



October 11, 2002

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

BUREAU OF AIR REGULATION

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

Dear Scott,

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

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

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

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

Very Truly yours,

A handwritten signature in black ink, appearing to read 'Kevin Washington'.

Kevin Washington
Senior Environmental Specialist
Florida Power and Light Company

Attachments: 1

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

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

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

Essential Potential to Emit (PTE) Parameters

C.5. Permitted Capacity.

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

b. **Direct Fired Heaters (DFHs).** The maximum heat input rate, based on the lower heating value (LHV) of the fuel to the DFHs at ambient conditions of 59°F, 60% relative humidity, 100% load, and 14.7 psia shall not exceed 132 mmBtu per hour.

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

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

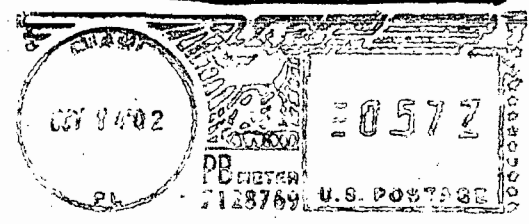
C.6. Emissions Unit Operating Rate Limitation After Testing. See specific condition ~~C.40.C.40.~~
[Rule 62-297.310(2), F.A.C.]

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

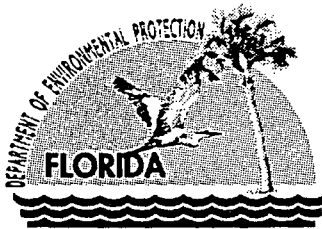
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Scott M. Sheplak
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Tallahassee, FL 32399-2400



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

Certified Mail – Return Receipt Requested

August 1, 2002

Mr. William Reichel
Plant General Manager and Responsible Official
Florida Power & Light Company
P.O. Box 14000
Juno Beach, FL 33408

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

Dear Mr. Reichel:

Thank you for your recent submission of a Title V Air Operation Permit Renewal Application for the referenced plant. Review of the document revealed that, at the time of submittal, certain required compliance tests had not been completed (as noted in Attachments PFMU1_5 and PFMU3_5 of your application). However, recent discussions with Kevin Washington of your Company indicated that the needed compliance with all specific conditions of the current Title V Permit has been achieved. Therefore, please provide us with an updated compliance certification to complete our files. Lacking this document, we must deem your renewal application incomplete.

When we receive this information we will continue processing your application. If you have any questions, please contact Tom Cascio at 850/921-9526.

Sincerely,

Scott M. Sheplak, P.E.
Administrator
Title V Section

cc: Kennard F. Kosky, P.E., Golder Associates, Inc. (regular mail)
Kevin Washington, Florida Power & Light Company (regular mail)

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Mr. William Reichel
 Plant General Manager and Responsible
 Official
 Florida Power & Light Company
 P.O. Box 14000
 Juno Beach, Florida 33408

2. Article Number (Copy from service label)
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PS Form 3800, July 1999

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W. Reichel

6 2002

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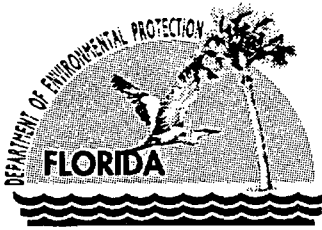
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 City, State, ZIP+4
 Juno Beach, Florida 33408

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Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Certified Mail – Return Receipt Requested

David B. Struhs
Secretary

July 24, 2002

Mr. William Reichel
Plant General Manager and Responsible Official
Florida Power & Light Company
P.O. Box 14000
Juno Beach, FL 33408

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

Dear Mr. Reichel:

Thank you for your recent submission of a Title V Air Operation Permit Renewal Application for the referenced plant. However, we must deem your application *incomplete*, due to the omission of an updated Phase II Acid Rain Part Application. Please be advised that Department Rule 62-214.320(1)(i) requires that, "the designated representative of any Title V source having a Title V permit with an Acid Rain Part shall submit a complete application for renewal of the Title V permit with the Acid Rain Part for each Acid Rain unit at the source."

Also, please check if there are any changes to the Designated Representative for the facility, and submit an updated Certificate of Representation if necessary.

When we receive this information we will continue processing your application. If you have any questions, please contact Tom Cascio at 850/921-9526.

Sincerely,

Scott M. Sheplak, P.E.
Administrator
Title V Section

cc: Kennard F. Kosky, P.E., Golder Associates, Inc. (regular mail)

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Mr. William Reichel

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Mr. William Reichel

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P.O. Box 14000

City, State, ZIP+4

Juno Beach, Florida 33408

PS Form 3800, February 2000

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