



**FPL**

July 1, 2009

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BUREAU OF AIR REGULATION

Trina Vielheur - Chief  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Mail Station #5505  
Tallahassee, FL 32399-2400

**Re: Request to Revise Air Construction Permit 0850001-010-AC and  
Martin Plant Title V Air Operation Permit 0850001-018-AV**

PSD-FL-

Dear Mrs. Vielhauer,

Project No: 0850001-020-AC / 327C  
0850001-021-AV

Martin Plant requests that the PSD Permit PSD FL 327 (0850001-010-AC) for Combined Cycle Unit 8 A-D and the Title V permit 0850001-018-AV be revised to modify the Excess Emission Exemption during Start-up; Specific Condition 16 and Specific Condition E.14 respectively.

Martin Unit 8 consists of four CT HRSG sets (8A, 8B, 8C, and 8D) combined with one steam turbine/generator. During various times of the year, system load conditions dictate that one, or more, CT/HRSG sets are cycled off during various times of the day. One or more of the shutdown units may be required to restart later the same day to meet system demand. The current Excess Emission exemption provided by Condition 14 allows two hours in 24 hours for each CT/HRSG, which, in Martin Plant's case, is equivalent to eight hours per 4 unit site. To allow additional operational flexibility, and to minimize excess emissions generated during multiple unit starts, Martin Plant requests that Condition 16 of the Air Construction permit and Condition E.14 of the Title V permit be modified as follows:

From:

Excess Emissions Allowed: ".....For each gas turbine/HRSG system, excess emissions resulting from startup, shutdown, or documented malfunctions shall not exceed two hours in any 24-hour period except for the following specific cases."

To:

Excess Emissions Allowed: ".....For each gas turbine/HRSG system, excess emissions resulting from startup, shutdown, or documented malfunction shall not exceed two hours in any 24-hour period (or shall not exceed eight hours per 4-unit site, with the additional provisions of a limit of two startup periods per 24 hours per unit) except for the following specific cases."

The modified language will allow one CT/HRSG set to cycle multiple times, rather than requiring multiple CT/HRSG sets to cycle once each. This operating flexibility can reduce emissions during cycling operation by allowing one unit to have shortened start up times rather than multiple protracted start-ups by several units. This change was also requested for Manatee Plant Unit 3 which was adopted and added to the Title V Permit. Martin Plant's Unit 8 is essentially identical to Unit 3 at Manatee Power Plant.

In addition, Martin Plant requests that the excess emission exemption for fuel changing be extended from one (1) hour to two (2) hours similar to the 2-hour exemption for fuel changing that is in the Turkey Point Unit 5 permit. Martin Units 8A-D are essentially the same as Turkey Point Unit 5. Units 8A-D may not always be able to execute successful fuel changes in an hour's time because the equipment utilized in the change-over process is exercised so infrequently. The components are prone to certain operational inconsistencies which require adjustment during the fuel changing process which can extend beyond 1 hour. Since the units have been operational, they have not been called upon to operate on liquid fuel for dispatch purposes. The only liquid fuel operation, an average of 5 hours for each of the 4 units, has been to test the capability of switching to liquid. In the event a unit cannot successfully execute the change-over in 1 hour, it is shut down and restarted which has a greater impact on the air emissions. Martin plant requests that Condition 16.d of the Air Construction permit and Specific Condition E.14.d of the Title V permit be modified as follows:

*From:... For fuel switching (oil-to-gas or gas-to-oil), excess emissions shall not exceed one (1) hour in any 24-hour period.*

**To: ... For fuel switching excess emissions shall not exceed 2 hours in any 24-hour period.**

Included with this request are the Purpose of Application, Responsible Official Certification, Professional Engineer Certification, and an updated Compliance Statement.

Thank you for your assistance in this matter, and, if you should have any questions, please do not hesitate to contact me at (772) 597-7106, or Kevin Washington at (561) 691-2877.

Sincerely,



William Reichel

Plant General Manager/Responsible Official – Martin Plant  
Florida Power and Light Company

Enclosures: (4)

**Application Responsible Official Certification**

**Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."**

1. Application Responsible Official Name: William Reichel
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.
3. Application Responsible Official Mailing Address... Organization/Firm: Martin Plant Street Address: Post Office Box 176 City: Indiantown State: Fl. Zip Code: 34956
4. Application Responsible Official Telephone Numbers... Telephone: (772) 597 - 7106 ext. Fax: (772) 597 - 7416
5. Application Responsible Official E-mail Address: Bill.Reichel@fpl.com
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. 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 and all other applicable requirements identified in this application to which the Title V source is subject. 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 the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature <u>William Reichel</u> Date <u>6/30/09</u>

**Purpose of Application**

**This application for air permit is being submitted to obtain: (Check one)**

**Air Construction Permit**

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

**Air Operation Permit**

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

**Air Construction Permit and Revised/Renewal Title V Air Operation Permit  
(Concurrent Processing)**

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

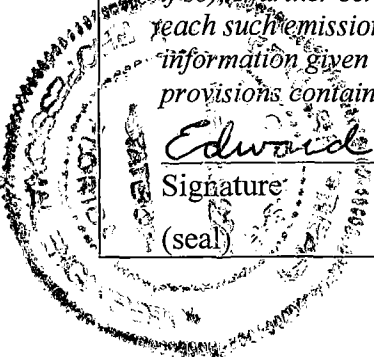
**Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:**

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

**Application Comment**

Revision to The Air Construction Permit and the Title V Permit.

# Professional Engineer Certification

1. Professional Engineer Name: Edward Preast Registration Number: 33225
2. Professional Engineer Mailing Address... P.O. Box 14000 Organization/Firm: Florida Power & Light Company Street Address: 800 Universe Blvd. City: Juno Beach State: Florida Zip Code: 33408
3. Professional Engineer Telephone Numbers... Telephone: (561) 691- 2679 ext. Fax: (561) 691- 7049
4. Professional Engineer E-mail Address: ed_prest@fpl.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(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</i> <i>(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.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, 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 plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, 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.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input checked="" type="checkbox"/>, 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.</i>  <u>Edward Preast</u> Signature (seal) Date <del>12/9/2008</del> <i>EP</i> 6/3/09



# Department of Environmental Protection

## Division of Air Resource Management

### STATEMENT OF COMPLIANCE - TITLE V SOURCE

**REASON FOR SUBMISSION (Check one to indicate why this statement of compliance is being submitted)**

<input type="checkbox"/> Annual Requirement	<input checked="" type="checkbox"/> Title V Permit Modification	<input type="checkbox"/> Permanent Facility Shutdown
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REPORTING PERIOD*	REPORT DEADLINE**
Jan 1, 2009 through June 1 of 2009 (year)	_____

\*The statement of compliance must cover all conditions that were in effect during the indicated reporting period, including any conditions that were added, deleted, or changed through permit revision.

\*\*See Rule 62-213.440(3)(a)2., F.A.C.

Facility Owner/Company Name: William Reichel, Plant Manager; Florida Power & Light

Site Name: Martin Plant Facility ID No. 085001 County: Martin

**COMPLIANCE STATEMENT (Check only one of the following three options)**

\_\_\_\_\_ A. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, and there were no reportable incidents of deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above.

X B. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part; however, there were one or more reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each incident of deviation, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

\_\_\_\_\_ C. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, EXCEPT those identified in the pages attached to this report and any reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each item of noncompliance, the following information is included:

1. Emissions unit identification number.
2. Specific permit condition number (note whether the permit condition has been added, deleted, or changed during certification period).
3. Description of the requirement of the permit condition.
4. Basis for the determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e., recorded at least every 15 minutes, or intermittent).
5. Beginning and ending dates of periods of noncompliance.
6. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented.
7. Dates of any reports previously submitted identifying this incident of noncompliance.


For each incident of deviation, as described in paragraph B. above, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

# STATEMENT OF COMPLIANCE - TITLE V SOURCE

## RESPONSIBLE OFFICIAL CERTIFICATION


I, the undersigned, am a responsible official (Title V air permit application or responsible official notification form on file with the Department) of the Title V source for which this document is being submitted. With respect to all matters other than Acid Rain program requirements, I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate, and complete.

 6/15/09  
(Signature of Title V Source Responsible Official) (Date)

Name: Tom Beck Title: Production Manager

## DESIGNATED REPRESENTATIVE CERTIFICATION (only applicable to Acid Rain source)

I, the undersigned, am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

 6/22/09  
(Signature of Acid Rain Source Designated Representative) (Date)

Name: Sheila Wilkinson Title: General Manager II

*{Note: Attachments, if required, are created by a responsible official or designated representative, as appropriate, and should consist of the information specified and any supporting records. Additional information may also be attached by a responsible official or designated representative when elaboration is required for clarity. This report is to be submitted to both the compliance authority (DEP district or local air program) and the U.S. Environmental Protection Agency(EPA) (U.S. EPA Region 4, Air and EPCRA Enforcement Branch, 61 Forsyth Street, Atlanta GA 30303).}*

For each incident of deviation, as described in paragraph **B.** above, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
  2. Description of the incident.
- 
- A. January 20, 2009 – Martin Unit 2 - Opacity, Malfunction of Burner No. 9 Swirler, preventing flame stabilization and proper combustion.
  - B. January 22, 2009 – Martin Unit 2 - Opacity, Malfunction of Due to the malfunction of two of the three furnace pressure transmitters on the south side of the boiler, the resulting Master Fuel Trip and loss of all flames.



APPLICATION INFORMATION

Purpose of Application FPL MARTIN POWER PLANT 085001-019-AV

This application for air permit is being submitted to obtain: (Check one)

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JUL 20 2009

BUREAU OF AIR POLLUTION CONTROL

**Air Construction Permit**

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL) and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

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**Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:**

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

**Application Comment**

Revision to original Application to modify, in order to include the waiver of processing time.

K.T. Washington -- July 20, 2009

7/20/09

Good morning, Mr. Washington. Thanks for the application page submittal. I will put the page in with the original application submittal. Take care.

Bruce Mitchell

-----Original Message-----

From: Washington, Kevin [mailto:Kevin.Washington@fpl.com]  
Sent: Monday, July 20, 2009 10:00 AM  
To: Mitchell, Bruce; Koerner, Jeff  
Subject: REQUEST TO MODIFY FPL MARTIN PLANT PERMITS

Bruce/Jeff,

Please see the attached revision to Page 2 of the Permit Application for the FPL Martin Plant (0850001-019-AV) which waives the processing time requirements for the recently requested modifications to the Martin Plant AC and Title V permits.

If you have any questions, or need additional information feel free the contact me.

Thank you,  
Kevin Washington  
Project Manager  
FPL Environmental Services  
(561) 691-2877  
kevin\_washington@fpl.com

REC-1111  
JUL 20 2009  
BUREAU OF AIR REGULATION