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February 2, 1993

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Division of Air
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Clair H. Fancy
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399

RE: Florida Power & Light Co.;
FPL Martin CG/CC Project;
Request to Amend PSD Permit;
PSD-FL-146, Martin County

Dear Clair:

On behalf of Florida Power & Light Co. (FPL), I am writing to request minor amendments to the above-referenced PSD permit for the FPL Martin Coal Gasification/Combined Cycle Project (Project). The Department issued the permit on June 3, 1991, authorizing, in part, the construction of the first phase of the Project. That first phase consists of two natural gas and oil-fired combined cycle units (Martin Units 3 and 4) and various associated facilities. Among the associated facilities are an auxiliary boiler and an emergency diesel generator.

As a result of recent final design efforts, FPL has identified several needed changes to the PSD permit: 1) to authorize a different auxiliary boiler and diesel generator, both with smaller capacity but with slightly increased emission rates though overall lower total emissions; 2) to remove operating limits on those two facilities; and 3) to clarify the applicability of excess emission limits during "cold startup" periods for the combustion turbines. (In parallel to this request, FPL is seeking a separate modification of the site certification for the Project which was issued pursuant to the Florida Power Plant Siting Act.)

The final project design now includes a somewhat different auxiliary boiler and emergency diesel generator. Each will have a smaller capacity than the originally proposed facilities. The new smaller facilities will have lower total air emissions (pounds per hour) but higher emission rates (pounds per million Btu). FPL also requests that operating limits for the auxiliary boiler and diesel generator be removed. Details on the final design of these

Bill Dwyer

Clair H. Fancy
February 2, 1993
Page 2

facilities and their operating conditions are provided in the attached information package. The Department of Environmental Regulation's permit application form for an air pollution source has been used for convenience in providing this information.

FPL requests that Specific Condition 7 on page 9 of the PSD permit be revised to read as follows:

SPECIFIC CONDITIONS

* * *

7. Auxiliary Steam Boilers and Diesel Generators may be operated as needed. ~~shall operate only during start-up and shutdown, periodic maintenance testing, and for emergency power generation, respectively.~~ Nox emissions for the auxiliary boiler shall not exceed 0.3 ~~0.1~~ lb/MMBtu for natural gas firing or oil firing. ~~or 0.2 lb/MMBtu for oil firing.~~ NOx emissions for the diesel generators shall not exceed 15.0 ~~12.0~~ grams hp/hr.

Sulfur dioxide emissions limitations for the auxiliary steam boilers and the diesel generators are established by firing natural gas or limiting the light distillate fuel oil's sulfur content to 0.3% on an annual basis.

FPL is also requesting a clarification of Specific Condition 4 of the PSD permit which establishes emission limits for various pollutants which expressly do not apply "during periods of startup and shutdown" of the units. Pursuant to Rule 17-210.700(1), FAC, this authorization for excess emissions during startup and shutdown could be construed to be limited to two hours per day. It should be noted that the applicable NSPS regulations under 40 CFR Subpart GG do not prescribe time limits for excess emissions during periods of startup or shutdown.

After extensive investigation, FPL has determined that the CTs will not be able to comply with certain of the established emission limits during the initial periods of a cold steam turbine start (cold start) for those units. FPL has concluded that an additional two hours during cold starts for the first CT of a unit will be required to meet all established emission limits. Such cold start events are expected to occur approximately 12 times per year per unit. Accordingly, FPL is requesting that the start up period for these units under Specific Condition 4 be clarified to include an additional two hours (for a total of 4 hours).

Clair H. Fancy
February 2, 1993
Page 3

FPL requests that the following change be made to Specific Condition 4 on page 6 of the PSD permit

SPECIFIC CONDITIONS

* * *

4. The maximum allowable emissions from each CT in accordance with the BACT determination, shall not exceed the following, at 40°F (except during periods of startup and shutdown as prescribed by Note e. below.)

* * *

e. The excess emissions authorized under Rule 17-210.700(1), FAC, shall be extended an additional two hours (four hours total) for a cold steam turbine start for the first CT of a unit. The second CT of each unit shall comply with established emission limits in accordance with Rule 17-210.700(1), FAC.

Should you or your staff have any questions, FPL will be available to discuss this matter.

Sincerely,



Peter C. Cunningham

cc: Doug Neeley, Chief, Air Program Branch
USEPA Region IV (w/encls)
Hamilton S. Owen (w/o encls)
Richard T. Donelan (w/o encls)