



March 31, 1997

Ms. Virginia B. Wetherell, Secretary
State of Florida
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

**Re: Change of Responsible Official Designation
Title V Program**

Dear Ms. Wetherell:

This correspondence is to certify that **Mr. William Reichel has replaced Mr. Robert Fritz** as Plant General Manager of the FPL **Ft. Myers Plant**. As Plant General Manager, Mr. Reichel is authorized to act as the "Responsible Official" for that facility, pursuant to State Rule 62-213.200 F.A.C.. Mr. Reichel is hereby authorized to act on behalf of Florida Power & Light Company on all Title V permit related activities for the Ft. Myers plant.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Adalberto Alfonso'.

Adalberto Alfonso
Vice President
Power Generation Business Unit
Florida Power & Light Company

cc: Scott Sheplak
David Knowles

FDEP DARM
FDEP Southwest District

RECEIVED

APP 04 1997

BUREAU OF
AIR REGULATION

Appendix H-1, Permit History/ID Number Changes

Florida Power & Light
Fort Myers

[DRAFT/PROPOSED/FINAL]Permit No.: 0710002-001-AV
Facility ID No.: 0710002

Permit History (for tracking purposes):

E.U.

<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u> ^{1,2}	<u>Revised Date(s)</u>
-001	Oil-Fired Steam Turbine Electric Generator	AO36-221394	07/30/93	01/05/98		
-002	Oil-Fired Steam Turbine Electric Generator	AO36-221396	07/30/93	01/05/98		
-003	Combustion Turbine #1	AO36-223496	06/28/93	02/26/98		
-004	Combustion Turbine #2	AO36-223496	06/28/93	02/26/98		
-005	Combustion Turbine #3	AO36-223496	06/28/93	02/26/98		
-006	Combustion Turbine #4	AO36-223496	06/28/93	02/26/98		
-007	Combustion Turbine #5	AO36-223496	06/28/93	02/26/98		
-008	Combustion Turbine #6	AO36-223496	06/28/93	02/26/98		
-009	Combustion Turbine #7	AO36-223496	06/28/93	02/26/98		
-010	Combustion Turbine #8	AO36-223496	06/28/93	02/26/98		
-011	Combustion Turbine #9	AO36-223496	06/28/93	02/26/98		
-012	Combustion Turbine #10	AO36-223496	06/28/93	02/26/98		
-013	Combustion Turbine #11	AO36-223496	06/28/93	02/26/98		
-014	Combustion Turbine #12	AO36-223496	06/28/93	02/26/98		

(if applicable) ID Number Changes (for tracking purposes):

From: **Facility ID No.:** 52FTM360002

To: **Facility ID No.:** 0710002

Notes:

1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.

2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

File Copy

Florida Department of

Environmental Protection

Memorandum

TO: David Knowles, SD

FROM: Bruce Mitchell *Bon*

DATE: January 15, 1997

SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit
Florida Power & Light, Fort Myers: 0710002-001-AV

The Title V operating permit application package for the referenced facility is being processed in Tallahassee. The application was previously forwarded to your office for your files and future reference. Please have someone review the package for completeness and respond in writing by February 14, 1997, if you have any comments. Otherwise, no response is required. If there are any questions, please call the project engineer, Tom Cascio, at 904/488-1344 or SC:278-1344. It is very important to verify the compliance statement regarding the facility. Since we do not have a readily effective means of determining compliance at the time the application was submitted, please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. Also, do not write on the documents.

If there are any questions regarding this request, please call me or Scott Sheplak at the above number(s).

RBM/bm

cc: Earl Baker

Title V Reading File
File
Tom Cascio



Florida Department of
Environmental Protection

Lawton Chiles
 Governor

South District
 2295 Victoria Avenue
 Fort Myers, Florida 33901

Virginia B. Wetherell
 Secretary

PERMITTEE:

Florida Power & Light Company
 P.O. Box 088801
 North Palm Beach, FL 33408-8801

I.D. No. 52FTM36000201
 Permit/Certification
 Number: A036-221394
 Date of Issue: July 30, 1993
 Expiration Date: Jan. 5, 1998
 County: Lee
 Latitude: 26° 41' 49" N
 Longitude: 81° 46' 55" W
 Section/Town/Range: 35/43S/25E
 Project: Ft. Myers Power Plant
 Unit Number 1

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-296, 17-297 and 17-4. 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:

For operation of Unit No. 1 at Florida Power & Light Company's (FPL) Fort Myers Power Plant. Unit 1 is a 160 MW class (approximately 170 MW gross) oil fired steam generator. The maximum heat input rate while firing No. 6 fuel oil is 1,690 million (MM) Btu per hour.

Sulfur dioxide emissions are controlled by limiting the sulfur content of the fuel.

The Fort Myers Power Plant is located on State Road 80, 3.5 miles east of Tice.

PERMITTEE:
Florida Power & Light Company

I.D. No. 52FTM36000201
Permit/Cert. No. AO36-221394
Date of Issue: July 30, 1993
Expiration Date: Jan. 5, 1998

SPECIFIC CONDITIONS:

(1) Heat Input Rate:

The heat input rate shall not exceed 1,690.0 MM Btu/hr.
[Requested in the permit application].

(2) Permitted Fuels:

The only fuels authorized to be burned in this source are, (a) No. 6 residual fuel oil, (b) No. 2 fuel oil, (c) propane gas, or (d) non-specification used oil from FPL operations. These fuels may be mixed or burned simultaneously.
[Requested in the permit application].

(3) Source Emission Limiting Standards and Compliance Testing Requirements:

POLLUTANT	EMISSION (1) LIMITING STDS.	TESTING FREQUENCY (2)			TEST (3) METHOD
		ANNUAL	QUARTERLY	OTHER	
Particulate Matter					
-Steady State	0.1 lb/MM Btu ✓	X ⁽⁶⁾	----	----	EPA Method 5 or 17 ⁽⁴⁾
-Sootblowing and Load Changing	0.3 lb/MM Btu ⁽⁵⁾ (Max 3 hrs in 24 hrs)	X	----	----	EPA Method 5 or 17 ⁽⁴⁾
Sulfur Dioxide	2.75 lb/MM Btu	----	----	X	Fuel Analysis
Visible Emissions					
-Steady State	40% Opacity ⁽⁶⁾	X ⁽⁶⁾	----	----	DEP Method 9
-Sootblowing and Load Changing	60% Opacity for ⁽⁵⁾ up to 3 hrs in 24 hrs, with up to four 6-minute periods of up to 100% if unit has an operational opacity CEM.	X	----	----	DEP Method 9

PERMITTEE:
Florida Power & Light Company

I.D. No. 52FTM36000201
Permit/Cert. No. AO36-221394
Date of Issue: July 30, 1993
Expiration Date: Jan. 5, 1998

SPECIFIC CONDITIONS:

Footnotes:

- (1) Rules 17-296.405(1) and 17-210.700(3), F.A.C.
- (2) Rule 17-297.340, F.A.C.
- (3) Rule 17-297.330, F.A.C.
- (4) EPA Method 17 may be used only if the stack gas exit temperature is less than 375°F.
- (5) Rule 17-210.700(3), F.A.C. Excess emissions are authorized only if (a) best operational practices to minimize emissions are adhered to, and (b) the duration of excess emissions is minimized.
- (6) This source has been authorized by Order of the Department's Secretary dated January 2, 1986 to test particulate matter emissions and visible emissions annually with a 40% opacity limit. If FPL fails to demonstrate compliance with an applicable particulate or visible emission standard, then the Order will terminate upon written notice by the Department.

(4) Compliance Testing Related Requirements:

- (a) Notification - Rule 17-297.340(1)(i), F.A.C.

FPL shall notify the South District Office of the Department of Environmental Protection at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner. The Department may waive the 15 day notice requirement on a case by case basis.

- (b) Conditions - Rule 17-4.070(3), F.A.C.

Compliance testing of particulate matter and visible emissions should be conducted while the source is firing No. 6 residual fuel oil within 90-100% of the maximum allowable rate of 1,690.0 MM Btu per hour. Particulate matter and visible emissions tests shall be conducted under both sootblowing and steady state conditions.

Testing may be conducted with the source firing No. 6 residual fuel oil at less than 90 percent of the maximum allowable rate; however, if so, subsequent source operation is limited up to 110% of the average No. 6 residual fuel oil firing rate during the test. Once the unit is so limited, then operation at higher No. 6 residual fuel oil firing rates is allowed for no more than fifteen days for purposes of additional compliance testing to regain the higher rates, not to exceed 1,690.0 MM Btu per hour of No. 6 residual fuel oil.

PERMITTEE:
Florida Power & Light Company

I.D. No. 52FTM36000201
Permit/Cert. No. AO36-221394
Date of Issue: July 30, 1993
Expiration Date: Jan. 5, 1998

SPECIFIC CONDITIONS:

Operating at conditions during testing which do not reflect representative operating conditions may invalidate a test.

Should FPL decide to pursue routine use of magnesium hydroxide fuel additive, then all future compliance testing for particulate matter and visible emissions shall include use of the additive at the maximum dosage rate to be used during normal operation.

(c) Test Schedule:

Stack tests shall be conducted at least on an annual basis, on or within 60 days before the date May 28. FPL may request an extension of the May 28 deadline on a case by case basis. For good cause shown, the Department shall extend the deadline for a reasonable time. A timely request to extend the deadline shall automatically extend the deadline for 30 days or until the request is acted upon, whichever is earlier.

(d) Stack Sampling Facility - Rule 17-297.345, F.A.C.

The stack sampling facility must comply with Rule 17-297.345, F.A.C.

(e) Report Submittal - Rules 17-297.570 and 17-4.070(3), F.A.C.

A copy of the test results shall be submitted to the Department's South District Office within 45 days after the last test run is completed. The test report shall provide the actual heat input rate and at least all of the information listed in Rule 17-297.570(3), F.A.C. A copy of the continuous opacity monitor strip chart recorded during each compliance test shall be submitted with the test reports. Each test report shall also include a fuel oil analysis from a representative sample of the fuel oil burned during the test. Failure to submit any of the above information may invalidate the test.

(5) Recordkeeping to Document Compliance with the Sulfur Dioxide Emission Limit - Rule 17-4.070(3), F.A.C.

In order to document compliance with the sulfur dioxide emission limitation, FPL shall analyze a calendar monthly composite fuel oil sample for sulfur content and heat content. The monthly composite oil sample shall be created by taking daily as-burned fuel oil samples for each day that either of the Fort Myers plant units operates. The records shall contain, at a minimum, for each calendar month, the sulfur content and heat content of the composite sample, and a calculation of the monthly average sulfur dioxide emission rate in pounds per MM Btu heat input. The records shall contain sufficient detail to allow the Department to determine whether the emissions were properly computed. All recorded data shall be maintained on file for a period of at least 2

PERMITTEE:

Florida Power & Light Company

I.D. No. 52FTM36000201

Permit/Cert. No. AO36-221394

Date of Issue: July 30, 1993

Expiration Date: Jan. 5, 1998

SPECIFIC CONDITIONS:

years. FPL shall submit a summary of the calendar monthly averages for fuel sulfur content, heat content, and sulfur dioxide emission rate on a quarterly basis, within 30 days following the end of each calendar quarter.

(6) Annual Operations Report (AOR):

On or before March 1 of each calendar year, a completed DEP Form 17-213.900(4), "Annual Operating Report for Air Pollutant Emitting Facility", shall be submitted to the Department's South District Office. The report shall provide sufficient detail to allow the Department to determine whether the emissions were properly computed.

(7) Excess Emissions:

(a) Events - Rule 17-210.700, F.A.C.

Excess emissions resulting from start-up or shut-down are permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions is minimized.

Excess emissions resulting from malfunction are permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions is minimized but in no case exceeds two hours in any 24-hour period unless specifically authorized by the Department for longer duration.

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 are prohibited.

(b) Notification - Rules 17-210.700(6) and 17-4.130, F.A.C.

In the event the permittee is temporarily unable to comply with any of the conditions of the permit, the permittee shall immediately notify the Department's South District Office. Notification shall be conducted in accordance with General Condition (8) of this permit. In case of excess emissions resulting from malfunctions, FPL shall notify the Department in accordance with Rule 17-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

(c) Quarterly Report Submittal - Rule 17-4.070(3), F.A.C.

FPL shall submit to the Department of Environmental Protection a written report of emissions in excess of the emission limiting standards as set forth in Rule 17-296.405 and 17-210.700, F.A.C., for each calendar quarter. The nature and cause of the excessive emissions shall be explained. The report shall state the cause,

PERMITTEE:
Florida Power & Light Company

I.D. No. 52FTM36000201
Permit/Cert. No. AO36-221394
Date of Issue: July 30, 1993
Expiration Date: Jan. 5, 1998

SPECIFIC CONDITIONS:

period of non-compliance, steps taken for corrective action, and steps taken to prevent recurrence. The Department shall also be notified when there are no exceedances for a quarter. This report does not relieve FPL of the legal liability for violations. All relevant records shall be maintained on file for a period of at least two years. The report shall be submitted within 30 days following each calendar quarter.

(8) Used Oil Combustion:

(a) FPL shall not burn off-specification used oil. Used oil which fails to comply with any of the following specification levels is off-specification used oil [Requested by applicant; 40 CFR 279 Subpart B]:

1. Arsenic shall not exceed 5.0 ppm.
2. Cadmium shall not exceed 2.0 ppm.
3. Chromium shall not exceed 10.0 ppm.
4. Lead shall not exceed 100.0 ppm.
5. Total halogens shall not exceed 4,000.0 ppm. * See note ² ₁₀ ₁₀₀ _{1,000} _{1,117} ppm
6. Flash point shall not be less than 100.0 °F.

* Note: Used oil containing more than 1,000.0 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under 40 CFR 279.10(b)(1)(ii). Such oil may not be burned in this unit unless FPL demonstrates through the use of DEP approved analytical methods that the used oil does not constitute hazardous waste.

- (b) Each batch of used oil to be burned shall be sampled and analyzed for: arsenic, cadmium, chromium, lead, total halogens, and flash point using EPA/DEP or ASTM approved methods. Split samples of the used oil shall be retained for three (3) months after analysis for further testing if necessary.
- (c) Results of used oil sampling and analysis performed pursuant to Specific Condition 8(b) shall be retained by the permittee for at least three (3) years and made available for inspection by the Department upon request.
- (d) On a quarterly basis, for each quarter during which used oil is burned, FPL shall submit reports of the monthly quantities of used oil burned and the results from the sample analyses performed pursuant to Specific Condition 8(b) to the Department's South District Office. FPL shall submit these reports within 30 days from the end of every calendar quarter in which used oil was burned. Furthermore, the quantities of burned used oil shall be included in the Annual Operation Report.

PERMITTEE:
Florida Power & Light Company

I.D. No. 52FTM36000201
Permit/Cert. No. A036-221394
Date of Issue: July 30, 1993
Expiration Date: Jan. 5, 1998

SPECIFIC CONDITIONS:

(9) Continuous Emission Monitoring - Rule 17-210.700(3), F.A.C.

FPL requested authority to occasionally exceed visible emissions of 60 percent opacity as allowed by Rule 17-210.700(3), F.A.C.,; therefore, pursuant to Rule 17-210.700(3), F.A.C., FPL shall operate, calibrate, and maintain a continuous opacity monitoring system. The continuous opacity monitoring system shall be calibrated, operated, span checked, and maintained according to the manufacturers recommendations.

(10) Objectionable Odors - Rule 17-296.320(2), F.A.C.

FPL shall not discharge air pollutants which cause or contribute to an objectionable odor.

(11) Hours of Operation:

The hours of operation are not restricted.

(12) Special Compliance Tests - Rule 17-297.340(2), F.A.C.

If the Department of Environmental Protection, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard is being violated, then the Department of Environmental Protection may require FPL to conduct compliance tests which identify the nature and quantity of pollutant emissions and to provide a report on the results of said tests.

(13) Disposal of Spent Boiler Cleaning Chemicals - Rule 17-4.070(3), F.A.C.

FPL shall not dispose of spent boiler cleaning chemicals by injecting them into this source.

(14) Other Requirements - Rule 17-210.300, F.A.C.

Issuance of this permit does not relieve FPL from complying with applicable emission limiting standards or other requirements of Rules 17-210, 17-212, 17-252, 17-272, 17-273, 17-275, 17-296, and 17-297, F.A.C., or any other requirements under federal, state, or local law.

PERMITTEE:

Florida Power & Light Company

I.D. No. 52FTM36000201
Permit/Cert. No. A036-221394
Date of Issue: July 30, 1993
Expiration Date: Jan. 5, 1998

SPECIFIC CONDITIONS:

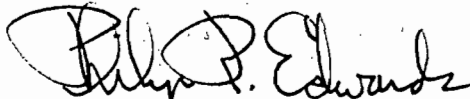
- (15) Operation Permit Renewal - Rules 17-4.050(2) and 17-4.090(1), F.A.C.

In order to renew this operation permit, an application for renewal shall be submitted to the Department of Environmental Protection by November 6, 1997.

Note: In the event of an emergency the permittee shall contact the Department by calling (904) 488-1320. During normal business hours, the permittee shall call (813) 332-6975.

Issued this 2ND day of AUGUST, 1993.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Philip R. Edwards
Director of
District Management

PRE/GM/gm

16 Pages Attached

xcd permits

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTH FLORIDA DISTRICT
2269 BAY STREET
FORT MYERS, FLORIDA 33901-2896
(813)332-2667



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY
PHILIP R. EDWARDS
DISTRICT MANAGER

PERMITTEE: T. R. Fair, Manager
Environmental Permitting
& Programs
Florida Power & Light Co.
P. O. Box 14000
Juno Beach, FL 33408

I.D.No: 52/36/0002/01
Permit/Certification
Number: AO36-143155
Date of Issue: 1-5-88
Expiration Date: 1-5-93
County: Lee
Latitude: 26° 41' 49" N
Longitude: 81° 46' 55" W
Section/Town/Range: 35/43S/25E
Project: Florida Power &
Light Company
Ft. Myers Power Plant
Unit Number 1

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. 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 department and made a part hereof and specifically described as follows:

Operate a fossil fuel steam generator unit with a rated capacity of 165 MW fired with Number 6 residual fuel oil having a maximum heat input of 1690 MMBTU/HR.

Plant is located on State Road 80, 3.5 miles east of Tice, Fort Myers, Florida.

DER FORM 17-1.205(5)
Effective November 30, 1982

Page 1 of 6

PERMITTEE: Florida Power &
Light Company

I.D. Number: 52/36/0002/01
Permit/Certification No. AO36-143155
Date of Issue: 1-5-88
Expiration Date: 1-5-93

SPECIFIC CONDITIONS:

1. Visible emission tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the unit is capable of compliance at the permitted maximum operating rate. Test shall be conducted in accordance with EPA Method Nine as published in 40 CFR-60, Appendix A, or State approved equivalent method. Such tests shall be conducted once per year commencing July 1988. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.
2. Particulate emission tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the unit is capable of compliance at the permitted maximum operating rate. Test shall be conducted in accordance with EPA Method Five as published in 40 CFR-60, Appendix A, or State approved equivalent method. Such tests shall be conducted once per year commencing July 1988. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.
3. Visible emissions shall not exceed 40% opacity.
4. During steady-state conditions, the particulate emissions shall not exceed 0.1 pounds per million BTU heat input.
5. During soot-blowing conditions, the particulate emissions shall not exceed 0.3 pounds per million BTU heat input.
6. ~~Sulfur dioxide emissions shall not exceed 2.75 pounds per million BTU heat input.~~ Compliance will be calculated from analyses of Sulfur in fuel oil. Sulfur content in fuel shall not exceed 2.5%.
7. Excess emissions resulting from start-up, shutdown, malfunction or soot blowing shall comply with the requirements of Chapter 17-2.250, Florida Administrative Code.

PERMITTEE: Florida Power &
Light Company

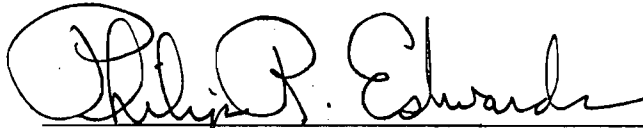
I.D. Number: 52/36/0002/01
Permit/Certification No. AO36-143155
Date of Issue: 1-5-88
Expiration Date: 1-5-93

SPECIFIC CONDITIONS:

8. All fugitive dust generated at this site shall be adequately controlled.
9. This facility shall be operated in such a fashion so as to preclude objectionable odors.
10. An annual operation report (DER Form 17-1.202(6) attached) shall be submitted by March 1st each year. The attached form shall be reproduced by the permittee and used for future annual submittals.
11. Existing oil flow meters shall be maintained to monitor the fuel oil being consumed.
12. Stack sampling facilities provided by the owner shall be in accordance with the requirements of Chapter 17-2.700(4), Florida Administrative Code.
- ~~13.~~ Used oil fuel may be burned provided it complies with the specifications set forth in the U. S. EPA RCRA rule promulgated on November 29, 1985 along with DER memorandum (copy attached) dated January 5, 1987.

Issued this 5th day of January, 1988.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION




Philip R. Edwards
District Manager

PRE/00/1s

____ Pages Attached

DER Form 17-1.201(5)
Effective November 30, 1982

Page 6 of 6



Florida Department of
Environmental Protection

Lawton Chiles
Governor

South District
2295 Victoria Avenue
Fort Myers, Florida 33901

Virginia B. Wetherell
Secretary

PERMITTEE:

Florida Power & Light Company
P.O. Box 088801
North Palm Beach, FL 33408-8801

I.D. No. 52FTM36000202
Permit/Certification
Number: A036-221396
Date of Issue: July 30, 1993
Expiration Date: Jan. 5, 1998
County: Lee
Latitude: 26° 41' 49" N
Longitude: 81° 46' 55" W
Section/Town/Range: 35/43S/25E
Project: Ft. Myers Power Plant
Unit Number 2

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-296, 17-297 and 17-4. 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:

For operation of Unit No. 2 at Florida Power & Light Company's (FPL) Fort Myers Power Plant. Unit 2 is a 400 MW class (approximately 440 MW gross) oil fired steam generator. The maximum heat input rate while firing No. 6 fuel oil is 3,850 million (MM) Btu per hour.

Particulate matter emissions are controlled by two UOP Aerotec DES 104B-GHS mechanical dust collectors designed to handle approximately 1,129,000 ACFM at 323 °F. Each of the two mechanical dust collectors contains 695 centrifugal precipitating tubes.

Sulfur dioxide emissions are controlled by limiting the sulfur content of the fuel.

The Fort Myers Power Plant is located on State Road 80, 3.5 miles east of Tice.

PERMITTEE:

Florida Power & Light Company

I.D. No. 52FTM36000202

Permit/Cert. No. AO36-221396

Date of Issue: July 30, 1993

Expiration Date: Jan. 5, 1998

SPECIFIC CONDITIONS:

(1) Heat Input Rate:

The heat input rate shall not exceed 3,850.0 MM Btu/hr.
[Requested in the permit application].

(2) Permitted Fuels:

The only fuels authorized to be burned in this source are, (a) ~~No. 6~~ residual fuel oil, (b) No. 2 fuel oil, (c) propane gas, or (d) ~~on-~~ specification used oil from FPL operations. These fuels may be mixed or burned simultaneously.
[Requested in the permit application].

(3) Source Emission Limiting Standards and Compliance Testing Requirements:

POLLUTANT	EMISSION (1) LIMITING STDS.	TESTING FREQUENCY (2)			TEST (3) METHOD
		ANNUAL	QUARTERLY	OTHER	
Particulate Matter					
-Steady State	0.1 lb/MM Btu ✓	X ⁽⁶⁾	----	----	EPA Method 5 or 17 ⁽⁴⁾
-Sootblowing and Load Changing	0.3 lb/MM Btu ⁽⁵⁾ ✓ (Max 3 hrs in 24 hrs)	X	----	----	EPA Method 5 or 17 ⁽⁴⁾
Sulfur Dioxide	2.75 lb/MM Btu ✓	----	----	X	Fuel Analysis
Visible Emissions					
-Steady State	40% Opacity ⁽⁶⁾	X ⁽⁶⁾	----	----	DEP Method 9
-Sootblowing and Load Changing	60% Opacity for ⁽⁵⁾ up to 3 hrs in 24 hrs, with up to four 6-minute periods of up to 100% if unit has an operational opacity CEM.	X	----	----	DEP Method 9

PERMITTEE:
Florida Power & Light Company

I.D. No. 52FTM36000202
Permit/Cert. No. AO36-221396
Date of Issue: July 30, 1993
Expiration Date: Jan. 5, 1998

SPECIFIC CONDITIONS:

Footnotes:

- (1) Rules 17-296.405(1) and 17-210.700(3), F.A.C.
- (2) Rule 17-297.340, F.A.C.
- (3) Rule 17-297.330, F.A.C.
- (4) EPA Method 17 may be used only if the stack gas exit temperature is less than 375°F.
- (5) Rule 17-210.700(3), F.A.C. Excess emissions are authorized only if (a) best operational practices to minimize emissions are adhered to, and (b) the duration of excess emissions is minimized.
- (6) This source has been authorized by Order of the Department's Secretary dated January 2, 1986 to test particulate matter emissions and visible emissions annually with a 40% opacity limit. If FPL fails to demonstrate compliance with an applicable particulate or visible emission standard, then the Order will terminate upon written notice by the Department.

(4) Compliance Testing Related Requirements:

- (a) Notification - Rule 17-297.340(1)(i), F.A.C.

FPL shall notify the South District Office of the Department of Environmental Protection at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner. The Department may waive the 15 day notice requirement on a case by case basis.

- (b) Conditions - Rule 17-4.070(3), F.A.C.

Compliance testing of particulate matter and visible emissions should be conducted while the source is firing No. 6 residual fuel oil within 90-100% of the maximum allowable rate of 3,850.0 MM Btu per hour. Particulate matter and visible emissions tests shall be conducted under both sootblowing and steady state conditions.

Testing may be conducted with the source firing No. 6 residual fuel oil at less than 90 percent of the maximum allowable rate; however, if so, subsequent source operation is limited up to 110% of the average No. 6 residual fuel oil firing rate during the test. Once the unit is so limited, then operation at higher No. 6 residual fuel oil firing rates is allowed for no more than fifteen days for purposes of additional compliance testing to regain the higher rates, not to exceed 3,850.0 MM Btu per hour of No. 6 residual fuel oil.

PERMITTEE:

Florida Power & Light Company

I.D. No. 52FTM36000202
Permit/Cert. No. AO36-221396
Date of Issue: July 30, 1993
Expiration Date: Jan. 5, 1998

SPECIFIC CONDITIONS:

Operating at conditions during testing which do not reflect representative operating conditions may invalidate a test.

Should FPL decide to pursue routine use of magnesium hydroxide fuel additive, then all future compliance testing for particulate matter and visible emissions shall include use of the additive at the maximum dosage rate to be used during normal operation.

(c) Test Schedule:

Stack tests shall be conducted at least on an annual basis, on or within 60 days before the date March 28. FPL may request an extension of the March 28 deadline on a case by case basis. For good cause shown, the Department shall extend the deadline for a reasonable time. A timely request to extend the deadline shall automatically extend the deadline for 30 days or until the request is acted upon, whichever is earlier.

(d) Stack Sampling Facility - Rule 17-297.345, F.A.C.

The stack sampling facility must comply with Rule 17-297.345, F.A.C.

(e) Report Submittal - Rules 17-297.570 and 17-4.070(3), F.A.C.

A copy of the test results shall be submitted to the Department's South District Office within 45 days after the last test run is completed. The test report shall provide the actual heat input rate and at least all of the information listed in Rule 17-297.570(3), F.A.C. A copy of the continuous opacity monitor strip chart recorded during each compliance test shall be submitted with the test reports. Each test report shall also include a fuel oil analysis from a representative sample of the fuel oil burned during the test. Failure to submit any of the above information may invalidate the test.

(5) Recordkeeping to Document Compliance with the Sulfur Dioxide Emission Limit - Rule 17-4.070(3), F.A.C.

In order to document compliance with the sulfur dioxide emission limitation, FPL shall analyze a calendar monthly composite fuel oil sample for sulfur content and heat content. The monthly composite oil sample shall be created by taking daily as-burned fuel oil samples for each day that either of the Fort Myers plant units operates. The records shall contain, at a minimum, for each calendar month, the sulfur content and heat content of the composite sample, and a calculation of the monthly average sulfur dioxide emission rate in pounds per MM Btu heat input. The records shall contain sufficient detail to allow the Department to determine whether the emissions were properly computed. All recorded data shall be maintained on file for a period of at least 2

ERMITTEE:

Florida Power & Light Company

I.D. No. 52FTM36000202
Permit/Cert. No. AO36-221396
Date of Issue: July 30, 1993
Expiration Date: Jan. 5, 1998

SPECIFIC CONDITIONS:

years. FPL shall submit a summary of the calendar monthly averages for fuel sulfur content, heat content, and sulfur dioxide emission rate on a quarterly basis, within 30 days following the end of each calendar quarter.

(6) Annual Operations Report (AOR):

On or before March 1 of each calendar year, a completed DEP Form 17-213.900(4), "Annual Operating Report for Air Pollutant Emitting Facility", shall be submitted to the Department's South District Office. The report shall provide sufficient detail to allow the Department to determine whether the emissions were properly computed.

(7) Excess Emissions:(a) Events - Rule 17-210.700, F.A.C.

Excess emissions resulting from start-up or shut-down are permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions is minimized.

Excess emissions resulting from malfunction are permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions is minimized but in no case exceeds two hours in any 24-hour period unless specifically authorized by the Department for longer duration.

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 are prohibited.

(b) Notification - Rules 17-210.700(6) and 17-4.130, F.A.C.

In the event the permittee is temporarily unable to comply with any of the conditions of the permit, the permittee shall immediately notify the Department's South District Office. Notification shall be conducted in accordance with General Condition (8) of this permit. In case of excess emissions resulting from malfunctions, FPL shall notify the Department in accordance with Rule 17-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

(c) Quarterly Report Submittal - Rule 17-4.070(3), F.A.C.

FPL shall submit to the Department of Environmental Protection a written report of emissions in excess of the emission limiting standards as set forth in Rule 17-296.405 and 17-210.700, F.A.C., for each calendar quarter. The nature and cause of the excessive emissions shall be explained. The report shall state the cause,

PERMITTEE:

Florida Power & Light Company

I.D. No. 52FTM36000202

Permit/Cert. No. AO36-221396

Date of Issue: July 30, 1993

Expiration Date: Jan. 5, 1998

SPECIFIC CONDITIONS:

period of non-compliance, steps taken for corrective action, and steps taken to prevent recurrence. The Department shall also be notified when there are no exceedances for a quarter. This report does not relieve FPL of the legal liability for violations. All relevant records shall be maintained on file for a period of at least two years. The report shall be submitted within 30 days following each calendar quarter.

(8) Used Oil Combustion:

(a) FPL shall not burn off-specification used oil. Used oil which fails to comply with any of the following specification levels is off-specification used oil [Requested by applicant; 40 CFR 279 Subpart B]:

1. Arsenic shall not exceed 5.0 ppm.
2. Cadmium shall not exceed 2.0 ppm.
3. Chromium shall not exceed 10.0 ppm.
4. Lead shall not exceed 100.0 ppm.
5. ~~Total halogens shall not exceed 4,000.0 ppm. * See note~~
6. ~~Flash point shall not be less than 100.0 °F.~~

* Note: Used oil containing more than 1,000.0 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under 40 CFR 279.10(b)(1)(ii). Such oil may not be burned in this unit unless FPL demonstrates through the use of DEP approved analytical methods that the used oil does not constitute hazardous waste.

- (b) Each batch of used oil to be burned shall be sampled and analyzed for: arsenic, cadmium, chromium, lead, total halogens, and flash point using EPA/DEP or ASTM approved methods. Split samples of the used oil shall be retained for three (3) months after analysis for further testing if necessary.
- (c) Results of used oil sampling and analysis performed pursuant to Specific Condition 8(b) shall be retained by the permittee for at least three (3) years and made available for inspection by the Department upon request.
- (d) On a quarterly basis, for each quarter during which used oil is burned, FPL shall submit reports of the monthly quantities of used oil burned and the results from the sample analyses performed pursuant to Specific Condition 8(b) to the Department's South District Office. FPL shall submit these reports within 30 days from the end of every calendar quarter in which used oil was burned. Furthermore, the quantities of burned used oil shall be included in the Annual Operation Report.

PERMITTEE:

Florida Power & Light Company

I.D. No. 52FTM36000202
Permit/Cert. No. AO36-221396
Date of Issue: July 30, 1993
Expiration Date: Jan. 5, 1998

SPECIFIC CONDITIONS:

(9) Continuous Emission Monitoring - Rule 17-210.700(3), F.A.C.

FPL requested authority to occasionally exceed visible emissions of 60 percent opacity as allowed by Rule 17-210.700(3), F.A.C.; therefore, pursuant to Rule 17-210.700(3), F.A.C., FPL shall operate, calibrate, and maintain a continuous opacity monitoring system. The continuous opacity monitoring system shall be calibrated, operated, span checked, and maintained according to the manufacturers recommendations.

(10) Objectionable Odors - Rule 17-296.320(2), F.A.C.

FPL shall not discharge air pollutants which cause or contribute to an objectionable odor.

(11) Hours of Operation:

The hours of operation are not restricted.

(12) Special Compliance Tests - Rule 17-297.340(2), F.A.C.

If the Department of Environmental Protection, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard is being violated, then the Department of Environmental Protection may require FPL to conduct compliance tests which identify the nature and quantity of pollutant emissions and to provide a report on the results of said tests.

(13) Disposal of Spent Boiler Cleaning Chemicals - Rule 17-4.070(3), F.A.C.

FPL shall not dispose of spent boiler cleaning chemicals by injecting them into this source.

(14) Other Requirements - Rule 17-210.300, F.A.C.

Issuance of this permit does not relieve FPL from complying with applicable emission limiting standards or other requirements of Rules 17-210, 17-212, 17-252, 17-272, 17-273, 17-275, 17-296, and 17-297, F.A.C., or any other requirements under federal, state, or local law.

PERMITTEE:

Florida Power & Light Company

I.D. No. 52FTM36000202
Permit/Cert. No. A036-221396
Date of Issue: July 30, 1993
Expiration Date: Jan. 5, 1998

SPECIFIC CONDITIONS:

(15) Operation Permit Renewal - Rules 17-4.050(2) and 17-4.090(1), F.A.C.

In order to renew this operation permit, an application for renewal shall be submitted to the Department of Environmental Protection by November 6, 1997.

Note: In the event of an emergency the permittee shall contact the Department by calling (904) 488-1320. During normal business hours, the permittee shall call (813) 332-6975.

Issued this 2ND day of AUGUST, 1993.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION



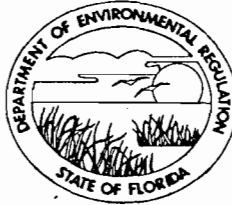
Philip R. Edwards
Director of
District Management

PRE/GM/gm

12 Pages Attached

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTH FLORIDA DISTRICT
2269 BAY STREET
FORT MYERS, FLORIDA 33901-2896
(813)332-2667



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY
PHILIP R. EDWARDS
DISTRICT MANAGER

PERMITTEE: T. R. Fair, Manager
Environmental Permitting
& Programs
Florida Power & Light Co.
P. O. Box 14000
Juno Beach, FL 33408

I.D.No: 52/36/0002/02
Permit/Certification
Number: AO36-143156
Date of Issue: 1-5-88
Expiration Date: 1-5-93
County: Lee
Latitude: 26° 41' 49" N
Longitude: 81° 46' 55" W
Section/Town/Range: 35/43S/25E
Project: Florida Power &
Light Company
Ft. Myers Power Plant
Unit Number 2

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. 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 department and made a part hereof and specifically described as follows:

Operate a fossil fuel steam generator unit with a rated capacity of 408 MW fired with Number 6 residual fuel oil having a maximum heat input of 3850 MMBTU/HR.

Plant is located on State Road 80, 3.5 miles east of Tice, Fort Myers, Florida.

DER FORM 17-1.205(5)
Effective November 30, 1982

Page 1 of 6

$$2.75 \frac{\#}{\text{MMBTU}} \times 3850 \frac{\text{MMBTU}}{\text{HR}} = 10,587.5 \frac{\#}{\text{M}} \\ = 5.3 \text{ Tons/hr} \\ \Rightarrow 46,373 \text{ Tons/yr SO}_2$$

PERMITTEE: Florida Power &
Light Company

I.D. Number: 52/36/0002/02
Permit/Certification No. AO36-143156
Date of Issue: 1-5-88
Expiration Date: 1-5-93

SPECIFIC CONDITIONS:

1. Visible emission tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the unit is capable of compliance at the permitted maximum operating rate. Test shall be conducted in accordance with EPA Method Nine as published in 40 CFR-60, Appendix A, or State approved equivalent method. Such tests shall be conducted once per year commencing July 1988. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.

2. Particulate emission tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the unit is capable of compliance at the permitted maximum operating rate. Test shall be conducted in accordance with EPA Method Five as published in 40 CFR-60, Appendix A, or State approved equivalent method. Such tests shall be conducted once per year commencing July 1988. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.

3. Visible emissions shall not exceed 40% opacity.

4. During steady-state conditions, the particulate emissions shall not exceed 0.1 pounds per million BTU heat input.

5. During soot-blowing conditions, the particulate emissions shall not exceed 0.3 pounds per million BTU heat input.

6. Sulfur dioxide emissions shall not exceed 2.75 pounds per million BTU heat input. Compliance will be calculated from analyses of Sulfur in fuel oil. Sulfur content in fuel shall not exceed 2.5%.

7. Excess emissions resulting from start-up, shutdown, malfunction or soot blowing shall comply with the requirements of Chapter 17-2.250, Florida Administrative Code.

PERMITTEE: Florida Power &
Light Company

I.D. Number: 52/36/0002/02
Permit/Certification No. AO36-143156
Date of Issue: 1-5-88
Expiration Date: 1-5-93

SPECIFIC CONDITIONS:

8. All fugitive dust generated at this site shall be adequately controlled.
9. This facility shall be operated in such a fashion so as to preclude objectionable odors.
10. An annual operation report (DER Form 17-1.202(6) attached) shall be submitted by March 1st each year. The attached form shall be reproduced by the permittee and used for future annual submittals.
11. Existing oil flow meters shall be maintained to monitor the fuel oil being consumed.
12. Stack sampling facilities provided by the owner shall be in accordance with the requirements of Chapter 17-2.700(4), Florida Administrative Code.
13. Used oil fuel may be burned provided it complies with the specifications set forth in the U. S. EPA RCRA rule promulgated on November 29, 1985 along with DER memorandum (copy attached) dated January 5, 1987.

Issued this 5th day of January, 1988.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



Philip R. Edwards
District Manager

PRE/00/1s

____ Pages Attached

DER Form 17-1.201(5)
Effective November 30, 1982

Page 6 of 6



Florida Department of Environmental Regulation

South District

• 2295 Victoria Avenue •

Fort Myers, Florida 33901

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

PERMITTEE:

Florida Power & Light Company
 P.O. Box 088801
 North Palm Beach, FL 33408-8801

I.D. No. 52FTM360002/03-14
 Permit/Certification
 Number: A036-223496
 Date of Issue: June 28, 1993
 Expiration Date: Feb. 26, 1998
 County: Lee
 Latitude: 26° 41' 50" N
 Longitude: 81° 46' 56" W
 Section/Town/Range: 35/43S/25E
 Project: Ft. Myers Power Plant
 Combustion Turbine
 Units ~~1 through 12~~

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-296, 17-297 and 17-4. 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:

For operation of twelve combustion turbines at Florida Power & Light Company's (FPL) Fort Myers Power Plant. Each unit has a rated gross capacity of 63 MW. The maximum heat input rate to each unit is 850 million Btu per hour. The units are authorized to burn Number 2 distillate fuel oil.

The Fort Myers Power Plant is located on State Road 80, 3.5 miles east of Tice.

PERMITTEE:

Florida Power & Light Company

I.D. No. 52FTM360002/03-14
Permit/Cert. No. AO36-223496
Date of Issue: June 28, 1993
Expiration Date: Feb. 26, 1998

SPECIFIC CONDITIONS:

(1) Heat Input Rate:

The heat input rate to each combustion turbine shall not exceed 850.0 million Btu per hour. [Requested in the permit application].

(2) Permitted Fuels:

The only fuel authorized to be burned in these sources is No. 2 distillate fuel oil. [Requested in the permit application].

(3) Source Emission Limiting Standards and Compliance Testing Requirements:

POLLUTANT	EMISSION LIMITING STDS.	TESTING FREQUENCY (1)			TEST (2) METHOD
		ANNUAL	QUARTERLY	OTHER	
Nitrogen Dioxide	0.70 lb/MM Btu (3)	---	---	---	
	595 lb/hour from each unit. (3)	---	---	---	
Visible Emissions	Shall not be equal to nor greater than 20 percent opacity(4)	---	---	X(1)	EPA Method 9

Footnotes:

- (1) Rules 17-297.340(1)(d) and (h), F.A.C. FPL shall conduct a visible emissions compliance test on each combustion turbine at least once during the term of this permit.
- (2) Rule 17-297.330, F.A.C., Table 297.330-1. The observation period shall be at least 60 minutes.
- (3) Requested by FPL to provide the Department with an emission limit that would not cause or contribute to a violation of the nitrogen dioxide ambient air quality standard established under Rule 17-272.300(3)(e), F.A.C.
- (4) Rule 17-296.310(2)(a), F.A.C.

PERMITTEE:

Florida Power & Light Company

I.D. No. 52FTM360002/03-14
Permit/Cert. No. AO36-223496
Date of Issue: June 28, 1993
Expiration Date: Feb. 26, 1998

SPECIFIC CONDITIONS:

(4) Compliance Testing Related Requirements:

(a) Notification - Rule 17-297.340(1)(i), F.A.C.

FPL shall notify the South District Office of the Department of Environmental Protection at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner. The Department may waive the 15 day notice requirement on a case by case basis.

(b) Conditions - Rule 17-4.070(3), F.A.C.

Compliance testing for each combustion turbine should be conducted while the combustion turbine is firing No. 2 distillate fuel oil within 90-100% of the maximum allowable heat input rate of 850.0 MM Btu per hour. Testing may be conducted with the source firing No. 2 distillate fuel oil at less than 90 percent of the maximum allowable heat input rate; however, if so, subsequent source operation is limited to 110% of the average heat input rate during the test. Once the unit is so limited, then operation at higher heat input rates is allowed for a cumulative total of no more than fifteen days for the purpose of additional compliance testing to regain the higher rate, not to exceed 850.0 MM Btu per hour.

Operating at conditions during testing which do not reflect representative operating conditions may invalidate a test.

(c) Test Schedule - Rule 17-297.340(1)(d) and (h), F.A.C.

FPL shall conduct a visible emissions compliance test on each combustion turbine at least once during the term of this permit.

(d) Report Submittal - Rules 17-297.570 and 17-4.070(3), F.A.C.

A copy of the test results shall be submitted to the Department's South District Office within 45 days after the test is completed. The test report shall provide the actual heat input rate.

(5) Annual Operations Report (AOR):

On or before March 1 of each calendar year, a completed Form 17-210.900(4), "Annual Operating Report for Air Pollutant Emitting Facility", shall be submitted to the Department's South District Office. The report shall provide sufficient detail to allow the Department to determine whether the emissions were properly computed.

PERMITTEE:

Florida Power & Light Company

I.D. No. 52FTM360002/03-14
Permit/Cert. No. A036-223496
Date of Issue: June 28, 1993
Expiration Date: Feb. 26, 1998

SPECIFIC CONDITIONS:

(6) Excess Emissions:

(a) Events - Rule 17-210.700, F.A.C.

Excess emissions resulting from startup, shutdown or malfunction are permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions is minimized but in no case exceeds two hours in any 24-hour period unless specifically authorized by the Department for longer duration.

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 are prohibited.

(b) Notification - Rules 17-210.700(6) and 17-4.130, F.A.C.

In the event the permittee is temporarily unable to comply with any of the conditions of the permit, the permittee shall immediately notify the Department's South District Office. Notification shall be conducted in accordance with General Condition (8) of this permit. In case of excess emissions resulting from malfunctions, FPL shall notify the Department in accordance with Rule 17-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

(7) Objectionable Odors - Rule 17-296.320(2), F.A.C.

FPL shall not discharge air pollutants which cause or contribute to an objectionable odor.

(8) Hours of Operation:

The hours of operation are not restricted.

(9) Special Compliance Tests - Rule 17-297.340(2), F.A.C.

If the Department of Environmental Protection, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard is being violated, then the Department of Environmental Protection may require FPL to conduct compliance tests which identify the nature and quantity of pollutant emissions and to provide a report on the results of said tests.

PERMITTEE:

Florida Power & Light Company

I.D. No. 52FTM360002/03-14
Permit/Cert. No. AO36-223496
Date of Issue: June 28, 1993
Expiration Date: Feb. 26, 1998

SPECIFIC CONDITIONS:

(10) Other Requirements - Rule 17-210.300, F.A.C.

Issuance of this permit does not relieve FPL from complying with applicable emission limiting standards or other requirements of Rules 17-210, 17-212, 17-252, 17-272, 17-273, 17-275, 17-296, and 17-297, F.A.C., or any other requirements under federal, state, or local law.


(11) Operation Permit Renewal - Rule 17-4.090(1), F.A.C.

In order to renew this operation permit, an application for renewal shall be submitted to the Department of Environmental Protection by December 28, 1997.

Note: In the event of an emergency the permittee shall contact the Department by calling (904) 488-1320. During normal business hours, the permittee shall call (813) 332-6975.

Issued this *28th* day of *June*, 1993.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION


Philip R. Edwards
Director of
District Management

PRE/GM/gm

12 Pages Attached

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTH FLORIDA DISTRICT
2269 BAY STREET
FORT MYERS, FLORIDA 33901-2896
(813)332-2667



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY
PHILIP R. EDWARDS
DISTRICT MANAGER

PERMITTEE: T. R. Fair, Manager
Environmental Permitting
& Programs
Florida Power & Light Co.
P. O. Box 14000
Juno Beach, FL 33408

I.D.No: 52/36/0002/03
Permit/Certification
Number: AO36-145172,
145173, 145303, 145308 thru
145316
Date of Issue: 2-26-88
Expiration Date: 2-26-93
County: Lee
Latitude: 26° 41' 50" N
Longitude: 81° 46' 56" W
Section/Town/Range: 35/43S/25E
Project: Florida Power &
Light Co.
Fort Myers Power Plant
Gas Turbine Units 1
thru 12

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. 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:

Operate 12 gas turbine electric power generating units. Each unit has a rated gross capacity of 63 MW fired with Number 2 distillate fuel oil having a maximum heat input of 850 million Btu per hour.

Plant is located on State Road 80, 3.5 miles east of Tice, Fort Myers, Florida.

DER FORM 17-1.205(5)
Effective November 30, 1982

Page 1 of 6

PERMITTEE: Florida Power &
Light Co.

I.D. Number: 52/36/0002/03
Permit/Certification No. AO36-145172,
145173, 145303, 145308 thru 145316
Date of Issue: 2-26-88
Expiration Date: 2-26-93

SPECIFIC CONDITIONS:

1. Heat Input Rate:

The permitted heat input rate for these sources is 850 MMBTU/hr per unit.

2. Permitted Fuels:

These sources shall be fired with Number 2 Distillate Fuel Oil.

3. Source Emission Limiting Standards and Compliance Testing Requirements:

POLLUTANT	EMISSION ¹ LIMITING STDS.	TESTING FREQUENCY			TEST ² METHOD
		ANNUAL	QUARTERLY	OTHER	
Visible Emissions	20% Opacity	-----	-----	✓	on a typical unit in the year prior to permit expiration*

1. - FAC 17-2.610(2)
2. - FAC 17-2.700(1)(d), Table 700-1

*NOTE: Annual tests may be required if Department inspections show a need for such tests.

4. Compliance Testing Related Requirements:

a.) Notification - FAC 17-2.700(2)(a)5

Notification of scheduled test dates shall be given to the Department at least 15 days prior to testing unless otherwise agreed to by the Department.

PERMITTEE: Florida Power &
Light Co.

I.D. Number: 52/36/0002/03
Permit/Certification No. AO36-145172,
145173, 145303, 145308 thru 145316
Date of Issue: 2-26-88
Expiration Date: 2-26-93
Expiration Date:

SPECIFIC CONDITIONS:

b.) Conditions

Testing of emissions should be conducted with the source operating within 10% of its rated capacity. Testing may be conducted at less than 90% of rated capacity; however, if so, subsequent source operation is limited to up to 110% of the test load. Once the unit is so limited, then operation at higher capacities is allowed for purposes of additional compliance testing to regain rated capacity in permit, with prior notification to the Department.

c.) Report Submittal - FAC 17-2.700(7)

A copy of the test results shall be submitted to the Department District Office within 45 days after the test is completed.

5. Annual Operations Report - FAC 17-4.140:


On or before March 1 of each calendar year, a completed DER Form 17-1.202(6), Annual Operations Report Form for Air Emissions Sources shall be submitted to the Department.

6. Excess Emissions - FAC 17-2.250(1):

Excess emissions resulting from start-up, shut-down or malfunction shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period unless specifically authorized by the Department for longer duration.

Issued this 26th day of February, 1988.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION


Philip R. Edwards
District Manager

PRE/00/1s
____ Pages Attached

DER Form 17-1.201(5)
Effective November 30, 1982

Page 6 of 6

File Copy - General



Florida Power & Light Company, P. O. Box 14000, Juno Beach, FL 33408-0420
700 Universe Boulevard

June 4, 1998

RECEIVED

JUN 08 1998

BUREAU OF
AIR REGULATION

Mr. Bruce Mitchell, Environmental Administrator
Department of Environmental Protection
2600 Blair Stone Road
Mail Station 5505
Tallahassee, Florida 32399-2400

RE: FLORIDA POWER & LIGHT COMPANY ANNUAL EMISSION FEES - 1997

Dear Mr. Mitchell:

In response to your fax dated June 3, 1998, summarized below are the adjustments made by FPL and your Office from the initial wire transfer payment on February 24, 1998 for our 1997 Annual Emission Fees.

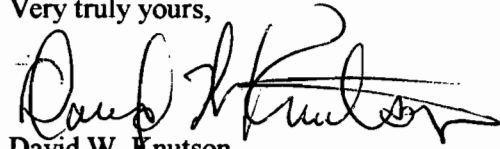
Total Remitted by Wire Transfer on 2/24/98		\$1,865,081.59
Net Over-Payments by FPL (Wire vs Calculation Packages):		(1,529.92)
Putnam Plant	(\$1,536.92)	
Lauderdale Plant	7.00	
Net Under-Payment by FPL (Adjustments made by FDEP):		348.66
Putnam -	Over-payment due to inclusion of SO2 limitation on natural gas	(\$ 173.82)
Fort Myers -	Under-payment due to an incorrect computation for NOx Emissions	522.48
Total Adjusted 1997 FPL Annual Emission Fees:		\$1,863,900.33
Net Over-Payment Due FPL:		\$ 1,181.26

I hereby authorize your office to deduct the net under-payment by FPL in the amount of \$348.66 from the net amount overpaid by our original wire transfer. Also per your request is a signed Application for Refund Form which is attached.

Please remit the amount due FPL to my attention: Mr. David W. Knutson, Florida Power & Light Company, P. O. Box 14000, Juno Beach, Florida 33408-0420.

Please contact Mike Szybinski at (561) 691-2898 or Scott Busa at (561) 691-2889 if you have any questions.
Thank you for your assistance in this matter.

Very truly yours,



David W. Knutson
Manager Technical Services

DWK:mjs

cc: Richard Piper - JES/JB


Scott Busa - GPA/JB

File

Scott

Ed

Jonathan

} 6-9-98 

BEST AVAILABLE COPY

DEP 14-081
DBF AA-4

REFUND REQUEST #: 3972

*6-9-98
Original sent to
FHA for processing
BPM*

APPLICATION FOR REFUND FORM
THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OF FLORIDA, COUNTY OF _____

Pursuant to the provisions of Section 215.26, or Section _____*, Florida Statutes
I hereby apply for a refund and request that a State Warrant be drawn in favor of:

NAME: FLORIDA POWER AND LIGHT
ADDRESS: MR. RICH PIPER P.O. BOX 14000 JUNO BEACH, FL 33408-8801
FEID OR SS NUMBER:
AMOUNT: \$1,181.26 DEPOSIT DATE: 24-FEB-98 DEPOSIT: 22498
DOCUMENT NUMBER: SYS RECEIPT#: 189131
REV OBJECT CODE: 2275 TITLE V MAJOR SOURCE

which represents moneys I paid into the State Treasury subject to refund, and to substantiate such claim the following facts are submitted:

REASON FOR CLAIM: OVER PAYMENT

CERTIFIED TRUE AND CORRECT this _____ day of _____, 19____.

[Handwritten Signature]
*
Applicant's Signature

*Must be completed if authority is other than Section 215.26, Florida Statutes.

(FOR AGENCY USE ONLY)

(1) Agency recommends denial of above claim based on the following facts, including statutory authority for collection:

OR

(2) Agency recommends approval of above claim and submits the following information to substantiate such claim. \$1,181.26 was originally deposited into the State Treasury, receipt _____, dated _____.

NAME OF ACCOUNT:

SAMAS ACCOUNT CODE

3720203500137 _____ 00000000020000

Statutory Authority for Collection _____

It is requested that payment be made from:

NAME OF ACCOUNT:

SAMAS ACCOUNT CODE

3720203500137 _____ 00000022000000

CERTIFIED TRUE AND CORRECT this _____ day of _____, 19____.

Signature and Title of Authorized Person

SECTION 215.26 STATES, IN PART: "APPLICATION FOR REFUNDS AS PROVIDED BY THIS SECTION SHALL BE FILED WITH THE COMPTROLLER, EXCEPT AS OTHERWISE PROVIDED HEREIN, WITHIN 3 YEARS AFTER THE RIGHT TO SUCH REFUND SHALL HAVE ACCRUED ELSE SUCH RIGHT SHALL BE BARRED." Three years is interpreted as meaning three years from the date of payment into State Treasury.

File -



RECEIVED

OCT 28 2002

October 24, 2002

BUREAU OF AIR REGULATION

Scott M. Sheplak, P.E.
Administrator – Title V Permit Program
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Administrative Change to add Additional Responsible Official to Fort Myers Plant – 0710002-001-AV

Dear Scott:

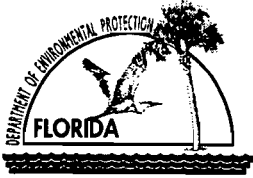
Enclosed is the Responsible Official Notification Form to add Mr. Rick Young as an Additional Responsible Official (R.O.) for the Fort Myers Plant. FPL requests that an administrative change be made to the permit referenced above to accommodate the addition of Mr. Young as an additional R.O.

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,

Kevin Washington
Senior Environmental Specialist
Florida Power & Light Company

Enclosure: 1



Department of Environmental Protection

Division of Air Resource Management

RESPONSIBLE OFFICIAL NOTIFICATION FORM

Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.

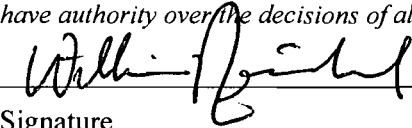
Identification of Facility

1. Facility Owner/Company Name: Florida Power and Light Company	
2. Site Name: Fort Myers Plant	3. County: Lee
4. Title V Air Operation Permit/Project No. <i>(leave blank for initial Title V applications)</i> : 0710002-007-AV	

Notification Type *(Check one or more)*

INITIAL:	Notification of responsible officials for an initial Title V application.
RENEWAL:	Notification of responsible officials for a renewal Title V application.
X CHANGE:	Notification of change in responsible official(s). Effective date of change in responsible official(s) 11/2/02

Primary Responsible Official

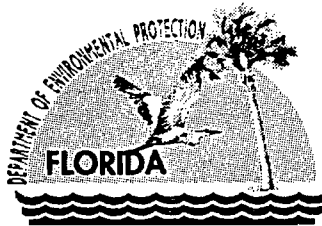
1. Name and Position Title of Responsible Official: William M. Reichel
2. Responsible Official Mailing Address: Organization/Firm: Florida Power & Light Company Street Address: PO Box 430 City: Ft. Myers State: Florida Zip Code: 33902-0430
3. Responsible Official Telephone Numbers: Telephone: (941) 693 - 4200 Fax: (941) 693 - 4333
4. Responsible Official Qualification <i>(Check one or more of the following options, as applicable)</i> : <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
5. Responsible Official Statement: <i>I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.</i>  Signature _____ Date <u>10/23/02</u>

Additional Responsible Official

1. Name and Position Title of Responsible Official: Rick Young / Production Manager
2. Responsible Official Mailing Address: Organization/Firm: Florida Power and Light Company Street Address: P. O. Box 430 City: Fort Myers State: FL Zip Code: 33902-0430
3. Responsible Official Telephone Numbers: Telephone: (239) 693-4202 Fax: (239) 693-4333
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

Additional Responsible Official

1. Name and Position Title of Responsible Official:
2. Responsible Official Mailing Address: Organization/Firm: Street Address: City: State: Zip Code:
3. Responsible Official Telephone Numbers: Telephone: Fax:
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.



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"

Printed on recycled paper.

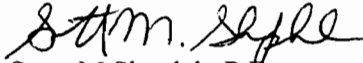
Mr. Kevin Washington
June 18, 2001
Page 2 of 2

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,


Scott M Sheplak, P.E.
Administrator
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 Holtom
Reading File

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

2. Article Number (Copy from service label)
 7000 0600 0021 2825 4740

COMPLETE THIS SECTION ON DELIVERY

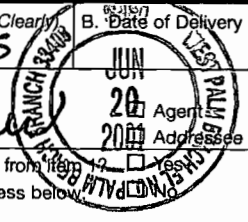
A. Received by (Please Print Clearly) **G. ADAMS** B. Date of Delivery **JUN 26 2000**

C. Signature **X G. Adams** Agent Addressee

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes



7000 0600 0021 2825 4740

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:
 Mr. Kevin Washington

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

Name (Please Print Clearly) (to be completed by mailer)
 Mr. Kevin Washington
 Street, Apt. No., or PO Box No.
 P.O. Box 14000
 City, State, ZIP+4
 Juno Beach, Florida 33408

PS Form 3800, July 1999 See Reverse for Instructions

-56-



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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,

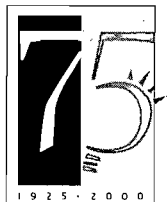
In reference to my letter of October 20, 2000 [Attachment No.1] requesting a change in the NO_x testing frequency of the simple cycle Gas Turbines from annually to five years; rather than opening the permit at this time, FPL would like to hold that request in abeyance until the next permit renewal period,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

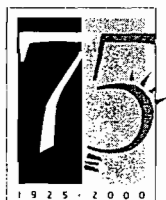
"Provided operation is no more than 400 hours/year/turbine on oil, NOx emissions for the combustion turbines shall be tested every five (5) years by a stack test on any representative turbine in the bank of the combustion turbines. Testing shall be performed each federal fiscal year no later than September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

A handwritten signature in black ink, appearing to read 'W. Reichel'.

William F. Reichel
Plant Manager, Ft. Myers Plant
Florida Power & Light Company





RECEIVED

MAR 06 2000

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_x 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_x:

- 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_x, delete "EPA Method 20" and replace with "CEM Data". In addition, under the Testing Time Frequency column for NO_x, 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_x emission limits: Continuous compliance with the NO_x 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_x 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 SO₂ and PM/PM₁₀ 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 SO₂ and PM₁₀.



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	*** 20	X	X
Volatile Organic Compounds	25A	X	X
	Test Method		
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						
Florida Power & Light Company Lauderdale Plant				Permit No.: 0110037-001-AV Facility ID No.: 0110037				
This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.								
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 Annual	1-Oct			A.19	
	Gas	ASTM D 1072-90(94)E-1 or D 3031-81(86) or D 4084-94 or D 3246-92					A.19	
NOx	Oil	CEM EPA Method 20 DATA	30-DAY Annual Rolling Avg.	1-Oct		Yes	A.19	
	Gas	CEM EPA Method 20 DATA	30-DAY Annual Rolling Avg.	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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JAN 31 2000

BUREAU OF AIR REGULATION

January 24, 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: Modification of Title V Permit - 0710002-001-AV Ft. Myers Power Plant,
Simple Cycle Units 003-0014; DEP File No. 0710002-005-AC**

Dear Scott,

In reference to my letter of Jan 07, 2000 regarding the installation of inlet foggers at the Ft. Myers Simple Cycle Gas turbines, please find:

- 1) One copy of the Input Heat vs. Atmospheric Temperature curve that was promised under separate cover pending its receipt.

This completes the enclosures required to facilitate the permit modification regarding the inlet foggers.

Thanks 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,

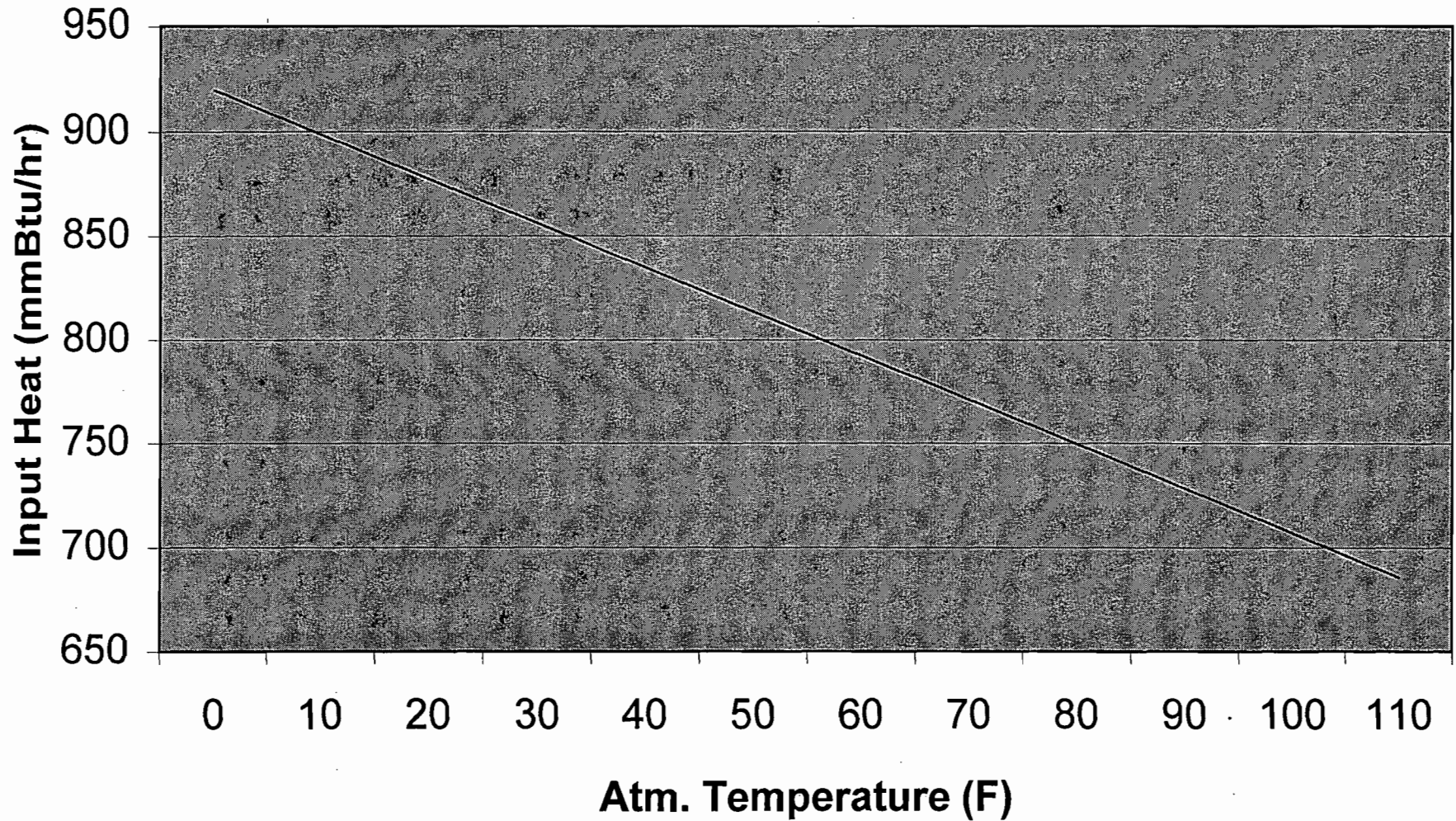


Kevin Washington
Sr. PGBU Leader
Florida Power and Light Company

Cc:
Ken Kosky Golder Associates

2/1/00 cc: Scott Sheplak
Tom Cascio

Input Heat Vs. Atm. Temperature





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 Cabrio

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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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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, appearing to read 'J. R. Trelles', is written over the typed name.

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 CF992, CF996						
GFM							GFM					PPN						
Based on Actual Data			Based on Design Data				PPN		Ambient	Peak	Base	Base	Peak	MW	HR	Heat Input	Heat Input	Heat Input
Ambient	Peak	Base	Peak	Base	Base	Peak	Temp	Heat Input	Heat Input	Heat Input	Heat Input	Heat Input	Correction	Correction	correction	Base	Peak	
deg F	Btu/hr	Btu/hr	Btu/hr	Btu/hr	Btu/hr	Btu/hr	deg F	Btu/hr	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	1.0673E+09	1.1023E+09
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	1.0030E+09	1.0359E+09
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	9.7217E+08	1.0041E+09
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	Reference	59	1.0000	1.0000	1.0000	9.4500E+08	9.7600E+08
75	6.6833E+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	8.9758E+08	9.2703E+08
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		80	0.8887	1.0339	0.9188	8.6826E+08	8.9674E+08
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	8.3896E+08	8.6648E+08
NOTES:																		
PPN																		
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.																		
GFM																		
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

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.

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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 Cascio

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 # CC602535 EXPIRES
 November 19, 2000
 BONDED THRU TROY FAIN 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 (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 #500, 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 applicable amendments. 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. The petition must contain the information set forth below and must be filed (received) in the Office of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 904/850/488-9730; 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 submit 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 to 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 766id(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 766id(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's EPA must meet the requirements of 42 U.S.C. Section 766id(b)(2) and must be filed with the Administrator of the EPA at 410 M Street, SW, Washington, DC 20460.
 The 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: 850/487-4979.
 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, the 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 1997 No. 22076**



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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

0710002-001-AV

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

BEST AVAILABLE COPY

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)
Particulate Matter							
Steady State	Oil	EPA Method 5 or 17	Annual	1-Oct	3 Hour		A.20
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	Oil		Continuous			Yes	A.17
Steady State	Oil	DEP Method 9	Annual	1-Oct	1 Hour		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)
Opacity	Oil	DEP Method 9	Annual	1-Oct	1 Hour		B.10
Nitrogen Oxides	Oil	EPA Method 7, 7A, 7B, 7C, 7D, or 7E	Annual (Pairs)	1-Oct			B.11
Notes:							
* Frequency base for test listed for planning purposes only; see Rule 62-297.310, F.A.C.							
** CMS is a Continuous Monitoring System							
*** EPA Method 17 may be used only if the stack gas exit temperature is less than 375 degrees F.							

delete

Table 1-1, Summary of Air Pollutant Standards and Tenna

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 62-296.320(4)(b)1., F.A.C.	B.5
Nitrogen Oxides	oil	8760	0.70 lb/MMBtu	595			2606.1	Rule 62-204.240(5), F.A.C.	B.6
Notes:									
* 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.				

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

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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, P.E.
District Air
Program Administrator



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

PERMITTEE:

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

MODIFICATION TO PERMIT AO36-
223496
Facility I.D.: 0710002
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

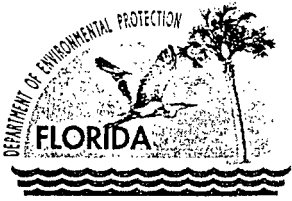
9/3/97 *Tom Cascio*
an FPL Group company

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

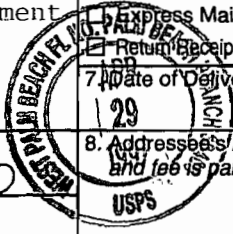
4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery
1 29

5. Received By: (Print Name)
H CORZO

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

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	<i>Plant General Manager</i>
Street & Number	<i>Fla. Power & Light Co.</i>
Post Office, State, & ZIP Code	<i>P.O. Box 14000 Juno Beach, FL 33408</i>
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	<i>04-25-97</i>

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