



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
September 29, 1998

David B. Struhs
Secretary

Ms. Mary Archer
Sr. Environmental Specialist
Florida Power & Light Company
Martin Plant
P.O. Box 176
Indiantown, FL 34956-0176

Re: Permit No. 0850001-004-AV
FPL Martin Plant FINAL Title V Permit

Dear Ms. Archer:

We have reviewed your two letters dated July 29, 1998, that requested three administrative changes to the FINAL Title V Permit for the Martin plant. The first request, concerning the replacement of EPA Method 20 with EPA Method 7E, will require an application for an Alternate Sampling Method to implement, pursuant to Rule 297.620, F.A.C. Please send this request to Mr. Michael Harley, the Supervisor of our Emissions Monitoring Section for review. The second request, dealing with the timing of the initial compliance test and initial firing of oil, is acceptable and will be incorporated in the permit. The third request, dealing with NOx testing at one versus four different load conditions, is being evaluated. We will provide status on this item as soon as it is resolved.

If you have any questions concerning these matters, please contact Tom Cascio at 850/921-9526.

Sincerely,

Scott M. Sheplak, P.E.
Administrator
Title V Section

cc: Michael Harley

BEST AVAILABLE COPY



Florida Power & Light Company
Martin Plant, P. O. Box 176, Indiantown, FL 34956-0176

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BUREAU OF
AIR REGULATION

July 29, 1998

Mr. Scott M. Sheplak, P.E.
State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Permit No. 0850001-004-AV
FPL Martin Plant Final Title V Permit

Dear Mr. Sheplak:

After reviewing the subject Title V permit, FPL has identified the following issues which need to be addressed. Each issue is described as follows:

Page 31 of 61. Specific Condition B.23. We request Method 20 be replaced with Method 7E as the test method. The cited method creates inaccuracies in the testing due to the span levels required.

Page 32 of 61. Specific Condition B.27. Please add following the first sentence in this condition "It is not necessary to plan the firing of a fuel solely to complete the initial compliance test, instead, the initial test may be postponed until such time as the untested fuel is ready for service".

Thank you for your assistance in resolving these issues. If you have any questions, please do not hesitate to contact me at (561) 691-7057.

Sincerely,

Vito Guarnasorelli

Beeper 800 447 2433 # 8495

John H 561 691 2894

MA
Mary Archer
Sr. Environmental Specialist
Florida Power & Light Company





Florida Power & Light Company
Martin Plant, P. O. Box 176, Indiantown, FL 34956-0176

July 29, 1998

Mr. Scott M. Sheplak, P.E.
State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Permit No. 0850001-004-AV ADDMUM
FPL Martin Plant Final Title V Permit

Dear Mr. Sheplak:

An additional administrative type change has been identified and needs to be made to the above referenced permit.

Page 31 Specific Condition B.23. States the NOx emissions shall be determined at each of the load conditions specified in 40CFR 60.335(c)(2). This regulation requires testing at four different loads. Several years we negotiated with your Department that testing at only one load would be required. Therefore we request the permit language be revised to include this change.

Thank you for your assistance, if you have any questions, please do not hesitate to contact me at (561) 691-7057.

Sincerely,

A handwritten signature in cursive script that reads "Vito Carruso".

Handwritten initials "MA" in the left margin.
Mary Archer
Sr. Environmental Specialist
Florida Power & Light Company

