



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

December 21, 1999

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 your original request received October 25, 1999 to replace burners at the Manatee Plant on Unit 2 in the spring of 2000 and on Unit 1 in the fall of 2000. The Department received additional information from FPL on December 13, 1999 regarding this request.

Background

Florida Power & Light Company (FPL) operates a steam electric plant in Manatee County located at 19050 State Road 62 in Parrish, Florida. Units 1 and 2 at this plant are fossil fuel (oil) fired steam generators, which were originally equipped with mechanical-atomizing burners. In 1994/1995, FPL replaced the mechanical atomization with steam atomization in these units without obtaining any air permits or prior Department approval. FPL states that the purpose of the 1994/1995 change was to increase the combustion efficiency of the burners.

Current Request

FPL proposes to replace the existing "Forney" steam-atomizing burners with new mechanically atomized, low NOx burners (LNB) manufactured by ABB Combustion Services, Ltd. Apparently, replacement parts for the current burners are difficult to acquire. FPL identifies the primary purpose of the burner replacement project as increasing the reliability of the burners and reducing plume opacity. FPL's Martin Plant in Indiantown has operated similar steam generators with the new burners since 1985. Based on this experience, FPL also anticipates that this project will result in 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.

"More Protection, Less Process"

Printed on recycled paper.

Comments

The Department received comments from DEP's Southwest District Office. The district expressed concerns about the possibility of increased particulate matter or acid smut emissions. Apparently, the district office received several complaints regarding soot fallout in 1994/1995. The number of complaints appeared to decrease with the addition of steam atomization.

Conclusion

The Department has reviewed the available information regarding FPL's request and authorizes the replacement of the existing burners with Model CSL Twin Register Low NOx Burner manufactured by ABB Combustion Services Ltd. This authorization does not recognize any changes to accommodate any fuels not currently authorized by permit. The authorization is granted solely for the proposed burner replacements on Units 1 and 2 at the Manatee Plant and is based on the specific information provided by FPL (attached) and the items presented below:

- The primary purpose of the project is to increase reliability of the burners and decrease the plume opacity. FPL identifies this project as routine maintenance/replacement for the existing units. The burner replacements are not part of a larger project that could be construed as a life extension project.
- The dispatch order and relative use of Units 1 and 2 will not change as a result of this project.
- The inherent design of the proposed burners incorporates compatibility with natural gas. FPL acknowledges that Manatee Plant Units 1 and 2 are single-fuel units and that *any* fuel change would require appropriate construction permit modifications.
- FPL certifies that this project will not result in an increase in emissions. Any emissions decreases resulting from this project are coincidental and not subject for use as a future net emissions decrease.

To provide reasonable assurance that no emissions increases occurred as a result of this project, FPL shall provide the following additional information.

1. In accordance with the procedures described in Appendix C of 40 CFR 60, FPL shall conduct emissions performance tests for carbon monoxide (EPA Method 10) and particulate matter (EPA Method 5) within 60 days of completing the burner replacements for each unit. A report indicating the results of the emissions performance tests shall be submitted to the Department 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. In addition, NOx and opacity data from the continuous monitors collected during each CO and PM test runs shall be summarized and included in the report to the Department for review.
2. FPL shall submit information regarding the replacement equipment to the Title V Section of the Bureau of Air Regulation and obtain the appropriate Title V revision, as necessary.

A copy of this letter shall be filed with all current air permits and shall become parts of those permits. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

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, F.A.C.

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.

Mediation is not available in this proceeding.

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. 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.

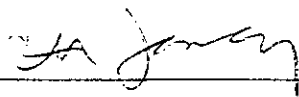
Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable 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.

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this order will not be effective until further order of the Department.

Any party to this permitting decision (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 days after this order is filed with the clerk of the Department.

If you have any questions regarding this letter, please contact Al Linero or Jeff Koerner at 850/488-0114.

Executed in Tallahassee, Florida.



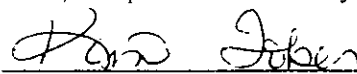
C.H. Fancy, Chief
Bureau of Air Regulation

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 12-22-99 to the person(s) listed:

Ms. Mary Archer, FPL*
Mr. Jerry Kissel, Southwest District Office DEP
Chair, Manatee County B.C.C.
Clarence Troxell*
Gregg Worley, 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.

 12-22-99

(Clerk) (Date)

Memorandum

Florida Department of Environmental Protection

TO: Clair Fancy, Chief, BAR
THROUGH Al Linero, BAR - New Source Review Section
FROM: Jeff Koerner, BAR - New Source Review Section JK
DATE: December 21, 1999
SUBJECT: FPL Manatee Plant
Burner Replacements for Units 1 and 2

FPL has requested approval to replace the existing steam-atomized Forney-type burners with mechanically atomized low-NOx burners. Apparently, replacement parts are difficult to obtain for the older burners and the change to newer burners would provide greater reliability. FPL also claims the newer burners would reduce opacity, NOx, CO, and water consumption (used for current steam atomization). FPL states that this project is considered routine maintenance/replacement and will not increase emissions, change the dispatch order of the Manatee Plant or increase the relative use of these units. Although the proposed burners incorporate compatibility with natural gas, FPL acknowledges that appropriate air construction permit modifications are necessary to incorporate any fuel change. The switch back to mechanical atomization may prevent these units from firing orimulsion. We believe this request is best handled with a letter of authorization instead of a permit modification.

AL/jfk

Attachments

Fold at line over top of envelope to

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Clarence Travell
3321 Lakeside Circle
Parrish, FL 34219

4a. Article Number

2 031 391 910

4b. Service Type

- | | |
|---|---|
| <input type="checkbox"/> Registered | <input checked="" type="checkbox"/> Certified |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Insured |
| <input type="checkbox"/> Return Receipt for Merchandise | <input type="checkbox"/> COD |

7. Date of Delivery

5. Received By: (Print Name)

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

6. Signature: (Addressee or Agent)

X Clarence Travell

PS Form 3811, December 1994

102595-98-B-0229

Domestic Return Receipt

Thank you for using Return Receipt Service.

2 031 391 910

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to: Clarence Travell
Street & Number: 3321 Lakeside Circle
Post Office, State & ZIP Code: Parrish FL

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: 12-22-99
061CC10-005-AC

PS Form 3800, April 1995

Is your RETURN ADDRESS completed on the reverse side?

- Attach return permit.
- Write "Return Receipt requested" on the envelope.
- The Return Receipt will show to whom the article was delivered and the date delivered.

- ☐ Addressee's Address
2. ☐ Restricted Delivery
- Consult postmaster for fee.

3. Article Addressed to:
 Mary Archer, QEP
 Environmental Services Dept
 F&L
 P O Box 14000
 Juno Beach, FL
 33408

4a. Article Number
 Z 031 391 909

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

7. Date of Delivery

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)
 X *C. Fournier*

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

PS Form 3811, December 1994

102595-98-B-0229 Domestic Return Receipt

Thank you for using Return Receipt Service.

Z 031 391 909

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to	
Mary Archer	
Street & Number	
F&L	
Post Office, State, & ZIP Code	
Juno Beach FL	
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	
12-22-99	
0810010-005-AC	

PS Form 3800, April 1995