Memorandum

Florida Department of Environmental Protection

TO:

Howard Rhodes

THRU:

Clair Fancy

Al Linero

FROM:

Jeff Koerner

DATE:

August 9, 2002

SUBJECT:

Final Air Permit No. 0810010-007-AC

Florida Power and Light, Manatee Power Plant Addition of Natural Gas To Units 1 and 2

The Final Permit for this project is attached for your approval and signature. The permit authorizes the construction of natural gas facilities for existing fossil fuel fired steam generator Units 1 and 2 at the FPL Manatee Power Plant. It supplements any previously issued air construction and operation permits for these units.

A draft permit package was issued on July 9, 2002. The applicant published the public notice in The Bradenton Herald on July 15, 2002. The Department received the proof of publication on July 18, 2002. On July 23, 2002, Florida Power and Light filed a request for an extension of time in which to file for an administrative hearing and provided comments on the draft permit. On August 7, 2002, Florida Power and Light withdrew their request for an extension of time with the understanding that minor changes to testing conditions and corrections would be made to the final permit. No other requests for administrative hearings were filed.

Day 90 of the permitting time clock is August 23, 2002. I recommend your approval and signature.

Attachments

CHF/AAL/jfk

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF FINAL PERMIT

In the Matter of an Application for Permit by:

Mr. Paul Plotkin, Plant General Manager Florida Power and Light, Manatee Power Plant 19050 State Road 62 Parrish, FL 34219 FPL Manatee Power Plant Air Permit No. 0810010-007-AC Addition of Natural Gas, Units 1 and 2 Emissions Units 001 and 002

Enclosed is Final Air Permit No. 0810010-007-AC. This action authorizes the construction of natural gas facilities for existing fossil fuel fired steam generator Units 1 and 2. The permit supplements any previously issued air construction and operation permits for these units. The Department made only minor changes to the draft permit as noted in the Final Determination (attached). This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, 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.

Executed in Tallahassee, Florida.

C. H. Fancy, P.E., Chief Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 8/12/02 to the persons listed:

Mr. Paul Plotkin, FPL*
Mr. Clarence Troxell*
Chair, Manatee County Commissioners*
President, Manatee County Citizens Against Pollution (MCAP)*
Manatee County Environmental Management Department
Mr. Kevin Washington, FPL

Ms. Kathryn S. Salvador, FPL Mr. Gerald Kissel, SWD

Mr. Hamilton Oven, DEP Siting Office Mr. Gregg Worley, EPA Region 4

Mr. John Bunyak, NPS ManaSota 88, Inc.*

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 Libron August 12, 200.

PERMITTEE

Mr. Paul Plotkin, Plant General Manager Florida Power and Light, Manatee Power Plant 19050 State Road 62 Parrish, FL 34219

PERMITTING AUTHORITY

Florida Department of Environmental Protection Division of Air Resources Management Bureau of Air Regulation New Source Review Section 2600 Blair Stone Road, MS #5505 Tallahassee, Florida 32399-2400

PROJECT

Air Permit No. 0810010-007-AC FPL Manatee Power Plant

This action authorizes the construction of natural gas facilities for existing fossil fuel fired steam generator Units 1 and 2. This permit supplements any previously issued air construction and operation permits for these units. A concurrent request to revise the Title V operation permit is being processed as Project No. 0810010-008-AV.

NOTICE, PUBLICATION, AND COMMENTS

The Department distributed an "Intent to Issue Permit" package on July 9, 2002. The applicant published the "Public Notice of Intent to Issue" in The Bradenton Herald on July 15, 2002. The Department received the proof of publication on July 18, 2002. On July 23, 2002, Florida Power and Light filed a request for an extension of time in which to file for an administrative hearing and provided comments on the draft permit. On August 7, 2002, Florida Power and Light withdrew their request for an extension of time with the understanding that minor changes to testing conditions and corrections would be made to the final permit. No other requests for administrative hearings were filed. The following summarizes the applicant's comments and the Department's response.

- 1. Comment: The applicant again contested the need for a construction permit for this project. The applicant maintains that the addition of natural gas will not result in increased emissions and is therefore not a modification of existing units. The applicant disagrees with the Department's determination that the activities associated with the project meet the definition of construction and require a permit. The applicant concludes that, if this were true, "... the Department would be swamped by applications for work that does not involve emissions units or emissions increases." Response: The Department reiterates its position that a construction permit is necessary to add a fuel that is not currently authorized. The construction activities associated with adding natural gas facilities are specifically defined as construction. These activities are necessary to provide natural gas as an alternate fuel source and directly affect the existing emissions units.
- 2. Specific Condition No. 3, Comment: FPL requests placing the maximum fuel sulfur content in a permitting note for informational purposes only. FPL will not have direct control of the fuel sulfur content in the gas pipeline. Response: The Department agrees with this minor change. Federal requirements currently limit pipeline natural gas to less than 10 grains of sulfur per 100 SCF of natural gas. The actual fuel sulfur content is typically less than 1 grain of sulfur per 100 SCF of natural gas.
- 3. Specific Condition No. 5, Comment: Initially, FPL requested the addition of "#6 fuel oil or a combination of both" to clarify that oil is also fired. Response: The Department recognizes that other fuels are authorized for these units. However, the authorization granted by this permit is limited solely to the firing

natural gas. No change was made.

- 4. Specific Condition No. 6, Comment: FPL requests deletion of the phrase "When firing natural gas," and inclusion of the particulate matter limit of "0.3 pounds per million Btu of heat input when soot-blowing" as specified by Rule 62-296.405(1)(b), F.A.C. Response: Again, the authorization granted by this permit is limited solely to the firing natural gas. The first phrase was not deleted. The soot-blowing limit was not included in the draft permit because it is specified in the current Title V permit. However, the Department will include it in the final permit for completeness.
- 5. Specific Condition No. 8, Comment: FPL requests deletion of the reference to the fuel sulfur specification and inclusion of the sulfur dioxide limit of "1.1 pounds per million Btu heat input" in accordance with Rule 62-296.405(1)(d), F.A.C. Response: The reference to the fuel sulfur specification will be removed. The sulfur dioxide limit was not included in the final permit because this limit applies only to the firing of liquid fuels. However, the condition remains clear that blending natural gas shall not be used to comply with the existing standard for fuel oil.
- 6. Specific Condition No. 10, Comment: The applicant recommends punctuation to clarify the test methods for determining the flue gas oxygen content. Response: The condition is consistent with Rule 62-296.405(1)(e)2, F.A.C. and the current Title V permit. No change was made.
- 7. Specific Condition Nos. 11, 13, 14 and 18; Comment: The applicant requests clarification of these conditions to reflect the following:
 - Initial compliance tests are required only for particulate matter and opacity.
 - To report annual emissions from gas firing in the PSD Applicability Report, emissions shall be based on the following: initial test for particulate matter and volatile organic compounds; initial and annual (during annual NOx RATA) tests for carbon monoxide; and CEMS data for emissions of nitrogen oxides and sulfur dioxide as indicated by the EPA Scorecard values for the acid rain program.
 - To report annual emissions from oil firing in the PSD Applicability Report, emissions shall be based on the following: emissions data for carbon monoxide, particulate matter, and volatile organic compounds as reported in the certified Annual Operating Reports; and CEMS data for emissions of nitrogen oxides and sulfur dioxide as indicated by the EPA Scorecard values for the acid rain program.
 - Consistent with the previous fuel sulfur changes, deletion of the requirement to keep fuel sulfur records for natural gas.

Response: The Department agrees with the clarifications. An initial test for particulate matter is required by rule. The current Title V permit does not require annual testing for particulate matter if only gaseous fuels are fired, which is based on Rule 62-297.310(7)(a), F.A.C. An initial test for volatile organic compounds will reflect actual emissions. Thereafter, the annual tests for carbon monoxide will demonstrate efficient fuel combustion.

8. Specific Condition No. 18, Comment: FPL requests a change in the reporting deadline from March 1st to August 1st of each year. This is necessary because EPA must review and approve the final annual emissions of nitrogen oxides and sulfur dioxide for the acid rain program. Also, change the annual emissions of nitrogen oxides from 8179 to 8762 tons per year based on the final emissions approved by EPA. Response: The Department agrees to both changes. FPL provided an email from EPA dated July 21, 2002 that summarized the final 2001 emissions for FPL Manatee Units 1 and 2.

No other comments on the draft permit were received.

CONCLUSION

The above minor revisions are not considered substantial. The final action of the Department is to issue the permit with the changes described above as well as corrections of typographical errors.



Department of Environmental Protection

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

David B. Struhs Secretary

PERMITTEE:

Florida Power and Light 19050 State Road 62 Parrish, FL 34219

Authorized Representative:

Mr. Paul Plotkin, Plant General Manager

FPL Manatee Power Plant Air Permit No. 0810010-007-AC Facility ID No. 0810010 SIC No. 4911

Permit Expires: July 1, 2003

PROJECT AND LOCATION

Florida Power and Light owns and operates the Manatee Plant, which is an electrical power plant located at 19050 State Road 62 in Parrish (Manatee County), Florida. The UTM coordinates are: Zone 17, 367.25 km East, and 3054.15 km North (Latitude: 27° 36' 21" and Longitude: 82° 20' 44").

This permit authorizes the construction of natural gas facilities for existing fossil fuel fired steam generator Units 1 and 2. This permit supplements any previously issued air construction and operation permits for these units.

STATEMENT OF BASIS

The Department issues this air pollution construction permit under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The Department authorizes the permittee to install the proposed equipment in accordance with the conditions of the permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

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Section I. General Information

Section II. Administrative Requirements

Section III. Emissions Units Specific Conditions

Section IV. Appendices

Howard L. Rhodes, Director

Division of Air Resources Management

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(Date)

FACILITY AND PROJECT DESCRIPTION

The existing facility is a steam-electric power plant consisting of the following emissions units.

EU ID	Emissions Unit Description
001	Unit 1 - Foster Wheeler fossil fuel fired steam generator (863 MW)
002	Unit 2 - Foster Wheeler fossil fuel fired steam generator (863 MW)
003	Emergency diesel generator and miscellaneous mobile equipment and internal combustion engines
004	Painting of plant equipment and non-halogenated solvent cleaning

This permit authorizes the construction of the infrastructure necessary to support the firing of natural gas for existing fossil fuel fired steam generator Units 1 and 2. Only Emissions Units 001 and 002 are affected by this permit.

REGULATORY CLASSIFICATION

Title III: The facility is a major source of hazardous air pollutants (HAP).

Title IV: The facility operates emissions units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is Title V major source of air pollution.

PSD: The facility is a major source of air pollution with respect to the requirements of the Prevention of Significant Deterioration (PSD) of Air Quality Program, Rule 62-212.400, F.A.C.

RELEVANT DOCUMENTS

The documents listed below are not a part of this permit, but are specifically related to the permitting action and are on file with the Department.

- Application Nos. 0810010-007-AC and 0810010-008-AV received on 05/10/02; complete.
- Title V Air Operation Permit No. 0810010-001-AV, which became effective on January 1, 1999.

SECTION II. ADMINISTRATIVE REQUIREMENTS

- 1. <u>Permitting Authority</u>: Applications for permits to construct or operate shall be submitted to the Department's Bureau of Air Regulation at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all such applications shall also be submitted to the Department's Southwest District Office and the Manatee County Environmental Management Department at the addresses listed below.
- 2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Southwest District Office at 3804 Coconut Palm Drive in Tampa, Florida 33619-8218. Copies of all such documents shall also be submitted to the Manatee County Environmental Management Department at 202 Sixth Avenue East, Bradenton, FL 34208.
- 3. Appendices: The permit includes the following appendices:
 - Appendix CF Formats used to cite applicable rules, regulations, and previous permitting actions;
 - Appendix GC General conditions applicable to all state permits; and
 - Appendix SC: Standard conditions complied from applicable state regulations.
- 4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of each emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
- 5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
- 6. <u>Modifications</u>: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department, prior to beginning such construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
- 7. <u>Title V Permit</u>: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A revision to the Title V operation permit is required to authorize regular operation of the regulated emissions units. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Department's Bureau of Air Regulation with copies to the Compliance Authority. {Permitting Note: This condition was satisfied by the submittal of an application for a concurrent Title V revision.} [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

A. UNITS 1 AND 2

This permit affects the following existing emissions units.

EU ID	Emissions Unit Description	
001	Fossil Fuel Steam Generator, Unit 1	
002	Fossil Fuel Steam Generator, Unit 2	

Fossil fuel fired steam generators Unit 1 and Unit 2 are each nominal 800 megawatt (900 MW gross capacity, electric) steam generators designated as Manatee Plant Unit 1 and Unit 2. The emissions units are fired on a variable combination of natural gas, No. 6 fuel oil, No. 2 fuel oil, propane, and used oil from FPL operations. Propane is utilized primarily for ignition of the main fuel. When firing fuel oil (or combinations of authorized fuels), the maximum heat input for each boiler is 8650 MMBtu per hour. When firing natural gas alone, the maximum heat input for each boiler is 5670 MMBtu per hour.

Each emissions unit consists of a boiler that drives a turbine generator. Emissions are controlled with multiple cyclones, a flue gas recirculation system, and staged combustion. The twin register low-NOx burners (ABB Combustion Services, Ltd.) are dual fuel with mechanical atomization for oil firing. Each unit is equipped with a 499-foot stack and systems to continuously monitor and record emissions of nitrogen oxides and opacity.

{Permitting Note: These emissions units are regulated under Acid Rain, Phase II; and Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input. Fossil fuel fired steam generator Unit 1 began commercial operation in 1976 and fossil fuel fired steam generator Unit 2 began commercial operation in 1977. These emissions units may inject additives such as magnesium oxide, magnesium hydroxide and related compounds into each boiler.}

CONSTRUCTION

- 1. Natural Gas Supply: The permittee is authorized to construct the natural gas supply lines and infrastructure necessary to support gas-fired operation of both Units 1 and 2. The existing burners for each unit are twin register low NOx burners manufactured by ABB Combustion Services, Ltd. (formerly International Combustion Limited). The low-NOx burner design incorporates air and fuel staging to reduce emissions of nitrogen oxides when firing either fuel oil or natural gas. Mechanical atomization is used to reduce droplet size for the efficient combustion of fuel oil. This permit authorizes the addition of natural gas as an allowable fuel for Units 1 and 2. It supplements all previously issued air construction and operation permits for these units. [Applicant Request]
- 2. <u>Unconfined Particulate Emissions</u>: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

OPERATIONAL REQUIREMENTS

- 3. <u>Authorized Fuel</u>: Each unit is authorized to fire natural gas alone or in combination with other authorized fuels. When available, the Department strongly encourages the permittee to fire natural gas as a clean-burning alternative to fuel oil. *{Permitting Note: The maximum fuel sulfur content of pipeline natural gas is 10 grains of sulfur per 100 standard cubic feet of natural gas. However, pipeline natural gas typically contains less than 1 grain of sulfur per 100 SCF of natural gas.}* [Applicant Request; Rule 62-210.200(PTE), F.A.C.]
- 4. <u>Permitted Capacity</u>: When firing natural gas alone, the maximum heat input rate to each unit shall not exceed 5670 MMBtu per hour. When a blend of fuel oil and natural gas is fired, the maximum heat input to each unit shall not exceed 8650 MMBtu per hour. *Permitting Note: The heat input limitation has been placed in the permit to identify the capacity of each unit for the purposes of confirming that emissions*

A. UNITS 1 AND 2

testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.} [Applicant Request; Rule 62-210.200(PTE), F.A.C.]

5. <u>Hours of Operation</u>: The units may operate continuously on natural gas (8760 hours per year). [Rule 62-210.200(PTE), F.A.C.]

EMISSIONS LIMITING STANDARDS

{Permitting Note: The following standards apply to each emissions unit.}

- 6. Particulate Matter: When firing natural gas, emissions of particulate matter shall not exceed 0.1 pounds per million Btu heat input as determined by EPA Methods 5, 5B, 5F, or 17, incorporated by reference in Chapter 62-297, F.A.C. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change. [Rules 62-296.405(1)(b) and 62-210.700(3), F.A.C.]
- 7. <u>Nitrogen Oxides</u>: When firing natural gas, emissions of nitrogen oxides (NOx) shall not exceed 0.30 lb per million Btu. Compliance shall be demonstrated based on a 30-day rolling average as measured by the continuous emission monitoring system (CEMS). The CEMS must meet the performance specifications contained in 40 CFR 75. [Rule 62-296.405(1)(d), F.A.C.]
- 8. <u>Sulfur Dioxide</u>: The blending of natural gas shall not be used to demonstrate compliance with the sulfur dioxide standard for "liquid fuel" in Rule 62-296.405(c), F.A.C. [Rule 62-4.070(3), F.A.C]
- 9. <u>Visible Emissions</u>: When firing natural gas or co-firing natural gas in combination with other authorized fuels, visible emissions shall not exceed 40 percent opacity as determined by DEP Method 9 and incorporated by reference in Chapter 62-297, F.A.C. [Rule 62-296.405(1)(a), F.A.C.]

TESTING AND MONITORING

10. Test Methods: All required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments				
EPA 5, 5B, 5F, or 17	Determination of Particulate Matter Emissions from Stationary Sources The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method				
DEP 9	5 or 17. Visual Determination of the Opacity of Emissions from Stationary Sources				
EPA 10	Determination of Carbon Monoxide Emissions from Stationary Sources				
EPA 18	Measurement of Gaseous Organic Compound Emissions by Gas Chromatography {Note: EPA Method 18 may be used (optional) concurrently with EPA Method 25A to deduct emissions of methane and ethane from the measured VOC emissions.}				
EPA 25 or 25A	Determination of Volatile Organic Concentrations				

EPA methods are described in 40 CFR 60, Appendix A, and are adopted by reference in Rule 62-204.800, F.A.C. DEP Method 9 is specified in Rule 62-297.401, F.A.C. No other methods may be used for testing

A. UNITS 1 AND 2

- unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.100, F.A.C.; 40 CFR 60, Appendix A]
- 11. <u>Initial Compliance Tests</u>: When firing 100% natural gas, the permittee shall conduct initial compliance tests to determine the emissions of particulate matter and level of opacity from Units 1 and 2. Test results shall demonstrate compliance with the applicable standards. A transmissometer calibrated in accordance with Rule 62-297.520, F.A.C., may also be used to demonstrate compliance with the visible emissions standard. Initial tests shall be conducted within 60 days after completing shakedown for each unit, but not later than 180 days after first fire on natural gas. [Rule 62-296.405(1)(e)1, F.A.C.]
- 12. <u>Continuous Emissions Monitoring Systems</u>: The permittee shall use the existing Continuous Emissions Monitoring Systems (CEMS) to report emissions of nitrogen oxides (NOx) and sulfur dioxide (SO₂). Compliance with the standard for nitrogen oxides shall be demonstrated based on data collected by the NOx CEMS. The NOx and SO₂ CEMS shall meet the performance specifications contained in 40 CFR 75. [Rule 62-4.070(3), F.A.C.]
- 13. Natural Gas: The permittee shall install, operate, and maintain a system to continuously monitor and record the amount of natural gas consumption and heat input. This system shall be designed to interact with the existing continuous emissions monitors. [Rule 62-4.070(3), F.A.C.]
- 14. Tests for Reporting Annual Emissions: When firing natural gas, the permittee shall conduct initial performance tests to determine the emissions of carbon monoxide and volatile organic compounds from Units 1 and 2. Thereafter, annual tests for carbon monoxide shall be conducted for each unit in conjunction with the annual NOx RATA tests during each year the reports are required. These tests shall be used to document the emission rates of these pollutants for use in the reports required by Condition No. 18. [Rules 62-210.200(11)(d), 62-212.400(2)(d), and 62-297.100, F.A.C.]

NOTIFICATIONS

- 15. Construction Notifications: Within 15 days of beginning construction, the permittee shall notify the Compliance Authority that construction has commenced. Within 15 days of completing construction, the permittee shall notify the Compliance Authority that construction has concluded. Each notification shall include an updated proposed schedule of activities through the initial shakedown period and the firing of natural gas. [Rule 62-4.070(3), F.A.C.]
- 16. <u>Test Notifications</u>: At least 15 days prior to the date on which each required test is to begin, the permittee shall notify the Compliance Authority of the date, time, and place of each test. The notification shall also include the name and phone number of the contact person who will be responsible for coordinating and having the tests conducted. [Rule 62-4.297.310(7)(a)9, F.A.C.]

REPORTS

- 17. Emissions Performance Test Reports: A report indicating the results of any required emissions performance test shall be submitted to each Compliance Authority no later than 45 days after completion of the last test run. The test report shall provide sufficient detail on the tested emission unit and the procedures used to allow the Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8)(c), F.A.C. [Rule 62-297.310(8), F.A.C.]
- 18. <u>PSD Applicability Report</u>: Before August 1st of each year, the permittee shall submit a report to the Bureau of Air Regulation and the Compliance Authority summarizing actual annual emissions for the previous calendar year. The reports shall be used to verify the permittee's predictions of future representative actual annual emissions. The reports shall be submitted for five separate years that are representative of normal

A. UNITS 1 AND 2

post-change operations after completing construction of the natural gas project. The reports shall begin during the first year that natural gas is fired and continue for five years. Reports are subject to the following conditions.

a. The Department determines the "past actual emissions" for Units 1 and 2 as follows:

Pollutant	Past Actual Emissions Two-Year Average Tons per Year	Future Representative Actual Annual Emissions Calculation Methods
Carbon Monoxide (CO)	18,987	AOR (oil); Initial/Annual Performance Tests (gas)
Nitrogen Oxides (NOx)	8762	CEMS; Acid Rain Reporting
Particulate Matter (PM)	2384	AOR (oil); Initial Performance Test (gas)
Sulfur Dioxide (SO2)	31,753	CEMS; Acid Rain Reporting
Volatile Organic Compounds (VOC)	149	AOR (oil); Initial Performance Test (gas)

"Past actual annual emissions" are based on: the two-year average for operation during 2000 and 2001; annual CO, PM, and VOC emissions reported in the certified Annual Operating Reports submitted by the permittee; and data collected by the Continuous Emissions Monitoring Systems for NOx and SO2 emissions as indicated by the EPA Scorecard values for the Acid Rain Program. "Future actual annual emissions" shall be based on: actual annual fuel combustion (heat input) rates; initial tested emission rates for PM (gas) and VOC (gas); a series of annual tested emission rates for CO (gas); certified Annual Operating Report data for CO (oil), PM (oil), and VOC (oil); and data collected by the Continuous Emissions Monitoring Systems for NOx and SO2 emissions as indicated by the EPA Scorecard values for the Acid Rain Program. The calculation methodology shall remain consistent from year to year.

- b. In accordance with 40 CFR 52.21(b)(33)(ii), the permittee shall, "Exclude, in calculating any increase in emissions that results from the particular physical change or change in the method of operation at an electric utility steam generating unit, that portion of the unit's emissions following the change that could have been accommodated during the representative baseline period and is attributable to an increase in projected capacity utilization at the unit that is unrelated to the particular change, including any increased utilization due to the rate of electricity demand growth for the utility system as a whole." The permittee shall identify and quantify the excluded emissions and present a justification for the exclusion.
- c. Each report shall compare the actual emissions for the given year with the past actual annual emissions as described above. If the difference between the current actual annual emissions and the past actual annual emissions defined above is greater than the PSD significant emission rates defined in Table 212.400-2 of Chapter 62-212, F.A.C., then Units 1 and 2 shall be subject to a full PSD review at that time. This review shall include a determination of the Best Available Control Technology (BACT) for each PSD-significant pollutant.

[Rules 62-204.800, 62-210.200(11) and 62-212.400, F.A.C.; 40 CFR 52.21(b)(33)(ii)]

SECTION IV. APPENDICES

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Appendix GC. General Conditions
Appendix SC. Standard Conditions

SECTION IV. APPENDIX CF

CITATION FORMAT

The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.

REFERENCES TO PREVIOUS PERMITTING ACTIONS

Old Permit Numbers

Example: Permit No. AC50-123456 or Air Permit No. AO50-123456

Where: "AC" identifies the permit as an Air Construction Permit

"AO" identifies the permit as an Air Operation Permit "123456" identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: "099" represents the specific county ID number in which the project is located

"2222" represents the specific facility ID number

"001" identifies the specific permit project

"AC" identifies the permit as an air construction permit

"AF" identifies the permit as a minor federally enforceable state operation permit

"AO" identifies the permit as a minor source air operation permit

"AV" identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: "PSD" means issued pursuant to the Prevention of Significant Deterioration of Air Quality

"FL" means that the permit was issued by the State of Florida

"317" identifies the specific permit project

RULE CITATION FORMATS

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CRF 60.7]

Means: Title 40, Part 60, Section 7

SECTION IV. APPENDIX GC

GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

- 1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- 2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- 3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- 4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- 5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- 6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- 7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- 8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

SECTION IV. APPENDIX GC

GENERAL CONDITIONS

Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

- 10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- 11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- 12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
- 13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (NA);
 - b. Determination of Prevention of Significant Deterioration (NA); and
 - c. Compliance with New Source Performance Standards (NA).
- 14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
- 15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION IV. APPENDIX SC

STANDARD CONDITIONS

{Permitting Note: The following conditions apply to all emissions units and activities at this facility.}

EMISSIONS AND CONTROLS

- 1. Plant Operation Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
- 2. <u>Circumvention</u>: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
- 3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit 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. [Rule 62-210.700(1), F.A.C.]
- 4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
- 5. Excess Emissions Notification: In case of excess emissions resulting from malfunctions, the permitee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
- 6. <u>VOC or OS Emissions</u>: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
- 7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and62-210.200(203), F.A.C.]
- 8. General Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. [Rule 62-296.320(4)(b)1, F.A.C.]
- 9. <u>Unconfined Particulate Emissions</u>: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

10. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]

SECTION IV. APPENDIX SC

STANDARD CONDITIONS

- 11. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]
- 12. <u>Calculation of Emission Rate</u>: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
- 13. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
 - a. Required Sampling Time. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
 - b. Minimum Sample Volume. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
 - c. Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

[Rule 62-297.310(4), F.A.C.]

14. Determination of Process Variables

- a. Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- b. Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

- 15. <u>Sampling Facilities</u>: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.
- 16. <u>Test Notification</u>: The owner or operator shall notify the Department, 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 or operator. [Rule 62-297.310(7)(a)9, F.A.C.]
- 17. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]
- 18. <u>Test Reports</u>: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide

SECTION IV. APPENDIX SC

STANDARD CONDITIONS

sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

- 1. The type, location, and designation of the emissions unit tested.
- 2. The facility at which the emissions unit is located.
- 3. The owner or operator of the emissions unit.
- 4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
- 5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
- 6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
- 7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
- 8. The date, starting time and duration of each sampling run.
- 9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
- 10. The number of points sampled and configuration and location of the sampling plane.
- 11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
- 12. The type, manufacturer and configuration of the sampling equipment used.
- 13. Data related to the required calibration of the test equipment.
- 14. Data on the identification, processing and weights of all filters used.
- 15. Data on the types and amounts of any chemical solutions used.
- 16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
- 17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
- 18. All measured and calculated data required to be determined by each applicable test procedure for each run.
- 19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
- 20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
- 21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

RECORDS AND REPORTS

- 19. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
- 20. <u>Annual Operating Report</u>: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

SENDER: COMPLETE THIS SECTION COMPLETE THIS SECTION ON DELIVERY A Received by (Please Print Clearly) B. Date of Delivery ■ 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. ☐ Agent X NCVA Attach this card to the back of the mailpiece, Addressee or on the front if space permits. D. Is delivery address different from item 1? ☐ Yes 1. Article Addressed to: If YES, enter delivery address below: Mr. Dan Kumarich President Pollution Manatee Citizens Against P. O. **B**ox 660 3. Service Type Certified Mail Registered Parrish, FL 34219 ☐ Express Mail ☐ Return Receipt for Merchandise

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