



August 19, 2002

James Cleary
State of Florida
Department of Environmental Protection
Southwest Florida
3804 Coconut Palm Drive
Tampa, FL 33619-8318

RECEIVED
AUG 21 2002
BUREAU OF AIR REGULATION

**RE: Manatee Plant Units 1 and 2
FDEP Air Permit No. 0810010-007-AC
Notification of Commencement of Construction**

Dear Mr. Cleary:

Pursuant to Specific Condition 15 of the referenced permit, we hereby provide notification that construction has commenced. Our current schedule for construction, startup on natural gas, combustion optimization, and final testing is attached. Please be advised that this schedule is subject to change.

We appreciate the diligent and detailed work the Department put forth processing our application for permit revision and will now move forward preparing these emission units to use natural gas.

If you have any questions or need any additional information, please contact me at (941) 776-5211.

Sincerely,

A handwritten signature in cursive script that reads 'Paul Plotkin'.

Paul Plotkin
Manatee Plant General Manager

cc: A.A. Linero, P.E., Administrator New Source Review Section, DEP
Rob Brown, Manatee County, Environmental Management Department

Attachments: (1)

ID	Task Name	Start	Finish	2002												2003												2004				
				J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M
1	Design Engineer	Jan 15 '02	Jul 9 '02																													
2	Foster Wheeler Start Mechanical Construction	Aug 15 '02	Aug 16 '02																													
3	Dale C Rossman Start ICS & Electrical Construction	Aug 20 '02	Aug 21 '02																													
4	Pipe & platform construction	Aug 19 '02	Nov 11 '02																													
5	Instrument & Electrical Installation	Aug 22 '02	Nov 13 '02																													
6	Gulfstream interconnect tie in	Oct 31 '02	Nov 4 '02																													
7	#2 Unit Burner connection & tie ins	Nov 9 '02	Nov 23 '02																													
8	#2 Unit Final Control Integration	Nov 9 '02	Nov 22 '02																													
9	#2 Start up	Nov 23 '02	Nov 28 '02																													
10	#2 Optimize Combustion	Nov 28 '02	Jan 7 '03																													
11	#2 Compliance Test	Jan 8 '03	Jan 14 '03																													
12	# 1 Unit Burner connection & tie ins	Nov 30 '02	Dec 13 '02																													
13	# 1 Unit Final Control Integration	Nov 30 '02	Dec 13 '02																													
14	FW & DCR Demobilize	Dec 15 '02	Dec 15 '02																													
15	#1 Start up	Dec 13 '02	Dec 18 '02																													
16	#1 Optimize Combustion	Dec 18 '02	Jan 28 '03																													
17	#1 Compliance Test	Jan 28 '03	Feb 3 '03																													

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



RECEIVED

DEC 05 2002

0237606

December 3, 2002

Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

Attention: Mr. Edward J. Svec, Title V Section

RE: TROPICANA PRODUCTS, INC., FORT PIERCE CITRUS PROCESSING PLANT
DEP FILE NOS. 1110004-004AC AND 1110004-002AV

Dear Ed:

On behalf of Tropicana Products, Inc. an extension of the expiration date for the above referenced construction permit form December 31, 2002 to September 30, 2003 is requested. Although a compliance plan was submitted with the Title V application (revision), the extension of the construction permit would allow sufficient time to submit the required compliance information while still under the construction permit.

In addition, a waiver of the 30-day completeness review, which is applicable for the Department's action on the application, is enclosed. A waiver of the 90-day approval timeframe has already been submitted.

Please call Doug Foster or me if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.

Kennard F. Kosky, P.E.
Principal

KFK/jkw

cc: Richard Coyle, Tropicana Products, Inc.
Douglas Foster, Tropicana Products, Inc.
Scott Davis, Tropicana Products, Inc.

P:\Projects\2002\0237606 Tropicana Ft. Pierce\4\4.1\120402\L120402.doc

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

WAIVER OF PERMIT APPLICATION PROCESSING TIME PERIODS
UNDER SECTIONS 120.60(1), 403.0872 AND 403.0876 FLORIDA STATUTES

Applicant: **Tropicana Products, Inc.**

Permit Application/Project: **1110004-002-AV**
Fort Pierce Citrus Processing Plant

Facility ID No.: **1110004**

The undersigned has read sections 120.60(1), 403.0872 and 403.0876, Florida Statutes, and fully understands the applicant's rights under those sections.

With regard to the above referenced permit application, the applicant hereby with full knowledge and understanding of its rights under Sections 120.60(1), 403.0872, and 403.0876, Florida Statutes, waives the right under Sections 120.60(1), 403.0872, and 403.0876, Florida Statutes, to have the application reviewed by the State of Florida Department of Environmental Protection within the 30-day time period prescribed in Sections 120.60(1), and 403.0876, Florida Statutes.

Said waiver is made freely and voluntarily by the applicant, is in its self interest and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Protection.

This waiver shall expire on **September 30, 2003**, at which time all processing time clocks will resume.

The undersigned is authorized to make this waiver on behalf of the applicant.

Signature



Date

11/4/02

By: Kennard F. Kosky, P.E.
Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, FL 32653

RECEIVED

DEC 05 2002

BUREAU OF AIR REGULATION



July 23, 2003

RECEIVED

JUL 28 2003

BUREAU OF AIR REGULATION

Ms. Trina Vielhauer
Chief, Bureau of Air Regulation
Department of Environmental Protection
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida
32399-2400

RE: Manatee Power Plant FDEP Air Permit No. 08100100-008-AV
PSD Applicability Report

Dear Ms. Vielhauer:

Pursuant to Specific Condition A.40 of the above referenced permit, FPL submits the following PSD Applicability Report. The PSD Applicability Report is required as a result of adding natural gas as a permitted fuel to Manatee Units 1&2. The report is required to be submitted for five years that are representative of normal post-change operation following the addition of natural gas. Natural gas was added to Unit 2 during 2002 and to Unit 1 in 2003.

Table 1 below summarizes the 2002 Actual Emissions compared to the "Past Actual Emissions" (Years 2000 & 2001 average) for the Manatee Plant.

Pollutant	Past Actual Emissions (Years 2000 & 2001 Average) Tons per Year	2002 Actual Emissions	Calculation Methods
Carbon Monoxide (CO)	18,987	20,214	AOR (oil), Initial Performance Test (gas)
Nitrogen Oxides (NOx)	8762	8252	EPA Scorecard
Particulate Matter (PM)	2384	2500	AOR (oil), Initial Performance Test (gas)
Sulfur Dioxide (SO ₂)	31,753	32,701	EPA Scorecard
Volatile Organic Compounds (VOC)	149	160	AOR (oil), Initial Performance Test (gas)

Table 1

With the exception of NOx, all 2002 Actual Emissions increased over the Past Actual Emissions. The decrease in NOx in 2002 is attributed to the full implementation of the Low NOx burner retrofit. During the "Base Year" the NOx emissions, 8762 tons, are reflective of only a partial implementation of the burner retrofit project (Unit 2) which occurred late in 2001.

The increases in the other emissions are unrelated to the physical change of adding natural gas as a permitted fuel, but rather, the result of Manatee Plant's increased utilization to meet load demands during 2002.

In 2002 the generation and fuel oil usage at Manatee Plant Units 1&2 increased 6% over the 2000 & 2001 (Base Year) average (Ref. Figs. 1 & 2 below).

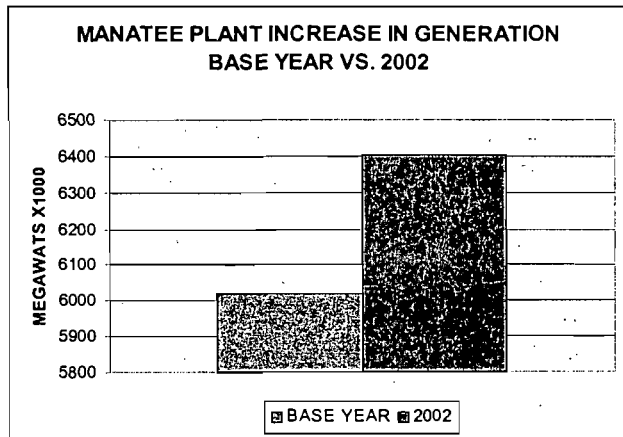


Fig. 1

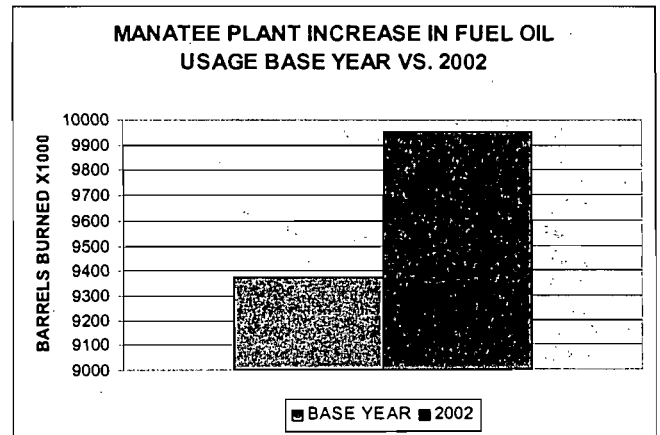


Fig. 2

In 2002 natural gas represented only 0.08% of the fuel used at Manatee (Ref. Fig. 3 below). Considering natural gas fuel was an insignificant percentage of the total fuel in 2002, and it's inherently "clean burning" characteristics, the increase in emissions were driven completely by the increase in utilization due to electricity demand.

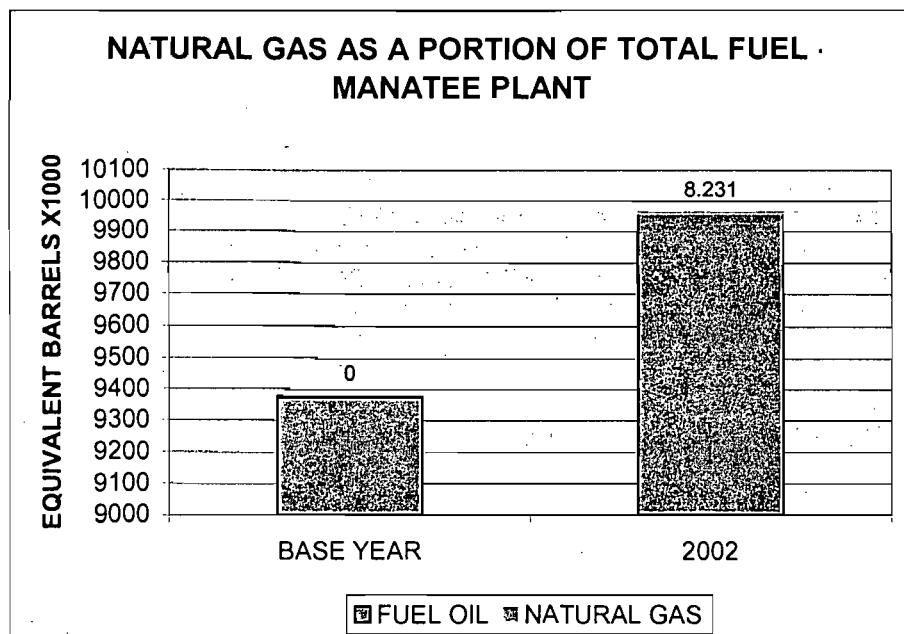


Fig. 3

In accordance with Specific Condition A.40.b and 40 CFR 52.21(b)(33)(ii), Table 2 below shows the 2002 annual emissions excluding the portion of emissions that are unrelated to the physical change of adding natural gas to Units 1&2.

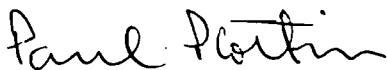
Pollutant	Past Actual Emissions (Years 2000 & 2001 Average) Tons per Year	2002 Actual Emissions Tons	2002 Actual Emissions Excluding Emissions Unrelated to The addition of Natural Gas
Carbon Monoxide (CO)	18,987	20,214	14
Nitrogen Oxides (NOx)	8762	8252	(510)
Particulate Matter (PM)	2384	2500	(34)
Sulfur Dioxide (SO ₂)	31,753	32,701	(1015)
Volatile Organic Compounds (VOC)	149	160	1

Table 2

From the table, the insignificant increases in CO and VOC are more than offset by the decreases in the other pollutants, and are most likely associated with process variability throughout the year, rather than directly attributable to natural gas firing.

In summary, the addition of natural gas to Manatee Units 1&2 did not cause a significant increase in annual emissions and should not be subject to PSD review. Should you have any questions, or require additional information, please feel free to contact me at (941) 776-5211 or Kevin Washington at (561) 691-2877.

Sincerely,



Paul Plotkin
Plant General Manager

cc: A. A. Linero, P.E. Administrator New Source Review Section, DEP
James Cleary, Department of Environmental Protection Southwest Florida District
Rob Brown, Manatee County Environmental Management Department



May 22, 2003

RECEIVED

MAY 27 2003

BUREAU OF AIR REGULATION

Mr. Bill Proses
State of Florida
Department of Environmental Protection
Southwest Florida District
3804 Coconut Palm Drive
Tampa, Florida 33619-8318

RE: Manatee Power Plant - Unit 1
FDEP Air Permit No. 08100100-007-AC
Notification of Construction Completion

Dear Mr. Proses:

Pursuant to Specific Condition 15 of the referenced permit, we hereby provide notification that construction will be complete on or about June 12, 2003 for Unit #1. A revised schedule for Unit 1 startup and compliance testing is attached. We will be sending a test notification pursuant to Specific Condition 16 of the above referenced permit in the near future.

If you have any questions or need any additional information, please contact me at (941)-776-5211.

Sincerely,

A handwritten signature in cursive script that reads 'Paul Plotkin'.

Paul Plotkin
Plant General Manager

Enclosure:

cc: A.A. Linero, P.E. Administrator New Source Review Section, DEP
Rob Brown, Manatee County Environmental Management Department

Attachments: (1)

ID	Task Name	Start	Finish	2002												2003											
				J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A				
1	Design Engineer	Jan 15 '02	Jul 9 '02	<div></div>																							
2	Foster Wheeler Start Mechanical Construction	Aug 15 '02	Aug 16 '02	100%																							
3	Dale C Rossman Start ICS & Electrical Construction	Aug 20 '02	Aug 21 '02	100%																							
4	Pipe & platform construction	Aug 19 '02	Sep 9 '02	100% <div></div>																							
5	Instrument & Electrical Installation	Aug 22 '02	Sep 11 '02	100% <div></div>																							
6	Gulfstream interconnect tie in	Oct 31 '02	Nov 1 '02	100%																							
7	#2 Unit Burner connection & tie ins	Nov 9 '02	Nov 12 '02	100%																							
8	#2 Unit Final Control Integration	Nov 9 '02	Nov 12 '02	100%																							
9	#2 Start up	Nov 20 '02	Nov 22 '02	100%																							
10	#2 Optimize Combustion	Nov 25 '02	Jan 7 '03	100% <div></div>																							
11	#2 Compliance Test	Jan 8 '03	Mar 9 '03	100% <div></div>																							
12	# 1 Unit Burner connection and tie in	Apr 15 '03	Apr 18 '03													100%											
13	# 1 Unit Final Control Integration	Apr 15 '03	Apr 18 '03													95%											
14	#1 Start up	Jun 10 '03	Jun 12 '03													0%											
15	#1 Optimize Combustion	Jun 12 '03	Aug 11 '03													0% <div></div>											
16	#1 Compliance Test	Aug 11 '03	Aug 21 '03													0% <div></div>											

Florida Department of
Environmental Protection

Memorandum

TO: Howard Rhodes
THRU: Clair Fancy
Al Linero *aoj 8/9*
FROM: Jeff Koerner *JK*
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.


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

CERTIFICATE OF SERVICE

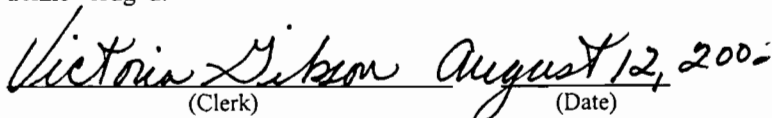
The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 8/12/02 to the persons listed:

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 Owen, 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.


(Clerk) August 12, 2002 (Date)

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

FINAL DETERMINATION

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 NO_x 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.



Jeb Bush
Governor

Department of Environmental Protection

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.

CONTENTS

- 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

(Date)

SECTION I. GENERAL INFORMATION

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. Permitting Authority: 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. Modifications: 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. Title V Permit: 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.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

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. Unconfined Particulate Emissions: 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. Authorized Fuel: 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. Permitted Capacity: 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*

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

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. Hours of Operation: 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. Nitrogen Oxides: When firing natural gas, emissions of nitrogen oxides (NO_x) 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. Sulfur Dioxide: 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. Visible Emissions: 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 5 or 17.
DEP 9	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

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

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. Initial Compliance Tests: 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. Continuous Emissions Monitoring Systems: 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. Test Notifications: 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. PSD Applicability Report: 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

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

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 (SO ₂)	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 III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. UNITS 1 AND 2

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. Hours of Operation: The units may operate continuously on natural gas, #6 fuel oil, or a combination of both (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~~ Emissions of particulate matter shall not exceed 0.1 pounds per million Btu heat input steady state, nor 0.3 pounds per million Btu heat input when sootblowing as determined by EPA Methods 5, 5B, 5F, or 17, incorporated by reference in Chapter 62-297, F.A.C. [Rule 62-296.405(1)(b), F.A.C.]
7. Nitrogen Oxides: When firing natural gas, emissions of nitrogen oxides (NO_x) 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. Sulfur Dioxide: Emissions of sulfur dioxide are limited ~~by the fuel specification in Condition No. 3 to 1.1 pounds per million Btu heat input~~. 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. Visible Emissions: 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 or 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 5 or 17.
DEP 9	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 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]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

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-NO_x 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 NO_x burners manufactured by ABB Combustion Services, Ltd. (formerly International Combustion Limited). The low-NO_x 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. **Unconfined Particulate Emissions:** 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. **Authorized Fuel:** Each unit is authorized to fire "pipeline quality" natural gas, ~~containing no more than 10 grains of sulfur per 100 standard cubic feet of natural gas.~~ Natural gas may be fired 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. [Applicant Request; Rule 62-210.200(PTE), F.A.C.]
4. **Permitted Capacity:** 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 testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110*

SECTION II. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: 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 compiled 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. Modifications: 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. Title V Permit: 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.]

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.

Att. 1

DRAFT PERMIT

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.

CONTENTS

Section I. General Information

Section II. Administrative Requirements

Section III. Emissions Units Specific Conditions

Section IV. Appendices

(DRAFT)

Howard L. Rhodes, Director
Division of Air Resources Management

(Date)

Initial Compliance Tests - FPL proposes to use Initial Compliance Test results to calculate the emissions of carbon monoxide and volatile organic compounds for reporting the "future actual annual emissions" via the AOR. This is consistent with the methodology used to determine the "past actual" emissions. The AP-42 emission factor will be used to determine the particulate emissions while burning natural gas and will be reported via the AOR. "Future actual annual" emissions of NO_x and SO₂ will be CEM based, determined by the EPA Scorecard values from the Acid Rain Reporting. Language in the referenced Specific Conditions has been changed to reflect the absence of particulate testing while burning natural gas and the use of the actual annual fuel combustion (heat input) and the AOR values for determining the "future actual annual" emissions of CO, VOC and PM. As a result, Specific Condition No. 14 is not necessary.

Specific Condition renumbered 17: The EPA Scorecard values are not published by March 1st, therefore the annual report submission date has been changed to August 1st.

Specific Condition renumbered 17a: The "past actual emissions" for nitrogen oxides using the EPA Scorecard value from the Acid Rain Reporting is 8,762 tons (2000 and 2001 annual average). Year 2000 was 8,381 tons. Year 2001 was 9,143 tons [Refer E-mail correspondence from EPA – Attachment No.2].

Comments regarding corresponding changes to the Draft Title V Permit revisions will be submitted by separate letter.

Thank you for your consideration in this matter. If you should have any questions, please feel free to contact me at (941) 776-5211, or Kevin Washington at (561) 691-2877.

Sincerely yours,



Paul Plotkin

Manatee Plant General Manager

Attachment: 2

C.c.s: Clair Fancy
Al Linero

such circumstances, the Department would be swamped by applications for work that does not involve emissions units or emissions increases. This would expend substantial Department resources in a manner at variance from Secretary Struhs' stated principle of "less process, more protection". It would also be inconsistent with past Department practice.

While FPL does not believe a construction permit is warranted in connection with the addition of natural gas at Manatee Units 1 and 2, we do not intend to proceed with the work necessary to connect the units to the gas supply until this issue has been resolved. If the Draft Construction Permit provisions addressed below can be resolved expeditiously, we recognize it may be more practical in these circumstances to bypass the threshold issue and accept a corrected construction permit. Given that possibility, and without conceding the need for a construction permit, we offer our comments on the Department's draft permit below.

Specific Condition No. 1: This condition should, at most, reference construction on the emissions units (Units 1 and 2) as discussed above.

Specific Condition No. 3: We are not aware of any rule basis for restricting the sulfur content of natural gas in this case. Other FPL dual-fuel fossil steam boilers do not have a separate sulfur limit for natural gas, nor do they have record keeping requirements to demonstrate gas sulfur quantity. FPL and the Department have worked closely in the past to achieve consistency in the permit language and requirements where appropriate. At most, this condition should require that sulfur content of the natural gas fuel shall be consistent with "pipeline quality" natural gas. The sentence reading "When available, the Department strongly encourages the permittee to fire natural gas as a clean-burning alternative to fuel oil" should be deleted, as it is not an enforceable requirement.

Specific Condition No. 5: The language has been changed to include the use of fuel oil along with natural gas.

Specific Condition No. 6: Include reference to 0.3 lbs. per MBTU heat input allowance for soot blowing/load changing.

Specific Condition No. 10: Punctuation and language has been added to clarify the distinction between EPA methods 3 and 3A which are analyzer methods for determining O₂, and the Orsat analysis method for determining O₂.

Specific Conditions Nos. 11, 14 and renumbered 17: Testing for particulate matter while burning natural gas - FPL believes that testing for particulate matter while firing natural gas is unnecessary due to the miniscule amounts of ash and sulfur contained in the fuel. The Department's Technical Evaluation and Preliminary Determination also recognizes that distinction. . This requirement is inconsistent with the other dual-fueled fossil steam boilers in the FPL system, which are not required to perform particulate tests while burning natural gas in order to demonstrate compliance to the standard. Past experience indicates that so little particulate matter exists, the sampling duration must be at least trebled in order to gather enough sample catch to measure.

During the "Initial Compliance Tests" on natural gas, FPL proposes to test for carbon monoxide and volatile organic compounds in addition to opacity, which we believe, will provide the Department reasonable assurance that the particulate standard is being met.



RECEIVED

JUL 25 2002

July 23, 2002

Hopping Green Sams & Smith

Jeff Koerner – Permit Engineer
Bureau of Air Regulation
State of Florida
Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5505
Tallahassee, FL 32399-2400

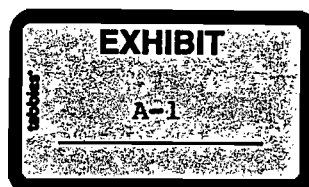
Re: Manatee Plant Draft Air Construction Permit No. 0810010-007-AC

Dear Mr. Koerner:


FPL would like to provide you with comments to the Draft Air Construction Permit referenced above. Our general comments follow in prose form, followed by a marked-up copy of the permit [Attachment No.1] with the suggested language that we believe is consistent with our comments. Deletions in the marked-up version are indicated by strikethrough, added language is indicated by underline.

Our first comment concerns the threshold issue of whether an Air Construction Permit is required to authorize the addition of natural gas as a fuel for Manatee Units 1 and 2. As stated in our May 2, 2002 application for revision of the Manatee Plant Title V permit, FPL does not believe an air construction permit is required in this case. We find the rational advanced in the "Technical Evaluation and Preliminary Determination" on this point to be problematic.

FPL's request for revision of the Title V permit explained, and the Department has accepted, that addition of natural gas as a permitted fuel for Manatee Units 1 and 2 is not likely to result in an increase in actual emissions, and thus does not constitute a "modification" of these existing emission units under Rule 62-210.200(169), F.A.C. We would suggest that any work necessary to enable the burning of natural gas should not, therefore, require an air construction permit under Rule 62-210.300(1)(a), F.A.C. In our view, that rule establishes the need for a construction permit in two circumstances: 1) "Construction" of a proposed new emissions unit; and 2) "modification" of an existing emissions unit (which by definition would result in an increase in actual emissions). It would seem that the basis for the Department's preliminary determination that a construction permit is required in this case is that some activity falling within the definition of "construction" is associated with the addition of gas at existing Manatee Units 1 and 2. We cannot agree with this premise, as it would apparently mean that virtually any work at an existing permitted facility, even if the work would not result in an emissions increase and even if the work is not on an emissions unit, would nonetheless require an air construction permit. At a facility such as the Manatee Plant, with a 9,500-acre plant site, where some such work is ongoing almost all of the time, this interpretation would be untenable. If it were feasible for facility owners to apply for construction permits under



HOPPING GREEN & SAMS, P.A.

By: 
Peter C. Cunningham
Florida Bar No. 0321907
Angela R. Morrison
Florida Bar No. 0855766
Post Office Box 6526
Tallahassee, FL 32314
850-222-7500


Attorneys for FLORIDA POWER & LIGHT CO.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following
by U.S. Mail on this 7TH day of August, 2002:

Jeff Koerner
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

W. Douglas Beason, Esq.
Department of Environmental Protection
Office of General Counsel
3900 Commonwealth Blvd.
Tallahassee, FL 32399


Attorney

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

RECEIVED
AUG 07 2002
BUREAU OF AIR REGULATION

IN RE:
FLORIDA POWER & LIGHT CO.
MANATEE COUNTY, FLORIDA

DRAFT PERMIT NO. 0810010-007-AC
OGC CASE NO. 02-1067

**NOTICE OF WITHDRAWAL OF
REQUEST FOR ENLARGEMENT OF TIME**

By and through undersigned counsel, Florida Power & Light Co. ("FPL") hereby gives notice:

1. On July 23, 2002, FPL requested, pursuant to Florida Administrative Code Rule 62-110.106(4), an Enlargement of Time, to and including August 22, 2002, in which to file a Petition for Administrative Proceedings in the above-styled matter.

2. FPL and the Department have reached agreement on all issues involving the above-referenced permit. The agreement between FPL and the Department is reflected in correspondence dated July 23, 2002 and August 5, 2002, copies of which are attached to this Notice (Exhibits A-1 and A-2). The Department has agreed to issue the referenced air construction permit with certain changes that satisfactorily address FPL's concerns with the permit, obviating the need for an enlargement of time.

Therefore, FPL hereby withdraws its Request for Enlargement of Time, conditioned upon the Department's issuance of the air construction permit in accordance with the Department's agreement with FPL.

Respectfully submitted this 7th day of August, 2002.

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.

Article Addressed to:

Clarence Troxell
3321 Lakeside Circle
Parrish, FL 34219

COMPLETE THIS SECTION ON DELIVERY

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

C. Troxell

8-14-02

C. Signature

X

C. J. Troxell

☐ 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. 7001 0320 0001 3692 8093

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

U.S. Postal Service**CERTIFIED MAIL RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage \$

Certified Fee

Return Receipt Fee
(Endorsement Required)Restricted Delivery Fee
(Endorsement Required)

Total Postage & Fees \$

Postmark
Here

Sent To

Clarence Troxell

Street, Apt. No.,
or PO Box

3321 Lakeside Circle

City, State, ZIP+4

Parrish, FL 34219

PS Form 3800, January 2001

See Reverse for Instructions

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

2. 7001 0320 0001 3692 8086

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) *Mary Maxwell* B. Date of Delivery *88-14-02*
C. Signature *Mary Maxwell* ☐ Agent ☐ Addressee
D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ YesU.S. Postal Service
CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage \$
Certified Fee
Return Receipt Fee (Endorsement Required)
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees \$

Postmark
Here

Sent To
Paul Plotkin
Street, Apt. No.,
or PO Box No. 19050 State Road 62
City, State, ZIP+4
Parrish, FL 34219

PS Form 3800, January 2001

See Reverse for Instructions

U.S. Postal Service
CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage \$
Certified Fee
Return Receipt Fee (Endorsement Required)
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees \$

Postmark
Here

Sent To
Amy E. Stein
Street, Apt. No.,
or PO Box No. Box 1000
City, State, ZIP+4
Bradenton, FL 34206-1000

PS Form 3800, January 2001

See Reverse for Instructions

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:

Amy E. Stein, Chair
Manatee County Board of
County Commissioners
P. O. Box 1000
Bradenton, FL 34206-1000

2. Article 7001 0320 0001 3692 8109

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) *Kerry L. Farnham* B. Date of Delivery
C. Signature *Kerry L. Farnham* ☐ Agent ☐ Addressee
D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

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. Dan Kumarich
President
Manatee Citizens Against Pollution
P. O. Box 660
Parrish, FL 34219

COMPLETE THIS SECTION ON DELIVERY

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

C. Signature

X NEVA Sayers ☐ Agent
☐ Addressee

D. Is delivery address different from item 1? ☐ YesIf 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

7001 0320 0001 3692 8116

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

U.S. Postal Service**CERTIFIED MAIL RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

Postage \$

Certified Fee

Return Receipt Fee
(Endorsement Required)Restricted Delivery Fee
(Endorsement Required)

Total Postage & Fees \$

Postmark
Here

Sent To

Dan Kumarich

Street, Apt. No.,

or PO Box No. Box 660

City, State, ZIP+4

Parrish, FL 34219

PS Form 3800, January 2001

See Reverse for Instructions

U.S. Postal Service**CERTIFIED MAIL RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

Postage \$

Certified Fee

Return Receipt Fee
(Endorsement Required)Restricted Delivery Fee
(Endorsement Required)

Total Postage & Fees \$

Postmark
Here

Sent To

Manasota 88, Inc.

Street, Apt. No.,

or PO Box No. Box 1728

City, State, ZIP+4

Nokomis, FL 34274

PS Form 3800, January 2001

See Reverse for Instructions

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:

Manasota 88, Inc.
P. O. Box 1728
Nokomis, FL 34274

COMPLETE THIS SECTION ON DELIVERY

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

C. Signature

X *Compton* ☐ Agent
☐ Addressee

D. Is delivery address different from item 1? ☐ YesIf 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. A1 7001 0320 0001 3692 8123

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

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. Annual Operating Report: 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.]

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. Calculation of Emission Rate: 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. Sampling Facilities: 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. Test Notification: 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. Test Reports: 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

{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. Circumvention: 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 permittee 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. VOC or OS Emissions: 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) and 62-210.200(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. Unconfined Particulate Emissions: 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. APPENDICES
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Appendix CF. Citation Format
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 CFR 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 III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. UNITS 1 AND 2

11. Initial Compliance Tests: When firing 100% natural gas, the permittee shall conduct initial compliance tests to determine the emissions of carbon monoxide, volatile organic compounds, 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. These tests shall be used to document the emission rates of these pollutants for use in the reports required by Condition No. 17. [Rule 62-296.405(1)(e)1, F.A.C.]
12. Continuous Emissions Monitoring Systems: 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. ~~Compliance with the fuel sulfur limit for natural gas shall be demonstrated by keeping monthly reports obtained from the vendor indicating the average sulfur content of the natural gas being supplied from the pipeline for each month of operation. Methods for determining the sulfur content of the natural gas shall be the most recent versions of ASTM methods D4084-82, D3246-81 or other equivalent methods approved by the Department.~~ [Rule 62-4.070(3), F.A.C.]
- ~~14. Tests for Reporting Annual Emissions: When firing natural gas, the permittee shall conduct performance tests to determine the emissions of carbon monoxide, particulate matter, and volatile organic compounds from Units 1 and 2. These tests shall be used to document the emission rates of these pollutants for use in the reports required by Condition No. 18. Tests shall be conducted at least once during each year the reports are required.~~ [Rules 62-210.200(11)(d), 62-212.400(2)(d), and 62-297.100, F.A.C.]

NOTIFICATIONS

- ~~15.~~14. 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.~~15. Test Notifications: 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.~~16. 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.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. UNITS 1 AND 2

~~48.~~17. **PSD Applicability Report:** Before ~~March~~ 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 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 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), <u>Initial</u> Performance Test (gas)
Nitrogen Oxides (NOx)	8179 <u>8762</u>	CEMS, <u>EPA Scorecard value</u> , Acid Rain Reporting
Particulate Matter (PM)	2384	Performance Tests (oil) <u>AOR and</u> (gas)
Sulfur Dioxide (SO ₂)	31,753	CEMS, <u>EPA Scorecard value</u> , Acid Rain Reporting
Volatile Organic Compounds (VOC)	149	AOR (oil), <u>Initial</u> 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 reported EPA Scorecard values for the Acid Rain Program. "Future actual annual emissions" shall be based on: actual annual fuel combustion (heat input) rates; tested emission rates for CO (gas), PM (oil) ~~and gas~~, and VOC (gas); certified Annual Operating Report data for CO (oil), ~~and~~ VOC (oil), ~~and~~ PM (gas); and data collected by the Continuous Emissions Monitoring Systems for NOx and SO₂ emissions as reported 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 III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. UNITS 1 AND 2

Att. 2



Patel.Ketan@epamail.

epa.gov

07/11/02 10:26 AM

To: mszybinski@fpl.com

cc:

Subject: 2001 Emissions and heat input data for Manatee (ORISPL 6042)

Mr. Szybinski,

Please find below a table summarizing the FINAL 2001 emissions and heat input values for Manatee (ORISPL 6042), units PMT1 and PMT2.

ORISPL	Unit ID	SO2 (tons)	CO2 (tons)	NOxRate	(lbs/mmBtu) NOx (tons)	(mmBtu) Heat Input
6042	PMT1	18,124	3,052,997	0.24	4,605	34,369,487
6042	PMT2	16,471	2,730,668	0.25	4,538	30,823,660

Feel free to contact me if you have any questions or concerns.

Thanks,

Ketan D. Patel

U.S. Environmental Protection Agency (6204N)

Clean Air Markets Division

patel.ketan@epa.gov

202.564.9144

----- Forwarded by Kevin Washington/GC/FPL on 08/05/2002 04:23 PM -----

"Koerner, Jeff"
<Jeff.Koerner@dep.s
Kevin_Washington@fpl.com
tate.fl.us>
To:
cc:
Subject: RE: DRAFT AIR
CONSTRUCTION PERMIT - MANATEE UNITS
08/05/2002 04:13 PM 1 &2

Kevin,

This appears consistent with our conversation earlier today.
I will be out of the office until Thursday. I may be able to have
the final package ready by the end of the week or early next week.

Thanks!

Jeff Koerner
New Source Review Section
850/921-9536

----- Message from Kevin_Washington@fpl.com on Mon, 5 Aug 2002 13:32:22
-0400 -----

To: "Koerner, Jeff" <jeff.koerner@dep.state.fl.us>

cc: Paul_Plotkin@fpl.com, peterc@hgss.com

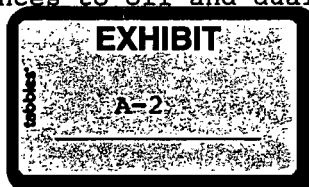
Subject: DRAFT AIR CONSTRUCTION PERMIT - MANATEE UNITS 1 &2

Jeff,

This e:mail is to confirm the understanding reached in telephone
discussions between the Department and FPL regarding FPL's comments to the
Draft Construction Permit adding natural gas to Manatee units 1&2.

Specific Condition 3: "Natural gas" will be the description of the fuel
to be burned. A permitting note indicating 10 grains of sulfur per 100
SCF for informational purposes only is acceptable.

Specific Condition 5: References to oil and dual fuel do not apply here.



Specific Condition 6: the reference to 0.3 #/mmbtu particulate when sootblowing will remain when firing natural gas.

Specific Condition 8: Emissions of sulfur dioxide will be controlled by the characteristics of natural gas. The reference to 1.1 #/mmbtu is a liquid fuel value and will not be used in this Specific Condition.

Specific Condition 10: Suggested punctuation changes will remain.

The "Initial Compliance Test" will be for PM and Opacity. Additional initial tests on gas for CO and VOC will be performed. Also, an annual CO test on gas will be conducted in conjunction with the CEM RATA test. The results from these tests (initial and annual CO) will be used to develop factors to calculate the annual emissions.

Compliance with sulfur dioxide while burning gas will be through the use of natural gas fuel.

Specific Condition 18: Revised according to the August 1st date, past actual quantity of NOx as 8762 tons, and necessary changes to incorporate testing agreements referenced above.

Upon receipt of your e:mail confirming our mutual understanding of the points raised above, I'll instruct legal counsel to withdraw the request for extension of time associated with the Draft Construction Permit.

Following the receipt of the extension withdrawal, can you provide an estimate of when we can expect the final permit?

Jeff, I appreciate your cooperation in working together to reach resolution of the issues, and look forward to your reply.
Thanks again.

Kevin Washington

CC: <Lynn_French@fpl.com>, <Mary_Maxwell@fpl.com>,
<W_T_Smith@fpl.com>, <Roger_Messer@fpl.com>



July 23, 2002

RECEIVED

JUL 24 2002

BUREAU OF AIR REGULATION

Jeff Koerner – Permit Engineer
Bureau of Air Regulation
State of Florida
Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5505
Tallahassee, FL 32399-2400

Re: Manatee Plant Draft Air Construction Permit No. 0810010-007-AC

Dear Mr. Koerner:

FPL would like to provide you with comments to the Draft Air Construction Permit referenced above. Our general comments follow in prose form, followed by a marked-up copy of the permit [Attachment No.1] with the suggested language that we believe is consistent with our comments. Deletions in the marked-up version are indicated by strikethrough, added language is indicated by underline.

Our first comment concerns the threshold issue of whether an Air Construction Permit is required to authorize the addition of natural gas as a fuel for Manatee Units 1 and 2. As stated in our May 2, 2002 application for revision of the Manatee Plant Title V permit, FPL does not believe an air construction permit is required in this case. We find the rationale advanced in the "Technical Evaluation and Preliminary Determination" on this point to be problematic.

FPL's request for revision of the Title V permit explained, and the Department has accepted, that addition of natural gas as a permitted fuel for Manatee Units 1 and 2 is not likely to result in an increase in actual emissions, and thus does not constitute a "modification" of these existing emission units under Rule 62-210.200(169), F.A.C. We would suggest that any work necessary to enable the burning of natural gas should not, therefore, require an air construction permit under Rule 62-210.300(1)(a), F.A.C. In our view, that rule establishes the need for a construction permit in two circumstances: 1) "Construction" of a proposed new emissions unit; and 2) "modification" of an existing emissions unit (which by definition would result in an increase in actual emissions). It would seem that the basis for the Department's preliminary determination that a construction permit is required in this case is that some activity falling within the definition of "construction" is associated with the addition of gas at existing Manatee Units 1 and 2. We cannot agree with this premise, as it would apparently mean that virtually any work at an existing permitted facility, even if the work would not result in an emissions increase and even if the work is not on an emissions unit, would nonetheless require an air construction permit. At a facility such as the Manatee Plant, with a 9,500-acre plant site, where some such work is ongoing almost all of the time, this interpretation would be untenable. If it were feasible for facility owners to apply for construction permits under

such circumstances, the Department would be swamped by applications for work that does not involve emissions units or emissions increases. This would expend substantial Department resources in a manner at variance from Secretary Struhs' stated principle of "less process, more protection". It would also be inconsistent with past Department practice.

While FPL does not believe a construction permit is warranted in connection with the addition of natural gas at Manatee Units 1 and 2, we do not intend to proceed with the work necessary to connect the units to the gas supply until this issue has been resolved. If the Draft Construction Permit provisions addressed below can be resolved expeditiously, we recognize it may be more practical in these circumstances to bypass the threshold issue and accept a corrected construction permit. Given that possibility, and without conceding the need for a construction permit, we offer our comments on the Department's draft permit below.

Specific Condition No. 1: This condition should, at most, reference construction on the emissions units (Units 1 and 2) as discussed above.

Specific Condition No. 3: We are not aware of any rule basis for restricting the sulfur content of natural gas in this case. Other FPL dual-fuel fossil steam boilers do not have a separate sulfur limit for natural gas, nor do they have record keeping requirements to demonstrate gas sulfur quantity. FPL and the Department have worked closely in the past to achieve consistency in the permit language and requirements where appropriate. At most, this condition should require that sulfur content of the natural gas fuel shall be consistent with "pipeline quality" natural gas. The sentence reading "When available, the Department strongly encourages the permittee to fire natural gas as a clean-burning alternative to fuel oil" should be deleted, as it is not an enforceable requirement.

Specific Condition No. 5: The language has been changed to include the use of fuel oil along with natural gas.

Specific Condition No. 6: Include reference to 0.3 lbs. per MBTU heat input allowance for soot blowing/load changing.

Specific Condition No. 10: Punctuation and language has been added to clarify the distinction between EPA methods 3 and 3A which are analyzer methods for determining O₂, and the Orsat analysis method for determining O₂.

Specific Conditions Nos. 11, 14 and renumbered 17: Testing for particulate matter while burning natural gas - FPL believes that testing for particulate matter while firing natural gas is unnecessary due to the miniscule amounts of ash and sulfur contained in the fuel. The Department's Technical Evaluation and Preliminary Determination also recognizes that distinction. . This requirement is inconsistent with the other dual-fueled fossil steam boilers in the FPL system, which are not required to perform particulate tests while burning natural gas in order to demonstrate compliance to the standard. Past experience indicates that so little particulate matter exists, the sampling duration must be at least trebled in order to gather enough sample catch to measure.

During the "Initial Compliance Tests" on natural gas, FPL proposes to test for carbon monoxide and volatile organic compounds in addition to opacity, which we believe, will provide the Department reasonable assurance that the particulate standard is being met.

Initial Compliance Tests - FPL proposes to use Initial Compliance Test results to calculate the emissions of carbon monoxide and volatile organic compounds for reporting the "future actual annual emissions" via the AOR. This is consistent with the methodology used to determine the "past actual" emissions. The AP-42 emission factor will be used to determine the particulate emissions while burning natural gas and will be reported via the AOR. "Future actual annual" emissions of NO_x and SO₂ will be CEM based, determined by the EPA Scorecard values from the Acid Rain Reporting. Language in the referenced Specific Conditions has been changed to reflect the absence of particulate testing while burning natural gas and the use of the actual annual fuel combustion (heat input) and the AOR values for determining the "future actual annual" emissions of CO, VOC and PM. As a result, Specific Condition No. 14 is not necessary.

Specific Condition renumbered 17: The EPA Scorecard values are not published by March 1st, therefore the annual report submission date has been changed to August 1st.

Specific Condition renumbered 17a: The "past actual emissions" for nitrogen oxides using the EPA Scorecard value from the Acid Rain Reporting is 8,762 tons (2000 and 2001 annual average). Year 2000 was 8,381 tons. Year 2001 was 9,143 tons [Refer E-mail correspondence from EPA – Attachment No.2].

Comments regarding corresponding changes to the Draft Title V Permit revisions will be submitted by separate letter.

Thank you for your consideration in this matter. If you should have any questions, please feel free to contact me at (941) 776-5211, or Kevin Washington at (561) 691-2877.

Sincerely yours,



Paul Plotkin

Manatee Plant General Manager

Attachment: 2

C.c.s: Clair Fancy
Al Linero

J. Kissel, SWD
B. Owen, DEP
G. Worley, EPA
J. Burroughs, NPS

Att. 1

DRAFT PERMIT

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.

CONTENTS

- Section I. General Information
- Section II. Administrative Requirements
- Section III. Emissions Units Specific Conditions
- Section IV. Appendices

(DRAFT)

Howard L. Rhodes, Director
Division of Air Resources Management

(Date)

SECTION I. GENERAL INFORMATION (DRAFT)

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 (DRAFT)

1. Permitting Authority: 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 compiled 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. Modifications: 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. Title V Permit: 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.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

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-NO_x 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 NO_x burners manufactured by ABB Combustion Services, Ltd. (formerly International Combustion Limited). The low-NO_x 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. Unconfined Particulate Emissions: 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. Authorized Fuel: Each unit is authorized to fire "pipeline quality" natural gas, ~~containing no more than 10 grains of sulfur per 100 standard cubic feet of natural gas.~~ Natural gas may be fired 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. [Applicant Request; Rule 62-210.200(PTE), F.A.C.]
4. Permitted Capacity: 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 testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110*

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. UNITS 1 AND 2

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. Hours of Operation: The units may operate continuously on natural gas, #6 fuel oil, or a combination of both (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~~ Emissions of particulate matter shall not exceed 0.1 pounds per million Btu heat input steady state, nor 0.3 pounds per million Btu heat input when sootblowing as determined by EPA Methods 5, 5B, 5F, or 17, incorporated by reference in Chapter 62-297, F.A.C. [Rule 62-296.405(1)(b), F.A.C.]
7. Nitrogen Oxides: When firing natural gas, emissions of nitrogen oxides (NO_x) 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. Sulfur Dioxide: Emissions of sulfur dioxide are limited by the fuel specification in Condition No. 3 to 1.1 pounds per million Btu heat input. 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. Visible Emissions: 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 or 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 5 or 17.
DEP 9	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 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]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. UNITS 1 AND 2

11. Initial Compliance Tests: When firing 100% natural gas, the permittee shall conduct initial compliance tests to determine the emissions of carbon monoxide, volatile organic compounds, 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. These tests shall be used to document the emission rates of these pollutants for use in the reports required by Condition No. 17. [Rule 62-296.405(1)(e)1, F.A.C.]
12. Continuous Emissions Monitoring Systems: 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. ~~Compliance with the fuel sulfur limit for natural gas shall be demonstrated by keeping monthly reports obtained from the vendor indicating the average sulfur content of the natural gas being supplied from the pipeline for each month of operation. Methods for determining the sulfur content of the natural gas shall be the most recent versions of ASTM methods D4084-82, D3246-81 or other equivalent methods approved by the Department.~~ [Rule 62-4.070(3), F.A.C.]
- ~~14. Tests for Reporting Annual Emissions: When firing natural gas, the permittee shall conduct performance tests to determine the emissions of carbon monoxide, particulate matter, and volatile organic compounds from Units 1 and 2. These tests shall be used to document the emission rates of these pollutants for use in the reports required by Condition No. 18. Tests shall be conducted at least once during each year the reports are required.~~ [Rules 62-210.200(11)(d), 62-212.400(2)(d), and 62-297.100, F.A.C.]

NOTIFICATIONS

- ~~15-14. 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.]
- ~~16-15. Test Notifications~~: 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

- ~~17-16. 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.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. UNITS 1 AND 2

~~18-17.~~ **PSD Applicability Report:** Before ~~March~~ 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 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 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), <u>Initial</u> Performance Test (gas)
Nitrogen Oxides (NOx)	8179 8762	CEMS, <u>EPA Scorecard value</u> , <u>Acid Rain Reporting</u>
Particulate Matter (PM)	2384	Performance Tests (oil) <u>AOR and</u> (gas)
Sulfur Dioxide (SO ₂)	31,753	CEMS, <u>EPA Scorecard value</u> , <u>Acid Rain Reporting</u>
Volatile Organic Compounds (VOC)	149	AOR (oil), <u>Initial</u> 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 reported EPA Scorecard values for the Acid Rain Program. "Future actual annual emissions" shall be based on: actual annual fuel combustion (heat input) rates; tested emission rates for CO (gas), PM (oil) ~~and gas~~, and VOC (gas); certified Annual Operating Report data for CO (oil), ~~and~~ VOC (oil), ~~and~~ PM (gas); and data collected by the Continuous Emissions Monitoring Systems for NOx and SO₂ emissions as reported 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 III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. UNITS 1 AND 2

Att. 2



Patel.Ketan@epamail.
epa.gov

07/11/02 10:26 AM

To: mszybinski@fpl.com
cc:

Subject: 2001 Emissions and heat input data for Manatee (ORISPL 6042)

Mr. Szybinski,

Please find below a table summarizing the FINAL 2001 emissions and heat input values for Manatee (ORISPL 6042), units PMT1 and PMT2.

ORISPL	Unit ID	SO2 (tons)	CO2 (tons)	NOxRate	(lbs/mmBtu) NOx (tons)	(mmBtu) Heat Input
6042	PMT1	18,124	3,052,997	0.24	4,605	34,369,487
6042	PMT2	16,471	2,730,668	0.25	4,538	30,823,660

Feel free to contact me if you have any questions or concerns.

Thanks,

Ketan D. Patel
U.S. Environmental Protection Agency (6204N)
Clean Air Markets Division
patel.ketan@epa.gov
202.564.9144

BRADENTON HERALD

www.bradenton.com
P.O. Box 921
Bradenton, FL 34206-0921
102 Manatee Avenue West
Bradenton, FL 34205-8894
941/748-0411 ext. 7065

RECEIVED

JUL 18 2002

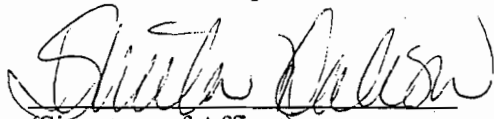
BUREAU OF AIR REGULATION

Bradenton Herald
Published Daily
Bradenton, Manatee, Florida

STATE OF FLORIDA
COUNTY OF MANATEE;

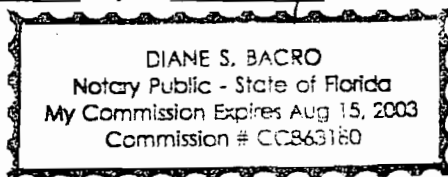
Before the undersigned authority personally appeared Sheila Dalesio, who on oath says that she is a Legal Advertising Representative of the Bradenton Herald, a daily newspaper published at Bradenton in Manatee County, Florida; that the attached copy of the advertisement, being a Legal Advertisement in the matter PUBLIC NOTICE in the Court, was published in said newspaper in the issues of JULY 15, 2002.

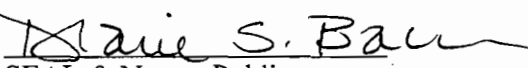
Affiant further says that the said publication is a newspaper published at Bradenton, in said Manatee County, Florida, and that the said newspaper has heretofore been continuously published in said Manatee County, Florida, each day and has been entered as second-class mail matter at the post office in Bradenton, in said Manatee County, Florida for a period of 1 year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.


(Signature of Affiant)

Sworn to and subscribed before me this

15th Day of July, 2002




SEAL & Notary Public

Personally Known ☒ OR Produced Identification ☐
Type of Identification Produced _____

cc. [unclear] [unclear]
[unclear] [unclear]
[unclear] [unclear]
B

PUBLIC NOTICE OF
INTENT TO ISSUE AIR
CONSTRUCTION PER-
MIT AND TITLE V AIR
OPERATION PERMIT
REVISION

Florida Department of
Environmental
Protection
Florida Power and
Light - Manatee Power
Plant, Manatee County
Florida
Draft Air Construction
Permit No. 0810010-
007-AC Construction
of Natural Gas
Infrastructure
Draft Title V Air
Operation Permit
Revision No. 0810010-
008-AV Concurrent
Revision to Add
Natural Gas as an
Authorized Fuel

The Florida
Department of
Environmental protection (permitting authority) gives notice of its intent to issue an Air construction Permit and a Title V Air Operation Permit Revision to Florida Power and Light (applicant) for the Manatee Power Plant located at 19050 State Road 62 in Parrish, Manatee County, Florida. The applicant's authorized representative and responsible official is Mr. Paul Plotkin, Plant General Manager. The applicant's address is Florida Power and Light, Manatee Power Plant, 19050 State Road 62, Parrish, FL 34219.

The new Gulfstream Natural Gas Pipeline began commercial operation in June of 2002. The project brings natural gas that is compressed near Mobile Alabama and conveyed through an underwater pipeline on the continental shelf to markets in Florida. The new pipeline instantly increases the total natural gas transportation capacity into Florida from approximately 1.5 to 2.5 billion standard cubic feet, excluding other proposed pipeline projects. The pipeline enters Florida in Manatee County at a location that is particularly convenient to the FPL Manatee Plant. Florida Power and Light (FPL) proposed to take advantage of the new pipeline by constructing the necessary infrastructure to supply natural gas to existing electric utility steam generating Units 1 and 2. These existing units include low NOx burners, which incorporate air and fuel staging to reduce emissions of nitrogen oxides when firing either fuel oil or natural gas. FPL predicts that the project will not result in net actual annual emissions increases above the past actual annual emissions from the units (averaged for 2000 to 2001). Therefore, FPL maintains that the project does not require review under the Prevention of Significant Deterioration (PSD) of Air Quality program. This procedure is available to operators of electric utility steam generating units in accordance with federal regulations and the Department's rules.

The Department determines that the addition of natural gas is not likely to cause an increase in actual annual emissions from the plant. Natural gas is a clean burning fuel that contains little ash or sulfur. Emissions of carbon monoxide, nitrogen oxides, particulate matter, sulfur dioxide, and volatile organic compounds are expected to decrease when firing natural gas as compared to firing fuel oil. The draft permits authorize the construction of the infrastructure to supply natural gas to existing Units 1 and 2 and establishes emissions standards for opacity, particulate matter, and nitrogen oxides that are consistent with Rule 62-296-405, F.A.C., which applies to large boilers. The draft permits also establish monitoring and reporting requirements to verify that the gas project was not subject to PSD. The Department notes that FPL is among the highest users of natural gas in the country and strongly encourages FPL to actually fire the newly available natural gas in Manatee Units 1 and 2.

The permitting authority will issue the Air Construction Permit and the PROPOSED Title V Air Operation Permit Revision and subsequent FINAL Title V Air Operation Permit Revision, in accordance with the conditions of the Draft Air Construction Permit and the Draft Title V Air Operation Permit Revision unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Draft Air Construction Permit issuance action for a period of 14 (fourteen) days from the publication of this Public Notice. The permitting authority will accept written comments concerning the proposed Draft Title V Air Operation Permit Revision issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in significant changes, the permitting authority shall issue revised draft permits and require, if applicable, another "Public Notice".

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. Under Section 120.60 (3)F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within 14 (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 applicable 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 (F.A.C.).

A petition that disputes the material facts on which the permitting authority'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; 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 petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the 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 state;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief; (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 wished the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority'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 permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority 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 for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit revision. Any petition shall be based only on objections to the permit revision that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrated to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at: Permitting Authority: Bureau of Air Regulation, Florida Department of Environmental Protection, 111 S. Magnolia Drive, Suite 4, Tallahassee, FL 32301. Phone: 1-850-488-0114. Affected District Office Southwest District Office, Florida Department of Environmental Protection, 3804 Caconut Palm Drive, Tampa, FL 33619-8218. Phone: 813-744-6100. The complete project file includes the Technical Evaluation and Preliminary Determination, the Draft Air Construction Permit, the Draft Title V Air Operation Permit Revision, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact permit engineer at the above address, or call 850-488-0114, for additional information. 7/15/2002

Memorandum

Florida Department of Environmental Protection

TO: Clair Fancy, Chief, BAR
THROUGH: Al Linero, Administrator - New Source Review Section
FROM: Jeff Koerner, New Source Review Section *ag 7/3*
DATE: July 3, 2002
SUBJECT: FPL Manatee Power Plant
Draft Air Permit No. 0810010-007-AC
Construction of Natural Gas Infrastructure for Units 1 and 2
Draft Title V Permit Revision No. 0810010-008-AV
Authorization to Fire Natural Gas in Units 1 and 2

Attached for your review are the following items:

- Intent to Issue Permit and Public Notice Package;
- Technical Evaluation and Preliminary Determination;
- Statement of Basis;
- Draft Construction and Title V Permits; and
- PE Certification

FPL proposes to construct the infrastructure necessary to fire natural gas in existing fossil fuel fired steam generator Units 1 and 2. FPL predicts that the change will not result any net emissions increases greater than the PSD significant emissions rates. The draft air construction permit authorizes the construction and requires record keeping to verify that the project was not subject to PSD. The concurrent draft Title V permit revision authorizes the firing of natural gas as an allowable fuel for Units 1 and 2. The Technical Evaluation and Preliminary Determination provides a detailed description of the project, rule applicability, and construction permit conditions. The Statement of Basis summarizes the changes made to the Title V operation permit. The P.E. certification briefly summarizes the proposed project.

Day #74 is July 22, 2002. I recommend your approval of the attached Draft Permit for this project.

CHF/AAL/jfk

Attachments

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

P.E. CERTIFICATION STATEMENT

PERMITTEE

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

FPL Manatee Power Plant, Units 1 and 2
Draft Air Permit No. 0810010-007-AC
Construction of Natural Gas Infrastructure
Draft Title V Permit Revision No. 0810010-008-AV
Authorization to Fire Natural Gas

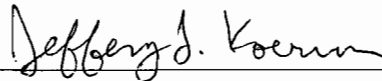
PROJECT DESCRIPTION

The applicant proposes to construct the infrastructure necessary to fire natural gas in existing fossil fuel fired steam generator Units 1 and 2. FPL predicts that the addition of natural gas will not result in PSD-significant net emissions increases for any pollutant and therefore PSD does not apply. This procedure is available to operators of electric utility steam generating units and is allowed in accordance with the provisions of Rule 62-210.200(11)(d), F.A.C. and 40 CFR 52.21(b)(33). Based on the information provided by the applicant and the annual emissions estimates, the Department determines that the addition of natural gas is not likely to cause any PSD-significant net annual emissions increases from the plant. The draft permit includes the following requirements:

- Requires monitoring and record keeping to verify that the project was not subject to PSD;
- Approves natural gas as an authorized fuel up to a maximum heat input rate of 5670 MMBtu per hour;
- Limits the fuel sulfur content to no more than 10 grains of sulfur per 100 standard cubic feet of natural gas; and
- Specifies opacity, particulate matter, and NOx standards consistent with Rule 62-296.405, F.A.C.

The applicant also requests a concurrent revision of the Title V operation permit that authorizes natural gas as an allowable fuel. The separate permitting actions are being processed under a single public notice package. The revised draft Title V operation permit includes the above requirements and updates the permit to incorporate two previous administrative permit corrections issued on July 16, 1998 and September 14, 1998.

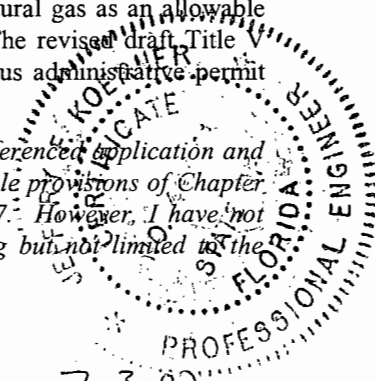
***I HEREBY CERTIFY** that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).*



Jeffery F. Koerner, P.E.
Registration Number: 49441

7-3-02

(Date)





Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

July 9, 2002

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

Re: FPL Manatee Power Plant
Draft Air Construction Project No. 0810010-007-AC
Construction of Natural Gas Infrastructure
Draft Title V Air Operation Permit Revision No. 0810010-008-AV
Concurrent Revision to Add Natural Gas as an Authorized Fuel

Dear Mr. Plotkin:

One copy of the Technical Evaluation and Preliminary Determination, the Statement of Basis, the combined Public Notice, the Draft Air Construction Permit, and the Draft Title V Air Operation Permit Revision for the FPL Manatee Power Plant is enclosed. The Department's "Intent to Issue Air Construction Permit and Title V Air Operation Permit Revision" and the "Public Notice of Intent to Issue Air Construction Permit and Title V Air Operation Permit Revision" are also included.

An electronic version of the Draft Title V Air Operation Permit Revision has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

["http://www.dep.state.fl.us/air/permitting/tv/TitleVSearch.asp"](http://www.dep.state.fl.us/air/permitting/tv/TitleVSearch.asp)

The "Public Notice of Intent to Issue Air Construction Permit and Title V Air Operation Permit Revision" must be published as soon as possible. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within seven (7) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits pursuant to Rule 62-110.106(11), F.A.C.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Jeff Koerner, at the above letterhead address. If you have any other questions, please contact Mr. Koerner, at 850/921-9536.

Sincerely,

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

CHF/AAL/SMS/jfk

Enclosures

U.S. EPA, Region 4 (INTERNET E-mail)

"More Protection, Less Process"

Printed on recycled paper.

In the Matter of an
Application for Permits by:

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

Authorized Representative and Responsible Official:
Mr. Paul Plotkin, Plant General Manager

Draft Construction Permit No. 0810010-007-AC
Draft Title V Permit No. 0810010-008-AV
FPL Manatee Power Plant
Manatee County, Florida

**INTENT TO ISSUE AIR CONSTRUCTION PERMIT AND
TITLE V AIR OPERATION PERMIT REVISION**

Florida Power and Light (applicant) applied on May 10, 2002 for an Air Construction Permit and concurrent Title V Air Operation Permit Revision for the Manatee Power Plant located at 19050 State Road 62 in Parrish, Manatee County, Florida. The Florida Department of Environmental Protection (permitting authority) gives notice of its intent to issue Air Construction Permit and Title V Air Operation Permit Revision for the Title V source detailed in the application specified above and the attached Technical Evaluation and Preliminary Determination, for the reasons stated below. Copies of the Draft Air Construction Permit and Draft Title V Air Operation Permit Revision are attached.

Florida Power and Light (FPL) proposes to construct the necessary infrastructure to supply natural gas to existing electric utility steam generating Units 1 and 2. These units include low NO_x burners, which incorporate air and fuel staging to reduce emissions of nitrogen oxides when firing either fuel oil or natural gas. FPL predicts that the project will not result in net actual emissions increases and therefore does not require review under the Prevention of Significant Deterioration (PSD) of Air Quality program. This procedure is available to operators of electric utility steam generating units in accordance with the Department's rules. The draft permits authorize the construction of the infrastructure to supply natural gas to existing Units 1 and 2, the use of natural gas as an allowable fuel, and specify emissions standards consistent with the Department's regulations.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-212 and 62-213. This source is not exempt from construction and Title V permitting procedures. The permitting authority has determined that an Air Construction Permit and a Title V Air Operation Permit Revision are required to modify and commence or continue operations at the facility.

The permitting authority intends to issue the Air Construction Permit and the Title V Air Operation Permit Revision based on the belief that reasonable assurances have been provided to indicate that the construction activity and operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice of Intent to Issue Air Construction Permit and Title V Air Operation Permit Revision" ("Public Notice"). The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400, within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication may result in the denial of the permits pursuant to Rule 62-110.106(11), F.A.C.

The permitting authority will issue the Air Construction Permit and the PROPOSED Title V Air Operation Permit Revision and subsequent FINAL Title V Air Operation Permit Revision, in accordance with the conditions of the attached Draft Air Construction Permit and the DRAFT Title V Air Operation Permit Revision unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Air Construction Permit issuance action for a period of 14 (fourteen) days from the date of publication of the "Public Notice". The permitting authority will accept written comments concerning the proposed Title V Air Operation Permit Revision issuance action for a period of 30 (thirty) days from the date of publication of the "Public Notice". Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed

shall be made available for public inspection. If written comments received result in significant changes, the permitting authority shall issue revised draft permits and require, if applicable, another "Public Notice".

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 (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), F.S., must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within 14 (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, F.A.C.

A petition that disputes the material facts on which the permitting authority'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 each 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, as well as the rules and statutes which entitle the petitioner to relief; (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 permitting authority'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 permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation will not be available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection 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 of Environmental Protection, 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 United States Environmental Protection Agency 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.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit revision. Any petition shall be based only on objections to the permit revision that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

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 "Intent to Issue an Air Construction Permit and a Title V Air Operation Permit Revision" (including the combined "Public Notice", the Draft Air Construction Permit and the DRAFT Title V Air Operation Permit Revision) and all copies were sent by certified mail* or U.S. mail before the close of business on 7/9/02 to the persons listed:

Mr. Paul Plotkin, FPL*
Chair, Manatee County Commissioners*
President, Manatee County Citizens Against Pollution (MCAP)*
Mr. Clarence Troxell*
Mr. Kevin Washington, FPL
Ms. Kathryn S. Salvador, FPL
Air Quality Manager, Manatee County Environmental Management Department
Mr. Gerald Kissel, SWD
Mr. Hamilton Owen, DEP Siting Office
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency Clerk, receipt of which is hereby acknowledged.

 July 9, 2002
(Clerk) (Date)

**PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT
AND TITLE V AIR OPERATION PERMIT REVISION**

Florida Department of Environmental Protection

Florida Power and Light - Manatee Power Plant
Manatee County, Florida

Draft Air Construction Permit No. 0810010-007-AC
Construction of Natural Gas Infrastructure

Draft Title V Air Operation Permit Revision No. 0810010-008-AV
Concurrent Revision to Add Natural Gas as an Authorized Fuel

The Florida Department of Environmental Protection (permitting authority) gives notice of its intent to issue an Air Construction Permit and a Title V Air Operation Permit Revision to Florida Power and Light (applicant) for the Manatee Power Plant located at 19050 State Road 62 in Parrish, Manatee County, Florida. The applicant's authorized representative and responsible official is Mr. Paul Plotkin, Plant General Manager. The applicant's address is Florida Power and Light, Manatee Power Plant, 19050 State Road 62, Parrish, FL 34219.

The new Gulfstream Natural Gas Pipeline began commercial operation in June of 2002. The project brings natural gas that is compressed near Mobile Alabama and conveyed through an underwater pipeline on the continental shelf to markets in Florida. The new pipeline instantly increases the total natural gas transportation capacity into Florida from approximately 1.5 to 2.5 billion standard cubic feet, excluding other proposed pipeline projects. The pipeline enters Florida in Manatee County at a location that is particularly convenient to the FPL Manatee Plant.

Florida Power and Light (FPL) proposes to take advantage of the new pipeline by constructing the necessary infrastructure to supply natural gas to existing electric utility steam generating Units 1 and 2. These existing units include low NOx burners, which incorporate air and fuel staging to reduce emissions of nitrogen oxides when firing either fuel oil or natural gas. FPL predicts that the project will not result in net actual annual emissions increases above the past actual annual emissions from the units (averaged for 2000 to 2001). Therefore, FPL maintains that the project does not require review under the Prevention of Significant Deterioration (PSD) of Air Quality program. This procedure is available to operators of electric utility steam generating units in accordance with federal regulations and the Department's rules.

The Department determines that the addition of natural gas is not likely to cause an increase in actual annual emissions from the plant. Natural gas is a clean burning fuel that contains little ash or sulfur. Emissions of carbon monoxide, nitrogen oxides, particulate matter, sulfur dioxide, and volatile organic compounds are expected to decrease when firing natural gas as compared to firing fuel oil. The draft permits authorize the construction of the infrastructure to supply natural gas to existing Units 1 and 2 and establishes emissions standards for opacity, particulate matter, and nitrogen oxides that are consistent with Rule 62-296.405, F.A.C., which applies to large boilers. The draft permits also establish monitoring and reporting requirements to verify that the gas project was not subject to PSD. The Department notes that FPL is among the highest users of natural gas in the country and strongly encourages FPL to actually fire the newly available natural gas in Manatee Units 1 and 2.

The permitting authority will issue the Air Construction Permit and the PROPOSED Title V Air Operation Permit Revision and subsequent FINAL Title V Air Operation Permit Revision, in accordance with the conditions of the Draft Air Construction Permit and the Draft Title V Air Operation Permit Revision unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Draft Air Construction Permit issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice. The permitting authority will accept written comments concerning the proposed Draft Title V Air Operation Permit Revision issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in significant changes, the permitting authority shall issue revised draft permits and require, if applicable, another "Public Notice".

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 (fourteen) days of publication of the

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within 14 (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 applicable 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 (F.A.C.).

A petition that disputes the material facts on which the permitting authority'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; 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 petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the 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 state; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief; (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.

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Mediation is not available for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit revision. Any petition shall be based only on objections to the permit revision that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

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

Permitting Authority:

Bureau of Air Regulation
Florida Department of Environmental Protection
111 S. Magnolia Drive, Suite 4
Tallahassee, FL 32301
Telephone: 850/488-0114

Affected District Office

Southwest District Office
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619-8218
Telephone: 813/744-6100

The complete project file includes the Technical Evaluation and Preliminary Determination, the Draft Air Construction Permit, the Draft Title V Air Operation Permit Revision, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact permit engineer at the above address, or call 850/488-0114, for additional information.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

PROJECT

Manatee Power Plant Units 1 and 2
ARMS Emissions Unit Nos. 001 and 002
Draft Air Construction Permit No. 0810010-007-AC
Construction of Natural Gas Facilities
Draft Title V Operation Permit Revision No. 0810010-008-AV
Addition of Natural Gas as an Authorized Fuel

COUNTY

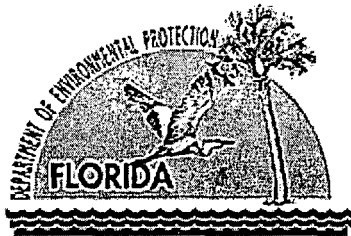
Manatee County

APPLICANT

Florida Power and Light
Manatee Power Plant
ARMS Facility ID No. 0810010

**PERMITTING
AUTHORITY**

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
New Source Review Section



July 3, 2002

1. APPLICATION INFORMATION

Applicant Name and Address

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

Authorized Representative: Mr. Paul Plotkin, Plant General Manager

Processing Schedule

05/10/02: Received permit application Nos. 0810010-007-AC and 0810010-008-AV; complete.

06/27/02: Letter received from applicant.

Existing Facility Description

Florida Power and Light owns and operates the Manatee Plant, which is a steam-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"). The plant consists of two oil-fired steam-electrical generating units and miscellaneous support equipment.

Regulatory Categories

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.

2. PROJECT DESCRIPTION

Florida Power and Light (FPL) operates the existing Manatee Power Plant, which is a steam-electrical generating plant located in Manatee County, Florida. The plant primarily consists of two oil-fired steam-electrical generators, each of which are designed to produce a nominal 800 MW of electricity. Unit 1 began commercial operation in 1976 and Unit 2 began commercial operation in 1977. Each unit is currently permitted to fire a variable combination of No. 6 fuel oil, No. 2 fuel oil, propane, and used oil fuel from FPL operations. Units 1 and 2 are considered "electric utility steam generating units" as defined in Rule 62-210.200(97), F.A.C. and with regard to Rule 62-210.200(11), F.A.C.

The new Gulfstream Natural Gas Pipeline began commercial operation in June of 2002. See Figure 1 on the following page. The project brings natural gas that is compressed near Mobile Alabama and conveyed through an underwater pipeline on the continental shelf to markets in Florida. The new pipeline instantly increases the total natural gas transportation capacity into Florida from approximately 1.5 to 2.5 billion standard cubic feet, excluding Florida Gas Transmission Company's Phases V and VI projects. The pipeline enters Florida in Manatee County at a location that is particularly convenient to the FPL Manatee Plant.

As a direct result of the new pipeline, FPL proposes to add natural gas as an authorized fuel for existing Units 1 and 2. (FPL also proposes a mostly gas-fired combined cycle project at the Manatee Plant, which is presently under separate review by the Department.) The existing burners for each unit are CSL Twin Register Low NOx burners manufactured by ABB Combustion Services, Ltd. (formerly International Combustion Limited), which are similar in configuration to the burners used for Units 1 and 2 at the FPL Martin Power Plant. 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 efficient combustion when firing fuel

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

oil. Due to temperature limitations of existing boiler components, FPL will physically restrict the maximum heat input rate when firing natural gas to 5670 MMBtu per hour, which is less than the current maximum for oil firing (8650 MMBtu per hour). At this rate, the unit will produce approximately 575 MW. The units will co-fire natural gas with fuel oil.

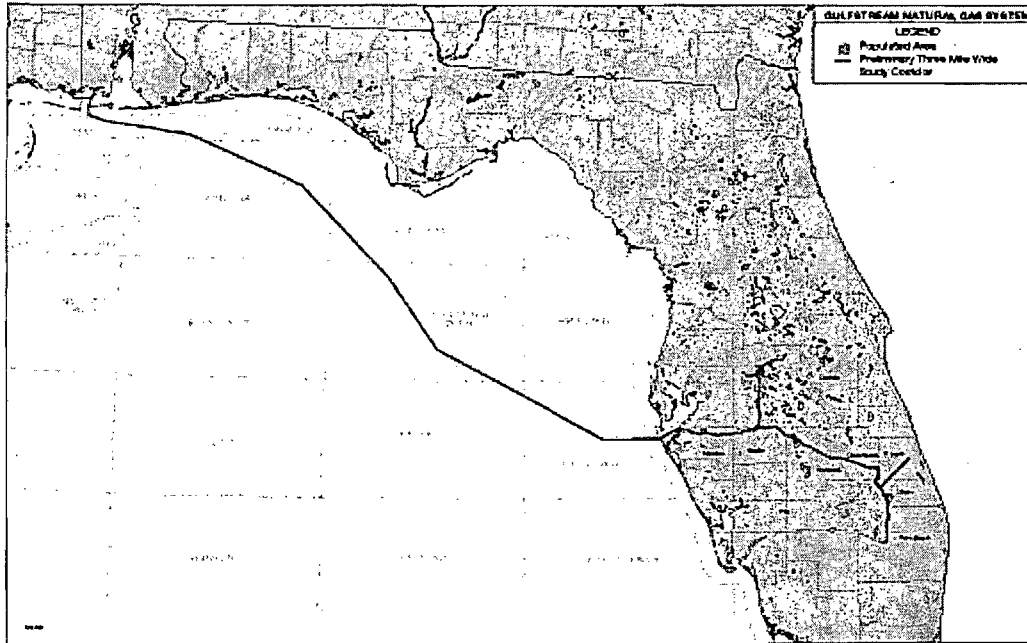


Figure 1. Ultimate Development Scenario for Gulfstream Pipeline

The applicant provided the following supporting information indicating that the short-term emission rates will not increase with the firing of natural gas.

Table 1. Emission Rates in Application

Pollutant	Emission Factors			
	Fuel Oil ^a		Natural Gas ^b	
	lb/MMBtu	lb/hour	lb/MMBtu	lb/hour
Carbon Monoxide (CO)	0.63	5450	0.46	2608
Nitrogen Oxides (NOx)	0.29	2545	0.20	1152
Particulate Matter (PM)	0.08	719	0.002	10
Sulfur Dioxide (SO ₂)	1.06	9183	0.0006	3
Volatile Organic Compounds (VOC)	0.005	44	0.003	17

Notes:

- Oil Firing:** The CO emission factor is based on actual test data. The NOx and SO₂ emission factors are from the EPA Acid Rain Scorecard values, which are based on actual CEMS data and heat input rates. The PM and VOC emission factors are based on EPA's AP-42 factors. The current maximum heat input to each unit is 8650 MMBtu per hour when firing only fuel oil.
- Gas Firing:** The CO and NOx emission factors are based on the burner manufacturer's predicted performance. The PM, SO₂, and VOC emission factors are based on EPA's AP-42 factors. Due to thermal

limitations of boiler components, FPL indicates that the maximum heat input rate to each boiler will be 5670 MMBtu per hour when firing only natural gas.

Pursuant to Rule 62-210.200(11)(d), F.A.C., the applicant also predicts that the project will not result in any net annual emissions increases that would require a PSD review in accordance with rule 62-212.400, F.A.C. The applicant does not believe this request requires a construction permit because the project is not a "modification" as specified in Rule 62-210.200(169), F.A.C., which defines a "modification" as a physical change or a change in the method of operation that would result in an increase in actual emissions. Therefore, the applicant requests a revision to the Title V air operation permit to allow the use of natural gas in Units 1 and 2. However, the applicant recognizes that the Department has determined that an air construction permit is required to make the necessary physical changes and instructs the Department to process the application as a construction permit with a concurrent revision to the Title V air operation permit, if necessary.

3. DEPARTMENT REVIEW

Application

The Department determines that an air construction permit is required to perform the necessary work that will enable the units to fire natural gas. Rule 62-210.200(76), F.A.C. defines construction as, "*the act of performing on-site fabrication, erection, installation or modification of an emissions unit or facility of a permanent nature, including installation of foundations or building supports; laying of underground pipe work or electrical conduit; and fabrication or installation of permanent storage structures, component parts of an emissions unit or facility, associated support equipment, or utility connections. Land clearing and other site preparation activities are not a part of the construction activities.*" FPL proposes to erect permanent natural gas pipelines and the associated equipment necessary for firing natural gas in Units 1 and 2. Therefore, the Department will process the request as both a construction permit and a revision to the Title V air operation permit.

Burner History

Manatee Units 1 and 2 were originally equipped with mechanically atomizing burners (Forney Type "QPWRMA") to fire fuel oil. The Department was informed by FPL after the fact that the mechanical-atomizing burners were replaced with steam-atomizing burners in 1994/1995. FPL stated that the purpose of the 1994/1995 change was to provide more efficient combustion of the fuel oil. In 1999, FPL received Department approval to return to mechanically atomizing burners by installing modern low NOx burners manufactured by ABB Combustion Services, Ltd. The new burners were expected to reduce opacity as well as emissions of carbon monoxide and nitrogen oxides. By this project, FPL is requesting authorization to construct natural gas facilities for Units 1 and 2 and to specify its use as an allowable fuel.

Annual Emissions Estimates

As part of the project review, the Department used several methods to estimate past actual annual emissions. Table 2 presents the results.

Table 2. Annual Emissions for Units 1 and 2 (Average for 2000/2001)

Pollutant	Application ^a	AORs ^b	Acid Rain ^c
CO	18,822	18,987	---
NOx	8664	9237	8179
PM	2390	2384	---
SO ₂	31,668	29,924	31,753
VOC	149	149	---

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Notes:

- Emissions are based on the actual fuel consumption during 2000 and 2001.
- The figures represent the average annual emissions for Units 1 and 2 in "tons per year" for operation during calendar years 2000 and 2001. "AOR" means the Annual Operating reports submitted to the Department as certified by FPL.
- The NO_x and SO₂ "Acid Rain" emissions are based on the annual emissions reported to the EPA Acid Rain Program for the calendar years 2000 and 2001.

In addition, FPL operates Units 1 and 2 at the Martin Power Plant, which were constructed in the early 1980's. These units have boiler and burner configurations that are similar to the Manatee units. Based on the 2001 Annual Operating Reports (AOR), the Martin Units 1 and 2 averaged an annual capacity factor of 41% and a fuel mix of 55% fuel oil to 45% natural gas. Table 3 provides a comparison of the Manatee and Martin Units 1 and 2. As shown, the future firing of natural gas is likely to result in fewer emissions than firing fuel oil. The actual emissions for the Martin units suggest that CO, NO_x, and SO₂ emissions from the Manatee units may be even lower than anticipated when firing natural gas.

Table 3. Comparison of Annual Emissions – Manatee and Martin Units 1 and 2

Pollutant	FPL Manatee Plant ^a		FPL Martin Plant ^b
	41% Capacity All Oil/No Gas	41% Capacity 55% Oil/45% Gas	41% Capacity 55% Oil/45% Gas
CO	19,572	17,196	12,904
NO _x	9,320	7,922	6010
PM	2,485	1,395	1508
SO ₂	32,931	18,121	17,592
VOC	155	127	140

Notes:

- A 41% capacity factor for Manatee Units 1 and 2 was assumed to provide a common basis for comparison with the Martin Plant. Similarly, the average annual fuel mix (55% oil/45% gas) reflects that of Martin Units 1 and 2 for 2001. CO and NO_x emissions are based on the manufacturer's predicted emissions rates of 0.46 lb/MMBtu and 0.20 lb/MMBtu, respectively.
- Based on the 2001 AOR, Martin Units 1 and 2 averaged an annual capacity factor of 41% and an annual fuel mix of 55% fuel oil to 45% natural gas.

The Department also estimated the emissions of hazardous air pollutants from both oil firing and gas firing based on published EPA emission factors. The firing of natural gas or the co-firing of natural gas with fuel oil would result in overall lower emissions of hazardous air pollutant emissions. No further review is required because the applicant does not intend to "construct" or "reconstruct" a major source of for hazardous air pollutants as defined in Subpart B of 40 CFR 63.

PSD Applicability

The FPL Manatee Plant is classified as a "fossil fuel fired steam electric plant of more than 250 million Btu/hr heat input", as defined in Table 62-212.400-1, F.A.C. Such facilities that emit more than 100 tons per year of any regulated pollutant are considered "major sources" in accordance with Rule 62-210.200(159), F.A.C. Modifications to major sources that result in net actual annual emissions increases greater than the PSD significant emission rates specified in Table 62-212.400-2, F.A.C. are subject to PSD major source

preconstruction review in accordance with Rule 62-212.400, F.A.C.

Rule 62-210.200(11), F.A.C. generally defines "actual emissions" as the average rate of emissions (in tons per year) for a two year period preceding a proposed project and which is representative of the normal operation of the emissions unit. For most emissions units, the actual emissions after completion of a proposed project are equal the potential emissions. However, for electric utility steam generating units (other than a new unit or the replacement of an existing unit), actual emissions following a physical or operational change, "... shall equal the representative actual annual emissions of the unit following the physical or operational change." Rule 62-204.800, F.A.C. incorporates by reference the following definition of "representative actual annual emissions" found in 40 CFR 52.21(b)(33):

"Representative actual annual emissions means the average rate, in tons per year, at which the source is projected to emit a pollutant for the two-year period after a physical change or change in the method of operation of a unit, (or a different consecutive two-year period within 10 years after that change, where the Administrator determines that such period is more representative of normal source operations), considering the effect any such change will have on increasing or decreasing the hourly emissions rate and on projected capacity utilization. In projecting future emissions the Administrator shall:

- (i) Consider all relevant information, including but not limited to, historical operational data, the company's own representations, filings with the State or Federal regulatory authorities, and compliance plans under title IV of the Clean Air Act; and
- (ii) 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."

Operators of electric utility steam generating units must provide annual reports to the Department demonstrating that the physical or operational change did not result in an emissions increase.

FPL provided the Department with the emissions rates presented in Table 1, which show that the firing of natural gas is expected to result in decreased emissions for all criteria pollutants on a short-term basis. Since long-term emissions are based on actual operation of the emissions units, FPL also provided a projection of its System Planning Projected Load Forecast. According to this information, the annual capacity factor for Units 1 and 2 have increased over the last several years from approximately 25% in 1997 to about 40% in 2001. The primary reason was shrinking reserve margin throughout the State of Florida. The company projects that the capacity factor will decrease back to about 20% in 2006. By that date, quite a number of new projects already permitted or under review will be complete, thus reducing the competitiveness of Units 1 and 2. Among these projects are very substantial capacity increases through natural gas re-powering at the FPL Sanford and Fort Myers Plants, which were projects that resulted in considerable emissions reductions.

The Department acknowledges FPL's projections regarding Units 1 and 2 at the Manatee Power Plant. Operation at or below the current annual capacity factors while firing natural gas would likely result less annual emissions than the past actual annual emissions from oil firing. Based on FPL's capacity projections, the anticipated short-term emission rates for gas firing, and the estimated annual emissions, the Department agrees that the addition of natural gas is not likely to result in an emissions increase from these units. In accordance with Rule 62-210.200(11), F.A.C., the Department will require FPL to submit annual reports for five years verifying that the gas project was not subject to PSD preconstruction review.

NSPS Subpart D Applicability

Manatee Units 1 and 2 were constructed in the early 1970's and began commercial operation in 1976 and 1977. In a letter dated January 26, 1976, EPA Region 4 informed FPL that the Manatee units were not subject to

Subpart D of the New Source Performance Standards. EPA stated that FPL provided evidence of binding contracts for the purchase of the units prior to the effective date of the regulations. Recent conversations with EPA Region 4 indicate that the addition of natural gas would not change this status with regard to the New Source Performance Standards.

Permit Requirements

As a fossil fuel fired steam electric generator with a heat input rate greater than 250 MMBtu per hour, Units 1 and 2 are subject to Rule 62-296.405, F.A.C. The following summarizes the requirements of this rule and conditions specified in the draft air construction permit.

Heat Input Rate: The maximum heat input rate from 100% natural gas firing will be limited to 5670 MMBtu per hour as requested by FPL. The maximum heat input from firing a combination of fuel oil and natural gas will be specified as 8650 MMBtu per hour, which is consistent with the current maximum rate for firing fuel oil.

Particulate Matter: Each boiler must comply with the particulate matter emissions standard (0.10 lb/MMBtu heat input) and visible emissions standard (40% opacity) specified in Rule 62-296.405, F.A.C. Natural gas contains little ash or sulfur, so particulate matter emissions from gas firing should readily comply with these requirements. Performance tests for particulate matter and opacity will be required to verify compliance with the standards. The test results for particulate matter will also provide information for the reporting of annual emissions.

Sulfur Dioxide: The Title V air operation permit currently regulates emissions of sulfur dioxide when firing fuel oil. For firing natural gas, the Department will establish a fuel sulfur specification of 10 grains of sulfur per 100 standard cubic feet of natural gas. This is consistent with the maximum fuel sulfur level allowed by the Department of Energy's Federal Energy Regulatory Commission, which regulates the interstate transmission of natural gas. Monthly verification and records of the average natural gas sulfur content will be required. The existing CEMS will be required for the reporting of annual sulfur dioxide emissions.

Carbon Monoxide: No standards for carbon monoxide are currently specified for FPL Manatee Units 1 and 2. Rule 62-296.405, F.A.C. for large utility boilers does not regulate emissions of this pollutant. Based on the burner manufacturer's predicted performance, emissions of carbon monoxide are expected to decrease by slightly more than 25% when firing natural gas. Performance tests will be required to provide information for the reporting of annual emissions.

Volatile Organic Compounds: At the high furnace temperatures associated with large utility boilers, emissions of volatile organic compounds are relatively low. Annual emissions reported for 2000 and 2001 averaged 149 tons per year when firing fuel oil. The firing of natural gas is expected to result in even lower emissions of volatile organic compounds. Rule 62-296.405, F.A.C. for large utility boilers does not regulate emissions of this pollutant. Performance tests will be required to provide information for the reporting of annual emissions.

Nitrogen Oxides: In accordance with Rule 62-296.405, F.A.C., emissions of nitrogen oxides (NOx) are limited to 0.30 lb/MMBtu based on a 30-day rolling average. This standard applies to oil firing, gas firing, or a combination of authorized fuels. Based on the burner manufacturer's predicted performance, the NOx emission rate for firing natural gas is expected to be 0.20 lb/MMBtu; however, the actual emissions rate is uncertain. FPL states that the contract with the manufacturer provided a guaranteed NOx emission rate of 0.30 lb/MMBtu for oil firing with liquidated damages should the burners fail to meet this performance specification. According to FPL, no such guarantee was provided for gas firing because:

- There is no emissions data available for gas firing because rig testing was not conducted when the burners were being manufactured.
- There are no operational baselines upon which to establish a guaranteed NOx emission rate because natural gas has never been fired in the Manatee units.
- At that time, FPL had no immediate or definite plans to fire natural gas, which would have made it

impossible to verify the NOx emission rate as part of any warranty performance testing for acceptance of the burners.

FPL maintains that there is reasonable assurance that NOx emission rate will be much less than 0.30 lb/MMBtu based on the similar boiler/burner configuration for the Martin Plant's Units 1 and 2, the manufacturer's predicted performance, and FPL's extensive experience with low-NOx burners on dual fuel boilers. The Department notes that this emission rate has been achievable with the similar boiler and burner configurations of Units 1 and 2 at the FPL Martin Power Plant. In addition, EPA's AP-42 emission factor reference document identifies average NOx emission rates of 0.14 lb/MMBtu for large utility boilers with low NOx burners. The Department has reason to believe that NOx emissions will be considerably reduced as a result of firing natural gas. The permit will establish a NOx limit of 0.30 lb/MMBtu based on a 30-day rolling CEMS average, which is consistent with the current limit. The existing CEMS will be required for the reporting of annual nitrogen oxides emissions.

Annual PSD Applicability Report: Pursuant to Rule 62-210.200(11), F.A.C., the permit will include the requirement to report annual emissions and compare to the past actual emissions. In accordance with 40 CFR 52.21(b)(33), the permit will allow the exclusion of "... 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." Should the annual emission reporting indicate that the project resulted in PSD-significant emissions increases, the project will be subject to PSD preconstruction review in accordance with Rule and 62-212.400, F.A.C.

Concurrent Title V Revision

FPL requests a concurrent revision of the Title V operation permit to incorporate the above changes. The Department will provide a single public notice package for the air construction permit and the Title V operation permit revision. The public notice will allow 14 days for comment on the minor source air construction permit and 30 days for comment on the Title V operation permit revision. If no administrative hearing is requested and no comments are received that would result in substantial changes, air construction Permit No. 0810010-007-AC will be issued as a final permitting action and revised Title V operation Permit No. 0810010-008-AV will continue to the "Proposed Permit" phase of the Title V permitting process for final EPA review.

4. PRELIMINARY DETERMINATION

Based on the information provided by FPL, the Department determines that the addition of natural gas is not likely to cause an increase in actual annual emissions from the plant; therefore, the project is not subject to PSD preconstruction review. This procedure is available only to operators of electric utility steam generating units in accordance with the provisions of Rule 62-210.200(11)(d), F.A.C. and 40 CFR 52.21(b)(33). FPL must provide annual reports for five years verifying that PSD preconstruction review did not apply to the gas project. The Department strongly encourages FPL to actually use the newly available natural gas to help ameliorate the concerns regarding increasing emissions voiced by the residents of Manatee County during the course of this review. The Department specifically notes that this action does not create the possibility of future project exemptions from the rules for the Prevention of Significant Deterioration (Rule 62-212.400, F.A.C.) that are based on the concept that the units or the facility are capable of accommodating natural gas.

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the proposed draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the specific conditions of the draft permit. Jeff Koerner is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT PERMIT

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.

CONTENTS

Section I. General Information

Section II. Administrative Requirements

Section III. Emissions Units Specific Conditions

Section IV. Appendices

(DRAFT)

Howard L. Rhodes, Director
Division of Air Resources Management

(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 (DRAFT)

1. Permitting Authority: 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 compiled 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. Modifications: 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. Title V Permit: 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.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

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. Unconfined Particulate Emissions: 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. Authorized Fuel: Each unit is authorized to fire natural gas containing no more than 10 grains of sulfur per 100 standard cubic feet of natural gas. Natural gas may be fired 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. [Applicant Request; Rule 62-210.200(PTE), F.A.C.]
4. Permitted Capacity: 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 testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110*

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. UNITS 1 AND 2

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. Hours of Operation: 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. [Rule 62-296.405(1)(b), F.A.C.]
7. Nitrogen Oxides: When firing natural gas, emissions of nitrogen oxides (NO_x) 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. Sulfur Dioxide: Emissions of sulfur dioxide are limited by the fuel specification in Condition No. 3. 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. Visible Emissions: 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 5 or 17.
DEP 9	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 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]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. UNITS 1 AND 2

11. Initial Compliance Tests: 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. Continuous Emissions Monitoring Systems: The permittee shall use the existing Continuous Emissions Monitoring Systems (CEMS) to report emissions of nitrogen oxides (NO_x) and sulfur dioxide (SO₂). Compliance with the standard for nitrogen oxides shall be demonstrated based on data collected by the NO_x CEMS. The NO_x 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. Compliance with the fuel sulfur limit for natural gas shall be demonstrated by keeping monthly reports obtained from the vendor indicating the average sulfur content of the natural gas being supplied from the pipeline for each month of operation. Methods for determining the sulfur content of the natural gas shall be the most recent versions of ASTM methods D4084-82, D3246-81 or other equivalent methods approved by the Department. [Rule 62-4.070(3), F.A.C.]
14. Tests for Reporting Annual Emissions: When firing natural gas, the permittee shall conduct performance tests to determine the emissions of carbon monoxide, particulate matter, and volatile organic compounds from Units 1 and 2. These tests shall be used to document the emission rates of these pollutants for use in the reports required by Condition No. 18. Tests shall be conducted at least once during each year the reports are required. [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. Test Notifications: 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. PSD Applicability Report: Before March 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 year. The reports shall be used to verify the permittee's predictions of future representative actual annual

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. UNITS 1 AND 2

emissions. The reports shall be submitted for five separate years that are representative of normal 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), Performance Test (gas)
Nitrogen Oxides (NOx)	8179	CEMS, Acid Rain Reporting
Particulate Matter (PM)	2384	Performance Tests (oil and gas)
Sulfur Dioxide (SO ₂)	31,753	CEMS, Acid Rain Reporting
Volatile Organic Compounds (VOC)	149	AOR (oil), 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 reported for the Acid Rain Program. Future actual annual emissions shall be based on: actual annual fuel combustion (heat input) rates; tested emission rates for CO (gas), PM (oil and gas), and VOC (gas); certified Annual Operating Report data for CO (oil) and VOC (oil); and data collected by the Continuous Emissions Monitoring Systems for NOx and SO₂ emissions as reported 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 CF. Citation Format
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 CFR 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. Circumvention: 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 permittee 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. VOC or OS Emissions: 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) and 62-210.200(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. Unconfined Particulate Emissions: 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. Calculation of Emission Rate: 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. Sampling Facilities: 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. Test Notification: 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. Test Reports: 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. Annual Operating Report: 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 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:

Amy E. Stein, Chair
Manatee County Board of
County Commissioners
P.O. Box 1000
Bradenton, FL 34206-1000

2. Article

7001 0320 0001 3692 8345

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

COMPLETE THIS SECTION ON DELIVERY

- A. Received by (Please Print Clearly) B. Date of Delivery
 C. Signature *Terry L. Farnham*
 x *Terry L. Farnham* ☐ Agent ☐ Addressee
 D. Is delivery address different from item 1? ☐ Yes ☐ No
 If YES, enter delivery address below:

3. Service Type

- ☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ YesU.S. Postal Service
CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage \$

Certified Fee

Return Receipt Fee
(Endorsement Required)Restricted Delivery Fee
(Endorsement Required)

Total Postage & Fees \$

Postmark
HereSent To
Amy E. SteinStreet, Apt. No.,
or P.O. Box 1000

City, State, ZIP+4

Bradenton, FL 34206-1000

PS Form 3800, January 2001

See Reverse for Instructions

U.S. Postal Service
CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage \$

Certified Fee

Return Receipt Fee
(Endorsement Required)Restricted Delivery Fee
(Endorsement Required)

Total Postage & Fees \$

Postmark
HereSent To
Clarence TroxellStreet, Apt. No.,
or P.O. Box No.
3321 Lakeside CircleCity, State, ZIP+4
Parrish, FL 34219

PS Form 3800, January 2001

See Reverse for Instructions

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. Clarence Troxell
3321 Lakeside Circle
Parrish, FL 34219

2. Article

7001 0320 0001 3692 8369

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

COMPLETE THIS SECTION ON DELIVERY

- A. Received by (Please Print Clearly) B. Date of Delivery
 C. Signature *C. G. Troxell*
 x *C. G. Troxell* ☐ Agent ☐ Addressee
 D. Is delivery address different from item 1? ☐ Yes ☐ No
 If YES, enter delivery address below:

3. Service Type

- ☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

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. Dan Kumarich
President
Manatee Citizens Against
P0 Box 660
Parrish, FL 34219

2. Art

7001 0320 0001 3692 8338

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

COMPLETE THIS SECTION ON DELIVERY

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

PAUL SATERS

7-12-02

C. Signature

X Paul Saters

☐ Agent
☐ Addressee

D. Is delivery address different from item 1?

If YES, enter delivery address below:

☐ Yes
☐ No

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

U.S. Postal Service

CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage \$

Certified Fee

Return Receipt Fee
(Endorsement Required)Restricted Delivery Fee
(Endorsement Required)

Total Postage & Fees \$

Postmark
Here

Sent To

Dan Kumarich

Street, Apt. No.,
or PO Box No. 660City, State, ZIP+4
Parrish, FL 34219

PS Form 3800, January 2001

See Reverse for Instructions

U.S. Postal Service

CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage \$

Certified Fee

Return Receipt Fee
(Endorsement Required)Restricted Delivery Fee
(Endorsement Required)

Total Postage & Fees \$

Postmark
Here

Sent To

Paul Plotkin

Street, Apt. No.,
or PO Box No. 19050 State Road 62City, State, ZIP+4
Parrish, FL 34219

PS Form 3800, January 2001

See Reverse for Instructions

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

2. Art

7001 0320 0001 3692 8352

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

COMPLETE THIS SECTION ON DELIVERY

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

B. Saters

7-11-02

C. Signature

X B. Saters

☐ Agent
☐ Addressee

D. Is delivery address different from item 1?

If YES, enter delivery address below:

☐ Yes
☐ No

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

For your information.....

PETER C. CUNNINGHAM
Hopping Green & Sams
123 S. Calhoun Street (32301)
Post Office Box 6526
Tallahassee, FL 32314
850-425-2305 (Direct)
850-224-8551 or 850-425-3415 (FAX)
cunningham@hess.com

June 24, 2002

BUREAU OF AIR REGULATION

JUN 24 2002

RECEIVED

Clair Fancy, Jeff Koerner

To follow up our discussion last week, enclosed are:

1. Letter dated 1/26/76 from EPA Region IV to FPL determining Manatee Units 1 and 2 are not subject to federal NSPS.
2. Excerpts from COT Hopkins Title V permit showing both oil and natural gas are permitted fuels (Cond. III.B.3.) and that the NOx emission limit is 0.3 lb/mmbtu for oil and/or natural gas (Cond. III.B.12)
3. Excerpts from JEA Northside Title V permit showing both oil and natural gas are permitted fuels (Cond. III.A.3.) and that the NOx emission limit is 0.30 lb/mmbtu for oil and/or natural gas (Cond. III.A.12)

We will call you at 3:30 today as arranged.

Peter

BEST AVAILABLE COPY

00075



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

1431 PEACHTREE ST., N.E.
ATLANTA, GEORGIA 30309

January 26, 1976

RECEIVED

JAN 29 1976

Envt. Protection

Mr. W. J. Barrow, Jr.
Florida Power and Light Company
Post Office Box 013100
Miami, Florida 33101

Re: Florida Power and Light Company
Willow Creek Site of Manatee County Station

Dear Mr. Barrow:

This is in response to your letter dated January 20, 1976, requesting a determination as to whether Florida Power and Light's Manatee County Station qualifies as an "existing source" under Title 40 of the Code of Federal Regulations (CFR), Part 60, Subpart D.

The information you submitted on January 21, 1976, and the information attached to your letter of January 20, 1976, evidence binding contracts for the purchase of equipment (Boiler Unit #1 and Boiler Unit #2) prior to the effective date of EPA's Regulations on Standards of Performance for New Stationary Sources. Based on this information, it is our opinion that the Manatee County Station is not a "new source" within the meaning of glll (a) (2) of the Clean Air Act Amendments of 1970, and is therefore exempt from the federal requirements imposed under 40 CFR 60.

This exemption is limited to the above described and in no way relieves Florida Power and Light from compliance with other federal, state or local pollution abatement requirements.

Sincerely,

Frances E. Phillips
Regional Counsel

CC: Mr. Jay Landers
Dr. J. P. Subramani

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JUN 24 2002

BUREAU OF AIR REGULATION

letter
2 TE permits - 200 Northside added gas in 80s

City of Tallahassee
Arvah B. Hopkins Generating Station
Facility ID No.: 0730003
Leon County

Initial Title V Air Operation Permit
FINAL Permit No.: 0730003-001-AV

Includes Administrative Permit Corrections made on January 2, 1998
(Permit/Project Number: 0730003-002-AV)

Permitting Authority
State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-1344
Fax: 850/922-6979

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JUN 24 2002

BUREAU OF AIR REGULATION

Subsection B. This section addresses the following emissions unit(s).

E.U. ID

No. Brief Description

-004 Boiler Number 2, (Phase II Acid Rain Unit)

Emissions unit number 004 is a Babcock & Wilcox steam generator (model number RB-533) designated as "Boiler Number 2". It is rated at a maximum heat input of 2,325 million Btu per hour (MMBtu/hour) when firing fuel oil and 2,500 MMBtu/hour when firing natural gas and a nominal 238 MW and 1,619,000 pounds of steam per hour.

{Permitting notes: This emissions unit is regulated under Acid Rain, Phase II and the Florida Electrical Power Plant Siting Act (permit number PA 74-03D). This emissions unit pre-dates PSD regulations, but is regulated under Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with more than 250 million Btu per Hour Heat Input. Stack height = 250 feet, exit diameter = 14.0 feet, exit temperature = 220 - 305°F, actual volumetric flow rate = 636,706 acfm. Emissions from this boiler are uncontrolled. This unit began commercial operation in October of 1977.}

The following conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum operation heat input rate is as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
-004	2,500	Natural Gas
	2,325	No. 2 - No. 6 Fuel Oil; On-Specification Used Oil

Note: When a blend of fuel oil and natural gas is fired, the allowable heat input is prorated based on the percent heat input of each fuel.

[Rules 62-4.160(2), 62-210.200(PTE) & 62-296.405, F.A.C.; and, Applicant request dated June 18, 1997.]

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition B.25.

[Rule 62-297.310(2), F.A.C.]

B.3. Methods of Operation - Fuels. The fuels that are allowed to be burned in this boiler are natural gas and/or new No. 2 thru No. 6 fuel oil and/or on-specification used oil. (See Specific Condition B.37.)

[Rule 62-213.410, F.A.C.; and, Applicant's request in initial Title V permit application dated June 14, 1996.]

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JUN 24 2002

BUREAU OF AIR REGULATION

B.4. Hours of Operation. This emissions unit may operate continuously, i.e. 8760 hours/year. The permittee shall maintain an operation log available for Department inspection that documents the total hours of annual operation, including a detailed account of the hours operated on each of the allowable fuels.

[Rule 62-210.200(PTE), F.A.C.; and, applicant request in initial Title V application received June 14, 1996.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.5. Visible Emissions. Visible emissions shall not exceed 20 percent opacity, except for one two-minute period per hour during which opacity shall not exceed 40 percent.

[Rule 62-296.405(1)(a), F.A.C.]

B.6. Visible Emissions. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

[Rule 62-210.700(3), F.A.C.]

B.7. Particulate Matter. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods.

[Rule 62-296.405(1)(b), F.A.C.]

B.8. Particulate Matter. 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.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

[Rule 62-210.700(3), F.A.C.]

B.9. Sulfur Dioxide. Sulfur dioxide emissions when burning liquid fuel shall not exceed 1.87 pounds per million Btu heat input, as measured by applicable compliance methods.

[Rule 62-296.405(1)(c)1.h., F.A.C.]

B.10. Sulfur Dioxide. For compliance purposes, the following limit supersedes the limit contained in **Specific Condition B.9.** Sulfur dioxide emissions shall not exceed 1.4 pounds per million Btu heat input, as measured by applicable compliance methods. Any calculations used to demonstrate compliance shall be based solely on the heating value, quantities, and the percent sulfur of the liquid and gaseous fuels being burned. (See specific conditions **B.11. & B.23.**)

[Rule 62-204.220 & .240, F.A.C.; AO37-242825 specific condition 4 and Applicant's request in initial Title V permit application received June 14, 1996.]

RECEIVED

JUN 24 2002

B.11. Fuel Sulfur. Fuel sulfur content (percent, by weight) shall be determined by a fuel analysis representative of all "as-fired" fuels. Prior to burning any fuels in the boiler pursuant to this permit, receipts of the analyses of the existing fuels shall have been received by the City in order to use their values and calculate a maximum allowable fuel blend of natural gas and fuel oil. Upon subsequent fuel deliveries, if the vendor's delivery receipts indicate that the sulfur content of the delivered fuel is greater than the sulfur content established by the previous analysis, then a new maximum allowable fuel blend shall be calculated using the assumption that any future fuel fired contains the higher sulfur content. The resulting maximum allowable fuel blend shall be adhered to until such time that a more accurate analysis has been provided. If the vendor's delivery receipt indicates that the sulfur content of the delivered fuel is less than the sulfur content previously established, a new analysis is only necessary if the permittee wishes to adjust the previously established maximum allowable fuel blend. (See specific conditions **B.10.** and **B.23.**)
[Rules 62-4.070(3) & 62-296.405(1)(c)3., F.A.C.; and, Applicant Request dated June 18, 1997.]

B.12. Nitrogen Oxide. Nitrogen oxide emissions shall not exceed 0.3 pounds per million Btu heat input, as measured by applicable compliance methods.
[Rule 62-296.405(1)(d)3., F.A.C.]

Excess Emissions

B.13. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and 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.]

B.14. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.
[Rule 62-210.700(2), F.A.C.]

B.15. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

{Permitting Note: In accordance with the Acid Rain Phase II requirements, the following continuous monitors are installed on this unit: Gas Fuel Flow, Oil Fuel Flow, NOx and CO₂.}
[Rules 62-296.405(1)(f)1.c. & d., 62-214.320 and 62-214.330, F.A.C.; 40 CFR Part 75 Appendix D, Section 2.1]}

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B.16. Sulfur Dioxide. The permittee elected to demonstrate compliance using fuel sampling and analysis. This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions B.11. and B.23. of this permit.
[Rule 62-296.405(1)(f)1.b., F.A.C.]

B.17. Nitrogen Oxides. For emission units that are subject to continuous monitoring requirements under 42 U.S.C. sections 7661-7661f or 40 CFR Part 75, compliance with nitrogen oxides emission limits shall be demonstrated based on a 30-day rolling average, except as specifically provided by 40 CFR Parts 60 or 76.
[Rule 62-296.405(1)(e)4., F.A.C.]

B.18. 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.]

Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.19. Visible emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. See specific condition B.20.
[Rule 62-296.405(1)(e)1., F.A.C.]

B.20. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent

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Jacksonville Electric Authority
Northside Generating Station/St. Johns River Power Park
Facility ID No.: 0310045
Duval County

Title V Air Operation Permit Revision
FINAL Permit No.: 0310045-002-AV

Permitting Authority:
State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-1344
Fax: 850/922-6979

Compliance Authority:
City of Jacksonville
Regulatory and Environmental Services Department
Air and Water Quality Division
421 West Church Street, Suite 422
Jacksonville, Florida 32202-4111
Telephone: 904/630-3484
Fax: 904/630-3638

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Section III. Emissions Units.

Subsection A. This section addresses the following emissions units.

E.U. ID

<u>No.</u>	<u>Brief Description</u>
-001	NGS Boiler No. 1
-002	NGS Boiler No. 2
-003	NGS Boiler No. 3

NGS Boiler No. 1 is a fossil fuel-fired steam generator with a nominal nameplate rating of 297.5 megawatts (electric). The emissions unit will be allowed to fire new No. 6 residual fuel oil, natural gas, LP gas, "on-specification" used oil, landfill gas, and a blend of fuel oil and natural gas and/or landfill gas. The maximum heat inputs are (1) 2767 MMBtu per hour when firing fuel oil; (2) 2892 MMBtu per hour when firing natural gas or natural/landfill gases; or (3) 2767 - 2892 MMBtu per hour when firing a combination of fuel oil and natural gas or natural/landfill gases, respectively. LP gas is used as the igniter fuel when natural gas is not available. Fuel additives, typically of a magnesium oxide, hydroxide or sulfonate, or calcium nitrate origin, are used to enhance combustion and/or control acidity. Pollutant emissions from this emissions unit are uncontrolled. The combustion gases exhaust through a single stack of 250 feet. NGS Boiler No. 1 began commercial operation in 1966.

NGS Boiler No. 2 is a fossil fuel-fired steam generator with a nominal nameplate rating of 297.5 megawatts (electric). The emissions unit is permitted to fire new No. 6 residual fuel oil, natural gas, and a blend of fuel oil and natural gas. The maximum heat inputs are (1) 2341 MMBtu per hour when firing fuel oil; (2) 2352 MMBtu per hour when firing natural gas; or (3) 2341 - 2352 MMBtu per hour when firing a combination of No. 6 fuel oil and natural gas, respectively. Fuel additives, typically of a magnesium oxide, hydroxide or sulfonate, or calcium nitrate origin, are used to enhance combustion and/or control acidity. Pollutant emissions from this emissions unit are uncontrolled. The combustion gases exhaust through a single stack of 300 feet. NGS Boiler No. 2 began commercial operation in November 1966. NGS Boiler No. 2 was placed on long-term reserve shutdown on March 1, 1984.

NGS Boiler No. 3 is a fossil fuel-fired steam generator with a nominal nameplate rating of 563.7 megawatts (electric). The emissions unit will be allowed to fire new No. 6 residual fuel oil, natural gas, LP gas, "on-specification" used oil, landfill gas, and a blend of fuel oil and natural gas and/or landfill gas. The maximum heat inputs are (1) 5033 MMBtu per hour when firing fuel oil; (2) 5260 MMBtu per hour when firing natural gas or natural/landfill gases; or (3) 5033 - 5260 MMBtu per hour when firing a combination of fuel oil and natural gas or natural/landfill gases, respectively. LP gas is used as the igniter fuel when natural gas is not available. Fuel additives, typically of a magnesium oxide, hydroxide or sulfonate, or calcium nitrate origin, are used to enhance combustion and/or control acidity. Pollutant emissions from this emissions unit are uncontrolled. The combustion gases exhaust through two stacks of 300 feet. NGS Boiler No. 3 began commercial operation in 1977.

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{Permitting note(s): These emissions units are regulated under Acid Rain, Phase II; Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input; and, Rule 62-296.702, F.A.C., Fossil Fuel Steam Generators.}

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum operation heat input rates are as follows:

<u>Emissions Unit</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
NGS Boiler No. 1	2892	Natural Gas
	2892	Landfill Gas
	2767	New No. 6 Fuel Oil
	2767	"On-specification" Used Oil
	2767-2892	Fuel Oil and Natural Gas
	2767-2892	Fuel Oil and Natural/Landfill Gases
NGS Boiler No. 2	2352	Natural Gas
	2341	New No. 6 Fuel Oil
	2341-2352	New No. 6 Fuel Oil and Natural Gas
NGS Boiler No. 3	5260	Natural Gas
	5260	Landfill Gas
	5033	New No. 6 Fuel Oil
	5033	"On-specification" Used Oil
	5033-5260	Fuel Oil and Natural Gas
	5033-5260	Fuel Oil and Natural/Landfill Gases

Note: When a blend of fuel oil and natural and/or landfill gas is fired, the heat input is prorated based on the percent heat input of each fuel.

{Permitting note: The heat input limitations have been placed in the permit to identify the capacity of each emissions unit for purposes of confirming that emissions testing is conducted within 90-100 percent of the emissions unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate limits and to aid in determining future rule applicability.}

[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.405, F.A.C.; and, AO16-194743, AO16-178094 and AO16-207528]

A.2. Emissions Unit Operating Rate Limitation After Testing. See specific conditions A.26. and A.27. [Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation - Fuels.

a. The only fuels allowed to be burned are natural gas, LP gas, landfill gas, new No. 6 fuel oil, "on-specification" used oil, and a blend of fuel oil and natural gas and/or landfill gas. "On-specification" used oil containing any quantifiable levels of PCBs can only be fired when the emissions unit is at normal operating temperatures. LP gas is used as the igniter fuel when natural gas is not available.

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b. The total station (NGS Boilers Nos. 1, 2 and 3, and NGS Auxiliary Boiler No. 1) residual fuel oil consumption must not exceed 1,440,000 pounds in any consecutive three (3) hour period.
[Rule 62-213.410, F.A.C.; 40 CFR 271.20(e)(3); AO16-194743, AO16-178094 and AO16-207528; AC16-85951 and BACT; and, applicant request dated June 14, 1996.]

A.4. Hours of Operation. The emissions units may operate continuously, i.e., 8,760 hours/year.
[Rule 62-210.200(PTE), F.A.C.; and, AO16-194743, AO16-178094 and AO16-207528]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.5. Visible Emissions. For Boilers Nos. 1 and 3, visible emissions shall not exceed 40 percent opacity. Emissions units governed by this visible emissions limit shall compliance test for particulate matter emissions annually and as otherwise required by Chapter 62-297, F.A.C.
[Rules 62-296.405(1)(a) and 62-296.702(2)(b), F.A.C.; Part X, Rule 2.1001, JEPB; and, AO16-194743 and AO16-207528]

A.6. Visible Emissions. For Boiler No. 2, visible emissions shall not exceed 20 percent opacity, except for one two-minute period per hour which opacity shall not exceed 40 percent. Emissions units governed by this visible emissions limit shall compliance test for particulate matter emissions annually and as otherwise required by Chapter 62-297, F.A.C.
[Rules 62-296.405(1)(a) and 62-296.702(2)(b), F.A.C.; Part X, Rule 2.1001, JEPB; and, AO16-178094]

A.7. Visible Emissions - Soot Blowing and Load Change. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

[Rule 62-210.700(3), F.A.C.; and, Part III, Rule 2.301, JEPB]

A.8. Particulate Matter. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods. See specific condition A.22.

[Rules 62-296.405(1)(b) and 62-296.702(2)(a), F.A.C.; and, Part X, Rule 2.1001, JEPB]

A.9. Particulate Matter - Soot Blowing and Load Change. 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.

[Rule 62-210.700(3), F.A.C.; and, Part III, Rule 2.301, JEPB]

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A.10. Sulfur Dioxide. SO₂ emissions shall not exceed 1.98 pounds per million Btu heat input, as measured by applicable compliance methods. Any calculations or methods used to demonstrate compliance shall be based on the total heat input from all fossil fuels, including natural gas, and the sulfur from all fuels fired. See specific conditions A.17., A.23. and A.24. [Rules 62-213.440 and 62-296.405(1)(c)1.a., F.A.C.; and, Part X, Rule 2.1001, JEPB]

A.11. Sulfur Dioxide - Sulfur Content. For Boilers Nos. 1 and 3, the sulfur content of the as-fired No. 6 fuel oil shall not exceed 1.8 percent, by weight, if the SO₂ continuous emissions monitor system is temporarily inoperative. For Boiler No. 2, the maximum sulfur content shall not exceed 1.8%, by weight. See specific conditions A.17. and A.24. [Rule 62-296.405(1)(e)3., F.A.C.; Part X, Rule 2.1001, JEPB; and, AO16-178094 and AO16-207528]

A.12. Nitrogen Oxides (expressed as NO₂). For Boiler No. 3, nitrogen oxides shall not exceed 0.30 lb/MMBtu heat input, as measured by applicable compliance methods. See specific condition A.18. [Rule 62-296.405(1)(d)1., F.A.C.; Part X, Rule 2.1001, JEPB; and, AO16-207528]

A.13. "On-Specification" Used Oil. The burning of "on-specification" used oil is allowed at this facility in accordance with all other conditions of this permit and the following additional conditions:

a. Only "on-specification" used oil generated by the Jacksonville Electric Authority in the production and distribution of electricity shall be fired in these emissions units. The total combined quantity allowed to be fired in these emissions units shall not exceed 1,000,000 gallons per calendar year. "On-specification" used oil is defined as each used oil delivery that meets the 40 CFR 279 (Standards for the Management of Used Oil) specifications listed below. Used oil that does not meet all of the following specifications is considered "off-specification" oil and shall not be fired. See specific conditions A.34., A.38. and A.39.

<u>CONSTITUENT / PROPERTY*</u>	<u>ALLOWABLE LEVEL</u>
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash Point	100 °F minimum
PCBs	less than 50 ppm

* As determined by approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).
[40 CFR 279.11]

Excess Emissions

A.14. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and 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.; and, Part III, Rule 2.301, JEPB]

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A.15. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.

[Rule 62-210.700(2), F.A.C.; and, Part III, Rule 2.301, JEPB]

A.16. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.; and, Part III, Rule 2.301, JEPB]

Monitoring of Operations

A.17. Sulfur Dioxide.

a. For Boilers Nos. 1 and 3, the permittee elected to monitor emissions using a SO₂ continuous emissions monitoring system (CEMS). This procedure is allowed because the emissions units do not have an operating flue gas desulfurization device. See specific conditions A.10., A.11., A.23. and A.24.

b. Boiler No. 2 has been on long-term reserve shutdown since March 1, 1984.

c. The CEMS shall be calibrated, operated and maintained in accordance with the quality assurance requirements of 40 CFR 75, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and demonstrated based on a 24-hour daily average. A Relative Accuracy Testing Audit (RATA) shall be performed no less than annually.

d. In the event the CEMS becomes temporarily inoperable or interrupted, the fuels and the maximum fuel oil to natural gas firing ratio that can be used is that which was last used to demonstrate compliance prior to the loss of the CEMS, or the emissions units shall fuel switch and be fired with a fuel oil containing a maximum sulfur content of 1.8%, by weight, or less.

e. In the event of natural gas disruption and the emissions units have to fire 100% fuel oil, the emissions units shall be fired with a fuel oil containing a maximum sulfur content of 1.8%, by weight, or less.

[Rules 62-213.440, 62-204.800, 62-296.405(1)(c)3., and 62-296.405(1)(f)1.b., F.A.C.; and, AO16-194743 and AO16-207528]

A.18. Nitrogen Oxides. For Boiler No. 3, compliance with the nitrogen oxides (expressed as NO₂) limit of 0.30 lb/MMBtu shall be demonstrated by the following:

a. Through the use of a CEMS installed, calibrated, operated and maintained in accordance with the quality assurance requirements of 40 CFR 60, Appendix F, and 40 CFR 75, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and demonstrated based on a 30-day rolling average.

b. The performance specifications, location of the monitor, data requirements, data reduction and reporting requirements shall conform with the requirements of 40 CFR 51, Appendix P, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and 40 CFR 60, Appendix B, adopted by reference in Rule 62-204.800, F.A.C.

[Rules 62-296.405(1)(e)4. and 62-296.405(1)(f), F.A.C.; Part X, Rule 2.1001, JEPB; and, 40 CFR 60 & 75]

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May 10, 2002

BUREAU OF AIR REGULATION

Via Hand Delivery

Clair H. Fancy, P.E.
Chief, Bureau of Air Regulation
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
Permit Revision to add Natural Gas as a Permitted Fuel

Dear Mr. Fancy:

0810010-007-AC
0810010-008-AV

On May 3, 2002, Florida Power & Light Company filed a request for permit revision with your office, regarding the above-referenced matter. The responsible official certification included with that request was inadvertently submitted without the signature. The properly signed version of the certification is attached, along with four copies.

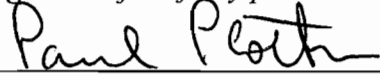
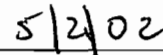
Thank you for your cooperation and assistance in this matter. Please let me know if you have any questions.

Sincerely,

Paul Plotkin
Manatee Plant General Manager

cc: A.A. Linero, P.E., Administrator, New Source Review Section, DEP
Scott M. Sheplak, P.E., Administrator, Title V Section, DEP
Jerry Kissel, Southwest District Office, DEP
Tom Murray, Manatee County Air Quality Management Division

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Paul Plotkin; Manatee Plant General Manager
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Florida Power & Light Company, Manatee Plant Street Address: 19050 State Road 62 City: Parrish State: Florida Zip Code: 34219
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (941)- 776-5211 Fax: (941)- 776-5219
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [X], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  Signature  Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Kathryn S. Salvador, P.E. Registration Number: 54726
2. Professional Engineer Mailing Address: Organization/Firm: Florida Power & Light Company, Environmental Services Street Address: P.O. Box 14000 City: Juno Beach State: Florida Zip Code: 33408
3. Professional Engineer Telephone Numbers: Telephone: (561)- 691- 7054 Fax: (561)- 691-7049

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Paul Plotkin; Manatee Plant General Manager
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Florida Power & Light Company, Manatee Plant Street Address: 19050 State Road 62 City: Parrish State: Florida Zip Code: 34219
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (941)- 776-5211 Fax: (941)- 776-5219
4. Owner/Authorized Representative or Responsible Official Statement: <p><i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [X], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i></p> <p><u>Paul Plotkin</u> <u>5/2/02</u></p> <p>Signature Date</p>

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Kathryn S. Salvador, P.E. Registration Number: 54726
2. Professional Engineer Mailing Address: Organization/Firm: Florida Power & Light Company, Environmental Services Street Address: P.O. Box 14000 City: Juno Beach State: Florida Zip Code: 33408
3. Professional Engineer Telephone Numbers: Telephone: (561)- 691- 7054 Fax: (561)- 691-7049



May 2, 2002

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BUREAU OF AIR REGULATION

Clair H. Fancy, P.E.
Chief, Bureau of Air Regulation
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
Permit Revision to add Natural Gas as a Permitted Fuel

Dear Mr. Fancy:

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 request 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 <i>Pounds Per Hour</i> <i>Pounds Per Million Btu</i>		
Pollutant	Fuel Oil	Natural Gas
Sulfur Dioxide	9,183	3
	1.06	0.0006
Particulate Matter (PM/PM10)	719	10
	0.08	0.002
Nitrogen Oxides	2,545	1,152
	0.29	0.20
Carbon Monoxide	5,450	2,608
	0.63	0.46
Volatile Organic Compounds	44	17
	0.005	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.

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 (annual capacity factors ranging from 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—To provide the Department with information demonstrating that the addition of natural gas does not cause an increase in actual annual emissions, we will submit annual emissions data for a period of five years following the addition of natural gas at Manatee Units 1 and 2 (calendar years 2003-2007), as required under Rule 62-210.200(11)(d), F.A.C.

Title V Permit Amendment—We respectfully request that the Department revise the Manatee Plant’s Title V permit to authorize the use of natural gas as a fuel for Units 1 and 2. Because the addition of natural gas does not constitute a “modification” and because the construction permit for Units 1 and 2 was not issued under the New Source Review program, a construction permit or construction permit revision is not required under Rule 62-210.300(1)(b)1., F.A.C. If the Department determines that a construction permit is needed, please process the application as a request to issue a construction permit as well as to revise the Title V permit. An original and four copies of the appropriate

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

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 revision. 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,

A handwritten signature in black ink that reads "Paul Plotkin". The signature is written in a cursive, slightly slanted style.

Paul Plotkin
Manatee Plant General Manager

cc: A. A. Linero, P.E., Administrator New Source Review Section, DEP
Scott M. Sheplak, P.E., Administrator Title V Section, DEP
Jerry Kissel, Southwest District Office, DEP
Tom Murray, Manatee County Air Quality Management Division

Attachments: (2)

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

Fuel Oil Data

- The SO₂, and NO_x, emissions 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.
- The maximum heat input while firing 100% oil is 8650 MMBtu/hr.

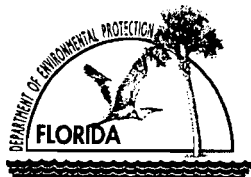
Natural Gas Data

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

- AP-42 emission factors were used to calculate the emissions of SO₂, 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.
- The maximum heat input while firing 100% gas is 5760 MMBtu/hr.

RECEIVED

MAY 03 2002



Department of
Environmental Protection
 Division of Air Resources Management

BUREAU OF AIR REGULATION

Identification of Facility

1. Facility Owner/Company Name: Florida Power & Light Company	
2. Site Name: Manatee Plant	
3. Facility Identification Number: 08 100 10 [] Unknown	
4. Facility Location: Street Address or Other Locator: 19050 State Road 62 City: Parrish County: Manatee Zip Code: 34219	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [X] Yes [] No

Application Contact

Name and Title of Application Contact: Kevin Washington, Senior Environmental Specialist	
2. Application Contact Mailing Address: Organization/Firm: Florida Power & Light Company, Environmental Services Street Address: P.O. Box 14000 City: Juno Beach State: Florida Zip Code: 33408	
3. Application Contact Telephone Numbers: Telephone: (561)- 691-2877 Fax: (561)- 691-7049	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- ☐ Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- ☐ Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

- ☐ Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit number to be revised: _____

- ☐ Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: _____

- ☒ Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: 08 100 10-001-AV

Reason for revision: The addition of natural gas as a boiler fuel to Units 1&2

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- ☐ Air construction permit to construct or modify one or more emissions units.
- ☐ Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- ☐ Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Paul Plotkin; Manatee Plant General Manager
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Florida Power & Light Company, Manatee Plant Street Address: 19050 State Road 62 City: Parrish State: Florida Zip Code: 34219
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (941)- 776-5211 Fax: (941)- 776-5219
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [X], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i> _____ Signature _____ Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Kathryn S. Salvador, P.E. Registration Number: 54726
2. Professional Engineer Mailing Address: Organization/Firm: Florida Power & Light Company, Environmental Services Street Address: P.O. Box 14000 City: Juno Beach State: Florida Zip Code: 33408
3. Professional Engineer Telephone Numbers: Telephone: (561)- 691- 7054 Fax: (561)- 691-7049

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

*If the purpose of this application is to **revise the existing** Title V source air operation permit (check here [☒], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.*

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [☐], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

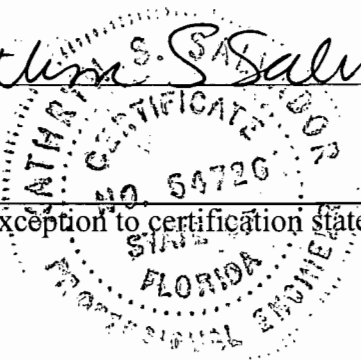
If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [☐], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Kathleen S. Salvaan
Signature

4/29/2002
Date

(seal)

* Attach any exception to certification statement.



Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
001	Fossil Fuel Steam Generator, Unit 1	Title V	N/A
002	Fossil Fuel Steam Generator, Unit 2	Title V	N/A

Application Processing Fee

Check one: ☐ Attached - Amount: \$ _____ ☒ Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:

The addition of natural gas as a permitted fuel to existing Units 1&2. The emissions units are currently permitted to burn a variable combination of No. 6 fuel oil, No. 2 fuel oil, propane, and used oil from FPL operations. The addition of natural gas as a permitted fuel will not cause an increase in emissions.

We believe that no Construction Permit revision is needed.

2. Projected or Actual Date of Commencement of Construction:

3. Projected Date of Completion of Construction:

Application Comment:

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/ <u>Fuel</u> Type) (limit to 500 characters): Natural gas: Pipeline quality natural gas		
2. Source Classification Code (SCC):		3. SCC Units: Dry Standard Cubic Foot (DSCF)
4. Maximum Hourly Rate: 5670 MMBtu/hour	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 0.0000006 Lb./ DSCF	8. Maximum % Ash: 0.0000019 Lb./DSCF	9. Million Btu per SCC Unit: 1.04 ⁻³
10. Segment Comment (limit to 200 characters): The maximum heat input rate while firing 100% natural gas is 5670 MMBtu/hour. This is reduced from 8650 MMBtu/hour when firing 100% fuel oil due to thermal limitations of certain boiler components. When natural gas and fuel oil are co-fired, the maximum hourly heat input rate is prorated accordingly.		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		



May 2, 2002

Clair H. Fancy, P.E.
Chief, Bureau of Air Regulation
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
Permit Revision to add Natural Gas as a Permitted Fuel

Dear Mr. Fancy:

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 request 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	3
	1.06	0.0006
Particulate Matter (PM/PM10)	719	10
	0.08	0.002
Nitrogen Oxides	2,545	1,152
	0.29	0.20
Carbon Monoxide	5,450	2,608
	0.63	0.46
Volatile Organic Compounds	44	17
	0.005	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.

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 (annual capacity factors ranging from 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—To provide the Department with information demonstrating that the addition of natural gas does not cause an increase in actual annual emissions, we will submit annual emissions data for a period of five years following the addition of natural gas at Manatee Units 1 and 2 (calendar years 2003-2007), as required under Rule 62-210.200(11)(d), F.A.C.

Title V Permit Amendment—We respectfully request that the Department revise the Manatee Plant’s Title V permit to authorize the use of natural gas as a fuel for Units 1 and 2. Because the addition of natural gas does not constitute a “modification” and because the construction permit for Units 1 and 2 was not issued under the New Source Review program, a construction permit or construction permit revision is not required under Rule 62-210.300(1)(b)1., F.A.C. If the Department determines that a construction permit is needed, please process the application as a request to issue a construction permit as well as to revise the Title V permit. An original and four copies of the appropriate

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

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 revision. 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,

A handwritten signature in black ink that reads "Paul Plotkin". The signature is fluid and cursive, with the first name "Paul" and last name "Plotkin" clearly distinguishable.

Paul Plotkin
Manatee Plant General Manager

cc: A. A. Linero, P.E., Administrator New Source Review Section, DEP
Scott M. Sheplak, P.E., Administrator Title V Section, DEP
Jerry Kissel, Southwest District Office, DEP
Tom Murray, Manatee County Air Quality Management Division

Attachments: (2)

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

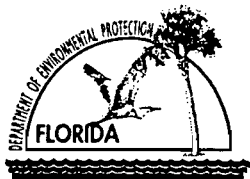
Fuel Oil Data

- The SO₂, and NO_x, emissions 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.
- The maximum heat input while firing 100% oil is 8650 MMBtu/hr.

Natural Gas Data

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

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- NO_x data is based upon the burner manufacturer's predicted performance.
- Carbon Monoxide data is based upon the burner manufacturer's predicted performance.
- The maximum heat input while firing 100% gas is 5760 MMBtu/hr.



Department of
Environmental Protection
 Division of Air Resources Management

Identification of Facility

1. Facility Owner/Company Name: Florida Power & Light Company	
2. Site Name: Manatee Plant	
3. Facility Identification Number: 08 100 10 [] Unknown	
4. Facility Location: Street Address or Other Locator: 19050 State Road 62 City: Parrish County: Manatee Zip Code: 34219	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [X] Yes [] No

Application Contact

Name and Title of Application Contact: Kevin Washington, Senior Environmental Specialist	
2. Application Contact Mailing Address: Organization/Firm: Florida Power & Light Company, Environmental Services Street Address: P.O. Box 14000 City: Juno Beach State: Florida Zip Code: 33408	
3. Application Contact Telephone Numbers: Telephone: (561)- 691-2877 Fax: (561)- 691-7049	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- ☐ Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- ☐ Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

- ☐ Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit number to be revised: _____

- ☐ Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: _____

- ☒ Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: 08 100 10-001-AV

Reason for revision: The addition of natural gas as a boiler fuel to Units 1&2

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- ☐ Air construction permit to construct or modify one or more emissions units.
- ☐ Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- ☐ Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Paul Plotkin; Manatee Plant General Manager
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Florida Power & Light Company, Manatee Plant Street Address: 19050 State Road 62 City: Parrish State: Florida Zip Code: 34219
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (941)- 776-5211 Fax: (941)- 776-5219
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [X], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i> _____ Signature Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Kathryn S. Salvador, P.E. Registration Number: 54726
2. Professional Engineer Mailing Address: Organization/Firm: Florida Power & Light Company, Environmental Services Street Address: P.O. Box 14000 City: Juno Beach State: Florida Zip Code: 33408
3. Professional Engineer Telephone Numbers: Telephone: (561)- 691- 7054 Fax: (561)- 691-7049

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to revise the existing Title V source air operation permit (check here [X], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Kathleen S Salvaan
Signature

4/29/2002
Date

(seal)

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
001	Fossil Fuel Steam Generator, Unit 1	Title V	N/A
002	Fossil Fuel Steam Generator, Unit 2	Title V	N/A

Application Processing Fee

Check one: ☐ Attached - Amount: \$ _____ ☒ Not Applicable

Construction/Modification Information**1. Description of Proposed Project or Alterations:**

The addition of natural gas as a permitted fuel to existing Units 1&2. The emissions units are currently permitted to burn a variable combination of No. 6 fuel oil, No. 2 fuel oil, propane, and used oil from FPL operations. The addition of natural gas as a permitted fuel will not cause an increase in emissions.

We believe that no Construction Permit revision is needed.

2. Projected or Actual Date of Commencement of Construction:**3. Projected Date of Completion of Construction:****Application Comment:**

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/ <u>Fuel</u> Type) (limit to 500 characters): Natural gas: Pipeline quality natural gas		
2. Source Classification Code (SCC):		3. SCC Units: Dry Standard Cubic Foot (DSCF)
4. Maximum Hourly Rate: 5670 MMBtu/hour	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 0.0000006 Lb./ DSCF	8. Maximum % Ash: 0.0000019 Lb./DSCF	9. Million Btu per SCC Unit: 1.04 ⁻³
10. Segment Comment (limit to 200 characters): The maximum heat input rate while firing 100% natural gas is 5670 MMBtu/hour. This is reduced from 8650 MMBtu/hour when firing 100% fuel oil due to thermal limitations of certain boiler components. When natural gas and fuel oil are co-fired, the maximum hourly heat input rate is prorated accordingly.		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		



FPL

3666

Clair H. Fancy, P.E.
Chief, Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

June 26, 2002

RECEIVED

JUN 27 2002

Re: Manatee Plant – Title V Permit No. 0810010-001-AV
Permit Revision to Add Natural Gas as a Permitted Fuel

BUREAU OF AIR REGULATION

Dear Mr. Fancy:

I am writing in regards to our pending request to add natural gas as a permitted fuel for Manatee Units 1 and 2, as a follow up to my letter dated May 2, 2002. We hope the Department's review of our request will benefit from clarification on several points, as provided below.

The applicable nitrogen oxides (NOx) emission limiting standard for Manatee Units 1 and 2 under the Department's rules is 0.30 pounds per million Btu heat input. See FAC Rule 62-296.405(1)(d)2. The NOx emissions limit is also specified in the Manatee Plant's Title V air permit, at Condition III.A.10. FPL understands this to be the applicable limit if natural gas is burned in Manatee Units 1 or 2, as the language of FAC Rule 62-296.405(1)(d)2. is not fuel-specific. This conclusion is entirely consistent with the Department's historical practice and regulatory treatment for other dual-fuel generating units under FAC Rule 62-296.405(1)d. We neither sought nor anticipated any change in the applicable NOx emission limit for Manatee Units 1 and 2 by virtue of the addition of natural gas as a permitted fuel.

FPL's request for permit revision did include a comparison showing both actual Manatee Unit 1 and 2 emission rates resulting from firing of fuel oil, and expected short-term emission rates for natural gas. The NOx emission rate indicated in that comparison for gas was, as noted, "based upon the burner manufacturer's predicted performance." To provide the Department with a full understanding on this point, I have reviewed the circumstances involving FPL's contract for new Low-NOx Burners (LNB) that were ultimately installed at Manatee Units 1 and 2 in 2000.

After evaluation of bids submitted in response to an RFP, FPL chose Alstom Power (formerly International Combustion Limited) as the manufacturer/vendor for the Manatee Low-NOx Burners. FPL's contract with Alstom included a guaranteed NOx emission rate of 0.30 pounds per million Btu and liquidated damages if NOx emissions exceed this rate when fuel oil is fired. Although the new burners were designed to be capable of firing natural gas, and performance levels were requested by FPL, no liquidated damages were established for emission rates or boiler performance when firing natural gas. No guarantee was obtained from Alstom for the maximum NOx emission rate firing gas for three main reasons. First, the Manatee Units had never burned natural gas and, accordingly, there were no data on NOx emissions or operational baselines upon which to establish a guaranteed NOx emission rate for gas. Second, given the

uncertainty as to whether gas would be fired in the Manatee Units, no test rig evaluation for natural gas was performed on the new burners, and thus, no emissions data were obtained with this fuel. Third, since the Manatee Units were not then served by a natural gas supply, and there were then no immediate or definite plans to add natural gas at the Manatee Plant, it would have been impossible to determine the NOx emission rate on gas as part of the warranty performance testing conducted following installation of the burners and prior to their final acceptance by FPL.

There is no application of these custom-designed Low-NOx Burners on any boiler similar to the Manatee Units. The NOx emission rate for natural gas at FPL's Martin Units 1 and 2 can be used only as a rough indicator of what we can expect when the boilers and burners of Manatee Units 1 and 2 burn gas. Nonetheless, all information available to FPL indicates that the NOx emission rate firing natural gas in Manatee Units 1 and 2 will be less than the rate for oil firing, and thus less than the applicable limit of 0.30 pounds per million Btu heat input. Alstom Power's predicted burner performance firing natural gas, which is the basis for the NOx emission rate indicated in my letter of May 2, 2002, is thus a reasonable estimate consistent with FPL's extensive experience with Low-NOx Burners on oil/gas-fired generating units. The predicted performance of the burners is also consistent with the desired objectives of the Manatee burner replacement program and design.

In summary, there is reasonable assurance that Manatee Units 1 and 2 will comply with the NOx emission limit applicable under Department rule when firing natural gas. We cannot be absolutely certain as to exactly how much lower the NOx emissions rate will be when firing gas compared to current operation firing fuel oil. We can be certain, however, that emission rates for other air pollutants, such as sulfur dioxide and particulate matter, will be several orders of magnitude lower with gas compared to oil. These clear and substantial improvements in environmental performance are available only if the Manatee Units burn gas.

Your continued consideration on this matter is appreciated. Please do not hesitate to contact me at (941) 776-5211 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Paul Plotkin". The signature is written in a cursive, flowing style.

Paul Plotkin
Manatee Plant General Manager

cc: A.A. Linero, P.E., Administrator New Source Review Section, DEP
Scott M. Sheplak, P.E., Administrator Title V Section, DEP
Jeffery F. Koerner, Permit Engineer New Source Review Section, DEP
Jerry Kissel, Southwest District Office, DEP
Tom Murray, Manatee County Air Quality Management Division

For your information.....

PETER C. CUNNINGHAM
Hopping Green & Sams
123 S. Calhoun Street (32301)
Post Office Box 6526
Tallahassee, FL 32314
850-425-2305 (Direct)
850-224-8551 or 850-425-3415 (FAX)
cunningham@hgs.com

June 24, 2002

BUREAU OF AIR REGULATION

RECEIVED
JUN 24 2002

Clair Fancy, Jeff Koerner

To follow up our discussion last week, enclosed are:

1. Letter dated 1/26/76 from EPA Region IV to FPL determining Manatee Units 1 and 2 are not subject to federal NSPS.
2. Excerpts from COT Hopkins Title V permit showing both oil and natural gas are permitted fuels (Cond. III.B.3.) and that the NOx emission limit is 0.3 lb/mmbtu for oil and/or natural gas (Cond. III.B.12)
3. Excerpts from JEA Northside Title V permit showing both oil and natural gas are permitted fuels (Cond. III.A.3.) and that the NOx emission limit is 0.30 lb/mmbtu for oil and/or natural gas (Cond. III.A.12)

We will call you at 3:30 today as arranged.

Peter

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. Dan Kumarich
President
Manatee Citizens Against
PO Box 660
Parrish, FL 34219

2. Air

7001 0320 0001 3692 8338

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

COMPLETE THIS SECTION ON DELIVERY

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

PAUL SAYERS 7-12-02

C. Signature

X Paul Sayers ☐ Agent ☐ AddresseeD. Is delivery address different from item 1? ☐ YesIf 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. Air

7001 0320 0001 3692 8338

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

U.S. Postal Service

CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage \$

Certified Fee

Return Receipt Fee
(Endorsement Required)Restricted Delivery Fee
(Endorsement Required)

Total Postage & Fees \$

Postmark
Here

Sent To

Dan Kumarich

Street, Apt. No.,
or P.O. Box No.

PO Box 660

City, State, ZIP+4

Parrish, FL 34219

PS Form 3800, January 2001

See Reverse for Instructions

U.S. Postal Service

CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage \$

Certified Fee

Return Receipt Fee
(Endorsement Required)Restricted Delivery Fee
(Endorsement Required)

Total Postage & Fees \$

Postmark
Here

Sent To

Paul Plotkin

Street, Apt. No.,
or P.O. Box No.

19050 State Road 62

City, State, ZIP+4

Parrish, FL 34219

PS Form 3800, January 2001

See Reverse for Instructions

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

2. Air

7001 0320 0001 3692 8352

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

COMPLETE THIS SECTION ON DELIVERY

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

B. Taylor 7-11-02

C. Signature

X B. Taylor ☐ Agent ☐ AddresseeD. Is delivery address different from item 1? ☐ YesIf 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. Air

7001 0320 0001 3692 8352

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

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:

Amy E. Stein, Chair
Manatee County Board of
County Commissioners
P.O. Box 1000
Bradenton, FL 34206-1000

2. Article

7001 0320 0001 3692 8345

COMPLETE THIS SECTION ON DELIVERY

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

C. Signature *Terry L. Farnham* 7/11/02
☐ Agent
☐ Addressee

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

3. Service Type

☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.
4. Restricted Delivery? (Extra Fee) ☐ Yes

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

U.S. Postal Service
CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage \$

Certified Fee

Return Receipt Fee
(Endorsement Required)Restricted Delivery Fee
(Endorsement Required)

Total Postage & Fees \$

Postmark
HereSent To
Amy E. SteinStreet, Apt. No.,
or P.O. Box No. 1000

City, State, ZIP+4

Bradenton, FL 34206-1000

PS Form 3800, January 2001

See Reverse for Instructions

U.S. Postal Service
CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage \$

Certified Fee

Return Receipt Fee
(Endorsement Required)Restricted Delivery Fee
(Endorsement Required)

Total Postage & Fees \$

Postmark
HereSent To
Clarence TroxellStreet, Apt. No.,
or P.O. Box No. 3321
City, State, ZIP+4
Lakeside Circle
Parrish, FL 34219

PS Form 3800, January 2001

See Reverse for Instructions

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. Clarence Troxell
3321 Lakeside Circle
Parrish, FL 34219

2. Article

7001 0320 0001 3692 8369

COMPLETE THIS SECTION ON DELIVERY

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

C. G. Troxell 7/12/02

☐ Agent
☐ Addressee

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

3. Service Type

☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.
4. Restricted Delivery? (Extra Fee) ☐ Yes

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

The Department determines that the addition of natural gas is not likely to cause an increase in actual annual emissions from the plant. Natural gas is a clean burning fuel that contains little ash or sulfur. Emissions of carbon monoxide, nitrogen oxides, particulate matter, sulfur dioxide, and volatile organic compounds are expected to decrease when firing natural gas as compared to firing fuel oil. The draft permits authorize the construction of the infrastructure to supply natural gas to existing Units 1 and 2 and establishes emissions standards for opacity, particulate matter, and nitrogen oxides that are consistent with Rule 62-296-405, F.A.C., which applies to large boilers. The draft permits also establish monitoring and reporting requirements to verify that the gas project was not subject to PSD. The Department notes that FPL is among the highest users of natural gas in the country and strongly encourages FPL to actually fire the newly available natural gas in Manatee Units 1 and 2.

The permitting authority will issue the Air Construction Permit and the PROPOSED Title V Air Operation Permit Revision and subsequent FINAL Title V Air Operation Permit Revision, in accordance with the conditions of the Draft Air Construction Permit and the Draft Title V Air Operation Permit. Revision unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Draft Air Construction Permit issuance action for a period of 14 (fourteen) days from the publication of this Public Notice. The permitting authority will accept written comments concerning the proposed Draft Title V Air Operation Permit Revision issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in significant changes, the permitting authority shall issue revised draft permits and require, if applicable, another "Public Notice".

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. Under Section 120.60 (3)F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within 14 (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 applicable 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 (F.A.C.).

A petition that disputes the material facts on which the permitting authority'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; 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 petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the 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 state;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief; (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 wished the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority'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 permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority 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 for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit revision. Any petition shall be based only on objections to the permit revision that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrated to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at: Permitting Authority: Bureau of Air Regulation, Florida Department of Environmental Protection, 111 S. Magnolia Drive, Suite 4, Tallahassee, FL 32301. Phone: 1-850-488-0114. Affected District Office: Southwest District Office, Florida Department of Environmental Protection, 3804 Coconut Palm Drive, Tampa, FL 33619-8218. Phone: 813-744-6100. The complete project file includes the Technical Evaluation and Preliminary Determination, the Draft Air Construction Permit, the Draft Title V Air Operation Permit Revision, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S.. Interested persons may contact permit engineer at the above address, or call 850-488-0114, for additional information. 7/15/2002

BRADENTON HERALD

www.bradenton.com
P.O. Box 921
Bradenton, FL 34206-0921
102 Manatee Avenue West
Bradenton, FL 34205-8894
941/748-0411 ext. 7065

Bradenton Herald
Published Daily
Bradenton, Manatee, Florida

RECEIVED


JUL 18 2002

BUREAU OF AIR REGULATION

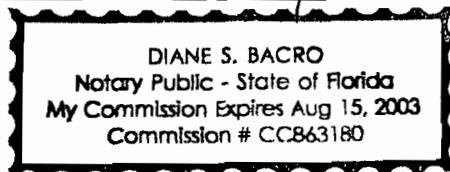
STATE OF FLORIDA
COUNTY OF MANATEE;

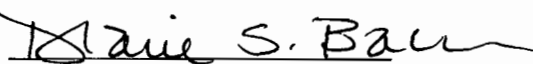
Before the undersigned authority personally appeared Sheila Dalesio, who on oath says that she is a Legal Advertising Representative of the Bradenton Herald, a daily newspaper published at Bradenton in Manatee County, Florida; that the attached copy of the advertisement, being a Legal Advertisement in the matter PUBLIC NOTICE in the Court, was published in said newspaper in the issues of JULY 15, 2002.

Affiant further says that the said publication is a newspaper published at Bradenton, in said Manatee County, Florida, and that the said newspaper has heretofore been continuously published in said Manatee County, Florida, each day and has been entered as second-class mail matter at the post office in Bradenton, in said Manatee County, Florida for a period of 1 year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.


(Signature of Affiant)

Sworn to and subscribed before me this
15th Day of July, 2002




SEAL & Notary Public

Personally Known ☒ OR Produced Identification _____
Type of Identification Produced _____

cc: G. Kiesel, SWD
B. Worley, EPA
G. Bungah, NPS
B. Orr, DEP

PUBLIC NOTICE OF
INTENT TO ISSUE AIR
CONSTRUCTION PER-
MIT AND TITLE V AIR
OPERATION PERMIT
REVISION
Florida Department of
Environmental
Protection
Florida Power and
Light - Manatee Power
Plant, Manatee County
Florida
Draft Air Construction
Permit No. 0810010-
007-AC Construction
of Natural Gas
Infrastructure
Draft Title V Air
Operation Permit
Revision No. 0810010-
008-AV Concurrent
Revision to Add
Natural Gas as an
Authorized Fuel

The Florida
Department of
Environmental protection (permitting authority) gives notice of its intent to issue an Air construction Permit and a Title V Air Operation Permit Revision to Florida Power and Light (applicant) for the Manatee Power Plant located at 19050 State Road 62 in Parrish, Manatee County, Florida. The applicant's authorized representative and responsible official is Mr. Paul Plotkin, Plant General Manager. The applicant's address is Florida Power and Light, Manatee Power Plant, 19050 State Road 62, Parrish, FL 34219.

The new Gulfstream Natural Gas Pipeline began commercial operation in June of 2002. The project brings natural gas that is compressed near Mobile Alabama and conveyed through an underwater pipeline on the continental shelf to markets in Florida. The new pipeline instantly increases the total natural gas transportation capacity into Florida from approximately 1.5 to 2.5 billion standard cubic feet, excluding other proposed pipeline projects. The pipeline enters Florida in Manatee County at a location that is particularly convenient to the FPL Manatee Plant. Florida Power and Light (FPL) proposed to take advantage of the new pipeline by constructing the necessary infrastructure to supply natural gas to existing electric utility steam generating Units 1 and 2. These existing units include low NOx burners, which incorporate air and fuel staging to reduce emissions of nitrogen oxides when firing either fuel oil or natural gas. FPL predicts that the project will not result in net actual annual emissions increases above the past actual annual emissions from the units (averaged for 2000 to 2001). Therefore, FPL maintains that the project does not require review under the Prevention of Significant Deterioration (PSD) of Air Quality program. This procedure is available to operators of electric utility steam generating units in accordance with federal regulations and the Department's rules.

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.

Article Addressed to:

Clarence Troxell
3321 Lakeside Circle
Parrish, FL 34219

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) C. Troxell B. Date of Delivery 8-14-02

C. Signature X C. Troxell ☐ 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. 7001 0320 0001 3692 8093

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

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

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To Clarence Troxell
Street, Apt. No.,
or PO Box 3321 Lakeside Circle
City, State, ZIP+4 Parrish, FL 34219

PS Form 3800, January 2001

See Reverse for Instructions

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

COMPLETE THIS SECTION ON DELIVERY

- A. Received by (Please Print Clearly) Mary Maxwell B. Date of Delivery 88-14-02
- C. Signature Mary Maxwell ☐ 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) ☐ Yes2. 7001 0320 0001 3692 8086

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

U.S. Postal Service
CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To Paul Plotkin
Street, Apt. No.,
or PO Box No. 19050 State Road 62
City, State, ZIP+4 Parrish, FL 34219

PS Form 3800, January 2001

See Reverse for Instructions

U.S. Postal Service
CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To Amy E. Stein
Street, Apt. No.,
or PO Box No. Box 1000
City, State, ZIP+4 Bradenton, FL 34206-1000

PS Form 3800, January 2001

See Reverse for Instructions

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:

Amy E. Stein, Chair
Manatee County Board of
County Commissioners
P. O. Box 1000
Bradenton, FL 34206-1000

COMPLETE THIS SECTION ON DELIVERY

- A. Received by (Please Print Clearly) Terry L. Farnham B. Date of Delivery AUG 14 2002
- C. Signature Terry L. Farnham ☐ 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) ☐ Yes2. Article 7001 0320 0001 3692 8109

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

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. Dan Kumarich
President
Manatee Citizens Against Pollution
P. O. Box 660
Parrish, FL 34219

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) *Neva Sayers* B. Date of Delivery *11/18/2002*
C. Signature *X NEVA SAYERS* ☐ 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

7001 0320 0001 3692 8116

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

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

OFFICIAL USE

Postage \$
Certified Fee
Return Receipt Fee (Endorsement Required)
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees \$

Postmark
Here

Sent To
Dan Kumarich
Street, Apt. No.,
or PO Box No. Box 660
City, State, ZIP+4
Parrish, FL 34219

PS Form 3800, January 2001

See Reverse for Instructions

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

OFFICIAL USE

Postage \$
Certified Fee
Return Receipt Fee (Endorsement Required)
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees \$

Postmark
Here

Sent To
ManaSota 88, Inc.
Street, Apt. No.,
or PO Box No. Box 1728
City, State, ZIP+4
Nokomis, FL 34274

PS Form 3800, January 2001

See Reverse for Instructions

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:

ManaSota 88, Inc.
P. O. Box 1728
Nokomis, FL 34274

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) *Compton* B. Date of Delivery
C. Signature *X Glen Compton* ☐ Agent ☐ Addressee
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

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

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article 7001 0320 0001 3692 8123

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952