
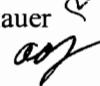


# Memorandum

# Florida Department of Environmental Protection

---

TO: Howard L. Rhodes

THRU: Trina L. Vielhauer   
A. A. Linero  4/21

FROM: Teresa Heron

DATE: April 21, 2003

SUBJECT: FPL Ft. Myers 340 MW Simple Cycle Combustion Turbine Project  
Representative Compliance Stack Test  
DEP File No. 0710002-013-AC and PSD-FI-298

Attached is the final permit modification package for the Ft. Myers Representative Compliance Stack Test for the Simple Cycle Turbines and Heaters Project.

FPL is in the process of testing for compliance with the permit emission limits for Units 3A and 3B along with two direct-fired gas heaters. This permit modification is to allow particulate tests conducted on one of two new and identical combustion turbines to suffice as a compliance demonstration for both. The units use inherently clean natural gas and very low sulfur fuel oil with only minute amounts of ash. Very long tests are required to collect sufficient samples to weigh. The emission limits are not based on a BACT determination and the company will still conduct separate tests for all other pollutants (CO, NO<sub>x</sub>, VOC, opacity) as required by the permit.

The gas heaters are rated at less than 100 million Btu and are not governed by any specific New Source Performance Standard. FPL proposes to use the results of carbon monoxide and nitrogen oxides tests on one as representative of both.

We recommend your approval of the attached letter approving FPL request.

AAL/th

Attachments

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF PERMIT

In the Matter of an Application for Permit by:

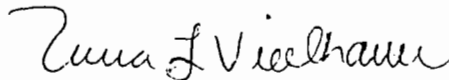
Mr. William Reichel, General Manager  
FPL Fort Myers Plant  
Post Office Box 430  
Fort Myers, Florida 33905

DEP File No. 0710002-013-AC  
340 MW Simple Cycle Combustion Turbine Project  
Representative Compliance Stack Tests  
Lee County

Enclosed is the Final Permit Number 0710002 -013-AC to modify this permit to allow the natural gas testing of the first CT Unit (3B) to be representative of both units for PM emissions. In addition, this permit modification also considers the submittal of the test results of one of the two identical direct-fired natural gas heaters to be representative of both heaters. These units are located at the FPL Fort Myers Plant near Tice, Lee County. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., 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 Legal Office; 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 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief  
Bureau of Air Regulation

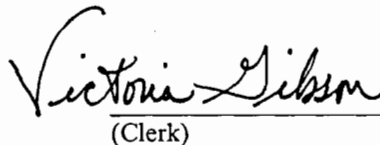
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT MODIFICATION (including the FINAL permit modification) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 4/22/03 to the person(s) listed:

William Reichel, FPL\*  
Kevin Washington, FPL  
Ron Blackburn, DEP SD  
Jim Little, EPA

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

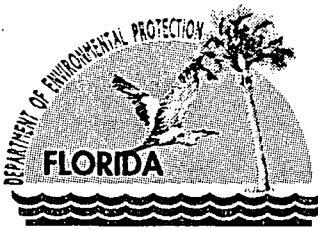
 April 22, 2003  
(Clerk) (Date)

FINAL DETERMINATION  
Florida Power & Light Company  
Fort Myers Power Plant  
340 Megawatt Simple Cycle Project  
Representative Compliance Stack Tests  
DEP File No. 0710002-013 (PSD-FL-298)

The Department distributed a public notice package on April 2, 2003 for the Revision of Testing Requirements for the New Combustion Turbines and Gas Heaters. The Public Notice of Intent to Issue was published in Fort Myers News-Press on April 4, 2003.

No comments were received by the Department pursuant to the public notice.

The Final action of the Department is to issue the permit modification as noted during the Public Notice period.



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

April 21, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William Reichel, General Manager  
FPL Fort Myers Plant  
Post Office Box 430  
Fort Myers, Florida 33905

Re: DEP File No. 0710002-013-AC (PSD-FL-298)  
340 MW Simple Cycle Combustion Turbine (SCCT) Project -Two GE Frame 7FA CT

Dear Mr. Reichel:

The Department acknowledges receipt of Mr. Kevin Washington's letter dated March 31, 2003 asking the Department to accept the natural gas testing of the first CT Unit (3B) to be representative of both units for PM emissions. In addition, FPL is also asking the Department to accept the test results of one of the two identical direct-fired natural gas heaters to be representative of both heaters.

The request is acceptable and the referenced permit is hereby modified as follows:

#### SECTION III – Specific Condition 16

- d. *Gas Fired Heaters*: NO<sub>x</sub> emission limit from each gas heater shall not exceed 0.10 lb/mmBtu to be demonstrated by stack test as required in Specific Condition 25 to 30. **Compliance shall be demonstrated by representative stack test on one unit.**

#### SECTION III – Specific Condition 18

Particulate Matter (PM/PM<sub>10</sub>): PM/PM<sub>10</sub> emissions shall not exceed 10 lb/hr when operating on natural gas and shall not exceed 17 lb/hr when operating on fuel oil. [Rule 62-4.070 (3) F.A.C]. Stack test shall be conducted as required in Specific Condition 25 to 30. **Compliance shall be demonstrated by representative stack test on one unit.**

#### SECTION III – Specific Condition 19

- d. *Gas Fired Heaters*: CO emission limit from each gas heater shall not exceed 0.075 lb/mmBtu to be demonstrated by stack test as required in Specific Condition 25 to 30. **Compliance shall be demonstrated by representative stack test on one unit.**

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal.

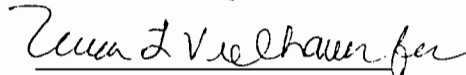
"More Protection, Less Process"

Printed on recycled paper.

The notice must be filed within thirty (30) days after this order is filed with the clerk of the Department.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Executed in Tallahassee, Florida.

  
Howard L. Rhodes, Director  
Division of Air Resources  
Management


CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Permit Modification was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 4/22/03 to the person(s) listed:

William Reichel, FPL\*  
Kevin Washington, FPL  
Ron Blackburn, DEP SD  
Jim Little, EPA

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED,**  
on this date, pursuant to §120.52, Florida Statutes,  
with the designated Department Clerk, receipt of  
which is hereby acknowledged.

  
(Clerk) April 22, 2003  
(Date)

**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. William Reichel  
 General Manager  
 Florida Power & Light Company - Fort Myers Plant  
 Post Office Box 430  
 Fort Myers, FL 33905

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) **MARY K. RUSSELL** B. Date of Delivery **4/25/03**

C. Signature *x Mary K. Russell*  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

7001 0320 0001 3692 6433

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

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

7001 0320 0001 3692 6433

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark  
Here

Sent To **William Reichel**  
 Street, Apt. No., or P.O. Box **Box 430**  
 City, State, ZIP+4 **Ft. Myers, FL 33905**



Florida Power & Light Company, P. O. Box 430, Fort Myers, FL 33902

April 8, 2003

RECEIVED

APR 10 2003

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
7000 0520 0012 3152 7470

**BUREAU OF AIR REGULATION**

Ms Trina L. Vielhauer  
Bureau of Air Regulation  
2600 Blair Stone Road  
Mail Station 5505  
Tallahassee, FL 32399-2400

Re: Air Construction Permit Modification  
340 MW Simple Cycle Combustion Turbine Project  
DEP File No. 0710002-013-AC and PSD-FL-298

Dear Ms Vielhauer;

Enclosed please find the affidavit of Publication for the Air Construction Permit modification for the FPL Fort Myers Plant Simple Cycle Combustion Turbine project as required under Section 403.815, F.S. and Rule 62-110.106(7)(a)1., F.A.C. The notice was published in the Fort Myers News-Press on Friday, April 4, 2003.

If you have any questions please contact me at (239) 693-4390.

Sincerely,

*B.P. Tibble*  
B. P. Tibble

Fort Myers Plant Environmental Specialist

CC: Kevin Washington

# 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

Kieanna Henry

who on oath says that he/she is the

Asst. Legal Clerk of the News-Press, a daily newspaper,  
published at Fort Myers, in Lee County, Florida; that the  
attached copy of advertisement, being a

Public Notice of Intent

In the matter of DEP Air Construction Permit to Fla.

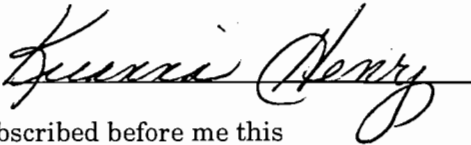
Power & Light

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

was published in said newspaper in the issues of

April 4, 2003

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.



Sworn to and subscribed before me this

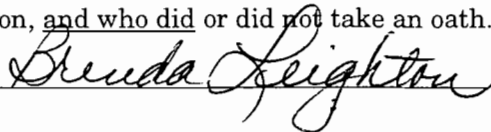
2<sup>nd</sup> day of April 2003 by

Kieanna Henry

personally known to me or who has produced

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

Notary Public



Print Name \_\_\_\_\_

My commission Expires:

RECEIVED

APR 10 2003

BUREAU OF AIR REGULATION



Brenda Leighton  
MY COMMISSION # DD169005 EXPIRES  
February 14, 2007  
BONDED THRU TROY FAIN INSURANCE, INC

INTENT TO ISSUE AIR  
CONSTRUCTION  
PERMIT  
MODIFICATION  
STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL  
PROTECTION  
DEP File No.  
0710002-013-AC  
(PSD-FL-298)  
Florida Power & Light  
Fort Myers Plant  
Revision of Testing  
Requirement for New  
Combustion Turbines  
and Gas Heaters  
Lee County  
The Department of  
Environmental Protec-  
tion (Department)  
gives notice of its in-  
tent to issue an air  
construction permit  
modification to Florida  
Power & Light Com-  
pany (FPL). A Best Avail-  
able Control Technol-  
ogy (BACT) determina-  
tion was not required  
pursuant to Rule 62-  
212.400, F.A.C. The ap-  
plicant's name and ad-  
dress are Florida Pow-  
er & Light, Fort Myers  
Plant, Post Office Box  
430, Fort Myers, Flori-  
da 33905.  
FPL is in the process  
of testing for compli-  
ance with the permit  
emission limits for  
Units 3A and 3B along  
with two direct-fired  
gas heaters. This per-  
mit modification is to  
allow particulate tests  
conducted on one of  
two new and identical  
combustion turbines to  
suffice as a compliance  
demonstration for  
both. The units use in-  
herently clean natural  
gas and very low sulfur  
fuel oil with only min-  
ute amounts of ash.  
Very long tests are re-  
quired to collect suffi-  
cient samples to weigh.  
The emission limits are  
not based on a BACT  
determination and the  
company will still con-  
duct separate tests for  
all other pollutants  
(CO, NOx, VOC, opaci-  
ty) as required by the  
permit.  
The gas heaters are  
rated at less than 100  
million Btu and are not  
governed by any spec-  
ific New Source Per-  
formance Standard.  
FPL proposes to use  
the results of carbon  
monoxide and nitrogen  
oxides tests on one as  
representative of both.  
The Department will  
issue the FINAL permit  
modification with the  
attached conditions un-  
less a response re-  
ceived in accordance  
with the following pro-  
cedures results in a dif-  
ferent decision or sig-  
nificant change of  
terms or conditions.  
The Department will  
accept written com-  
ments concerning the  
proposed modification  
issuance action for  
a period of fourteen  
days from the date of  
publication of Public  
Notice of Intent to Issue  
Air Construction Per-  
mit Modification. Written  
comments should be pro-  
vided to the Department's  
Bureau of Air Regulation  
at 2600 Blair Stone  
Road, Mail Station  
#5505, Tallahassee, FL  
32399-2400. Any written  
comments filed shall be  
made available for  
public inspection. If  
written comments re-  
ceived result in a sig-  
nificant change in the  
proposed agency ac-  
tion, the Department  
shall revise the pro-  
posed permit modifica-  
tion and require, if ap-  
plicable, another Pub-  
lic Notice.



The Department will issue the permit modification with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mall Station # 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at: Florida Department of Environmental Protection, Bureau of Air Regulation, 111 S. Magnolia Drive, Suite 4, Tallahassee, Florida, 32301 Telephone: (850) 488-0114 Fax: (850) 922-6979

Florida Department of Environmental Protection, South District Office, 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33902-2549 Telephone: (239) 332-6975 Fax: (239) 332-6969

The complete project file includes the request, draft permit modification, and any information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

Apr 4 No. 16859



April 8, 2003

Ms. Trina Vielhauer  
State of Florida  
Department of Environmental Protection  
Division of Air Resource Management  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RECEIVED

APR 11 2003

BUREAU OF AIR REGULATION

**Re: Initial Startup of Fort Myers Peaker Project  
Combustion Turbine # PFM 3A & 3B**

Dear Trina:

This correspondence is to serve as notification to the Department, in accordance with 40 CFR 60.7(a)(2), Florida Power & Light Company's (FPL) actual/estimated first fire dates for Fort Myers Peaker Project Units 3A and 3B. The current schedule for first fire on the permitted fuels are as follows:

Unit 3B (Gas) – March 15, 2003  
Unit 3B (Distillate) – April 4, 2003  
Unit 3A (Gas) – April 14, 2003  
Unit 3A (Distillate) – April 29, 2003

In addition, FPL will make final notification of actual first fire dates to your Office within 15 days after such event, per the requirements of 40 CFR 60.7(a)(3). Performance/Emission testing and commercial operation notifications will also be transmitted to the Department and EPA Region 4 under separate cover.

Please feel free to contact me at (561) 691-2930 or Michael Szybinski at (561) 691-2898 if you have any questions.

Very truly yours,

*Nancy Klerspe*

Nancy Klerspe  
Designated Representative  
Florida Power & Light Company

cc:

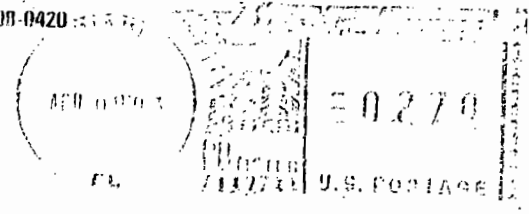
Errin Pichard	FDEP Division of Air Resource Management
Richard Cantrell	FDEP South District Office
Ron Blackburn	FDEP South District Office
Lynn Haynes	EPA Region 4
Brent Burger	OCI/Project Manager
Tom DePlonty	Project Manager
Bernie Tibble	Environmental Specialist - PFM
Bill Reichel	Plant General Manager – PFM
Augie de la Vega	FPL Emission Test Group
Barbara Linkiewicz	JES/FPL
File	

BEST AVAILABLE COPY



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

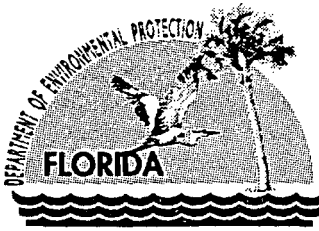
ADDRESSEE SERVICE  
POST OFFICE



Ms. Trina Vielhauer  
Florida Department of Environmental Protection  
Division of Air Resources Management  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

CW IHTMS 32399





Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

April 2, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William Reichel, General Manager  
FPL Fort Myers Plant  
Post Office Box 430  
Fort Myers, Florida 33905

Re: DEP File No. 0710002-013-AC (PSD-FL-298)  
340 MW Simple Cycle Combustion Turbine Project – Two GE Frame 7A Combustion Turbines

Dear Mr. Reichel:

Enclosed is one copy of the Draft Air Construction Permit Modification for the referenced project at the FPL Fort Myers Plant, north of State Road 80, near Tice, Lee County. The Department's Intent to Issue Air Construction Permit Modification and the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION" are also included.

The "PUBLIC NOTICE" must be published one time only, as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E. Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please call Ms Teresa Heron at 850/921-9529 or Mr. Linero 850/921-9523.

Sincerely,

Trina L. Vielhauer, Chief,  
Bureau of Air Regulation

TLV/th

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

In the Matter of an  
Application for Permit Modification by:

Mr. William Reichel, General Manager  
FPL Fort Myers Plant  
Post Office Box 430  
Fort Myers, Florida 33905

DEP File No. 0710002-013-AC and PSD-FL-298  
340 MW Simple Cycle Combustion Turbines Project  
Representative Compliance Stack Tests  
Lee County

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### **INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION**

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification (copy of DRAFT Permit modification attached) for the proposed testing protocol, detailed in the application specified above, for the reasons stated below.

The applicant, Florida Power & Light Company (FPL), applied on April 1, 2003 to the Department to modify their permit to allow the natural gas testing of the first CT Unit (3B) to be representative of both units for PM emissions. In addition, FPL has also requested to allow the test results of one of the two identical direct-fired natural gas heaters to be representative of both heaters.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit modification is required to perform proposed work.

The Department intends to issue this air construction permit modification based on the belief that the applicant has provided reasonable assurances to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit Modification. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114 / Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit modification. Failure to publish the notice and provide proof of publication may result in the denial of the permit modification pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit modification with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments and requests for public meetings concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of Public Notice of Intent to Issue Air Permit Modification. Written comments and requests for public meetings should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit modification with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application 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, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Mediation is not available in this proceeding. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

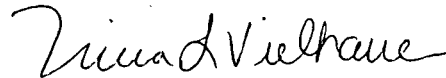
The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section

120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief  
Bureau of Air Regulation

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION (including the PUBLIC NOTICE and the DRAFT permit modification) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 4/2/03 to the person(s) listed:

William Reichel, FPL\*  
Kevin Washington, FPL  
Ron Blackburn, DEP SD  
Jim Little, EPA

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

*Victoria Gibson* / *April 2, 2003*  
(Clerk) (Date)

**PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION**

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0710002-013-AC (PSD-FL-298)

Florida Power & Light Fort Myers Plant  
Revision of Testing Requirement for New Combustion Turbines and Gas Heaters  
Lee County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to Florida Power & Light Company (FPL). A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. The applicant's name and address are Florida Power & Light, Fort Myers Plant, Post Office Box 430, Fort Myers, Florida 33905.

FPL is in the process of testing for compliance with the permit emission limits for Units 3A and 3B along with two direct-fired gas heaters. This permit modification is to allow particulate tests conducted on one of two new and identical combustion turbines to suffice as a compliance demonstration for both. The units use inherently clean natural gas and very low sulfur fuel oil with only minute amounts of ash. Very long tests are required to collect sufficient samples to weigh. The emission limits are not based on a BACT determination and the company will still conduct separate tests for all other pollutants (CO, NO<sub>x</sub>, VOC, opacity) as required by the permit.

The gas heaters are rated at less than 100 million Btu and are not governed by any specific New Source Performance Standard. FPL proposes to use the results of carbon monoxide and nitrogen oxides tests on one as representative of both.

The Department will issue the FINAL permit modification with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed modification issuance action for a period of fourten days from the date of publication of "Public Notice of Intent to Issue Air Construction Permit Modification." Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit modification and require, if applicable, another Public Notice.

The Department will issue the permit modification with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station # 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent,



whichever occurs first. Under Section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by  
Rule 28-106.301

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Florida Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida, 32301  
Telephone: (850)488-0114  
Fax: (850)922-6979

Florida Department of Environmental Protection  
South District Office  
2295 Victoria Avenue, Suite 364  
Fort Myers, Florida 33902-2549  
Telephone: (239)332-6975  
Fax: (239)332-6969

The complete project file includes the request, draft permit modification, and any information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

April XX, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William Reichel, General Manager  
FPL Fort Myers Plant  
Post Office Box 430  
Fort Myers, Florida 33905

Re: DEP File No. 0710002-013-AC (PSD-FL-298)  
340 MW Simple Cycle Combustion Turbine (SCCT) Project - Two GE Frame 7A CT

Dear Mr. Reichel:

The Department acknowledges receipt of Mr. Kevin Washington's letter dated March 31, 2003 asking the Department to accept the natural gas testing of the first CT Unit (3B) to be representative of both units for PM emissions. In addition, FPL is also asking the Department to accept the test results of one of the two identical direct-fired natural gas heaters to be representative of both heaters.

The request is acceptable and the referenced permit is hereby modified as follows:

SECTION III – Specific Condition 16

- d. *Gas Fired Heaters*: NO<sub>x</sub> emission limit from each gas heater shall not exceed 0.10 lb/mmBtu to be demonstrated by stack test as required in Specific Condition 25 to 30. **Compliance shall be demonstrated by representative stack test on one unit.**

SECTION III – Specific Condition 18

Particulate Matter (PM/PM<sub>10</sub>): PM/PM<sub>10</sub> emissions shall not exceed 10 lb/hr when operating on natural gas and shall not exceed 17 lb/hr when operating on fuel oil. [Rule 62-4.070 (3) F.A.C]. Stack test shall be conducted as required in Specific Condition 25 to 30. **Compliance shall be demonstrated by representative stack test on one unit.**

SECTION III – Specific Condition 19

- d. *Gas Fired Heaters*: CO emission limit from each gas heater shall not exceed 0.075 lb/mmBtu to be demonstrated by stack test as required in Specific Condition 25 to 30. **Compliance shall be demonstrated by representative stack test on one unit.**

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, 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 must be filed within thirty (30) days after this order is filed with the clerk of the Department.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Executed in Tallahassee, Florida.

\_\_\_\_\_  
Howard L. Rhodes, Director  
Division of Air Resources  
Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Permit Modification was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on \_\_\_\_\_ to the person(s) listed:

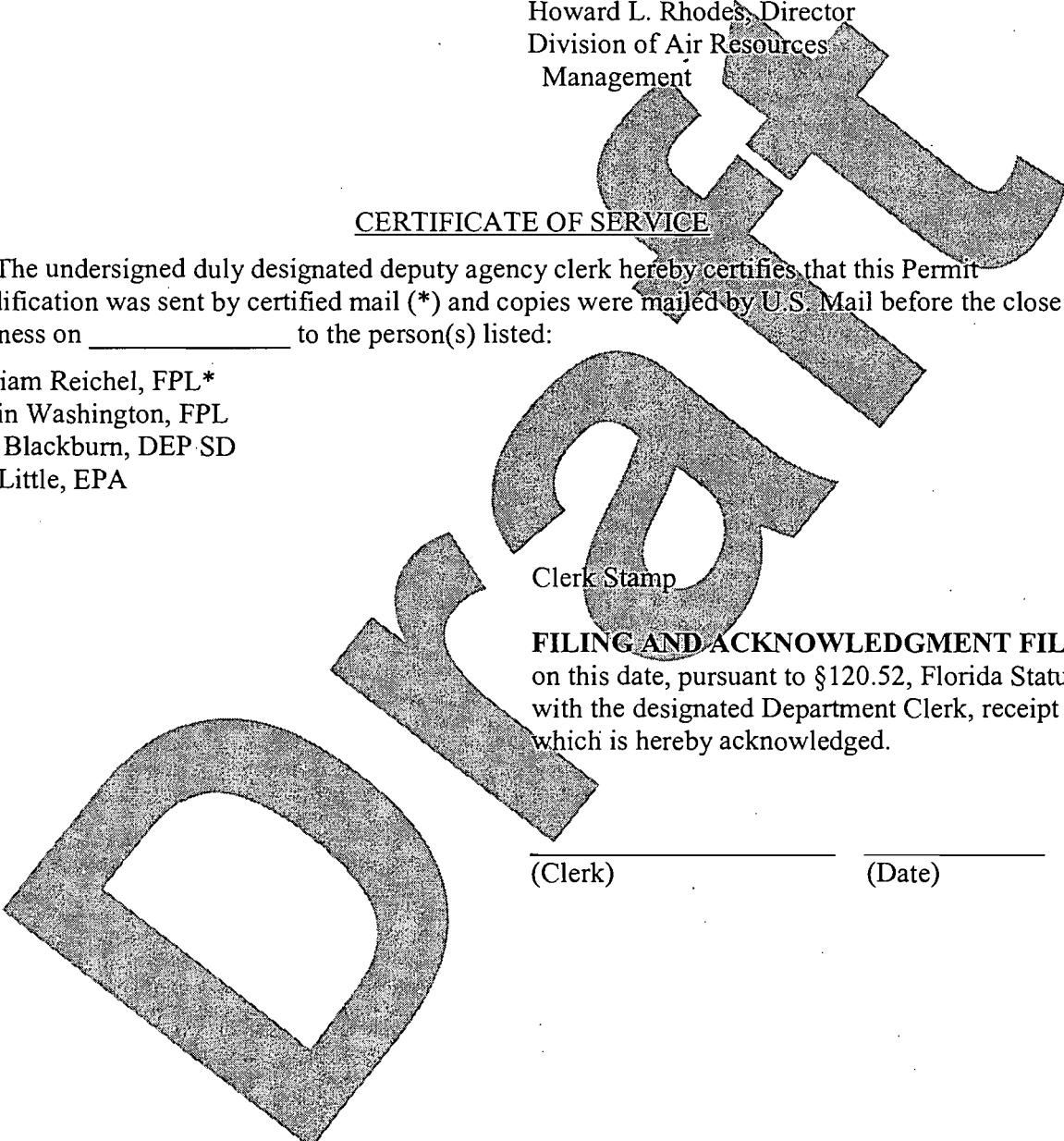
William Reichel, FPL\*  
Kevin Washington, FPL  
Ron Blackburn, DEP SD  
Jim Little, EPA

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED,**  
on this date, pursuant to §120.52, Florida Statutes,  
with the designated Department Clerk, receipt of  
which is hereby acknowledged.

\_\_\_\_\_  
(Clerk)

\_\_\_\_\_  
(Date)





March 31, 2003

RECEIVED

APR 01 2003

BUREAU OF AIR REGULATION

Al Linero, P.E.  
Division of Air Resources Management  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399

**RE: Fort Myers Plant – Air Construction Permit 0710002-009-AC  
To Install Two Simple-Cycle Units**

Dear Al:

FPL is in the process of commissioning two simple-cycle combustion turbine (CT) units, Units 3A & 3B, at the Ft. Myers plant. The units are General Electric frame 7FA machines, which are in widespread use within FPL and the electric industry in general. Each unit is permitted to have dual fuel capability, burning either natural gas or low sulfur distillate fuel. Each unit also has a direct-fired natural gas heater that raises the CT's natural gas fuel temperature to a level which assures optimum combustion for the dry, Low NOx combustors.

The CTs, when fired with natural gas, produce very low particulate matter (PM) emissions which has been demonstrated in the past on like FPL units, such as Martin Units 8A and 8B [Refer: Attachment No. 1]. In order to collect sufficient particulate matter to measure, the duration of the test runs of the EPA Test Method must be extended threefold, resulting in additional emissions of NOx, CO and other constituents. In addition, the cost of fuel for the extended test runs creates an unnecessary financial burden to the ratepayers, only to demonstrate the well-known low levels of PM emissions.

FPL is asking the Department to accept the natural gas testing results of the first CT (3B) to be representative of both units for PM emissions. FPL intends to test unit 3B for PM as well as the other required initial tests. In addition, FPL is asking the Department to accept the test results of one of the two identical direct-fired natural gas heaters to be representative of both heaters. In a previous commissioning scenario, the Department agreed to accept the test results from two of six direct-fired heaters as representative emissions during the Ft. Myers combined cycle unit commissioning [Refer: Attachment No. 2].

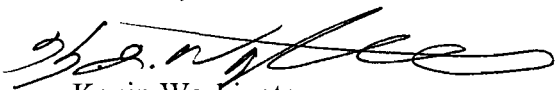
Al Linero  
Department of Environmental Protection  
March 28, 2002  
Page 2

FPL believes the testing regimen outlined above will provide the Department with sufficient assurance that the combustion of natural gas in the CTs results in low PM emissions, and that the emissions from the direct-fired gas heaters are very low as well.

A telephone discussion with Mr. Jeff Koerner and Ms. Teresa Heron on March 27, 2003 indicated that the testing/ reporting process outlined above could be acceptable to the Department.

Thank you for consideration of this request. We look forward to the Department's concurrence. If you have any questions or would like to discuss this matter further, please contact me at (561) 691- 2877 or Barbara Linkiewicz at (561) 691-7518.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Washington", written in a cursive style.

Kevin Washington  
Senior Environmental Specialist – FPL

cc: Mr. Earl Baker, Southwest District Office, FDEP

Attachments: (2)

ATTACHMENT No. 1



FLORIDA POWER & LIGHT COMPANY, P.O. BOX 14000, JUNO BEACH, FL 33408-0420

August 28, 2001

Mr. Tom Tittle  
Environmental Manager  
State of Florida  
Department of Environmental Protection  
400 North Congress Avenue  
PO Box 15425  
West Palm Beach, Florida 33416

RE: Emissions Test Report  
Florida Power & Light Company  
Martin Power Plant, Combustion Turbine No. 8A and 8B

Dear Mr. Tittle:

Per our telephone conversation on August 27, please find enclosed the test reports for the initial compliance testing performed on the Martin combustion turbines. Also enclosed are the 3 one hour VE's for each turbine.

If you have any questions, or need any additional information, you may contact me at the Cutler Emission Office at (305) 242-3896.

Sincerely,

A handwritten signature in cursive script that reads "Agustin J. de la Vega".

Agustin J. de la Vega  
Test Group Supervisor  
Florida Power & Light Company

cc: File

**BEST AVAILABLE COPY**



**GE Energy and Environmental Research Corporation**

Table 4-5. Emission Summary Table for FP&L, Indiantown, FL - Unit 8A  
Approximately 100% Base Load Conditions on Natural Gas

Test Identification		1	2	3	Average
Test Period	--	1	2	3	Average
Test Condition	load level, %	100	100	100	
Sampling Location	--	stack	stack	stack	
Date	--	07-May-01	07-May-01	07-May-01	
Test Time (start-stop)	--	1725-1825	1910-2010	2050-2150	
<b>Ambient Conditions</b>					
Barometric Pressure	In. Hg	30.05	30.00	30.05	30.03
Ambient Temperature	°F	82	81	73	79
Wet Bulb Temperature	°F	67	71	69	69
Absolute Humidity	lb water/lb dry air	0.01063	0.01403	0.01433	0.01300
<b>Turbine Operating Conditions</b>					
Mean Turbine Exhaust Temp., TTXM	°F	1123.9	1119.6	1118.9	1120.8
Fuel Flow, FQG	lb/sec	21.323	21.631	21.721	21.558
Compressor Inlet Temperature, CTIM	°F	78.7	73.2	71.7	74.5
Specific Humidity, CMHUM	lb/lb	0.01313	0.01165	0.01157	0.01212
Inlet Guide Vane Angle, CSGV	degrees	88.0	88.0	88.0	88.0
Generator Output, DWATT	mw	166.9	170.1	171.1	169.4
Compressor Discharge Pressure, CPD	psig	210.7	213.5	213.9	212.6
<b>Exhaust Gas Conditions</b>					
Volumetric Flow, M-19, F <sub>1</sub>	dscfm	739,830	747,400	745,360	744,200
Volumetric Flow, M-19, F <sub>2</sub>	dscfm	729,386	729,410	732,440	730,412
Moisture	%V	8.0	7.1	6.2	7.1
O <sub>2</sub>	%	13.7	13.7	13.6	13.7
CO <sub>2</sub>	%	4.2	4.2	4.2	4.2
F <sub>o</sub> Factor	--	1.731	1.714	1.726	1.724
NO <sub>x</sub>	ppmvd	9.5	9.7	9.5	9.6
<b>Exhaust Emissions</b>					
Particulate Matter	lb/hr	3.37	2.65	2.12	2.71
CO	ppmvd	0.2	0.3	0.2	0.2
	lb/hr	0.6	0.9	0.6	0.7
VOC	ppmvw	< 0.1	< 0.1	< 0.1	< 0.1
	lb/hr	< 0.004	< 0.004	< 0.004	< 0.004
NO <sub>x</sub>	ppmvd @ 15% O <sub>2</sub>	7.7	7.9	7.7	7.8
	lb/hr	50.1	52.0	50.7	50.9

**BEST AVAILABLE COPY**



**GE Energy and Environmental Research Corporation**

Table 4-9. Emission Summary Table for FP&L, Indiantown, FL - Unit 8B  
Approximately 100% Base Load Conditions on Natural Gas

Test Identification					
Test Period	--	1	2	3	Average
Test Condition	load level, %	100	100	100	
Sampling Location	--	stack	stack	stack	
Date	--	23-May-01	23-May-01	23-May-01	
Test Time (start-stop)	--	1415-1515	1818-1918	1954-2054	
Ambient Conditions					
Barometric Pressure	in. Hg	29.59	29.49	29.50	29.50
Ambient Temperature	°F	84	81	78	81
Wet Bulb Temperature	°F	79	77	75	77
Absolute Humidity	lb water/lb dry air	0.02027	0.01913	0.01803	0.01914
Turbine Operating Conditions					
Mean Turbine Exhaust Temp., TTXM	°F	1128.0	1127.7	1126.0	1127.2
Fuel Flow, FQG	lb/sec	20.51	20.51	20.66	20.56
Compressor Inlet Temperature, CTIM	°F	80.3	79.9	77.6	79.3
Specific Humidity, CMHUM	lb/lb	0.03485	0.03117	0.02614	0.03072
Inlet Guide Vane Angle, CSGV	degrees	88.0	88.0	88.0	88.0
Generator Output, DWATT	mw	162.2	162.6	163.9	162.9
Compressor Discharge Pressure, CPD	psig	206.4	206.5	207.6	206.8
Exhaust Gas Conditions					
Volumetric Flow, M-19, F <sub>d</sub>	dscfm	702,224	712,239	717,384	710,616
Volumetric Flow, M-19, F <sub>c</sub>	dscfm	701,582	701,840	690,471	697,965
Moisture	%V	10.1	9.7	8.6	9.5
O <sub>2</sub>	%	13.6	13.7	13.7	13.7
CO <sub>2</sub>	%	4.2	4.2	4.3	4.2
F <sub>o</sub> Factor	--	1.738	1.714	1.674	1.709
NO <sub>x</sub>	ppmvd	9.7	9.7	9.8	9.7
Exhaust Emissions					
Particulate Matter	lb/hr	1.73	1.78	2.07	1.86
CO	ppmvd	0.2	0.2	0.2	0.2
	lb/hr	0.7	0.5	0.7	0.6
VOC	ppmvw	< 0.1	< 0.1	< 0.1	< 0.1
	lb/hr	< 0.003	< 0.003	< 0.003	< 0.003
NO <sub>x</sub>	ppmvd @ 15% O <sub>2</sub>	7.8	8.0	8.0	7.9
	lb/hr	48.9	49.6	50.2	49.6



## BEST AVAILABLE COPY


**GE Energy and Environmental Research Corporation**

Table 4-5A. Emission Summary Table for FP&L, Indiantown, FL - Unit 8A  
Approximately 100% Base Load Conditions on Distillate Oil - PARTICULATE

Test Identification					
Test Period	--	1	2	3	Average
Test Condition	load level, %	100	100	100	
Sampling Location	--	stack	stack	stack	
Date	--	05-Jun-01	05-Jun-01	06-Jun-01	
Test Time (start-stop)	--	1040-1345	1430-2031	1000-1310	
Turbine Operating Conditions					
Turbine Exhaust Temperature, TTXM	°F	1121.9	1117.5	1120.2	1119.8
Fuel Flow, FQLM1	lb/sec	25.47	25.76	25.54	25.59
Compressor Inlet Temperature, CTIM	°F	85.7	80.9	81.9	82.8
Specific Humidity, CMHUM	lb/lb	0.01796	0.01785	0.01963	0.01848
Inlet Guide Vane Angle, CSGV	degrees	88.0	88.0	88.0	88.0
Generator Output, DWATT	MW	171.8	175.4	173.9	173.9
Compressor Discharge Pressure, CPD	psig	212.7	215.2	213.8	213.9
Water Injection Flow, WQ	lb/sec	31.4	31.8	31.0	31.4
Ratio, Act. NOx Water to Fuel, WXJ	--	1.23	1.23	1.21	1.22
Ratio, Req. NOx Water to Fuel, WXC	--	1.21	1.20	1.18	1.20
Exhaust Gas Conditions (a)					
Volumetric Flow, M-19, F <sub>d</sub>	dscfm	692,590	698,910	694,400	695,300
Volumetric Flow, M-19, F <sub>e</sub>	dscfm	684,890	691,680	718,934	698,501
Moisture	%V	10.2	12.3	8.6	10.4
O <sub>2</sub>	%	12.6	12.6	12.9	12.6
CO <sub>2</sub>	%	6.2	6.3	6.0	6.3
Exhaust Emissions					
Particulate Matter	lb/hr	(a)	2.59	2.46	2.52

(a) highest calculated exhaust gas volumetric flow rate used for emission rate calculation.

(b) Not included in reported average. See Section 4.2.

## BEST AVAILABLE COPY



## GE Energy and Environmental Research Corporation

Table 4-9. Emission Summary Table for FP&L, Indiantown, FL - Unit 8B  
Approximately 100% Base Load Conditions on Distillate Oil

Test Identification					
Test Period	--	1	2	3	Average
Test Condition	load level, %	100	100	100	
Sampling Location	--	stack	stack	stack	
Date	--	12-Jun-01	12-Jun-01	12-Jun-01	
Test Time (start-stop)	--	1825-1925	1956-2056	2135-2235	
Ambient Conditions					
Barometric Pressure	in. Hg	29.94	29.80	29.89	29.88
Ambient Temperature	°F	95	84	79	86.0
Wet Bulb Temperature	°F	80	73	71	74.7
Absolute Humidity	lb water/lb dry air	0.01873	0.01494	0.01449	0.01605
Turbine Operating Conditions					
Turbine Exhaust Temperature, TTXM	°F	1121.4	1119.8	1117.6	1119.6
Fuel Flow, FQLMI	lb/sec	25.01	25.38	25.52	25.30
Compressor Inlet Temperature, CTIM	°F	84.5	83.0	79.3	82.3
Specific Humidity, CMHUM	lb/lb	0.01625	0.01436	0.01500	0.01520
Inlet Guide Vane Angle, CSGV	degrees	88.0	88.0	88.0	88.0
Generator Output, DWATT	MW	171.3	172.2	174.4	172.6
Compressor Discharge Pressure, CPD	psig	211.4	212.3	213.9	212.5
Water Injection Flow, WQ	lb/sec	28.0	28.8	28.7	28.5
Ratio, Act. NOx Water to Fuel, WXJ	--	1.11	1.14	1.12	1.12
Ratio, Req. NOx Water to Fuel, WXC	--	1.09	1.11	1.10	1.10
Exhaust Gas Conditions					
Volumetric Flow, M-19, F <sub>d</sub>	dscfm	684,520	694,510	699,190	692,740
Volumetric Flow, M-19, F <sub>e</sub>	dscfm	675,430	686,390	687,960	683,260
Moisture	%V	11.4	9.3	9.9	10.2
O <sub>2</sub>	%	12.7	12.7	12.7	12.7
CO <sub>2</sub>	%	6.2	6.2	6.2	6.2
F <sub>o</sub> Factor	--	1.3	1.329	1.323	1.326
NO <sub>x</sub>	ppmvd	53.9	52.9	53.9	53.5
Exhaust Emissions					
Sulfur Dioxide	% by Vol. dry @ 15% O <sub>2</sub>	0.00074	0.0074	0.0074	0.0074
Particulate Matter	lb/hr	3.1	2.8	3.2	3.0
VOC	ppmvw	0.5	0.6	0.5	0.5
	lb/hr	0.02	0.02	0.02	0.02
CO	ppmvd	0.8	0.8	0.8	0.8
	lb/hr	2.4	2.5	2.6	2.5
NO <sub>x</sub>	ppmvd @ 15% O <sub>2</sub>	38.5	37.8	38.6	38.3
	lb/hr	264.1	263.1	269.9	267.5

ATTACHMENT No. 2



FLORIDA POWER & LIGHT COMPANY, P.O. BOX 14000, JUNO BEACH, FL 33408-0420

December 14, 2000

Mr. Ron Blackburn  
State of Florida  
Department of Environmental Protection  
South Florida District Office  
2295 Victoria Avenue, Suite 364  
Fort Myers, Florida 33901

**RE: Florida Power & Light Company  
Initial Visible Emission Evaluation,  
Nox, and CO Emission Test Report for  
Fort Myers Plant, Combustion Turbine  
2B Heater**

Dear Mr. Blackburn:

Enclosed please find the initial results of the Nox and CO emissions compliance tests conducted at the referenced unit by Florida Power & Light's Technical Services Emission Test Group on November 28, 2000. The referenced unit was fired with 100 percent natural gas. During testing, EPA Methods 3A, 10 and 20 were used for sampling and analysis.

A summary of the pertinent data is attached. Also enclosed is a 1 hour VE performed on November 28, 2000.

If you have any questions, please call Augie de la Vega at the Cutler Emissions Office (305) 242-3896.

Sincerely,

*for* William M. Reichel  
Plant General Manager  
Florida Power & Light Company

cc: Emission Test Group  
File

**BEST AVAILABLE COPY****FORT MYERS CT HEATER 2B  
EMISSION SUMMARY**

100% GAS

DATE	RUN #	CT	CO ppm	CO EMISSIONS lbs/MMBTU	NOx ppm	NOx EMISSIONS lbs/MMBTU	O2 %
11/28/00	1	2B	8.97	0.008	29.41	0.041	5.22
11/28/00	2	2B	7.75	0.006	29.94	0.041	5.10
11/28/00	3	2B	7.65	0.006	30.66	0.042	5.05
AVG			8.12	0.007	30.00	0.041	5.12

NOx Emission Standard for Gas 0.100 lb/MMbtu.

CO Emission Standard for Gas 0.150 lb/MMbtu.



FLORIDA POWER & LIGHT COMPANY, P.O. BOX 14000, JUNO BEACH, FL 33408-0420

December 15, 2000

Mr. Ron Blackburn  
State of Florida  
Department of Environmental Protection  
South Florida District Office  
2295 Victoria Avenue, Suite 364  
Fort Myers, Florida 33901

**RE: Florida Power & Light Company  
Initial Visible Emission Evaluation,  
Nox, and CO Emission Test Report for  
Fort Myers Plant, Combustion Turbine  
2A Heater**

Dear Mr. Blackburn:

Enclosed please find the initial results of the Nox and CO emissions compliance tests conducted at the referenced unit by Florida Power & Light's Technical Services Emission Test Group on November 8, 2000. The referenced unit was fired with 100 percent natural gas. During testing, EPA Methods 3A, 10 and 20 were used for sampling and analysis.

A summary of the pertinent data is attached. Also enclosed is a 1 hour VE performed on December 14, 2000.

If you have any questions, please call Augie de la Vega at the Cutler Emissions Office (305) 242-3896.

Sincerely,

for William M. Reichel  
Plant General Manager  
Florida Power & Light Company

cc: Emission Test Group  
File

**FORT MYERS CT HEATER 2A  
EMISSION SUMMARY**

100% GAS

DATE	RUN #	CT	CO ppm	CO EMISSIONS lbs/MMBTU	NOx ppm	NOx EMISSIONS lbs/MMBTU	O2 %
11/08/00	1	2A	8.44	0.006	40.78	0.050	3.23
11/08/00	2	2A	8.97	0.007	40.66	0.050	3.21
11/08/00	3	2A	8.71	0.006	41.21	0.050	3.12
AVG			8.71	0.006	40.88	0.050	3.19

NOx Emission Standard for Gas 0.100 lb/MMbtu.

CO Emission Standard for Gas 0.150 lb/MMbtu.

**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. William Reichel  
 General Manager  
 FPL Fort Myers Plant  
 Post Office Box 430  
 Fort Myers, FL 3390<sup>β</sup>

2

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  
 Addressee  
*Mary K. Russell*

B. Received by (Printed Name) C. Date of Delivery  
 MARY K. RUSSELL 8/10/03

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

7001 0320 0001 3692 6631

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

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

OFFICIAL USE

7001 0320 0001 3692 6631

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark Here

Sent To  
 William Reichel  
 Street, Apt. No.,  
 or PO Box 430  
 City, State, ZIP+4  
 Ft. Myers, FL 33905

PS Form 3800, January 2001

See Reverse for Instructions

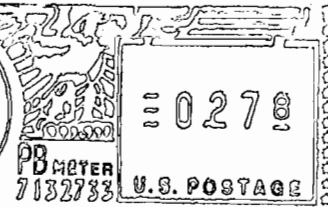


**FPL**

Florida Power & Light Company, P. O. Box 14000, Juno Beach, FL 33409-0420

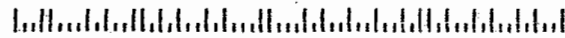
ADDRESS SERVICE  
REQUESTED

PRESORTED  
FIRST CLASS



Ms. Trina Vielhauer  
Florida Department of Environmental Protection  
Division of Air Resources Management  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

C\*1HTM5 32399





The Department will issue the permit modification with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station # 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Florida Department of Environmental Protection, Bureau of Air Regulation, 111 S. Magnolia Drive, Suite 4, Tallahassee, Florida, 32301 Telephone: (850) 488-0114 Fax: (850) 922-6979

Florida Department of Environmental Protection, South District Office, 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33902-2549 Telephone: (239) 332-6975 Fax: (239) 332-6969

The complete project file includes the request, draft permit modification, and any information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

Apr 4 No. 16859

**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. William Reichel  
 General Manager  
 Florida Power & Light Company - Fort Myers Plant  
 Post Office Box 430  
 Fort Myers, FL 33905

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) **MARY K. RUSSELL** B. Date of Delivery **4/25/03**

C. Signature *Mary K. Russell*  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

7001 0320 0001 3692 6433

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

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

OFFICIAL USE

7001 0320 0001 3692 6433

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark  
 Here

Sent To **William Reichel**  
 Street, Apt. No.,  
 or P.O. Box **Box 430**  
 City, State, ZIP+4  
**Ft. Myers, FL 33905**

PS Form 3800, January 2001

See Reverse for Instructions

# 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

Kieanna Henry

who on oath says that he/she is the

Asst. Legal Clerk of the News-Press, a daily newspaper,  
published at Fort Myers, in Lee County, Florida; that the  
attached copy of advertisement, being a

Public Notice of Intent

In the matter of DEP Air Construction Permit to Fla.

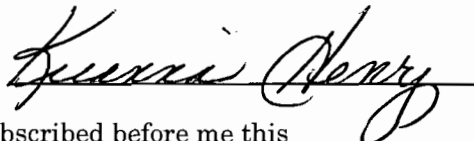
Power & Light

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

was published in said newspaper in the issues of

April 4, 2003

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.



Sworn to and subscribed before me this

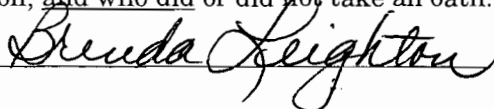
2<sup>nd</sup> day of April 2003 by

Kieanna Henry

personally known to me or who has produced

as identification, and who did or did not take an oath.

Notary Public



Print Name \_\_\_\_\_

My commission Expires:



Brenda Leighton  
MY COMMISSION # DD169005 EXPIRES  
February 14, 2007  
BONDED THRU TROY FAIN INSURANCE, INC.

RECEIVED

APR 10 2003

BUREAU OF AIR REGULATION

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION DEP File No. 0710002-013-AC (PSD-FL-298) Florida Power & Light Fort Myers Plant Revision of Testing Requirement for New Combustion Turbines and Gas Heaters Lee County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to Florida Power & Light Company (FPL). A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. The applicant's name and address are Florida Power & Light, Fort Myers Plant, Post Office Box 430, Fort Myers, Florida 33905. FPL is in the process of testing for compliance with the permit emission limits for Units 3A and 3B along with two direct-fired gas heaters. This permit modification is to allow particulate tests conducted on one of two new and identical combustion turbines to suffice as a compliance demonstration for both. The units use inherently clean natural gas and very low sulfur fuel oil with only minute amounts of ash. Very long tests are required to collect sufficient samples to weigh. The emission limits are not based on a BACT determination and the company will still conduct separate tests for all other pollutants (CO, NOx, VOC, opacity) as required by the permit.

The gas heaters are rated at less than 100 million Btu and are not governed by any specific New Source Performance Standard. FPL proposes to use the results of carbon monoxide and nitrogen oxides tests on one as representative of both.

The Department will issue the FINAL permit modification with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed modification issuance action for a period of fourteen days from the date of publication of 'Public Notice of Intent to Issue Air Construction Permit Modification.' Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments result in a significant change in the proposed agency action, the Department shall revise the proposed permit modification and require, if applicable, another Public Notice.

<b>AFFIDAVIT OF PUBLICATION</b>

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“Serving Southwest Florida Since 1884”