

Scott - Kanan:

Florida Power & Light Company, P.O. Box 088801, North Palm Beach, FL 33408-8801



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Bureau of
Air Regulation

September 15, 1995

Mr. Clair Fancy
Chief, Bureau of Air Regulation
State of Florida
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

**Re: Amendment of Permits AC43-4037, AC43-4038, AO43-170568 and AO43-170567
FPL Martin Plant Units 1 and 2**

Dear Clair:

The purpose of this correspondence is to request that the Department modify the air construction and air operating permits for these two emission units.

The two subject units are oil and gas-fired steam electric generating units that are currently subject to 40 CFR 60, SubPart D regulation. FPL has installed, operated and maintained continuous emission monitors (CEMs) for SO₂ on these units pursuant to 1993 modifications of the air construction and air operating permits for these units as an indicator for SO₂ emissions during co-firing. In addition, FPL has continued to monitor the fuel sulfur content for these units on a monthly basis, in accordance with specific condition 5 in the aforementioned permits.

FPL proposes to begin utilizing the continuous emission monitor for SO₂ as the compliance method for this pollutant. Limiting emissions to 0.8 lb/mmBtu is consistent with 40 CFR Subpart D requirements. In view of this proposal, the requirement to also limit the sulfur content of the fuel oil sulfur content is superfluous and redundant. FPL suggests the following modified language to the air construction and air operating permits:

Unit 1 - Permit No. AC43-4037 and Unit 2 - Permit No. AC43-4038
Unit 1 - Permit No. AO43-170568 and Unit 2 - Permit No. AO43-170567

Source Description: An air pollution source consisting of a 800 MW Class Fossil Fuel-Fired Steam Generator Unit (900 megawatt gross capacity) equipped with Low Nox Dual Fuel Firing Burners to reduce emission of nitrogen oxides; and multicyclones to control particulate matter emissions. The unit burns low-sulfur fuel oil containing a maximum of 0.7% sulfur (by weight), natural gas, or a mixture of low-sulfur fuel oil containing a maximum of 1.0% sulfur (by weight) and natural gas in a ratio that will result in a maximum sulfur dioxide emission rate of 0.80 lbs/mmBtu heat input. In addition, the unit has a continuous emission monitoring system for opacity, NOx, and sulfur dioxide. The unit's heat input is 8,650 mmBtu/hr on oil and 9,040 mmBtu/hr on natural gas. When a blend of fuel oil and natural gas are burned, the heat input is prorated based on the percent heat input of each fuel.

~~Specific Condition No. 14: Prior to burning a blend of No. 6 fuel oil containing above 0.7 percent sulfur to a maximum of 1.0 percent sulfur, the permittee shall install, calibrate, maintain, and operate a continuous emissions monitor for sulfur dioxide that meets the requirements of Performance Specification 2 of 40 CFR 75.60, Appendix B (July 1, 1992). The permittee shall utilize the continuous emission monitor for SO₂ as the method for determining compliance with the emission limit of 0.8 lb/mmBtu. In the event of a failure of the CEM, the permittee shall collect daily samples of fuel oil fired, and composite them over the duration that the CEM is inoperative, and then perform sulfur analysis on the sample to demonstrate compliance with the SO₂ emission limit until such time as the CEM is repaired and operational.~~

~~Specific Condition No. 5: Until such time when the Environmental Protection Agency (EPA) promulgates final rules regarding fuel sampling and test methods, the Department will accept the current fuel sampling and analysis program, provided that daily as fired fuel oil samples are composited and analyzed for sulfur content on a monthly basis to demonstrate compliance with the fuel oil sulfur content limits. Quarterly reports containing the results of monthly fuel oil sampling and analysis shall be submitted to the Department no later than thirty (30) days after the end of each quarter.~~

~~The permittee shall be allowed 90 days after promulgation of fuel sampling and analysis methods to implement an EPA approved method of monitoring sulfur dioxide emissions either by fuel sampling and analysis or continuous instack monitoring or other methods as approved under the provisions of 40 CFR 60.45.~~

FPL views this change as relatively minor in nature. The emission rate will not be affected, therefore PSD review should not be required.

I would like to thank the Department in advance for their consideration of this matter. As always, I would be pleased to answer any questions you may have. Please do not hesitate to contact me at (407) 625-7661.

Very truly yours,



Richard Piper
Environmental Specialist
Florida Power & Light Company

cc: Joe Kahn DEP / SED
Tom Tittle DEP / SED

copy to: ✓ Martin Plant file

J. Holton