference Method 10, "Determination of Carbon Monoxide Emissions from Stationary Sources" (I, A).
  - EPA Reference Method 20, "Determination of Oxides of Nitrogen Oxide, Sulfur Dioxide and Diluent Emissions from Stationary Gas Turbines." Initial test only for compliance with 40CFR60 Subpart GG.
  - EPA Reference Method 18, and/or 25A, "Determination of Volatile Organic Concentrations." Initial test only.
  - EPA Reference Method 19. "Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxides Emission Rates". Method 19 shall be used only for the calculation of lb/mmBtu and 40CFR75 shall be used to calculate mmBtu/hr and lb/hr emissions rates from stack tests. Initial test only.
29. Continuous compliance with the NO<sub>x</sub> emission limits: Continuous compliance with the NO<sub>x</sub> emission limits shall be demonstrated with the CEM system based on a 30-day rolling average. Based on CEMS data, a separate compliance determination is conducted at the end of each operating day and a new 30 day average emission rate is calculated from the arithmetic average of all valid hourly emission rates during the previous 30 operating days. Valid hourly emission rates shall not include periods of startup, shutdown, or malfunction. A valid hourly emission rate shall be calculated for each hour in which at least two NO<sub>x</sub> concentrations are obtained at least 15 minutes apart. [Rules 62-4.070 F.A.C., 62-210.700, F.A.C., and 40CFR75]
30. Compliance with the SO<sub>2</sub> and PM/PM<sub>10</sub> emission limits: Notwithstanding the requirements of Rule 62-297.340, F.A.C., the use of pipeline natural gas is the method for determining compliance for SO<sub>2</sub> and PM<sub>10</sub>.



**FPL**

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

March 9, 1999

Mr. Scott Sheplak, P.E., Title V Permitting  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Rd. Tallahassee, Florida 32399-2400

Re: **FPL Title V Permits Administrative Changes**  
**FPL Ft Lauderdale Power Plant**

Dear Mr. Sheplak:

This letter is provided as a summary of our understanding pertaining to actions concerning the Title V Permit of FPL's Ft. Lauderdale Power Plant. In our meeting with you and Tom Casio on September 23, 1998, the compliance method change for NOx from the steam tables to the use of the CEMs for compliance was agreed as a probable administrative change.

The compliance method change for NOx to the CEM from the steam to fuel ratio tables would allow for greater conservation of water. It is our understanding EPA guidance had allowed this in the past. You agreed to review the issue to determine if EPA approval would be required and anticipated it would be an administrative change. If this compliance change occurred the NOx testing would be removed from the permit.

Thank you for meeting with us on this issue. If you require any additional information, please do not hesitate to call me at 561-691-7057.

Sincerely,

Mary J. Archer  
Sr. Environmental Specialist  
Florida Power & Light Company

A.17. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

A.18. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[40 CFR 60.11(d)]

### Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.19. Except as specified in this condition for visible emissions testing on fuel oil, annual compliance tests shall be performed on each combustion turbine unit with the fuel(s) used for more than 400 hours in the preceding 12-month period. Tests shall be conducted using EPA reference methods, or equivalent, in accordance with the July 1, 1996 version of 40 CFR 60 Appendix A. The stack test for each turbine shall be performed according to the requirements of specific condition A.20.

Pollutant	EPA Reference Method	Gas	Oil
Particulate Matter	5 or 17		X
Visible Emissions	9	X	X
Carbon Monoxide	10	X	X
Nitrogen Oxides	<del>20</del>	X	X
Volatile Organic Compounds	25A	X	X
	<b>Test Method</b>		
Sulfur content	ASTM D 2880-96*		X
	ASTM D 1072-90(94) E-1, ASTM D 3031-81(86), ASTM D 4084-94, or ASTM D 3246-92*	X	

\*or the latest edition.

\*\*\* CEM DATA BASED ON 30-DAY ROLLING AVERAGE

(2) If the turbine is supplied its fuel without intermediate bulk storage, the values shall be determined and recorded daily. Owners, operators or fuel vendors may develop custom schedules for determination of the values based on the design and operation of the affected facility and the characteristics of the fuel supply. These custom schedules shall be substantiated with data and must be approved by the Administrator before they can be used to comply with 40 CFR 60.334(b). The Lauderdale Plant has an approved Customized Fuel Monitoring Schedule (dated March 12, 1993).

[40 CFR 60.334(b)(1) and (2)]

### Continuous Monitoring Requirements

~~A.24. Continuous monitoring of the steam injection rates shall be operated and maintained in accordance with 40 CFR 60, Subpart GG, for each unit- [PSD-FL-145, Specific Condition No. 12]~~

DELETED, INSERT FT. MYERS  
LANGUAGE

A.25. For the purposes of 40 CFR 60.13, all continuous monitoring systems required under applicable subparts shall be subject to the provisions of 40 CFR 60.13 upon promulgation of performance specifications for continuous monitoring systems under Appendix B of 40 CFR 60 and, if the continuous monitoring system is used to demonstrate compliance with emission limits on a continuous basis, the continuous emission monitoring system shall be installed, calibrated, operated and maintained in accordance with the quality assurance requirements of 40 CFR 75, adopted and incorporated by reference in rule 62-204.800, F.A.C. Compliance shall be demonstrated based on a 3-hour rolling average.

[40 CFR 60.13(a); and, Rules 62-213.440, 62-204.800 and 62-296.405(1)(c)3., F.A.C.]

A.26. (1) Owners and operators of all continuous emission monitoring systems (CEMS) installed in accordance with the provisions of this part shall check the zero (or low-level value between 0 and 20 percent of span value) and span (50 to 100 percent of span value) calibration drifts at least once daily in accordance with a written procedure. The zero and span shall, as a minimum, be adjusted whenever the 24-hour zero drift or 24-hour span drift exceeds two times the limits of the applicable performance specifications in Appendix B. The system must allow the amount of excess zero and span drift measured at the 24-hour interval checks to be recorded and quantified, whenever specified. For continuous monitoring systems measuring opacity of emissions, the optical surfaces exposed to the effluent gases shall be cleaned prior to performing the zero and span drift adjustments except that for systems using automatic zero adjustments. The optical surfaces shall be cleaned when the cumulative automatic zero compensation exceeds 4 percent opacity.

[40 CFR 60.13(d)(1)]

A.27. Except for system breakdowns, repairs, calibration checks, and zero and span adjustments required under 40 CFR 60.13(d), all continuous monitoring systems (CMS) shall be in continuous operation and shall meet minimum frequency of operation requirements as follows:

(1) All continuous monitoring systems referenced by 40 CFR 60.13(c) for measuring opacity of emissions shall complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period.

Table 2-1, Compliance Requirements

E.U. ID Nos.		Brief Description		Testing Time Frequency	Frequency Base Date **	Min. Compliance Test Duration	CMS*	See Permit Conditions
-035 -036 -037 -038		Combined-cycle Combustion Turbines with HRSGs						
Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date **	Min. Compliance Test Duration	CMS*	See Permit Conditions	
VE	Oil	EPA Method 9	Annual	1-Oct	1 Hour		A.19	
	Gas	EPA Method 9	Annual	1-Oct	1 Hour		A.19	
PM/PM10	Oil	EPA Method 5 or 17	Annual	1-Oct	3 Hours		A.19	
SO2 (Sulfur Content of Fuel)	Oil	ASTM D 2880-96	Upon receipt of distillate oil				A.19	
	Gas	ASTM D 1072-90(94)E-1 or D 3031-81(86) or D 4084-94 or D 3246-92	Annual	1-Oct			A.19	
NOx	Oil	<del>CEM EPA Method 20 DATA</del>	30-DAY Annual	1-Oct		Yes	A.19	
	Gas	<del>CEM EPA Method 20 DATA</del>	30-DAY Annual	1-Oct		Yes	A.19	
VOC	Oil	EPA Method 25A	Annual	1-Oct			A.19	
	Gas	EPA Method 25A	Annual	1-Oct			A.19	
CO	Oil	EPA Method 10	Annual	1-Oct			A.19	
	Gas	EPA Method 10	Annual	1-Oct			A.19	
CO2						Yes		

E.U. ID Nos.		Brief Description		Testing Time Frequency	Frequency Base Date **	Min. Compliance Test Duration	CMS*	See Permit Conditions
-003 -015		Banks of 12 Combustion Turbines						
Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date **	Min. Compliance Test Duration	CMS*	See Permit Conditions	
VE	Oil	EPA Method 9	Annual	1-Oct	1 Hour		B.15	
	Gas	EPA Method 9	Annual	1-Oct	1 Hour		B.15	
NOx	Oil	EPA Method 20	Annual	1-Oct			B.16, B.17	
	Gas	EPA Method 20	Annual	1-Oct			B.16, B.17	
VOC	Oil	EPA Method 25A	5 years	1-Oct			B.18	
	Gas	EPA Method 25A	5 years	1-Oct			B.18	

Notes:  
 \* CMS [=] Continuous Monitoring System  
 \*\* Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.



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NEWS-PRESS

Published every morning — Daily and Sunday  
Fort Myers, Florida

FEB 28 2000

Affidavit of Publication 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 Coordinator 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 \_\_\_\_\_

Air Operation Permit Revision

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

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

February 24, 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*

Sworn to and subscribed before me this \_\_\_\_\_

24th day of \_\_\_\_\_

February, 20 00 by \_\_\_\_\_

Kieanna Henry

who is 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: \_\_\_\_\_

CLASS-18



Brenda Leighton  
MY COMMISSION # CC080903 EXPIRES  
February 14, 2003  
SIGNED IN THE PRESENCE OF \_\_\_\_\_

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION DRAFT Title V Air Operation Permit Revision No.0710002-AV Fort Myers Plant Lee County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit revision to Florida Power & Light Company for the Fort Myers Plant located at 10650 State Road 80, Fort Myers, Lee County. The applicants name and address are: Florida Power & Light Company, Environmental Services Department, P.O. Box 14000, Juno Beach, Florida 33408.

The application requested that the specific conditions of construction permit 0710002-005-AC be incorporated. The construction permit authorized the installation of inlet foggers at the compressor inlet of the twelve simple cycle combustion turbines and established limitations on NOx and the hours of operation. Initial compliance testing was completed on November 30, 1999.

The permitting authority will issue the PROPOSED Title V Air Operation Permit Revision, and subsequent FINAL Title V Air Operation Permit Revision, in accordance with the conditions of the DRAFT Title V Air Operation Permit Revision 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 DRAFT Title V Air Operation Permit Revision 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 Title V Operation Permit Revision, the permitting authority shall issue a Revised DRAFT Title V Operation Permit Revision and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in 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 filed by any persons other than those entitled to written notice under Section

120.60(3), F.S.; must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting 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 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 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 28-106.205, F.A.C.

A petition that disputes the material facts on which the permitting authority'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; name and 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 petitioner's substantial rights will be affected by the agency determination;
- (c) A statement of how and when the 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 state;
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief; and
- (f) A demand for relief.

A petition that does not dispute the material facts upon which the permitting authority'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, F.A.C.

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 have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available for this proceeding.

In addition to the above, pursuant to 421

United States Code (U.S.C.) Section 7661d(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 revision. 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 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: 850/488-1344  
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 Title V Air Operation Permit Revision, the application, and the information submitted by the responsible official, exclusive of confidential records under Section

<b>AFFIDAVIT OF PUBLICATION</b>

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. Feb 24 No. 13749

NEWS-PRESS  
"Serving Southwest Florida Since 1884"

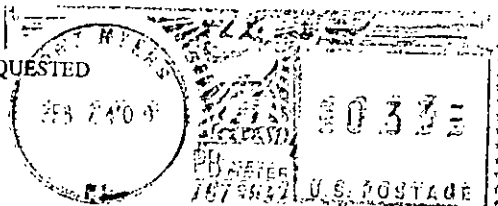
# NEWS-PRESS

(941) 335-0200 2442 Dr. Martin Luther King Jr. Blvd. Fort Myers FL 33901-3987

487-7048

Scott

RETURN SERVICE REQUESTED



Mr. C. H. Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Mail Station #5505  
Tallahassee, Florida 32399-2400

32399-6342 01

