



April 1, 2015

David Read
Bureau of Air Regulation
State of Florida
Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5505
Tallahassee, FL 32399-2400

**Re: Request to create a new Project Number for the Draft of Title V Permit - 0810010-021-AV:
Manatee Power Plant**

Dear David,

As a follow-up to the telephone call held on Friday March 27, 2015 with yourself, Jonathan Holtom of FDEP, Mary Archer, Jeff Zuczek, and Kevin Washington of FPL, FPL is requesting that a new project number be assigned to the Manatee Plant Draft Title V project that was assigned to incorporate the G.E. .04 changes from A/C permit 0810010-020AC (PSD-FL-328D) because of additional proposed changes to the Draft permit. In addition, FPL would like to withdraw the Enlargement of Time Request associated with the Draft permit 0810010-021.

While the Title V permit was open to incorporate the G.E. .04 modifications to Unit 3, the Department desired to add language to Units 1&2 to incorporate language for the Mercury and Air Toxics Standards (MATS Rule). FPL requests to utilize the modified MATs language provided by FDEP in the Revised Draft. In conjunction, FPL is requesting additional changes to the Draft while the permit is open. Specifically, FPL would like to add language related to:

- Changing the emissions test schedule to calendar year from Federal Fiscal Year as adopted in the Revised 62-297 FAC which became effective March 9, 2015
- Adopting an Alternate Sampling Procedure (ASP) for ammonia testing on Unit 3.
- Discontinuing the use of Continuous Opacity Monitors (COMs) on Units 1&2 because the Units now meet the definition of "gas-fired" units under Part 75.

As directed by the Department FPL is providing this cover letter under the Designated Representative's signature and the following additional documents:

- FDEP Form 62-210 package including P.E. sealed document – Attachment A
- Excerpts from the current Title V permit with strikethrough/underlined/highlighted FPL proposed language for the change to calendar year, the reference to an Alternate Ammonia Sampling Procedure, and a Permitting Note addressing the discontinuance of the COMs. – Attachment B
- Copy of FPL's request for the Alternate Sampling Procedure for ammonia testing – Attachment C
- Copy of FDEP's approval of the ASP. – Attachment D
- Copy of e:mail to Louis Nichols of EPA and EPA's reply regarding clarification on the ability to discontinue the use of COMs on Units 1&2 because of their "gas-fired" operation. – Attachment E

- OGC Enlargement of Time Request which expired on 3/27/15 – Attachment F

FPL appreciates the Department's suggestions and guidance on the best way to incorporate the various changes while the permit is open.

If you have questions or require additional information you may contact me at the information noted below, or Kevin Washington at (561) 691-2877 or kevin_washington@fpl.com

Sincerely yours,

A handwritten signature in black ink, appearing to read 'CK' followed by a long horizontal line.

Christian Kiernan
PGD Technical Services General Manager
FPL Designated Representative
(561) 691-2781
christian.kiernan@fpl.com

Enclosures: 6