Florida Department of Environmental Protection

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

Jeb Bush
Governor

David Struhs
Secretary

FAX TRANSMITTAL SHEET

DATE: 4/29/02

TO: Clarence Troxell

PHONE: _____ **FAX:** _____

FROM: A. Linero **PHONE:** _____

Division of Air Resources Management **FAX:** **850.922.6979**

RE: FPL Manatee

CC: _____

Total number of pages including cover sheet: 5

Message

Mr Troxell. Here is your publiz records request on FPL Manatee Unit 1+2 Gas Project We have no application yet. As you requested, we will add your name or your group's name to correspondence we send out on this project. A. Linero

If there are any problems with this fax transmittal, please call the above phone number.

DRAFT

Draft

April 23, 2002

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

RE: Manatee Plant – Title V Permit No. 0810010-001-AV
Addition of Natural Gas as a Permitted Fuel

Dear Mr. Linero:

A new natural gas pipeline is currently being constructed near Florida Power & Light Company's (FPL's) Manatee Plant. We therefore have the opportunity to add natural gas as a fuel for the two existing 800-megawatt (nominal) units. While these units, which commenced operation in 1976-1977, burn No. 6 residual fuel oil (with a maximum sulfur content of 1 percent) exclusively, they are capable of firing natural gas. With natural gas' lower emission rates, the addition of gas as a fuel for these units would be environmentally beneficial, as set forth more fully below. Because we do not project that our annual emissions will increase as a result of the addition of natural gas, we would like to pursue a revision to our Title V permit to include natural gas. With this letter, we are seeking the Department's concurrence in that approach and requesting that the Title V permit be revised accordingly.

Physical or Operational Change—We understand that the Department considers the addition of a new fuel to be a physical or operational change. Such a change would constitute a "modification" and require a construction permit only if it would cause a net emissions increase (and is not otherwise exempt). A net emissions increase for existing electric utility units is determined based on a comparison of recent past actual annual emissions and future projected or "representative actual" annual emissions. For the reasons discussed below, we project that the addition of gas would not cause a net emissions increase at the Manatee Plant, and it would therefore not be considered a modification.

Short-Term Rates—As you would expect, the short-term emission rates are lower for all of the following pollutants while firing natural gas than while firing fuel oil, in both pounds per hour and pounds per million British thermal units (lb/mmBtu), as shown in the following table.

Manatee Units 1 and 2 **Short-Term Emission Rate Comparison**[1] *Pounds Per Hour* *Pounds Per Million Btu*		
Pollutant	**Fuel Oil**	**Natural Gas**
Sulfur Dioxide	9,183 1.06	3 0.0006
Particulate Matter (PM/PM10)	719 0.08	10 0.002
Nitrogen Oxides	2,545 0.29	1,152 0.20
Carbon Monoxide	5,450 0.63	2,608 0.46
Volatile Organic Compounds	44 0.005	17 0.003

In addition to these regulated air pollutants, the emissions of carbon dioxide are also lower while firing natural gas than while firing fuel oil, which is environmentally beneficial.

Furthermore, to the extent that natural gas is co-fired with fuel oil, the emissions would be reduced in proportion to the ratio of gas to oil, and thus co-firing is also an environmentally beneficial method of operation.

Capacity Factor—Regardless of whether natural gas is added as a potential fuel for the existing Manatee units, the FPL resource planning group's projections indicate that the annual utilization rate of the units is expected to stay within the same range over the next five years as it has experienced within the past five years (a capacity factor of approximately 20 to 40 percent). The addition of natural gas will not cause the units' utilization rate to increase, and we project that the annual capacity factor for the units in the future will not exceed the recent two-year average for 2000 and 2001.

Annual Emissions—Because the short-term rates are lower while firing natural gas than while firing fuel oil, only an increase in utilization should cause an increase in annual emissions. To provide the Department with assurances that the addition of natural gas does not cause an increase in actual annual emissions, we will provide the Department with annual utilization data for a period of five years following the addition of natural gas at Manatee Units 1 and 2 (calendar years 2003-2007). This approach was suggested by the U.S. Environmental Protection Agency several years ago, when the definition of representative actual annual emissions was first promulgated. See 57 Fed. Reg. 32314, 32325 (July 21, 1992). If the annual utilization data were to indicate an increase in utilization compared to the baseline period (2000-2001), we would then provide the Department with emissions data and other supplemental information, as appropriate, to demonstrate whether the use of natural gas caused an annual emissions increase.

[1] The basis for these short-term emission rates is set forth in Attachment A.

Title V Permit Amendment—We respectfully request that the Department amend the Manatee Plant's Title V permit to authorize the use of natural gas as a fuel for Units 1 and 2. The appropriate pages from the Title V permit application are provided as Attachment "B," along with a Professional Engineer's certificate and the Responsible Official's certificate.

Thank you for consideration of our request. Because we would like to take advantage of an upcoming outage to accomplish the natural gas addition at Manatee Units 1 and 2, we would appreciate the Department's prompt processing of the attached application for permit amendment. If you have any questions, need any additional information, or would like to schedule a meeting to discuss this matter, please contact me at (941) 776-5211.

Sincerely,

Paul Plotkin
Manatee Plant General Manager

cc: Jerry Kissel, Southwest District Office, DEP
Tom Murray, Manatee County Air Quality Management Division

ATTACHMENT "A"

The short-term emission rates are based upon the following:

Fuel Oil Data

- The SO_2, NO_x, and CO_2 emission rates are EPA Scorecard values, which are CEM based. The Scorecard values are calculated from hourly CEM heat input and hourly CEM emissions data for each of the three pollutants.
- Particulate Matter and Volatile Organic Compounds emission rates are based on EPA AP-42 Emission Factors.
- CO emission rate is based on emissions test data.
- Full load heat input for oil is 8650 MMBtu/hr.

Natural Gas Data

Because natural gas has yet to be fired in these boilers;

- AP-42 emission factors were used to calculate the emission rate for SO_2, Particulate Matter, and Volatile Organic Compounds.
- NO_x data is based upon the burner manufacturer's predicted performance.
- Carbon monoxide data is based upon the burner manufacturer's predicted performance.
- Full load heat input for gas is 5670 MMBtu/hr.

HERE'S THE FAX!!!

TO: Al Linero

COMPANY: DEP

FAX #: 1-850-922-6979

FROM: Clarence

DATE: 6/25/02

OF PAGES INCLUDING COVER SHEET: 5

COMMENTS:

Clarence

IF ALL PAGES ARE NOT RECEIVED, PLEASE CONTACT CLARENCE TROXELL AS SOON AS POSSIBLE:

FAX NUMBER: (941) 776-2047

THE FLORIDA POWER AND LIGHT

POWER PLANT – PARRISH, FL

PRESENTED BY CLARENCE G. TROXELL

APRIL 24, 2002

THE FLORIDA POWER AND LIGHT POWER PLANT – PARRISH, FL

During the 1990's Florida Power and Light (FPL) vehemently and unabashedly endeavored to increase the amount of air pollution at the FPL Power plant in Parrish (Manatee County). FPL did not succeed in their attempt to bring Orimulsion into the area. Remember, Orimulsion was that manufactured fuel from Venezuela dubbed, "the dirtiest fuel in the world." FPL introduced us to this fuel in May, 1993. It is cheap! FPL did not spare the horses. FPL spent millions of dollars in a massive lobbying effort and lost.

FPL got the Florida Department of Environmental Protection (FDEP) to approve the burning of Orimulsion. Because of the perseverance of many individuals, environmental groups, a few elected officials and the terrific universal opposition of the news media, Orimulsion was defeated. Now the time has come whereby a similar effort must be made again, this time to reduce stack pollution at the Manatee plant. It's time to clean up this situation!

We've been in contact with the Selective Catalytic Reduction (SCR) Committee of the Institute of Clean Air Companies, Inc. (ICAC) located in Washington, DC. There are approximately fifty (50) members including well-recognized names as: Englehard, Corning, Siemens, 3M, Babcox and Wilcox, and Entropy. Entropy performed the Orimulsion tests for FPL at their Sanford plant. Yet, FPL did nothing about the use of selective catalytic reduction (SCR) control of NOx emissions at the Manatee Power Plant.

As of 1994, over 500 sources have used SCRs worldwide. In their 1994 paper, ICAC states:

> "Perceived high cost has been an impediment to the adoption of SCR in the U.S. Given a large and growing installed base and the increasing tendency of owners and operators of regulated units to choose SCR, authorities with extensive NOx control experience have concluded that SCR technology is proven, safe, and economical now." and "emissions reductions of greater than 90% are common with SCR, although this technology may be used economically for lower removal efficiencies as well."

At the February, 2002 meeting of the Parish Civic Association, the representative of FPL stated that control equipment does 'not earn money.'

It is our understanding that every teacher in the Manatee County school system has a list of students who have a chronic ailment. The list includes asthmatics. It does not include all asthmatics; only those names submitted by the parents. There are others. And, there are the elderly who are prone to respiratory ailments.

If the amount of NOx in the atmosphere can be reduced to alleviate the problem, isn't that worthwhile or must we protect FPL's profits before we consider public health?

When FPL brought Orimulsion into the picture in 1993, the NOx emissions at the Manatee plant were 7,318 tons per year (tpy). FPL told us that figure would become 17,000 tpy and, that according to government regulations that figure could be raised to 22,000 tpy. Obviously, that initiated a lot of opposition. Thankfully, Orimulsion failed. But, FPL has told us in the year 2001 the NOx emissions at the Manatee plant were 9,143 tons. Cause: their system load went up. I'm glad! FPL is in business to make a buck. But, does that mean that they must squeeze out every penny for profit at the detriment to the health of our citizens. I hope not!

At issue today is the EPA's so-called "new source review" regulations. This is meant primarily for old coal-fired plants. The industry is referring to this as grandfathered, i.e. exempt from the "new source review." And, FPL is saying the same thing for the old oil-fired plants. During a siting procedure, it is our understanding that the "public good" can be taken into account in rendering a decision not just the legal aspects.

In a report by the Florida Gas Transmission Company in the late 90's, it is stated that converting from oil to natural gas at the Fort Meyers station will reduce the amount of NOx by 96.4 percent and the amount of SO_2 by 99.9 percent. It can be done; let's hear it for Manatee. There's no reason not to install proper control equipment. As ICAC states in the last paragraph of their November 1997 report:

"Finally, suppliers are using financial innovations to help users of SCR. One potential impediment to installation of an SCR system is the requirement that

the user commit capital funds. Suppliers are now offering to provide SCR through a build-own operate-maintain (BOOM) program. In BOOM, the supplier finances, owns, and operates the SCR system, thus avoiding a capital expenditure by the user. The user of the SCR system merely pays an annual fee for NOx control, thus converting a capital cost to an operating cost."

It's time. The Florida Power and Light plant in Manatee should be shut down and the proper control equipment be installed. When this equipment is installed, only then should the plant be reopened.

If we can't get anybody's attention now, then we must do it at the ballot box. That's been done before and successfully. It is suggested that you write to:

Governor Jeb Bush
The Capitol
Tallahassee, FL 32399-0001
Phone: 1-850-458-4441
E-mail: jeb@jeb.org

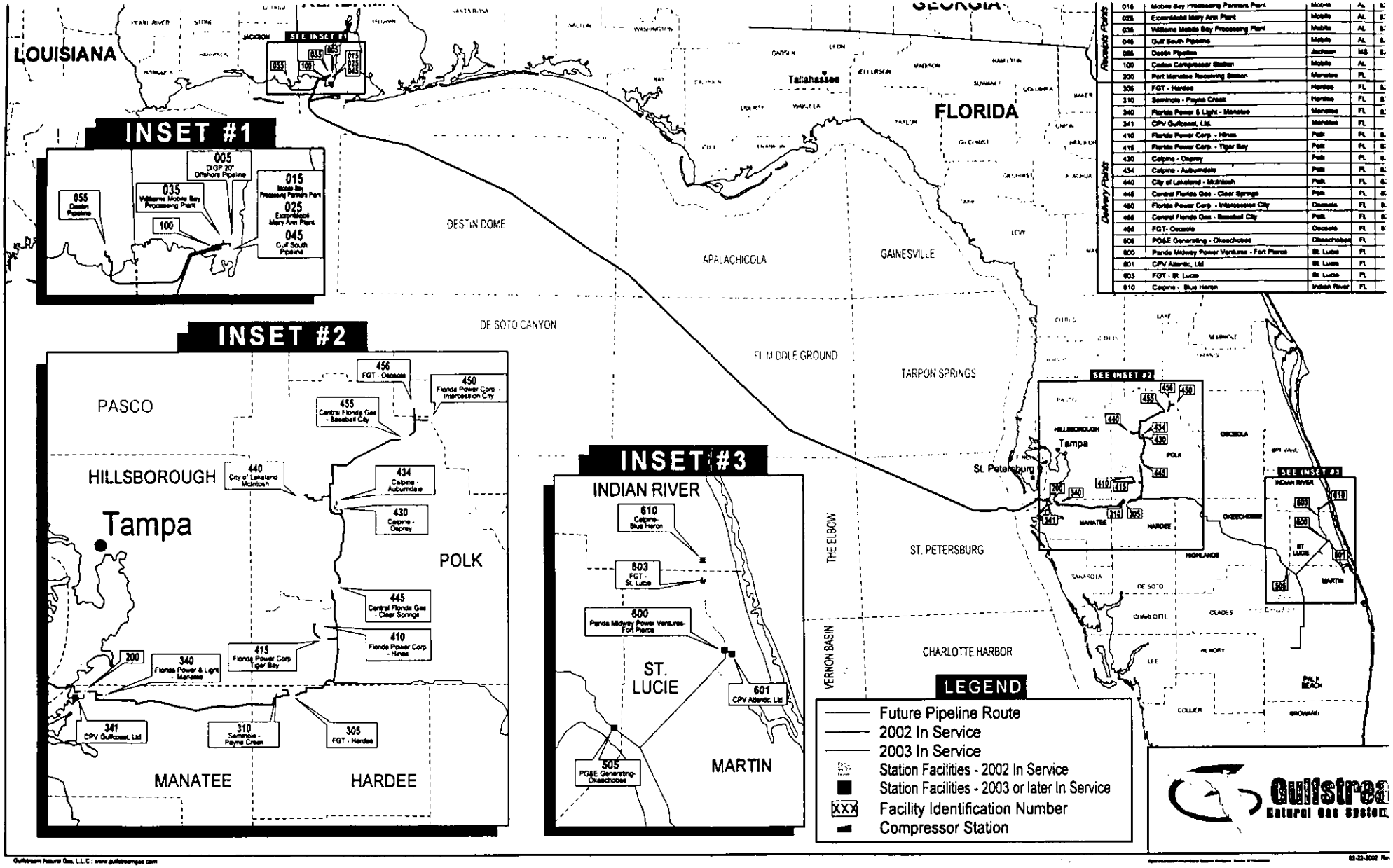
Letting the governor, candidates, and office holders know how you feel is most important.

Clarence G. Troxell

Clarence G. Troxell
3321 Lakeside Circle
Parrish, FL 34219
Phone: (941) 776-2047
E-mail elihu46fl@aol.com

Author's Credentials

B. of Eng.-Yale University
M.S. – Stevens Institute of Technology
Worked for Public Service E&G (New Jersey) for 40 years
Member of Manatee County Republican Executive Committee
Co-founder of Manatee County Citizen's Against Pollution (MCAP)
Past President – Federation of Manatee County Associations


LOUISIANA
FLORIDA
GEORGIA
Tallahassee
GAINESVILLE
APALACHICOLA
OESTIN DOME
DE SOTO CANYON
FT. MIDDLE GROUND
TARPON SPRINGS
ST. PETERSBURG
CHARLOTTE HARBOR
THE ELBOW
VERNON BASIN
SEE INSET #1
SEE INSET #2
SEE INSET #3
INSET #1
005 DKGP 20" Offshore Pipeline
015 Mobile Bay Processing Partners Plant
025 Escambia Mary Ann Plant
035 Williams Mobile Bay Processing Plant
045 Gulf South Pipeline
055 Destin Pipeline
100
INSET #2
PASCO
HILLSBOROUGH
Tampa
POLK
MANATEE
HARDEE
440 City of Lakeland - McIntosh
456 FGT - Osceola
450 Florida Power Corp - Intercession City
455 Central Florida Gas - Baseball City
434 Calpine - Auburndale
430 Calpine - Osprey
445 Central Florida Gas - Clear Springs
410 Florida Power Corp - Hines
415 Florida Power Corp - Tiger Bay
200
340 Florida Power & Light - Manatee
341 CPV Gulfcoast, Ltd
310 Seminole - Payne Creek
305 FGT - Hardee
INSET #3
INDIAN RIVER
ST. LUCIE
MARTIN
610 Calpine - Blue Heron
603 FGT - St. Lucie
600 Panda Midway Power Ventures - Fort Pierce
601 CPV Atlantic, Ltd
505 PG&E Generating - Okeechobee
Receipt Points
Delivery Points
016 Mobile Bay Processing Partners Plant Mobile AL
025 Escambia Mary Ann Plant Mobile AL
035 Williams Mobile Bay Processing Plant Mobile AL
045 Gulf South Pipeline Mobile AL
055 Destin Pipeline Jackson MS
100 Calpine Compressor Station Mobile AL
200 Port Manatee Receiving Station Manatee FL
305 FGT - Hardee Hardee FL
310 Seminole - Payne Creek Hardee FL
340 Florida Power & Light - Manatee Manatee FL
341 CPV Gulfcoast, Ltd. Manatee FL
410 Florida Power Corp. - Hines Polk FL
415 Florida Power Corp. - Tiger Bay Polk FL
430 Calpine - Osprey Polk FL
434 Calpine - Auburndale Polk FL
440 City of Lakeland - McIntosh Polk FL
445 Central Florida Gas - Clear Springs Polk FL
450 Florida Power Corp. - Intercession City Osceola FL
455 Central Florida Gas - Baseball City Polk FL
456 FGT- Osceola Osceola FL
505 PG&E Generating - Okeechobee Okeechobee FL
600 Panda Midway Power Ventures - Fort Pierce St. Lucie FL
601 CPV Atlantic, Ltd St. Lucie FL
603 FGT - St. Lucie St. Lucie FL
610 Calpine - Blue Heron Indian River FL
LEGEND
Future Pipeline Route
2002 In Service
2003 In Service
Station Facilities - 2002 In Service
Station Facilities - 2003 or later In Service
XXX Facility Identification Number
Compressor Station
Gulfstream
Natural Gas System

AOR Data (ARMS Ad Hoc Report)

SITE NAME	MANATEE POWER PLANT

Sum of ACT EMIS SUM		YEAR						
EU	POLLUTANT (TPY)	1995	1996	1997	1998	1999	2000	2001
Unit 1	NOX	2,448	2,550	2,977	3,957	3,368	3,845	5,459
Unit 2	NOX	3,152	2,364	2,930	4,589	4,455	4,289	4,881
TOTAL	NOX	5,600	4,914	5,907	8,547	7,823	8,134	10,340
Unit 1	SO2	8,191	8,646	9,999	12,095	10,910	12,455	17,685
Unit 2	SO2	10,533	8,005	9,858	14,027	14,430	13,896	15,812
TOTAL	SO2	18,724	16,651	19,857	26,121	25,340	26,351	33,497

Acid Rain Program Data

Unit 1	HEAT INPUT (MMBTU)	20,537,433	19,115,489	21,733,888	32,077,990	27,853,349	26,557,013	34,369,487
Unit 2	HEAT INPUT (MMBTU)	27,442,247	18,657,711	21,570,307	32,224,654	30,768,019	27,890,397	30,823,660

Chart 1. FPL Manatee Heat Input (mmBtu/yr)
EPA Acid Rain Program Data

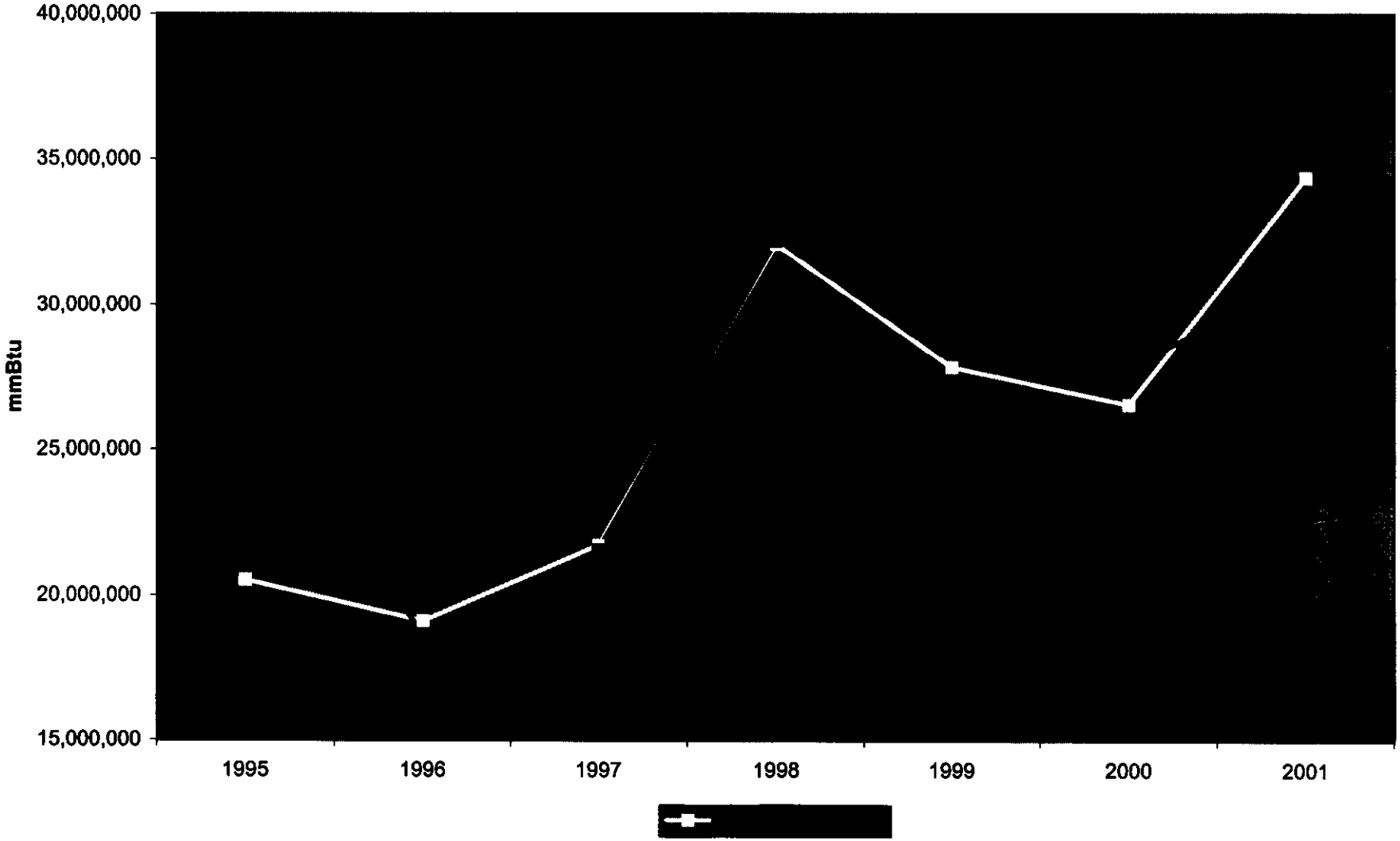


Chart 2. FPL Manatee Normalized Emissions (lb/mmBtu by Unit)

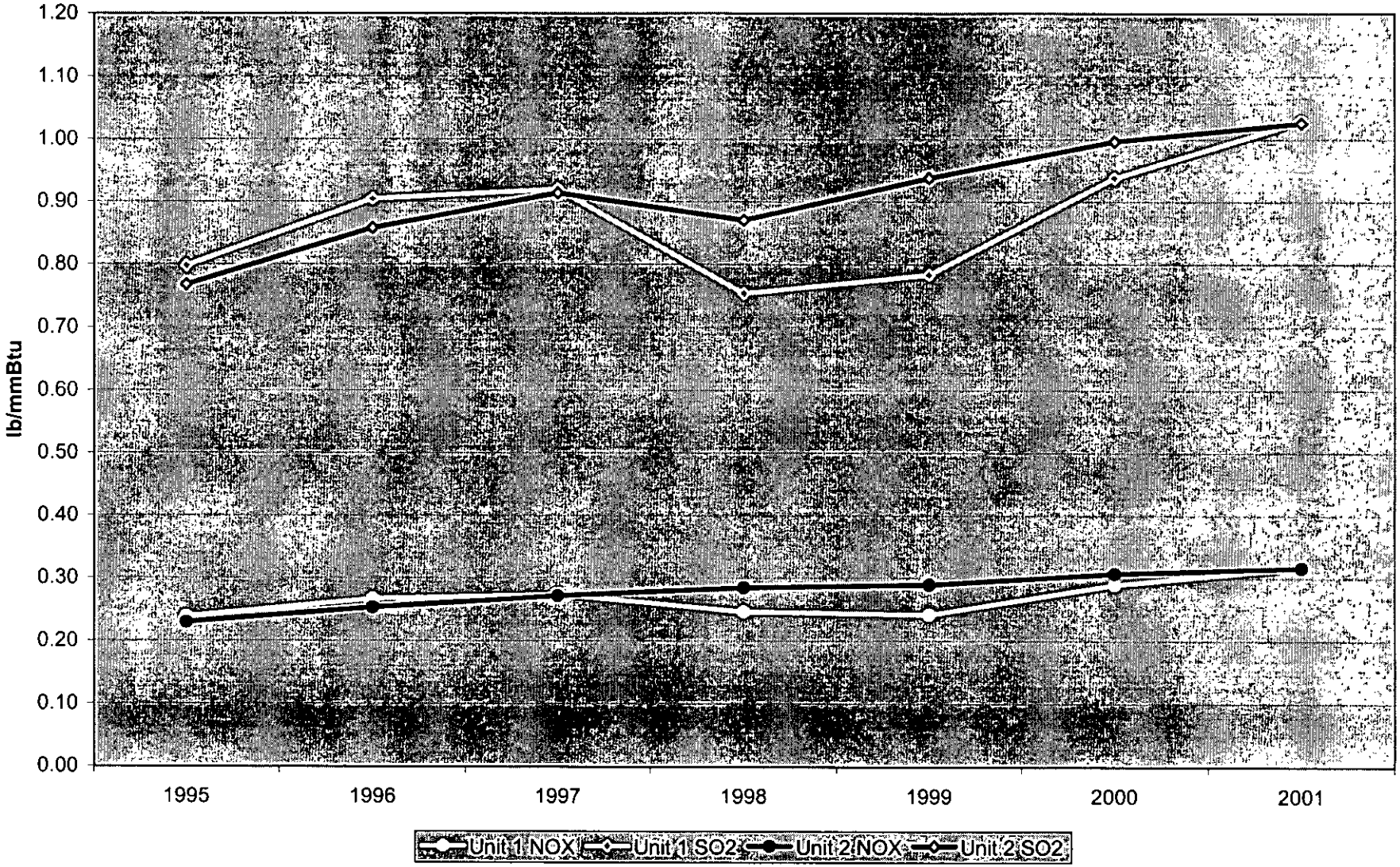


Chart 3. FPL Manatee Emissions (TPY by Unit)

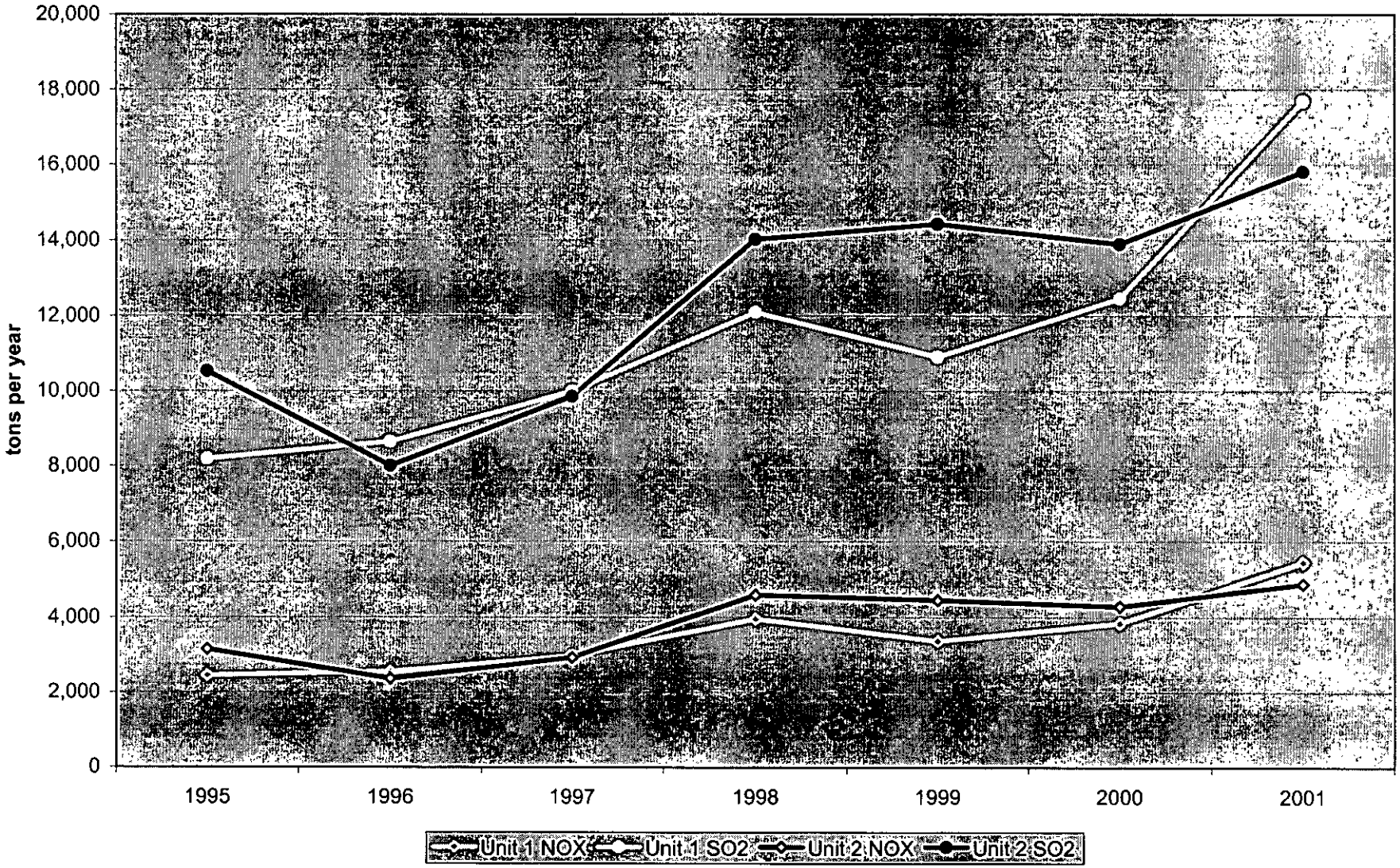
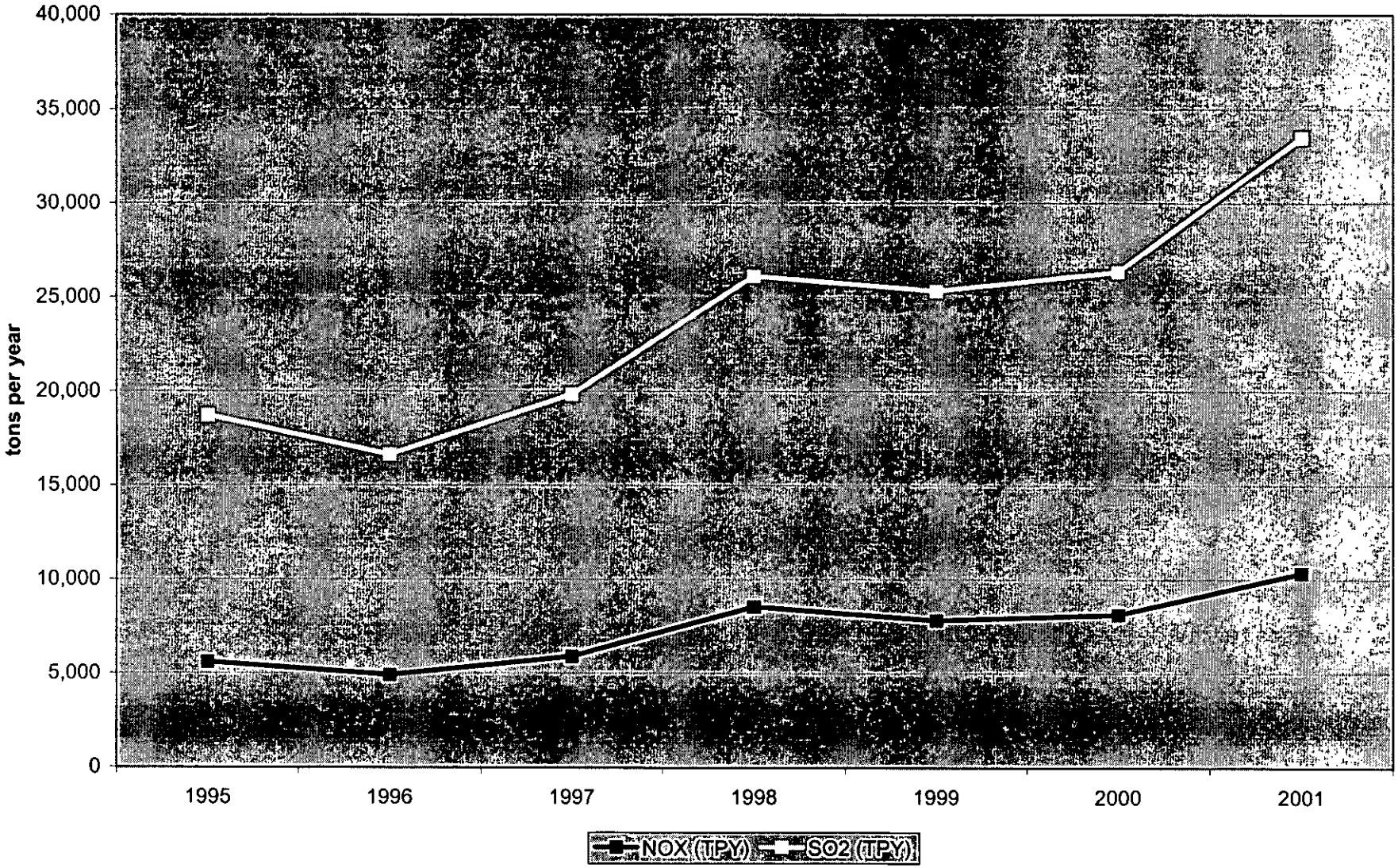
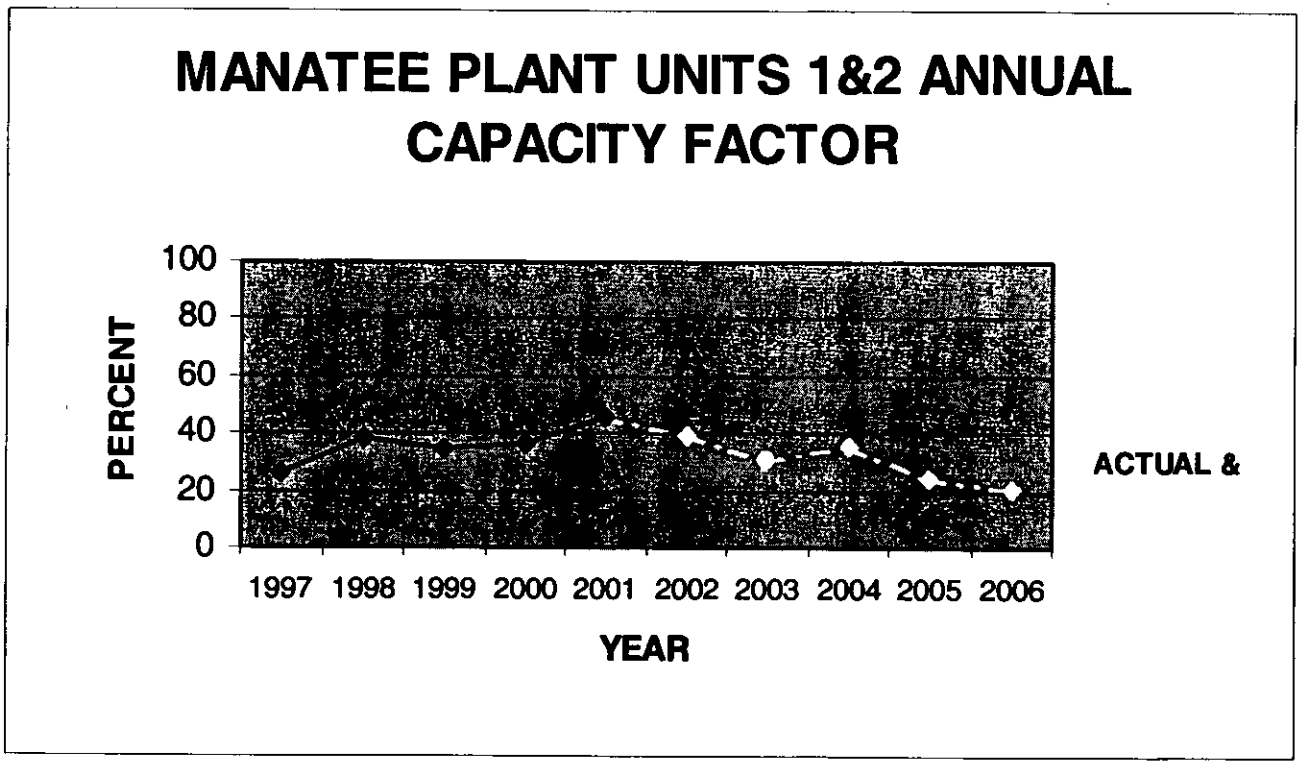


Chart 4. FPL Manatee Emissions (TPY)



System Planning Projected Load Forecast



Our Proposal to Expand Manatee Plant

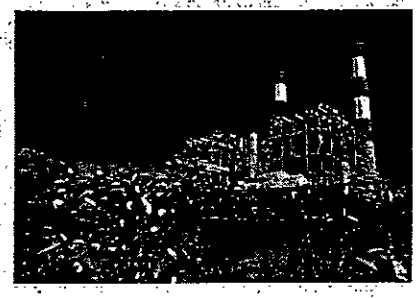
Helping to Meet Customer & Community Needs

Sharing and Learning

- Provide description of the current site
- Share information on the proposal
- Explain community research
- Share our plans for outreach and dialogue.
- Seek your comments and suggestions.

Safe, Reliable Operation

- Providing service for more than 25 years
- 9,500-acre site with 2 oil-fired units, providing 1,600 megawatts
- Site designed for more generation
- Area's growth -- faster than the rest of Florida



FPL

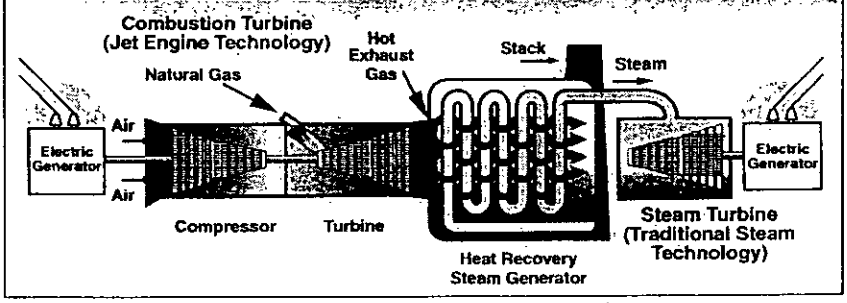
Adding New Technology

- Build Manatee Unit 3
- Use natural gas in very efficient combined cycle technology
- Gas supply now available
- Serve 235,000 more customers systemwide with 1,100 megawatts

FPL

Adding New Technology

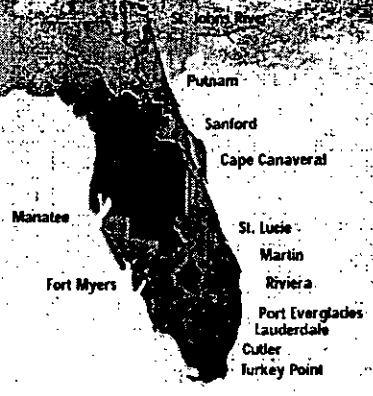
How does a combined-cycle power plant work?



FPL

Benefits of Proposed Expansion

- Increased efficiency
- Use of an existing site
- Improved system back-up, self-sufficiency
- Additional tax revenues



FPL

Environmental Interests

Air Quality

Clean-burning natural gas

- Design, controls to minimize emissions
- Clean Air Act standards to be met

FPL

Environmental Interests

Water Use

- Continued commitment to protect water resources
- Current water use permit can meet needs of Unit 3
- Proposal to reduce rate of water withdrawals

FPL

Another Plant Opportunity – Natural Gas Option for Existing Units

- Proposing to use both natural gas and oil at Manatee Units 1 & 2
- A separate plant initiative
- Benefits
  - -- Strengthens our fuel diversity position
  - -- Can improve environmental performance to the extent that gas is used

FPL

Existing Units' Operation

- Use of gas will depend on energy demands, costs & fuel availability
- Expect to operate somewhat less than in the past
- Continued operation remains important

FPL

What's Involved?

- Must prove need
- Must earn construction, operating permits
- Will continue community dialogue
- Expect construction in 2003; startup in 2005

FPL

What We're Hearing

- Improve our communication
- Listen, be open to comments and suggestions
- Address people's interests, such as protecting air quality
- Share information on community benefits of the expansion

FPL

How We're Responding

- Asking for your views, advice
- Preparing comprehensive information
- Evaluating ways to contribute
- Inviting people to see our facilities
- Open House May 18

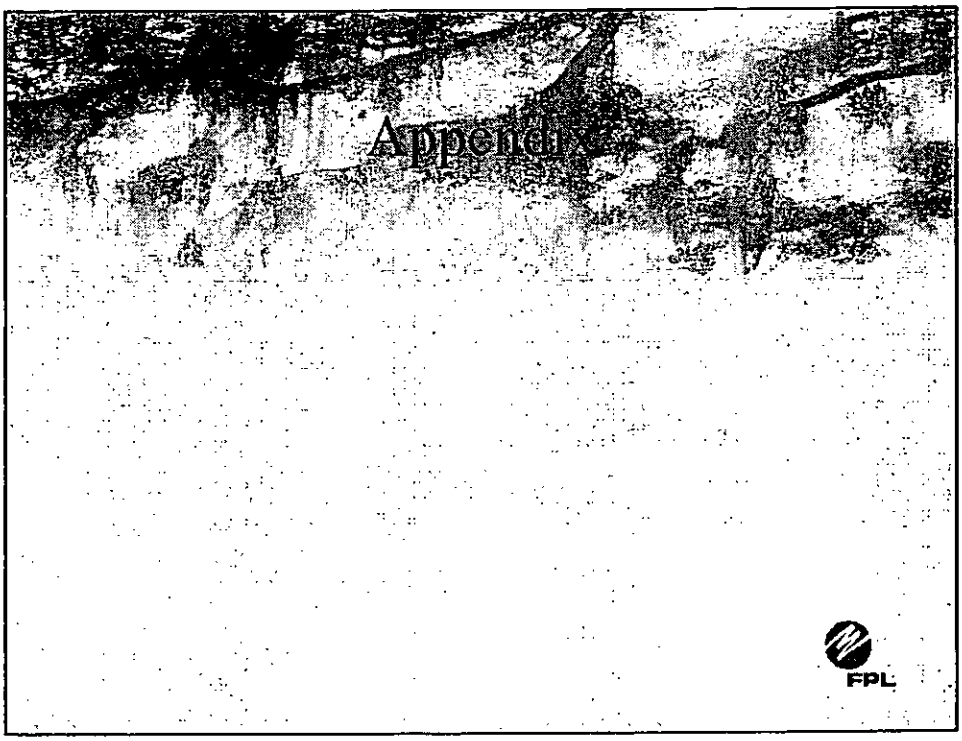
FPL

What Is Important to Know?

- As we go forward:
  - What are your interests and priorities for this proposal?
  - What do we need to make sure we do or don't do?
  - What's important when it comes to communicating well?
  - What else?

FPL

Appendix

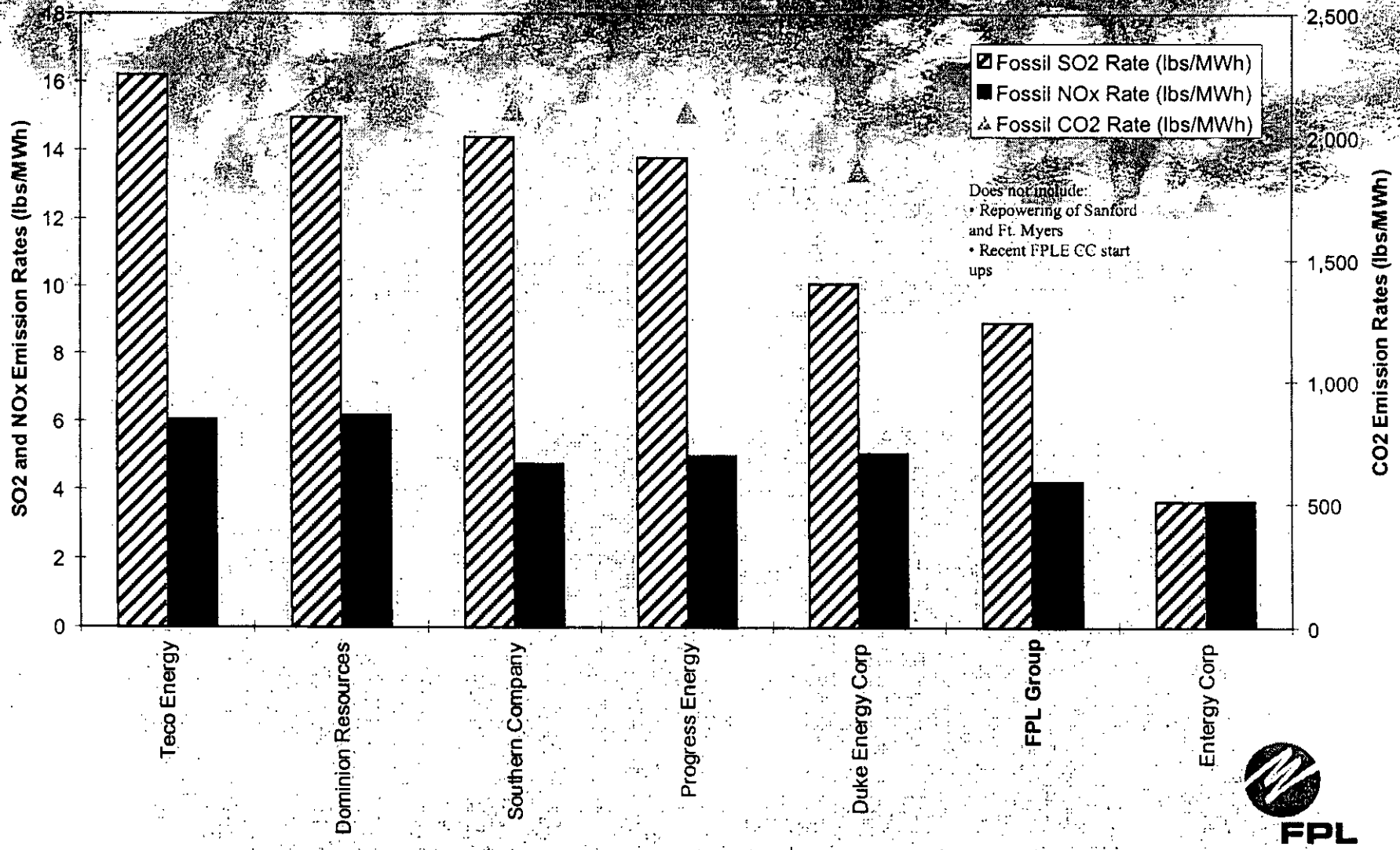


Environmental Record

- FPL's rate of emissions of sulfur dioxide, nitrogen oxide and carbon dioxide are significantly below the national and state averages and put FPL among the lowest emitters in the industry.
- Within the past 10 years, FPL-operated power plants have reduced the emission rate of sulfur dioxide by 28% and nitrogen oxide by 41%.
- Since installing new Low NOx burners at Manatee, we have reduced opacity, nitrogen oxide and carbon monoxide emissions, as well as water use.
- The installation of the site's cooling pond seepage recovery system has eliminated 6 tons of nitrogen from discharging into Tampa Bay annually.

Regional Competitors Fossil Emission Rates

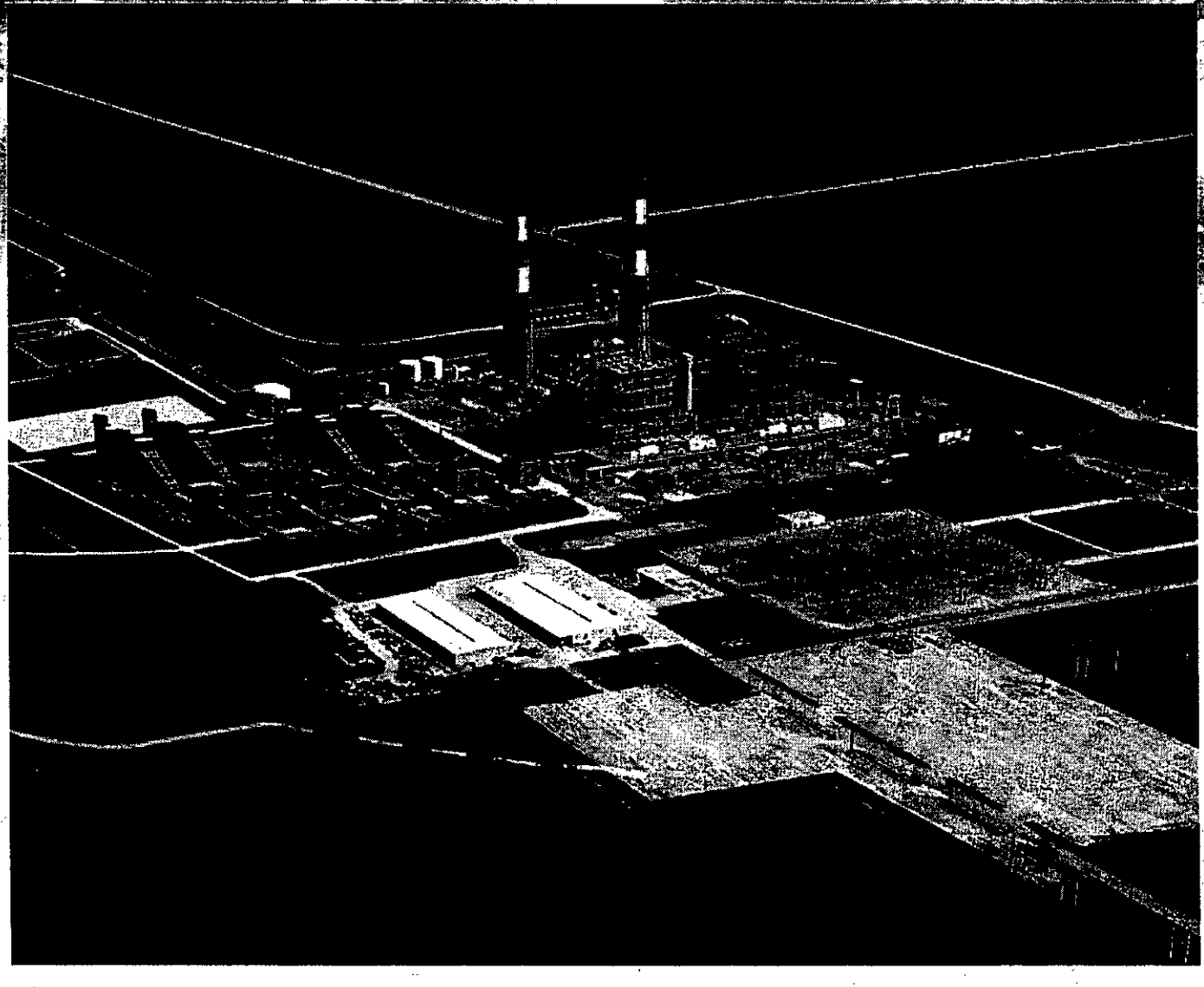
(1998-2000)



FPL

Management Plan

Rendering



Department of Environmental Protection

Jeb Bush
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

November 15, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mary J. Archer, QEP
Environmental Services Department
Florida Power & Light Company
P.O. Box 14000
Juno Beach, FL 33408

Re: FPL – Manatee Plant
Project: Burner Replacement for Units 1 and 2
DEP File No. 0810010-005-AC
ARMS ID No. 0810010, Emissions Units 001 and 002

Dear Ms. Archer:

This letter responds to the emissions summary report (dated September 10, 2001) provided by William Yeager, the Manatee Plant General Manager.

Background

In a letter date December 21, 1999, the Department authorized the replacement of the existing steam-atomizing burners for Units 1 and 2 with mechanical-atomizing burners (Model CSL Twin Register Low NOx Burner manufactured by ABB Combustion Services Ltd). The authorization was based on the specific information provided by FPL and did not recognize any change to accommodate fuels not currently authorized by permit. At that time, FPL indicated that the project would not result in increased emissions and FPL expected the following:

- A decrease in NOx emissions due to the air and fuel staging design of the low NOx burners;
- A decrease in CO emissions due to more complete combustion resulting from better fuel atomization;
- Perhaps a slight decrease in particulate matter emissions due to more efficient combustion; and
- A reduction of 30 to 37 million gallons of water per year (currently needed for steam atomization).

To provide reasonable assurance that no emissions increases occurred as a result of this project, the Department required emissions reporting based on stack testing (carbon monoxide emissions and particulate matter), CEMS data (nitrogen oxides), and COMS data (opacity). FPL submitted the report dated September 10, 2001 to satisfy this reporting requirement.

Comments and Questions

I have reviewed the report and offer the following summary table for discussion:

Table A. Summary of Emissions Data for Unit 1

Pollutants	FPL Test Report	Permit Limit	2000 AOR Report	2001 Acid Rain Data
Carbon Monoxide	0.567 (549 ppm)	NA	0.64 lb/MMBtu	ND
Nitrogen Oxides	0.30 lb/MMBtu	0.30 lb/MMBtu	0.30	0.25 lb/MMBtu
Opacity	17%	40%	ND	ND
Particulate Matter	0.06 lb/MMBtu	0.1 lb/MMBtu	0.08	ND
Sulfur Dioxide	ND	1.08 lb/MMBtu (≤ 1.0% S by wt.)	1.00 lb/MMBtu (0.97% S by wt.)	1.06 lb/MMBtu
Volatile Organic Compounds	ND	ND	0.005 lb/MMBtu (≈ 62 tons per year)	ND

The FPL stack test report indicated that the average heat input for the three test runs was 7582 MMBtu per hour. This is below the requirement to perform testing at 90% of the permitted maximum heat input of 8650 MMBtu per hour, which would be at least 7785 MMBtu per hour. Also, the NOx emissions rate appears higher than that expected with the low-NOx burner. Please comment and provide NOx CEMS data for a 1-month period indicating each 30-day rolling average. If you have any questions, please contact me at 850/921-9536.

Sincerely,

Jeffery F. Koerner
New Source Review Section

AAL/jfk

cc: Ms. Mary Archer, FPL
Mr. William Yeager, FPL Manatee Plant
Mr. Joe Cox, Southwest District Office DEP
Manatee County, Air Quality Management Division

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:

Mary J. Archer, QEP
Environmental Services Department
Florida Power & Light Company
PO Box 14000
Juno Beach, FL 33408

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* — B. Date of Delivery

C. Signature

X

☐ Agent
☐ Addressee

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

NOV 1

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

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

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PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

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Sent To Mary J. Archer
Street, Apt. No.; or PO Box No. PO Box 14000
City, State, ZIP+ 4 Juno Beach, FL 33408

PS Form 3800, May 2000 See Reverse for Instructions

Department of
Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

May 17, 2000

CERTIFIED LETTER – RETURN RECEIPT REQUESTED

Mr. William L. Yeager, Plant General Manager
Florida Power & Light Company – Manatee Power Plant
19050 Highway 62
Parrish, FL 34219-9220

Re: FPL Manatee Plant
Burner Change-out Project: Burner Replacement for Units 1 & 2
DEP File No. 0810010-005-AC
ARMS ID No. 0810010, Emissions Unit 002
Clarification of Replacement Date

Dear Mr. Yeager:

I received a copy of your letter to the Southwest District office regarding clarification of the "replacement date" for the burners. The letter accurately reflects my discussion of this matter with Joe Cox and Mary Archer. However, the letter refers to the burner replacements as a "pollution control project". Please be aware that this term has the following specific meaning in accordance with Rule 62-212.400(2)(a)2., F.A.C.

> *"Pollution Control Project Exemption. A pollution control project that is being added, replaced, or used at an existing electric utility steam generating unit and that meets the requirements of 40 CFR 52.21(b)(2)(iii)(h) shall not be subject to the preconstruction review requirements of this rule."*

Federal regulation 40 CFR 52.21(b)(2)(iii) states,

> *"A physical change or change in the method of operation shall not include:*
>
> *(a) through (g) omitted.*
>
> *(h) The addition, replacement or use of a pollution control project at an existing electric utility steam generating unit, unless the Administrator determines that such addition, replacement, or use renders the unit less environmentally beneficial, or except: (1) When the Administrator has reason to believe that the pollution control project would result in a significant net increase in representative actual annual emissions of any criteria pollutant over levels used for that source in the most recent air quality impact analysis in the area conducted for the purpose of title I, if any, and (2) The Administrator determines that the increase will cause or contribute to a violation of any national ambient air quality standard or PSD increment, or visibility limitation."*

In the original request for approval of this project, FPL proposed to replace the existing "Forney" steam-atomizing burners with new mechanically atomized, low NOx burners (LNB) manufactured by ABB Combustion Services, Ltd. FPL stated that replacement parts for the current burners were difficult to acquire and that the primary purpose of the replacement was to increase the reliability of the burners. Incidental benefits of the project included decreased water consumption and possible reductions in plume opacity and nitrogen oxide emissions. The Department did not make and has not made a determination that the burner replacements constitute a "pollution control project" as defined by the regulations.

If you have any questions, please contact Jeff Koerner at 850/414-7268.

Sincerely,

5/17

A.A. Linero, P.E. Administrator
New Source Review Section

cc: Mary Archer, FPL
Bill Thomas, SWD
Joe Cox, SWD
Manatee County – Air Quality Management Division

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 Yeager
FP & L - Manatee Plant
19050 Hwy 62
Parrish, Fl
34219-9220

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* GALE KINNE
B. Date of Delivery 5-19-00

C. Signature
X Gale Kinne
☐ Agent
☐ Addressee

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

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

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Copy from service label)* Z 341 355 291

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

Z 341 355 291

US Postal Service
Receipt for Certified Mail
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Sent to William Yeager	
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Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date 5-17-00	
0810010-005-AC	
Burner Replacement 142	

PS Form **3800**, April 1995

May 8, 2000

Mr. William C. Thomas
Florida Department of Environmental Protection
S.W. Florida District
3804 Coconut Palm Drive
Tampa, Florida 33619-8318

Re: FPL –Manatee Plant
Burner Change-out Project: Burner Replacement for Units 1 & 2
DEP File NO. 0810010-005-AC
ARMS ID No. 0810010, Emissions Unit 002
Clarification of "Replacement Date"

Dear Mr.Thomas:

Manatee Plant is currently balancing low N0x burners in the number 2 unit as part of a pollution control project approved for both Manatee units. In past low N0x burner replacements at other FPL facilities [specifically the Tri-county area] the Department addressed the replacement date as FPL's acceptance date from the manufacturer. The new burners still require balancing at high loads to maximize the N0x reduction and minimize the opacity impact before FPL will accept them as replaced from the manufacturer.

Al Linero and Joe Cox of FDEP recently had conversations with Mary Archer of FPL indicating that they concur with the following interpretation. The low N0x burners will be considered "replaced" upon the acceptance by FPL from the manufacturer. The 60-day compliance test date window will commence upon FPL's acceptance from the manufacturer or the "replaced" date.

If you require any additional information, please do not hesitate to call me at 813-776-5211.

Sincerely,

for WLY

William L. Yeager
Plant General Manager
Florida Power & Light Company

cc: Florida Southwest District DEP – Joe Cox
cc: FDEP Tallahassee – Al Linero
cc: Manatee County – Air Quality Management Division

1/11 AC
pls hand/LC cem

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

FPL

January 10, 2000

RECEIVED
JAN 11 2000
BUREAU OF AIR REGULATION

Mr. Clair Fancy, Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Rd. Tallahassee, Florida 32399-2400

Re: FPL –Manatee Plant
Project: Burner Replacement for Units 1 & 2
DEP File NO. 0810010-005-AC
ARMS ID No. 0810010, Emissions Units 001 & 002
Particulate Test Method Change Request

Dear Mr.Fancy:

In response to the December 21, 1999, letter authorizing the above addressed project, we request a change in the particulate test method.

The letter of December 21, 1999, addressed Method 5 as the method for use in particulate testing after the new burner installation. Method 17 has been determined as appropriate for the stack temperatures at the Manatee Power Plant units and has been used for Particulate Matter determination in the past. We Request the method be changed from Method 5 to Method 17 or other approved methods.

This issue was discussed with Jeff Koerner of your Department on January 10, 2000. Thank you for the Department support in our pursuance of this project, if I can be of assistance, please do not hesitate to call me at 561-691-7057.

Sincerely,

Mary J. Archer, QEP
Principal Environmental Specialist
Florida Power & Light Company

Cc: Jeff Koerner - FDEP
cc: Florida Southwest District DEP – Jerry Kissel
cc: Manatee County – Air Quality Management Division