

Check Sheet

→ PS/07

Company Name: *FP & L*
Permit Number: *AC 43-4037, AC 43-4038, Amendment*
PSD Number:
County:
Permit Engineer:
Others involved:

Application:

- Initial Application
- Incompleteness Letters
- Responses
- Final Application (if applicable)
- Waiver of Department Action
- Department Response
- Other

Intent:

- Intent to Issue
- Notice to Public
- Technical Evaluation
- BACT Determination
- Unsigned Permit *Amendment*
- Correspondence with:
 - EPA
 - Park Services
 - County
 - Other
- Proof of Publication
- Petitions - (Related to extensions, hearings, etc.)
- Other

Final Determination:

- ~~Final Determination~~
- Signed Permit *Amendment*
- BACT Determination
- Other

Post Permit Correspondence:

- Extensions
- Amendments/Modifications ✓
- Response from EPA
- Response from County
- Response from Park Services
- Other

In the folder labeled as follows there are documents, listed below, which were not reproduced in this electronic file. That folder can be found in the supplementary documents file drawer. Folders in that drawer are arranged alphabetically, then by permit number.

Folder Name: Florida Power and Light Company

Permit(s) Numbered:

AC	43	-4037
AC	43	-4038
AO	43	-107568
AO	43	-107567

Documents:

Period during Detailed Description
which
document was
received

TE&PD
1/11/93

1. Proof of Publication

Kanani - Piper

Called while you were out. I told him to send \$250.00. Submit first 4-page of application form & we'll take it from there. Go ahead and show on docket, A1

DEP ROUTING AND

TO: (NAME, OFFICE, LOCATION)

- 1. ~~AL~~
- 2. _____

PLEASE PREPARE REPLY FOR:

- ____ SECRETARY'S SIGNATURE
- ____ DIV/DIST DIR SIGNATURE
- ____ MY SIGNATURE
- ____ YOUR SIGNATURE
- ____ DUE DATE _____

ACTION/DISPOSITION

- ____ DISCUSS WITH ME
- COMMENTS/ADVISE
- ____ REVIEW AND RETURN
- ____ SET UP MEETING
- ____ FOR YOUR INFORMATION
- ____ HANDLE APPROPRIATELY
- ____ INITIAL AND FORWARD
- ____ SHARE WITH STAFF
- ____ FOR YOUR FILES

COMMENTS:

This is ~~an~~ ^{an} amendment request ^{separated} on an expired permit. According to the rules we are required to issue a new permit to maintain Federal enforceability. However, we have previously issued amendments to this permit even though it was ~~expired~~ ^{expired}. Should I call OGC ^(Pat comes) since it is such an old permit to get a legal opinion?
 Thanks, Kanani

P.S. - the answer determines how much fee we request!

~~AL~~ Kanani 9/24
 His handle.

Add to docket. Clara
 Put package together + include in meeting with Marty + me. AL
~~AL - Plz return to me to file - kt~~
 (Also, let's see if a fee is required. The OGC might have already expired. We might need a very short summary) AL

95, request to amend a permit
 essing your request, we will
 have any questions, please call

Scott,
 Check this out!
 We've need no fee.
 I would thought you might like to see this.

Let me know if you want to take care of it!
 Thanks,
 Kanani

FROM: Kanani DATE: 9/21/95 PHONE: 1-9535

Copy given to Scott Sheplak and Tom Classico. For them to discuss & possibly handle



file

RECEIVED

MAR 06 1996

BUREAU OF
AIR REGULATION

February 28, 1996

Mr. Martin Costello, Permitting Engineer
Bureau of Air Permitting
State of Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee FL 32399-2400

**Re: FPL Martin Plant
Modification to Martin Units 1 and 2 Permits
AIRS ID 0850001**

Dear Martin:

This correspondence is to confirm our conversation of earlier today regarding the subject request to modify the Martin 1 and 2 Air Construction and Air Operating permits. FPL has decided to withdraw our request to modify these permits at this time, however FPL may pursue these changes with the Department at some future date.

If you have any questions regarding this modification request, please do not hesitate to contact me at (407) 625-7661.

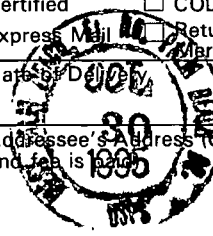
Very truly yours,

A handwritten signature in cursive script that reads "Richard Piper".

Richard Piper
Environmental Specialist
Florida Power & Light Company

cc: Al Linero FDEP - Tallahassee
Joe Kahn FDEP - West Palm Beach
Tom Tittle FDEP - West Palm Beach


Is your RETURN ADDRESS completed on the reverse side?

SENDER: • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece below the article number. • The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Mr. Richard Piper, Environmental Sp Florida Power and Light Post Office Box 088801 North Palm Beach, Florida 33408-8801		4a. Article Number 7 127 632 550	
		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
		7. Date of Delivery 	
5. Signature (Addressee)		8. Addressee's Address (Only if requested and fee is paid)	
6. Signature (Agent)			

Thank you for using Return Receipt Service

PS Form 3811, December 1991 *U.S. GPO: 1993-352-714 **DOMESTIC RETURN RECEIPT**

Z 127 632 550

 **Receipt for Certified Mail**
 No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to	
Mr. Richard Piper, Env. Spc.	
Florida Power and Light	
Post Office Box 088801	
P.O., State and ZIP Code	
North Palm Beach, Fl	
Postage	33408-8801
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	
10/25/95 Request addl. info	

PS Form 3800, March 1993



File

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

October 25, 1995

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Mr. Richard Piper, Environmental Specialist
Florida Power and Light
Post Office Box 088801
North Palm Beach, Florida 33408-8801

Dear Mr. Piper:

RE: Amendment of Permits No. AC43-4037, AC43-4038, AO43-170567, and AO43-170568
FPL Martin Plant Units 1 and 2. Request for additional information.

The Department has reviewed your September 15, and October 5, 1995, application for modification of the above referenced permits. It has been assigned the AIRS ID# 0850001. Please reference this number in all further correspondence. To process your application, the Department requests the following information:

1. Please provide an analysis of any increases in emissions in accordance with the requirements in 62-212.400 F.A.C., if the Department is to remove the fuel sulfur limit for the Martin Units 1 and 2.
2. Substitution of Method 5 with Method 17 will require an Alternate Sampling Procedure (ASP) request. The information outlined in 62-297.620 F.A.C., should be submitted to The Bureau of Air Monitoring and Mobile Sources, Emissions Monitoring, attention Mike Harley, if this substitution is desired.

We will resume processing the application after receipt of the above information. If you have any questions, please call me or Martin Costello at (904) 488-1344.

Sincerely,

A. A. Linero, P.E.
Administrator
New Source Review Section

AAL/mc/kw

cc: M. Harley, DEP
J. Kahn, SED
T. Tittle, SED

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

0850001-001-AC

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



October 5, 1995

RECEIVED

OCT 9 1995

Bureau of
Air Regulation

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

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

Dear Clair:

Pursuant to a conversation with Mr. Al Linero of your staff, enclosed please find a check in the amount of \$250.00 to cover the administrative costs of the FDEP processing the subject permit amendments for the FPL Martin Plant.

Due to some recent conversations with the Southeast District office, I would like to additionally suggest that the Department add the following change to the permits' Specific Condition #6:

Specific Condition No. 6: The Department may, after reviewing the quarterly opacity, nitrogen oxides, or sulfur dioxide excess emission reports, require the Permittee to perform testing in accordance with reference Method ~~5, 6, 7,~~ 17, 6C, 7E, and / or 9 or alternate test methods approved by the Department. The Department will notify the Permittee of such request, as well as the objective for such testing. At the request of the Permittee, the Department will take into account any potential instrument error or malfunction before requiring the scheduling of tests. Substantive violations, as verified by reference method testing, are subject to appropriate legal action; moreover, repetitive violation shall require the Permittee to revise operating and/or maintenance practice to abate these violations.

I would also like to take the opportunity to thank the Department for working with industry to resolve these types of issues in a common-sense, non-bureaucratic fashion. 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

an FPL Group company

cc: Al Linero



FPL

December 7, 1995

RECEIVED

DEC 11 1995

BUREAU OF
AIR REGULATION

Mr. A.A. Linero, P.E.
Administrator, New Source Section
State of Florida
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: AIRS ID# AO43-0850001
Amendment of FPL Martin Units 1 and 2 Operating and Construction Permits

In response to your letter of October 25, 1995, FPL is providing the following information that demonstrates that the Department rules given in 62-212.400 F.A.C. do not apply to our request to co-fire higher sulfur fuel oils with natural gas.

Change in the Method of Operation

FPL does not agree that co-firing fuel oil and natural gas is a change in the method of operation, regardless of the sulfur content of the fuel oil. The current operation permit provides for this operation when 1 percent fuel oil is co-fired with natural gas. When co-firing in this way, the controlling requirement is to assure that the sulfur dioxide *emissions limit* of 0.8 lb/mmBtu is met. The sulfur dioxide emission limit is a requirement of the New Source Performance Standards (NSPS) applicable to each unit [i.e., 40 Code of Federal Regulations (CFR) Part 60 Subpart D and rule 62-296.800 F.A.C.]. Co-firing is expressly allowed by the NSPS [refer to Section 60.43(c) which states: "Compliance shall be based on the total heat input from all fossil fuels burned, including gaseous fuels"]. In addition, as shown on the attached table which presents a comparison of emission when co-firing, emissions when co-firing would meet the NSPS emissions limits.

Capable of Accommodating

Even if the use of high sulfur oil is deemed a change in the method of operation, the Martin units would not be required to undergo PSD review due to the exemption in Rule 62-212.400(2)(c)4. F.A.C. which states:

"A modification that is to occur for any of the following reasons shall not be subject to the preconstruction review requirements of this section.....4) Use of an alternative fuel or raw material which the facility was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975..."

The Martin units "commenced construction" as defined in rule 62-212.200(19) F.A.C. prior to January 5, 1975 and were capable of accommodating any sulfur content fuel oil when the construction permits were issued on March 20, 1973. The emissions limits expressly stated in the construction permits and FDEP rules was the NSPS 40 CFR Part 60 Subpart D. Since the construction permit was issued, there have been no federally enforceable permit conditions that have limited the units ability to co-fire fuel oil and natural gas as long as the NSPS emission limit is met. As discussed on previous cases, FDEP-issued operation permits are not federally enforceable. Moreover, the use of the sulfur content in fuel is arguably not an emission limit but a description on how an emission limit would be met.

For these reasons the analysis of emission increases requested in your letter does not appear to be necessary, and I am requesting that the Department resume processing of the application in accordance with my previous request.

With respect to the Alternative Sampling Procedure you requested, FPL will follow this up with the Department at a later date.

As always, I would be pleased to discuss these issues with you or your staff. I may be reached at (407) 625-7661.

Very truly yours,



Rich Piper
Environmental Specialist
Florida Power & Light Company

cc: Tom Tittle

FDEP/SED

mike Kennedy

Example Emission Comparison for Co-Firing Residual Oil and Natural Gas at Martin Units 1 and 2

KBN/RGP
12/7/95

Fuel Parameters	Current Permit	Current Permit	Co-Firing with 2.5% Sulfur Fuel			Co-Firing with 1% Sulfur Fuel		
	(Oil firing Only)	(Gas firing Only)	Oil 29.21%	Gas 70.79%	Total	Oil 73.13%	Gas 26.87%	Total
Heat Content (Btu/gal)	150,952	NA	150,952	NA		150,952	NA	
Heat Content (Btu/cf)	NA	1,000	NA	1000		NA	1000	
Heat Content (Btu/lb)	18,300	21,956	18,300	21,956		18,300	21,956	
Heat Input (MMBtu/hr)	8,650	9,040	2,526	6,124	8,650	6,326	2,324	8,650
Fuel Input (lb/hr)	472,678	411,733	138,050	278,907	416,957	345,668	105,861	451,529
Fuel Input (1,000 gal or MMcf)	57.3	9.04	16.74	6.12		41.91	2.32	
Sulfur Content:								
Oil (%)	0.70%	NA	2.50%	NA		1.00%	NA	
gas (grains/100cf)	NA	1.0	NA	1.0		NA	1	
Sulfur Dioxide								
Basis	NSPS Limit	1 gr/100cf	2.5% Sulfur	1 gr/100cf		1% Sulfur	1 gr/100cf	
Emissions Rate (lb/MMBtu)	0.8	0.0029	2.73	0.0029	0.8	1.09	0.0029	0.8
Emissions (lb/hr)	6,920	25.83	6,903	1,750	6,920	6,913	6.64	6,920
Particulate Matter								
Basis	NSPS Limit	AP-42	AP-42	AP-42		AP-42	AP-42	
Emissions Rate (lb/MMBtu)	0.1	0.003	0.17	0.003	0.05	0.08	0.003	0.06
Emissions (lb/hr)	865	27.12	438	18.37	457	520	6.97	527
Nitrogen Oxides								
Basis	NSPS Limit	NSPS Limit	NSPS Limit	NSPS Limit		NSPS Limit	NSPS Limit	
Emissions Rate (lb/MMBtu)	0.3	0.2	0.3	0.2	0.23	0.3	0.2	0.27
Emissions (lb/hr)	2,595	1,730	758	1225	1,983	1,898	465	2,363
Carbon Monoxide								
Basis	AP-42	AP-42	AP-42	AP-42		AP-42	AP-42	
Emissions Rate (lb/MMBtu)	0.033	0.04	0.033	0.04	0.038	0.033	0.04	0.035
Emissions (lb/hr)	286.5	361.6	84	245	329	210	93	302
Volatile Organic Compounds								
Basis	AP-42	AP-42	AP-42	AP-42		AP-42	AP-42	
Emissions Rate (lb/MMBtu)	0.005	0.0014	0.005	0.0014	0.002	0.005	0.0014	0.004
Emissions (lb/hr)	43.55	12.75	12.72	8.63	21.35	31.65	3.28	35.13

File



September 15, 1995

RECEIVED

SEP 18 1995

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

Bureau of
Air Regulation

**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, NO_x, 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

File
Scott Sheplak
Tom Caserio

0050001-001-AC

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



October 5, 1995

RECEIVED

OCT 9 1995

Bureau of
Air Regulation

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

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

Dear Clair:

Pursuant to a conversation with Mr. Al Linero of your staff, enclosed please find a check in the amount of \$250.00 to cover the administrative costs of the FDEP processing the subject permit amendments for the FPL Martin Plant.

Due to some recent conversations with the Southeast District office, I would like to additionally suggest that the Department add the following change to the permits' Specific Condition #6:

Specific Condition No. 6: The Department may, after reviewing the quarterly opacity, nitrogen oxides, or sulfur dioxide excess emission reports, require the Permittee to perform testing in accordance with reference Method ~~5, 6, 7,~~ 17, 6C, 7E, and / or 9 or alternate test methods approved by the Department. The Department will notify the Permittee of such request, as well as the objective for such testing. At the request of the Permittee, the Department will take into account any potential instrument error or malfunction before requiring the scheduling of tests. Substantive violations, as verified by reference method testing, are subject to appropriate legal action; moreover, repetitive violation shall require the Permittee to revise operating and/or maintenance practice to abate these violations.

I would also like to take the opportunity to thank the Department for working with industry to resolve these types of issues in a common-sense, non-bureaucratic fashion. 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
al Linero m kw
an FPL Group company



April 12, 1995

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

RECEIVED

APR 13 1995

Bureau of
Air Regulation

Re: Florida Power & Light Company
Martin Power Plant
Temporary Permit Amendment

Dear Clair:

This correspondence is submitted to request from the Department a temporary permit amendment for FPL Martin Unit 4A combustion turbine. This emission unit is currently governed by PSD permit # PSD-FL-146 and Site Certification PA 89-27. This emission unit was placed into service on April 15, 1994. In September 1994, the Department granted a permit revision which allowed for testing of all four combustion turbines with redesigned combustor cans. Testing has been completed on three of the four combustion turbines as of this date.

However, FPL has, within the past few weeks, become aware of potential design issues in the compressor section of the GE combustion turbines. In order to adequately investigate these issues, FPL would like to conduct testing as described below.

Background

FPL has experienced two compressor failures on the 4A combustion turbine since October, 1994. There is no evidence that these failures are related to the dry low NOx combustors which, in their final design configuration, have performed well. The cause of these failures has not yet been determined. GE has identified additional problems with the same model combustion turbine in other installations outside of Florida. Some of these problems have been experienced at the Martin facility, but most were identified overseas. GE has initiated a world-wide test program to investigate the problems and identify their root cause. The root cause identification of the compressor failures and other related problems is the basis for a portion of the proposed test program.

Scope of Testing and Benefits

The test program that is contemplated for the 4A combustion turbine consists of five elements:

1. Compressor
2. Exhaust Diffuser
3. Vibration
4. Performance
5. Turbine Compartment

The purposes of the compressor testing are: 1) Verify the bolt clamping force at assembly and during machine operation; 2) Map the thermal response of the compressor rotor during operation; 3) Obtain rotor temperature data to determine the impact of temperatures on the compressor wheel; 4) Measure the dynamic response on stage 15 blades and stage 15 compressor wheel; and 5) Obtain operational data on the compressor.

The purpose of testing the exhaust diffuser is to determine the excitation mechanisms of the diffuser.

The purpose of the rotor vibration testing is to determine and understand vibrations during the various modes of operation.

The purpose of the performance testing is to determine the base load performance change with increased inlet guide vane (IGV) angle. This will allow determination of the firing temperature characteristics at current and future appropriate performance levels.

The purpose of the compartment temperature test is to monitor the turbine compartment during standard operating sequences.

Benefits of Testing

By performing this testing, FPL and GE will be able to determine what engineering design issues may exist in the compressor section of the combustion turbine, so they can be addressed and thus reduce the possibility of future failures of this component.

The Martin combined-cycle units are among the lowest-emitting as well as among the most efficient generating units in the FPL system. Therefore, when the Martin units are unavailable to provide generating capacity, other, higher-emitting units must be operated in order to make up the deficit in generating capacity.

Test Dates and Times

Unit 4A is currently out of service for an outage. The proposed test program is planned to commence on April 26, 1995, and to be completed on May 26, 1995 or 30 days after initial startup from the current outage. It is possible that the start date could change depending on when the unit is available to return to service. FPL has identified 75 to 100 hours of operation during the test period during which there is a potential for emissions to be higher than the current 25 ppm NOx permit basis. During that 75 to 100 hours,

emissions may at times be higher than the current permit limit of 177 pounds per hour of NOx.

Testing will be performed for 12-14 hours on a typical test day. However, the combustion turbine will be operated normally, in full compliance with current permit limits, during the remainder of each day during the testing period. During the evaluation and testing of the combustion turbine, all pollutant emissions will comply with applicable NSPS limits. Due to the fragile nature of the installed test instrumentation, the testing must be completed as soon as possible after the unit has been restarted from the current outage.

FPL understands that this temporary permit amendment will be in effect for 30 days after startup from the current outage or the completion of testing, whichever occurs first.

Attachment 1 to this letter is potential language for a Temporary Permit Amendment which FPL requests the Department issue, allowing the short-duration testing proposed herein.

FPL recognizes and is appreciative of the Department's cooperation in resolving this situation. Please do not hesitate to contact me at (407) 625-7661 if you have any questions. Thank-you in advance for your consideration of this matter.

Very Truly Yours,

Vince Blouin for Richard Piper

Richard Piper
Environmental Specialist
Florida Power & Light Company

cc: Hamilton S. Oven FDEP/Tallahassee
Tom Tittle FDEP/West Palm Beach

ATTACHMENT 1
TEMPORARY PERMIT AMENDMENT

Florida Power & Light Company is hereby authorized to perform operational testing on combustion turbine 4A for a maximum period of 30 days in order to evaluate potential design issues in the compressor section of the unit, subject to the following conditions:

1. The Department's Southeast District Air Program Administrator shall be notified either in writing or by facsimile, at least 3 days prior to the commencement of testing.
2. To allow time for evaluation and testing of alterations to the compressor section of the combustion turbine, the emission limitations in Specific Condition 4 of the referenced permit (PSD-FL-146) shall not apply on any day during which testing is being conducted during a 30-day period following startup after the current outage. This temporary permit amendment shall remain in effect for 30 days from startup after the current outage or until the testing is completed on combustion turbine 4A, whichever occurs first.
3. During the evaluation and testing of the combustion turbine all pollutant emissions shall comply with the emission limits specified by the New Source Performance Standards (NSPS) for CTs, 40 CFR 60, Subpart GG. The annual allowable emissions (TPY) of NOx for CT 4A in permit PSD-FL-146 shall not be exceeded.
4. During the test period, the currently permitted pounds per hour emission limits for NOx, CO and VOC shall apply as 24-hour average emission limits.
5. After completion of the testing period, CT 4A must be in compliance with all limitations in the referenced permit.



RECEIVED
APR 20 1993
Division of Air
Resources Management

April 8, 1993

Mr. Thomas Tittle, Environmental Manager
State of Florida
Department of Environmental Regulation
Southeast Florida District
1900 South Congress Avenue, Suite A
West Palm Beach, FL 33406

**RE: Florida Power & Light Company
Martin Power Plant - Unit 2
Notification of CEMS Performance Certification Testing**

Dear Mr. Tittle:

As you are aware, FPL has installed a SO₂ continuous emission monitoring system (CEMS) at Unit 2. The SO₂ CEM is required by the construction and air operating permit modifications recently issued by the Tallahassee air permitting staff which allow FPL to co-fire 1.0 percent sulfur fuel oil and natural gas in Unit 2.

The performance certification tests (calibration drift and relative accuracy tests) will be conducted in accordance with 40 CFR 60, Appendix B, Performance Specifications 2 and 3, as amended. In confirmation of our recent discussion, the calibration drift testing has been scheduled for April 27 to May 4, 1993. Furthermore, the relative accuracy testing has been scheduled for May 4, 1993 between 7:30am to 5:00pm. The relative accuracy testing will be performed using EPA Reference Methods 6C (SO₂), 7E (NO_x), and 3A (CO₂) of 40 CFR 60, Appendix A as adopted by reference in Chapter 17-2, F.A.C.

If you have any questions regarding this matter, please contact me at (407) 625-7635.

Sincerely,

Daniel R. Adams
Environmental Specialist
Florida Power & Light Company

cc: Willard Hanks - Florida DER Tallahassee
Eric Peterson - Florida DER Southeast District

040893.pmr

P 360 185 704



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, June 1991

Send to	
Charles Henderson	
Street and No.	
F.A. Power & Light	
P.O. State and ZIP Code	
N. Palm Beach, FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	2-22-93
Martin Power Plants Units 1+2	

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Charles D. Henderson
F.A. Power & Light
11770 Hwy One
N. Palm Beach, FL
33408-8801

4a. Article Number
P 360 185 704

4b. Service Type

Registered Insured

Certified COD

Express Mail Return Receipt for Merchandise

7. Date of Delivery
2-25-93

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

Thank you for using Return Receipt Service.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

February 16, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Charles D. Henderson
Environmental Affairs Department
Florida Power and Light Company
11770 U.S. Highway One
4th Floor (Mail Drop JEN/GB)
North Palm Beach, Florida 33408-8801

Dear Mr. Henderson:

Re: Amendment of Permits
Martin Power Plant - Units 1 and 2

The Department is in receipt of Mr. Daniel Adams' August 6, 1992, letter requesting that the permits for Units 1 and 2 of the Martin Power Plant be amended and his December 1, 1992, letter commenting on our proposed amendments to these units. The requested amendments would allow these units to burn a blend of No. 6 fuel oil containing a maximum of 1.0% sulfur and natural gas in a ratio that will result in the sulfur dioxide emissions meeting the current standard of 0.80 pounds per million Btu heat input, install a sulfur dioxide continuous emission monitor on each unit, and use one of the existing 0.7% sulfur fuel oil storage tanks to store fuel oil containing 1.0% sulfur. This plant is located 6 miles northwest of Indiantown off Highway 710 in Martin County, Florida. This request is acceptable, with conditions, and the permits for these units are amended as follows:

FROM:

Unit 1 - Permit No. AC43-4037 and Unit 2 - Permit No. AC43-4038

Source Description: Steam generator unit #1 [and 2], producing 5,579 MMBtu/hr, burning max. of 0.7% sulfur Bunker "C" oil or natural gas.

Specific Condition No. 14: None in the original permits

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 Steam Generator Unit Number 1 [and 2] (900 megawatt gross capacity) equipped with Low NOX Dual Fuel

Firing Burners to reduce emissions of nitrogen oxides; and multicyclones to control particulate emissions. The unit burns low sulfur fuel oil and natural gas to control sulfur dioxide emissions. In addition, the unit has a continuous emission monitoring system for opacity and NO_x. The unit's heat input is 8,650 MMBtu/hr on oil and 9,040 MMBtu/hr on natural gas.

Specific Condition No. 2: Emission limiting standards are as follows:

In accordance with 40 CFR 60 Subpart D and Florida Administrative Code Rule 17-2.660:

Pollutant	Emission Limit
Particulate Matter	0.10 lb. per million Btu heat input
Sulfur Dioxide	0.80 lb. per million Btu heat input
Nitrogen Oxides	0.30 lb. per million Btu heat input on oil
	0.20 lb. per million Btu heat input on gas
Opacity	Not greater than 20 percent, except one six-minute period per hour of not more than 27 percent opacity.

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 analysis program, provided that daily samples are composited and analyzed for sulfur content every seven (7) operating days, to demonstrate compliance with the 0.80 lb. SO₂ per million Btu based on the monthly composite. Monthly reports shall be submitted to the Department no later than thirty (30) days after the end of the month.

The permittee shall be allowed 90 days after promulgation of fuel sampling and analysis methods to implement an EPA approved method of monitoring SO₂ emissions either by fuel sampling and analysis or continuous in-stack monitoring or other methods as approved under the provisions of 40 CFR 60.45.

Specific Condition No. 6: The Department may, after reviewing FPL's quarterly excess emission reports, require the Permittee to conduct Method 9 testing. The Department will notify FPL of such request, as well as the objective for such testing. At the request of the Permittee, the Department will take into

account any potential instrument error or malfunction before requiring the scheduling of tests. Substantive opacity violations, as verified by Method 9, are subject to appropriate legal action; moreover, repetitive violations shall require the Permittee to revise operating and/or maintenance practice to abate these violations.

TO:

Unit 1 - Permit No. AC43-4037 and Unit 2 - Permit No. AC43-4038

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 emissions 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, NO_x, 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 (New): 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 60, Appendix B (July 1, 1992).

Unit 1 - Permit AO43-170568 and Unit 2 - Permit AO43-170567

Source Description: An air pollution source consisting of a 800 MW Class Fossil Fuel Steam Generator Unit (900 megawatt gross capacity) equipped with Low NOx Dual Fuel-Fired Burners to reduce emissions 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, nitrogen oxides, 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. 2: Emission limiting standards are as follows:

In accordance with 40 CFR 60 Subpart D and Florida Administrative Code Rule 17-2.660:

Pollutant	Emission Limit
Particulate Matter	0.10 lb per million Btu heat input and 865* lbs/hr
Sulfur Dioxide	0.80 lb per million Btu heat input and 6,920 lbs/hr
Nitrogen Oxides	0.30 lb per million Btu heat input and 2,595 lbs/hr on oil 0.20 lb per million Btu heat input and 1,808 lbs/hr on natural gas The emissions limit on the fuel blend is prorated, but no greater than 2,595 lbs/hr
Opacity	Not greater than 20 percent, except one six-minute period per hour of not more than 27 percent opacity

*On 100 percent oil

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 in-stack monitoring or other methods as approved under the provisions of 40 CFR 60.45.

Mr. Charles D. Henderson
Martin Power Plant Amendment
Page 5

Specific Condition No. 6: The Department may, after reviewing the quarterly opacity, nitrogen oxides, or sulfur dioxide excess emission reports, require the Permittee to perform testing in accordance with reference Method 5, 6, 7, and/or 9 or alternate test methods approved by the Department. The Department will notify the Permittee of such request, as well as the objective for such testing. At the request of the Permittee, the Department will take into account any potential instrument error or malfunction before requiring the scheduling of tests. Substantive violations, as verified by reference method testing, are subject to appropriate legal action; moreover, repetitive violations shall require the Permittee to revise operating and/or maintenance practice to abate these violations.

A copy of this letter shall be filed with the referenced permits and shall become a part of those permits.

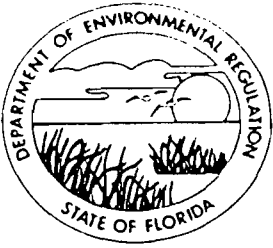
Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/WH/plm

cc: S. Brooks, SED
T. Tittle, SED



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

FAX TRANSMITTAL SHEET

TO: Dan Adams

DATE: 2/22/93 PHONE: 407/625-7668

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 6

FROM: Willard Hank

DIVISION OF AIR RESOURCES MANAGEMENT

COMMENTS: Amend. will be mailed today

PHONE: 904/488-1344

FAX NUMBER: 904/922-6979

If there are any problems with this fax transmittal, please call the above phone number.



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To _____	Location: _____
To _____	Location: _____
To _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Howard Rhodes
FROM: Clair Fancy *CF*
DATE: February 16, 1993
SUBJ: Amendment of Permits

Attached for your approval and signature is a letter that will amend the construction and operating permits for Units 1 and 2 at Florida Power and Light Company's Martin plant. This plant is located northwest of Indiantown in Martin County, Florida. The amendment will allow Units 1 and 2 to: burn a blend of No. 6 fuel oil containing a maximum of 1.0% sulfur and natural gas in a ratio that will result in the sulfur dioxide emissions meeting the current standard of 0.80 pounds per million Btu heat input, install a sulfur dioxide continuous emission monitor on each unit, and use one of the existing 0.7% sulfur fuel oil tanks to store fuel oil containing 1.0% sulfur.

The permittee requested several minor editorial changes to the draft amendment of the permits. There was no other response to the public notice the Department required for this amendment. The Bureau recommends your approval and signature of the attached letter.

CF/WH/plm

Attachment

HOPPING BOYD GREEN & SAMS

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(904) 222-7500

FAX (904) 224-8551

CARLOS ALVAREZ
JAMES S. ALVES
BRIAN H. BIBEAU
KATHLEEN BLIZZARD
ELIZABETH C. BOWMAN
WILLIAM L. BOYD, IV
RICHARD S. BRIGHTMAN
PETER C. CUNNINGHAM
THOMAS M. DeROSE
WILLIAM H. GREEN
WADE L. HOPPING
FRANK E. MATTHEWS
RICHARD D. MELSON
WILLIAM D. PRESTON
CAROLYN S. RAEPPLE
GARY P. SAMS
ROBERT P. SMITH
CHERYL G. STUART

C. ALLEN CULP, JR.
RALPH A. DeMEO
JONATHAN S. FOX
JAMES C. GOODLETT
GARY K. HUNTER, JR.
DALANA W. JOHNSON
RICHARD W. MOORE
ANGELA R. MORRISON
MARIBEL N. NICHOLSON
LAURA BOYD PEARCE
GARY V. PERKO
MICHAEL P. PETROVICH
DOUGLAS S. ROBERTS
JULIE B. ROME
KRISTIN C. RUBIN
CECELIA C. SMITH

OF COUNSEL
W. ROBERT FOKES

January 11, 1993

Willard Hanks
Florida Department of Environmental
Regulation
2600 Blair Stone Road, Room 338
Tallahassee, Florida 32399-2400

Re: Florida Power & Light Company
Martin Power Plant, Martin County
Unit 1, Permit Nos. AC 43-4037 and AO 43-170568
Unit 2, Permit Nos. AC 43-4038 and AO 43-170567

Dear Willard:

Enclosed please find a copy of the notice of intent to amend the above-referenced permits which was published in the Indiantown News on January 6, 1993. The certification of publication is in the upper right-hand corner of the page.

Sincerely,



Peter C. Cunningham

/gbb

cc: John Brown

Enclosure

St. Hanks
D. Goldmann

RECEIVED

JAN 11 1993

Division of Air
Resources Management

Patty

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



January 19, 1993

RECEIVED

JAN 25 1993

Division of Air
Resources Management

Mr. Preston Lewis, Supervisor
Permitting and Standards Section
State of Florida
Department of Environmental Regulation
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

**RE: Florida Power & Light Company
Martin Power Plant - Units 1 and 2
Amendment of Air Construction and Operating Permits**

Dear Mr. Lewis:

In response to Mr. C. H. Fancy's Letter of December 23, 1992 to Mr. Charles D. Henderson, FPL offers the following comments on the Florida DER's proposed amendments to the referenced permits which we would like incorporated in the final permit amendments.

Cover letter:

Please note that FPL's Environmental Affairs Department's new mailing address for purposes of certified mail transmittals is as follows.

11770 U. S. Highway One
4th Floor (Mail Drop JEN/GB)
North Palm Beach, Florida 33408-8801

Construction Permit Proposed Amendments for Permit Nos. AC43-4037 and AC 43-4038:

Specific Condition No. 14, line 5 - Should read as follows "dioxide that meets the requirements of Performance Specification 2 of 40 CFR".

Operating Permit Proposed Amendments for Permit Nos. AO43-170568 and AO43-170567:

Specific Condition No. 2 - The emissions limiting standards for nitrogen oxides should be documented as follows:

Nitrogen Oxides - 0.30 lb per million Btu heat input and 2,595 lbs/hr on oil.
0.20 lb per million Btu heat input and 1,808 lbs/hr on natural gas.
The emissions limit on the fuel blend is prorated, but no greater than 2,595 lbs/hr.

Specific Condition No. 5, paragraph 1, line 8 - Should read as follows "reports containing the results of monthly fuel oil sampling and analysis".

If you have any questions regarding our recommended changes to the proposed permit amendments, please contact me at (407) 625-7635.

Sincerely,

A handwritten signature in black ink that reads "Daniel R. Adams". The signature is written in a cursive style with a large initial 'D'.

Daniel R. Adams
Environmental Specialist
Florida Power & Light Company

cc: Willard Hanks - Florida DER Tallahassee
Tom Tittle - Florida DER Southeast District

011193.pmr

P 062 922 021



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, June 1991

Sent to Mr. Charles Henderson, FP&L	
Street and No. P. O. Box 088801	
P.O., State and ZIP Code N. Palm Beach, FL 33408-8801	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 12-28-92 Permit: AC 43-4037 & 4038 AO 43-170568 & -67	

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Charles D. Henderson
Environmental Affairs Dept.
Florida Power and Light Co.
P. O. Box 088801
North Palm Beach, FL 33408-8801

4a. Article Number

P 062 922 021

4b. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Registered | <input type="checkbox"/> Insured |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD |
| <input checked="" type="checkbox"/> Express Mail | <input type="checkbox"/> Return Receipt for Merchandise |

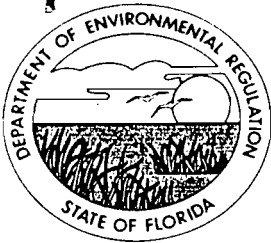
4c. Date of Delivery

DEC 29 1992

5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

December 23, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Charles D. Henderson
Environmental Affairs Department
Florida Power and Light Company
P. O. Box 078768
West Palm Beach, Florida 33407-0768

Dear Mr. Henderson:

Attached is one copy of the updated proposed revision to the permits package for Units 1 and 2 at the Martin Power Plant.

Your concerns about conditions 5, 7, and 9 of the construction permits are moot issues since the permits will not be reissued and the expiration dates will not be extended.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Preston Lewis of the Bureau of Air Regulation.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/WH/plm

Attachments

cc: S. Brooks, SED

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

CERTIFIED MAIL

In the Matter of
Modifications for Permits by:

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

DER File No. AC 43-4037
AC 43-4038
AO 43-170568
AO 43-170567
Martin County

INTENT TO ISSUE

The Department of Environmental Regulation gives notice of its intent to issue amendments to the permits (copy attached) for the proposed project as detailed in the request for the files specified above.

The applicant, Florida Power & Light Company, applied on August 10, 1992, to the Department of Environmental Regulation for a modification to the referenced construction and operation permits for Units 1 and 2 at the Martin Power Plant. The modifications would allow the burning of a mixture of No. 6 fuel oil containing a maximum of 1.0% sulfur and natural gas in a ratio that would result in a maximum sulfur dioxide emission of 0.80 pounds per million Btu heat input, install sulfur dioxide continuous emissions monitors on Units 1 and 2, and store No. 6 fuel oil containing a maximum of 1.0% sulfur in an existing low sulfur fuel oil storage tank. The Martin Power Plant is located in Martin County near Indiantown, Florida.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that a construction permit is required for the proposed work.

Pursuant to Section 403.815, Florida Statutes and Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Modifications to Permits. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide

proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.

The Department will issue the permits with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

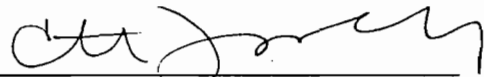
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this

intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



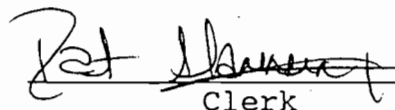
C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed by certified mail before the close of business on 12-28-92 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to
§120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.


Clerk

12-28-92
Date

Copies furnished to:
S. Brooks, SED

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF INTENT TO ISSUE MODIFICATIONS TO PERMITS

The Department of Environmental Regulation gives notice of its intent to issue modifications to the permits for Unit 1 (AC 43-4037 and AO 43-170568) and Unit 2 (AC 43-4038 and AO 43-170567) to Florida Power & Light Company's Martin Power Plant in Martin County near Indiantown, Florida. The modifications will authorize the company to burn a mixture of No. 6 fuel oil containing a maximum of 1.0% sulfur and natural gas in a ratio that would result in a sulfur dioxide emissions rate of 0.80 pounds per million Btu heat input. As this is the current emission standard for these units, there will be no increase in allowable sulfur dioxide emissions. The ambient air impact of the emissions from this plant are unchanged. A determination of Best Available Control Technology (BACT) is not required for this modification. The Department is issuing this Intent to Issue Modifications to Permits to satisfy the federal enforceability requirements.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is

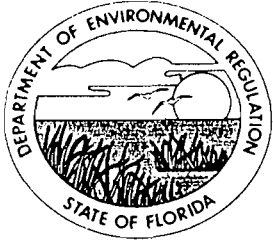
designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Southeast District
1900 S. Congress Ave., Suite A
West Palm Beach, Florida 33406

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.



DRAFT

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

December 23, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Charles D. Henderson
Environmental Affairs Department
Florida Power and Light Company
11770 U.S. Highway One
4th Floor (Mail Drop JEN/GB)
North Palm Beach, Florida 33408-8801

Dear Mr. Henderson:

Re: Amendment of Permits
Martin Power Plant - Units 1 and 2

The Department is in receipt of Mr. Daniel Adams' August 6, 1992, letter requesting that the permits for Units 1 and 2 of the Martin Power Plant be amended and his December 1, 1992, letter commenting on our proposed amendments to these units. The requested amendments would allow these units to burn a blend of No. 6 fuel oil containing a maximum of 1.0% sulfur and natural gas in a ratio that will result in the sulfur dioxide emissions meeting the current standard of 0.80 pounds per million Btu heat input, install a sulfur dioxide continuous emission monitor on each unit, and use one of the existing 0.7% sulfur fuel oil storage tanks to store fuel oil containing 1.0% sulfur. This plant is located 6 miles northwest of Indiantown off Highway 710 in Martin County, Florida. This request is acceptable, with conditions, and the permits for these units are amended as follows:

FROM:

Unit 1 - Permit No. AC43-4037 and Unit 2 - Permit No. AC43-4038

Source Description: Steam generator unit #1 [and 2], producing 5,579 MMBtu/hr, burning max. of 0.7% sulfur Bunker "C" oil or natural gas.

Specific Condition No. 14: None in the original permits

Unit 1 - Permit No. A043-170568 and Unit 2 - Permit No. A043-170567

Source Description: An air pollution source consisting of a 800 MW Class Fossil Fuel Steam Generator Unit Number 1 [and 2] (900 megawatt gross capacity) equipped with Low NOx Dual Fuel

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Firing Burners to reduce emissions of nitrogen oxides; and multicyclones to control particulate emissions. The unit burns low sulfur fuel oil and natural gas to control sulfur dioxide emissions. In addition, the unit has a continuous emission monitoring system for opacity and NO_x. The unit's heat input is 8,650 MMBtu/hr on oil and 9,040 MMBtu/hr on natural gas.

Specific Condition No. 2: Emission limiting standards are as follows:

In accordance with 40 CFR 60 Subpart D and Florida Administrative Code Rule 17-2.660:

Pollutant	Emission Limit
Particulate Matter	0.10 lb. per million Btu heat input
Sulfur Dioxide	0.80 lb. per million Btu heat input
Nitrogen Oxides	0.30 lb. per million Btu heat input on oil 0.20 lb. per million Btu heat input on gas
Opacity	Not greater than 20 percent, except one six-minute period per hour of not more than 27 percent opacity.

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 analysis program, provided that daily samples are composited and analyzed for sulfur content every seven (7) operating days, to demonstrate compliance with the 0.80 lb. SO₂ per million Btu based on the monthly composite. Monthly reports shall be submitted to the Department no later than thirty (30) days after the end of the month.

The permittee shall be allowed 90 days after promulgation of fuel sampling and analysis methods to implement an EPA approved method of monitoring SO₂ emissions either by fuel sampling and analysis or continuous in-stack monitoring or other methods as approved under the provisions of 40 CFR 60.45.

Specific Condition No. 6: The Department may, after reviewing FPL's quarterly excess emission reports, require the Permittee to conduct Method 9 testing. The Department will notify FPL of such request, as well as the objective for such testing. At the request of the Permittee, the Department will take into

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account any potential instrument error or malfunction before requiring the scheduling of tests. Substantive opacity violations, as verified by Method 9, are subject to appropriate legal action; moreover, repetitive violations shall require the Permittee to revise operating and/or maintenance practice to abate these violations.

TO:

Unit 1 - Permit No. AC43-4037 and Unit 2 - Permit No. AC43-4038

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 emissions 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, NO_x, 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 (New): 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 Performance Specification 2 of 40 CFR 60, Appendix B (July 1, 1992).

Unit 1 - Permit AO43-170568 and Unit 2 - Permit AO43-170567

Source Description: An air pollution source consisting of a 800 MW Class Fossil Fuel Steam Generator Unit (900 megawatt gross capacity) equipped with Low NOx Dual Fuel-Fired Burners to reduce emissions 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

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unit has a continuous emission monitoring system for opacity, nitrogen oxides, 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. 2: Emission limiting standards are as follows:

In accordance with 40 CFR 60 Subpart D and Florida Administrative Code Rule 17-2.660:

Pollutant	Emission Limit
Particulate Matter	0.10 lb per million Btu heat input and 865* lbs/hr
Sulfur Dioxide	0.80 lb per million Btu heat input and 6,920 lbs/hr
Nitrogen Oxides	0.30 lb per million Btu heat input on oil and 2,595 lbs/hr 0.20 lb per million Btu heat input on gas and 1,808 lbs/hr lb per million Btu heat input on fuel blend is prorated and 2,595 lbs/hr
Opacity	Not greater than 20 percent, except one six-minute period per hour of not more than 27 percent opacity

*On 100 percent oil

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 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 in-stack monitoring or other methods as approved under the provisions of 40 CFR 60.45.

Mr. Charles D. Henderson
Martin Power Plant Amendment
Page 5

DRAFT

Specific Condition No. 6: The Department may, after reviewing the quarterly opacity, nitrogen oxides, or sulfur dioxide excess emission reports, require the Permittee to perform testing in accordance with reference Method 5, 6, 7, and/or 9 or alternate test methods approved by the Department. The Department will notify the Permittee of such request, as well as the objective for such testing. At the request of the Permittee, the Department will take into account any potential instrument error or malfunction before requiring the scheduling of tests. Substantive violations, as verified by reference method testing, are subject to appropriate legal action; moreover, repetitive violations shall require the Permittee to revise operating and/or maintenance practice to abate these violations.

A copy of this letter shall be filed with the referenced permits and shall become a part of those permits.

Sincerely,

Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/WH/plm

cc: S. Brooks, SED
T. Tittle, SED



December 1, 1992

Mr. Preston Lewis, Supervisor
Permitting and Standards Section
State of Florida
Department of Environmental Regulation
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

RECEIVED

DEC 08 1992

Division of Air
Resources Management

**RE: Florida Power & Light Company
Martin Power Plant - Units 1 and 2
Amendment of Air Construction and Operating Permits**

Dear Mr. Lewis:

In response to Mr. C. H. Fancy's letter of October 1, 1992 to Mr. Charles D. Henderson, FPL offers the following comments on the Florida DER's proposed amendments to the referenced permits.

Intent to Issue Document:

Page 1 - Please note that FPL's Environmental Affairs Department's new mailing address is:

11770 U. S. Highway One
4th Floor (Mail Drop JEN/GB)
P.O. Box 088801
North Palm Beach, Florida 33408-8801

Notice of Intent to Issue Modifications to Permits:

Page 1, Paragraph 1, lines 7 and 8 - Should read "1.0% sulfur and natural gas in a ratio that would result in a sulfur dioxide emissions rate of 0.80 pound per million Btu heat input. As this is..."

FPL proposes to publish the notice with the corrections noted above unless the Department advises otherwise.

Draft Letter Dated October 9, 1992 Transmitting Permit Amendments for Martin Plant Units 1 and 2:

Page 1 - Note change in FPL Environmental Affairs Department's mailing address:

Construction Permit Proposed Modifications (page 3):

The following changes to the Florida DER proposed modifications to the construction permits for Martin Plant Units 1 and 2 are recommended.

Source Description - The source description should read as follows:

"An air pollution source consisting of a 800 MW class fossil fuel-fired steam generator unit (900 MW gross capacity) equipped with low NO_x dual fuel firing burners to reduce emissions 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 emissions rate of 0.80 pound per million Btu heat input. In addition, the unit has a continuous emission monitoring system for opacity, nitrogen oxides, and sulfur dioxide. The unit's heat input is 8,650 MMBtu/hr on oil, 8,770 MMBtu/hr on a blend of fuel oil (70 percent) and natural gas (30 percent), and 9,040 MMBtu/hr on natural gas.

Construction Permits' Expiration Date - Should be changed from February 1, 1982 and February 1, 1983 to November 29, 1994 to coincide with the expiration dates for the Units 1 and 2 air operating permits.

Construction Permit Specific Condition 5 - Should be deleted since specific conditions 1, 3, 5 and 6 of the air operating permit covers the requirement for compliance testing.

Construction Permit Specific Condition 7 - Should be deleted since specific condition 6 of the air operating permit covers the provision for special purpose testing upon DER's request and justification.

Construction Permit Specific Condition 9 - Should be deleted since this condition pertains to the start-up requirements for the generating unit. Units 1 and 2 have already met this condition when construction was completed and the units were brought on line.

In general, we believe it would be best to delete all of the construction permit specific conditions relating to air quality and reference the appropriate air operating permit specific conditions in their place within the construction permits.

Operating Permit Proposed Modifications (pages 3-4):

The following changes to the proposed modifications to the Florida DER air operating permits for Martin Plant Units 1 and 2 are recommended.

Source Description - The source description should read as follows:

"An air pollution source consisting of a 800 MW class fossil fuel-fired steam generator unit (900 MW gross capacity) equipped with low NO_x dual fuel firing burners to reduce emissions 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 emissions rate of 0.80 pound per million Btu heat input. In addition, the unit has a continuous emission monitoring system for opacity, nitrogen oxides, and sulfur dioxide. The unit's heat input is 8,650 MMBtu/hr on oil, 8,770 MMBtu/hr on a blend of fuel oil (70 percent) and natural gas (30 percent), and 9,040 MMBtu/hr on natural gas.

Specific Condition 5 - Should read as follows;

"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 samples are composited and analyzed for sulfur content on a monthly basis to demonstrate compliance with the fuel oil sulfur content limits. Monthly reports shall be submitted to the Department no later than thirty (30) days after the end of the month in which the samples were collected."

"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 in-stack monitoring or other methods as approved under the provisions of 40 CFR 60.45."

Specific Condition 6 - Should read as follows:

"The Department may, after reviewing the quarterly opacity, nitrogen oxides, or sulfur dioxide excess emissions reports, require the Permittee to perform testing in accordance with reference methods 5, 6, 7, and/or 9 or other alternate test procedures approved by the Department. The Department will notify the Permittee of such requests, as well as the objective for such testing. At the request of the Permittee, the Department will take into account any potential instrument error or malfunction before requiring the scheduling of tests. Substantive violations, as verified by reference method testing, are subject to appropriate legal action; moreover, repetitive violations shall require the Permittee to revise operating and/or maintenance practices to abate these violations."

If you have any questions regarding our recommended changes to the proposed permit modifications, please contact me at (407) 625-7635.

Sincerely,



Daniel R. Adams
Environmental Specialist
Florida Power & Light Company

DRA:jm

cc: Willard Hanks - Florida DER Tallahassee
Tom Tittle - Florida DER Southeast District

P 062 921 896



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, June 1991

Sent to <i>Charles Henderson</i>	
Street and No. <i>FIA Power + Light</i>	
P.O., State and ZIP Code <i>W Palm Bch, FL</i>	
Postage	\$
Certified Fee	
Special-Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>10-8-92</i>
<i>AC 43-4037 AO 43-176568</i>	
<i>" " -4038 AO 43-176567</i>	
<i>Martin City</i>	

PS Form 3811, July 1983 447-845

DOMESTIC RETURN RECEIPT

● **SENDER: Complete items 1, 2, 3 and 4.**

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

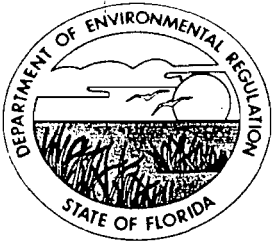
- Show to whom, date and address of delivery.
- Restricted Delivery.

3. Article Addressed to:
Charles D Logan
FIA Power + Light
PO Box 078968
West Palm Bch, FL 33407-8768

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail	<input type="checkbox"/> Insured <input type="checkbox"/> COD <i>P062921896</i>

Always obtain signature of addressee or agent and **DATE DELIVERED.**

- Signature - Addressee
X
- Signature - Agent
X H. del [Signature]
- Date of Delivery
10-13-92
- Addressee's Address (ONLY if requested and fee paid)



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

October 1, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Charles D. Henderson
Environmental Affairs Department
Florida Power and Light Company
P. O. Box 078768
West Palm Beach, Florida 33407-0768

Dear Mr. Henderson:

Attached is one copy of the proposed modification to the permits package for Units 1 and 2 at the Martin Power Plant.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Preston Lewis of the Bureau of Air Regulation.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/WH/plm

Attachments

cc: S. Brooks, SED

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

CERTIFIED MAIL

In the Matter of
Modifications for Permits by:

DER File No. AC 43-4037
AC 43-4038
AO 43-170568
AO 43-170567
Martin County

Florida Power & Light Company
P. O. Box 078768
West Palm Beach, FL 33407-0768

INTENT TO ISSUE

The Department of Environmental Regulation gives notice of its intent to issue amendments to the permits (copy attached) for the proposed project as detailed in the request for the files specified above.

The applicant, Florida Power & Light Company, applied on August 10, 1992, to the Department of Environmental Regulation for a modification to the referenced construction and operation permits for Units 1 and 2 at the Martin Power Plant. The modifications would allow the burning of a mixture of No. 6 fuel oil containing a maximum of 1.0% sulfur and natural gas in a ratio that would result in a maximum sulfur dioxide emission of 0.80 pounds per million Btu heat input, install sulfur dioxide continuous emissions monitors on Units 1 and 2, and store No. 6 fuel oil containing a maximum of 1.0% sulfur in an existing low sulfur fuel oil storage tank. The Martin Power Plant is located in Martin County near Indiantown, Florida.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that a construction permit is required for the proposed work.

Pursuant to Section 403.815, Florida Statutes and Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Modifications to Permits. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide

proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.

The Department will issue the permits with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this

intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed by certified mail before the close of business on 10-8-92 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


Clerk

10-8-92
Date

Copies furnished to:
S. Brooks, SED

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF INTENT TO ISSUE MODIFICATIONS TO PERMITS

The Department of Environmental Regulation gives notice of its intent to issue modifications to the permits for Unit 1 (AC 43-4037 and AO 43-170568) and Unit 2 (AC 43-4038 and AO 43-170567) to Florida Power & Light Company's Martin Power Plant in Martin County near Indiantown, Florida. The modifications will authorize the company to burn a mixture of No. 6 fuel oil containing a maximum of 1.0% sulfur and natural gas in a ratio that produces sulfur dioxide emissions of 0.80 pounds per million Btu heat input. As this is the current emission standard for these units, there will be no increase in allowable sulfur dioxide emissions. The ambient air impact of the emissions from this plant are unchanged. A determination of Best Available Control Technology (BACT) is not required for this modification. The Department is issuing this Intent to Issue Modifications to Permits to satisfy the federal enforceability requirements.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is

designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Southeast District
1900 S. Congress Ave., Suite A
West Palm Beach, Florida 33406

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

October 9, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

DRAFT

Mr. Charles D. Henderson
Environmental Affairs Department
Florida Power and Light Company
P. O. Box 078768
West Palm Beach, Florida 33407-0768

Dear Mr. Henderson:

Re: Amendment of Permits
Martin Power Plant - Units 1 and 2

The Department is in receipt of Mr. Daniel Adams' August 6, 1992, letter requesting that the permits for units 1 and 2 of the Martin Power Plant be amended. The requested amendments would allow these units to burn a blend of No. 6 fuel oil containing a maximum of 1.0% sulfur and natural gas in a ratio that will result in the sulfur dioxide emissions meeting the current standard of 0.80 pounds per million Btu heat input, install a sulfur dioxide continuous emission monitor on each unit, and use one of the existing 0.7% sulfur fuel oil storage tanks to store fuel oil containing 1.0% sulfur. This plant is located 6 miles northwest of Indiantown off Highway 710 in Martin County, Florida. This request is acceptable and the permits for these units are amended as follows:

FROM:

UNIT 1 - PERMIT NO. AC 43-4037
UNIT 2 - PERMIT NO. AC 43-4038

Source Description: Steam generator unit #1 [and 2], producing 5,579 MMBtu/hr, burning max. of 0.7% sulfur Bunker "C" oil or natural gas.

Specific Condition No. 9

The following items are required prior to our issuance of an operation permit in addition to the engineer of record's report of inspection:

- (X) (a) An emission report for total particulates based upon actual operations.

DRAFT

- (X) (b) A tabular summary of fuels used & sulfur content (as received basis).
- (X) (c) A tabular summary of actual records of frequencies and durations of soot blowing as well as boiler blowdown characteristics and disposal practices.

UNIT 1 - PERMIT NO. AO 43-170568
UNIT 2 - PERMIT NO. AO 43-170567

Source Description: An air pollution source consisting of a 800 MW Class Fossil Fuel Steam Generator Unit Number 1 [and 2] (900 megawatt gross capacity) equipped with Low NO_x Dual Fuel Firing Burners to reduce emissions of nitrogen oxides; and multicyclones to control particulate emissions. The unit burns low sulfur fuel oil and natural gas to control sulfur dioxide emissions. In addition, the unit has a continuous emission monitoring system for opacity and NO_x. The unit's heat input is 8,650 MMBtu/hr on oil and 9,040 MMBTU/hr on natural gas.

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 analysis program, provided that daily samples are composited and analyzed for sulfur content every seven (7) operating days, to demonstrate compliance with the 0.80 lb SO₂ per million BTU based on the monthly composite. Monthly reports shall be submitted to the Department no later than thirty (30) days after the end of the month.

The permittee shall be allowed 90 days after promulgation of fuel sampling and analysis methods to implement an EPA approved method of monitoring SO₂ emissions either by fuel sampling and analysis or continuous in-stack monitoring or other methods as approved under the provisions of 40CFR60.45.

Specific Condition No.6: The Department may, after reviewing FPL's quarterly excess emission reports, require the Permittee to conduct Method 9 testing. The Department will notify FPL of such requests, as well as the objective for such testing. At the request of the Permittee, the Department will take into account any potential instrument error or malfunction before requiring the scheduling of tests. Substantive opacity violations, as verified by Method 9, are subject to appropriate legal action; moreover, repetitive violations shall require the Permittee to revise operating and/or maintenance practice to abate these violations.

Mr. Charles D. Henderson
October 9, 1992
Page 3 of 5
Amendments to Permits

DRAFT

TO:

UNIT 1 - PERMIT NO. AC 43-4037
UNIT 2 - PERMIT No. AC 43-4038

Source Description: An air pollution source consisting of a 800 MW Class Fossil Fuel Steam Generator Unit (900 megawatt gross capacity) equipped with Low NO_x Dual Fuel Firing Burners to reduce emissions of nitrogen oxides; and multicyclones to control particulate 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 concentration of 0.80 lbs/MMBtu heat input. In addition, the unit has a continuous emission monitoring system for opacity, NO_x, and sulfur dioxide. The unit's heat input is 8,650 MMBtu/hr on oil, 8,650 MMBtu/hr on a blend of fuel oil and natural gas, and 9,040 MMBtu/hr on natural gas.

Specific Condition No. 9: The following items are required prior to our issuance of an operation permit in addition to the engineer of record's report of inspection:

- (X) (a) An emission report for total particulates based upon actual operations.
- (X) (b) A tabular summary of fuels used and sulfur content (as received basis) and quarterly excess emission reports from the sulfur dioxide continuous emissions monitor that has been certified and meets the performance standards described in 40CFR60, Appendix B, Performance Specification 2 (July 1, 1992).
- (X) (c) A tabular summary of actual records of frequencies and durations of soot blowing as well as boiler blowdown characteristics and disposal practices.

UNIT 1 - PERMIT AO 43-170568
UNIT 2 - PERMIT AO 43-170567

Source Description: An air pollution source consisting of a 800 MW Class Fossil Fuel Steam Generator Unit (900 megawatt gross capacity) equipped with Low NO_x Dual Fuel Firing Burners to reduce emissions of nitrogen oxides; and multicyclones to control particulate emissions. The unit burns low sulfur fuel

Mr. Charles D. Henderson
October 9, 1992
Page 4 of 5
Amendments to Permits

DRAFT

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 concentration of 0.80 lbs/MMBtu heat input. In addition, the unit has a continuous emission monitoring system for opacity, NO_x, and sulfur dioxide. The unit's heat input is 8,650 MMBtu/hr on oil, 8,650 MMBtu/hr on a blend of fuel oil and natural gas, and 9,040 MMBtu/hr on natural gas.

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 analysis program, provided that daily samples are composited and analyzed for sulfur content every seven (7) operating days, to demonstrate compliance with the sulfur content limits of the fuel oil based on the monthly composite. Monthly reports shall be submitted to the Department no later than thirty (30) days after the end of the month.

The permittee shall be allowed 90 days after promulgation of fuel sampling and analysis methods to implement an EPA approved method of monitoring SO₂ emissions either by fuel sampling and analysis or continuous in-stack monitoring or other methods as approved under the provisions of 40CFR60.45.

Specific Condition No.6: The Department may, after reviewing FPL's quarterly opacity, nitrogen oxides, or sulfur dioxide excess emission reports, require the Permittee to conduct Method 5, 6, 7, and/or 9 or other Department approved alternate test procedures. The Department will notify FPL of such requests, as well as the objective for such testing. At the request of the Permittee, the Department will take into account any potential instrument error or malfunction before requiring the scheduling of tests. Substantive violations, as verified by tests, are subject to appropriate legal action; moreover, repetitive violations shall require the Permittee to revise operating and/or maintenance practice to abate these violations.

A copy of this letter shall be filed with the referenced permits and shall become a part of those permits.

Mr. Charles D. Henderson
October 9, 1992
Page 5 of 5
Amendments to Permits

DRAFT

Sincerely,

Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/WH/plm

cc: S. Brooks, SED



RECEIVED
DER - MAIL ROOM

1992 AUG 11 AM 11:12

August 6, 1992

Mr. Preston Lewis, Supervisor
Permitting and Standards Section
State of Florida
Department of Environmental Regulation
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

**RE: Florida Power & Light Company
Martin Power Plant - Units 1 and 2
Request for Amendment of Construction Permits**

Dear Mr. Lewis:

Florida Power & Light Company (FPL) is planning to co-fire higher sulfur (1.0 percent sulfur) fuel oil and natural gas at the Martin Power Plant Units 1 and 2. The Martin Plant Units 1 and 2 currently burn 0.7 percent sulfur fuel oil and/or natural gas to meet an SO₂ emission limitation of 0.80 pound/MMBtu heat input. The plant uses fuel sampling and analysis to determine compliance with the SO₂ emission limitation.

FPL proposes to burn a variable combination of 1.0 percent sulfur fuel oil and natural gas to meet the SO₂ permit emission limitation specified above for Units 1 and 2. The air operating permit specifies an SO₂ emission limitation of 0.80 pound/MMBtu heat input which allows FPL to burn a variable combination of fuel oil and natural gas. However, the construction permits for Units 1 and 2 describe the use of 0.7 percent sulfur fuel oil or natural gas. It is my understanding based on previous discussions with you and your staff that only the construction permits for Units 1 and 2 would need to be amended to allow FPL to burn a variable combination of 1.0 percent sulfur fuel oil and natural gas to meet the SO₂ permit emission limitation.

FPL has decided to forgo the performance of a feasibility test for Unit 1 for burning 1.0 percent sulfur fuel oil and natural gas as previously discussed with you and your staff at our June 11, 1992 meeting. We hereby request Department approval for an amendment to the Units 1 and 2 construction permits to allow routine co-firing of higher sulfur (1.0 percent) fuel oil and sufficient quantities of natural gas, not to exceed the equivalent of a 0.80 pound SO₂/MMBtu emission limitation. Based on our June 11, 1992 meeting, it is my understanding the information contained in Enclosure 1 should be sufficient for the Department to process the requested construction permit amendments. Enclosed is FPL Check No. 0093 dated August 5, 1992 in the amount of \$250.00 to cover the construction permit amendment processing fee for the two generating units.

001031

Martin Power Plant - Units 1 and 2
Request for Modification of Construction Permits
August 6, 1992
Page 2

If you have any questions regarding this request, please contact me at (407) 697-6924.

Sincerely,

A handwritten signature in cursive script that reads "Daniel R. Adams".

Daniel R. Adams
Environmental Specialist
Florida Power & Light Company

DRA;jm

Enclosures: (2)

cc: Willard Hanks - Florida DER Tallahassee
Tom Tittle - Florida DER Southeast District

**Martin Power Plant Units 1 and 2
Co-Firing Higher Sulfur Fuel Oil and Natural Gas
Construction Permit Amendment Request Letter Information**

The Florida DER has requested the following information regarding the referenced proposal at a June 11, 1992 meeting with FPL staff.

1. The construction permits and air operating permits for Units 1 and 2. See Attachment 1 for details on the construction permits and Attachment 2 for details on the air operating permits. Note that Units 1 and 2 have identical construction and air operating permits.
2. Description and location of the facility. The Martin Power Plant currently contains two 800 MW class fossil fuel-fired steam generators equipped with low NO_x dual fuel firing burners to control nitrogen oxides and multicyclones to control particulate matter emissions. The units burn low sulfur (0.7 percent) fuel oil and natural gas to control SO₂ emissions. In addition, these units have continuous emission monitoring systems for opacity and NO_x. Each unit's heat input rate is 8650 MMBtu/hr. on oil and 9040 MMBtu/hr. on natural gas. The plant is located in Martin County about six miles northwest of Indiantown, Florida off Highway 710.
3. The objective of the proposal is to allow FPL to operate Units 1 and 2 in a more flexible and cost effective manner. FPL plans to amend the construction permits for Units 1 and 2 to reflect an SO₂ emission limitation of 0.80 pound/MMBtu heat input as currently specified in the air operating permits for those units to allow FPL to co-fire higher sulfur (1.0 percent) fuel oil and natural gas in a variable combination. FPL estimates the cost savings to the customer in going from 0.7 to 1.0 percent sulfur fuel oil at the Martin Plant to be \$1.43 per barrel based on 1991 fuel cost data or about \$5.2 million per year based on the most recent five-year fuel use data for Units 1 and 2.
4. Comparison of fuel oil analyses for 0.7 and 1.0 percent sulfur fuel oils. See Attachment 3 for details. Please note that FPL does not expect an increase in emissions of regulated air pollutants to result from the proposed project. Furthermore, please note that Section 17-2.500(2)(c)(4), F.A.C., provides a new source review exemption for source modifications due to the use of an alternative fuel which the facility was capable of accommodating before January 6, 1975. The Martin Units 1 and 2 construction permits were initially issued by the Department on March 20, 1973 which qualifies for this exemption.
5. Identify and describe plant equipment and operational changes associated with the proposal. See Attachment 4 for details. Please note that the changes are to be made for the convenience in switching between 0.7 and 1.0 percent sulfur fuel oils.

Enclosure 1

6. Compliance determination method for sulfur dioxide emissions. Based on previous discussions with Department staff, it is FPL's understanding that fuel sampling and analysis will no longer be acceptable for determining compliance with the SO₂ emission limitation. We understand that SO₂ continuous emission monitors will need to be installed and operated on Units 1 and 2 to ensure compliance with the SO₂ emission limitation. The SO₂ continuous emission monitors will be installed and certified in accordance with 40 CFR 60, Appendix B requirements.

7. Compliance testing provisions. FPL will be performing compliance stack testing for opacity (Method 9), SO₂ (Method 6C), particulate matter (Method 5 or 17), and nitrogen oxides (Method 7 or 7E) for each of the two generating units to demonstrate compliance with all applicable permit emissions limitations. Please note that all applicable compliance testing requirements and compliance test reporting requirements will be complied with by FPL.

8. Best operational practices as discussed in Attachment 4 will be implemented when co-firing the higher sulfur fuel oil.

ATTACHMENT 1

**Martin Power Plant - Unit 1
Construction Permit**



STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL
2562 EXECUTIVE CENTER CIRCLE, EAST
MONTGOMERY BUILDING, TALLAHASSEE, FLORIDA 32301

Peter P. Baljet
EXECUTIVE DIRECTOR

DAVID H. LEVIN
CHAIRMAN

Date: March 20, 1973

County: Martin County AP

Applicant: Florida Power & Light Company

Florida Power and Light Company
Mr.: Norris R. Kincaid
Director of Environmental Affairs
P. O. Box 3100
Miami, Florida 33101

Dear Mr. Kincaid : *construct,

Pursuant to your recent application, please find enclosed a permit No. AC 73044, dated 3/20/73, to *construct the subject steam generator - Unit #1

This construction permit is issued subject to the attached provisos.

Your continued cooperation will be appreciated.

Sincerely,

K. K. Huffstutler, Chief
Bureau of Permitting

^{7H}
KKH:hmj

cc: Southeast Regional Office
Board of County Commissioners (Martin County)
Project Engineer: W. H. Rogers, Jr.
Fort Pierce Sub-Region

JOHN R. MIDDLEMAS
BOARD MEMBER

GEORGE RUPPEL
BOARD MEMBER

JAMES F. REDFORD, JR.
BOARD MEMBER

A. D. VINCENT
BOARD MEMBER

STATE OF FLORIDA
DEPARTMENT OF AIR AND WATER
POLLUTION CONTROL

CONSTRUCTION PERMIT

FOR Florida Power & Light Company
P. O. Box 3100
Miami, Florida 33101

PERMIT NO. AC-73044

DATE 3/20/73

PURSUANT TO THE PROVISION OF SECTION 403.061 (16) OF CHAPTER 403, FLORIDA STATUTES AND CHAPTER 17-4 FLORIDA ADMINISTRATIVE CODE, THIS PERMIT IS ISSUED TO:
Norris R. Kincaid, Director of Environmental Affairs

FOR THE CONSTRUCTION OF THE FOLLOWING:

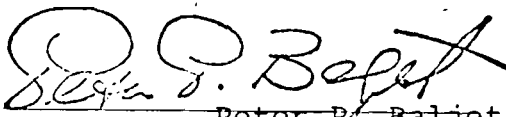
#1 Steam Generator Unit producing 13.38×10^{10} BTU/Day
burning .7% sulfur Bunker "C" oil.

LOCATED AT: Martin County, Florida
UTM - East 542600 - NORTH 2991500

IN ACCORDANCE WITH THE APPLICATION DATED 12/18/72
AND IN CONFORMITY WITH THE STATEMENTS AND SUPPORTING DATA ENTERED THEREIN,
ALL OF WHICH ARE FILED WITH THE DEPARTMENT AND ARE CONSIDERED A PART OF THIS
PERMIT.

THIS PERMIT SHALL BE EFFECTIVE FROM THE DATE OF ITS ISSUANCE UNTIL 12/30/77
AND SHALL BE SUBJECT TO ALL APPLICABLE LAWS OF THE STATE AND THE RULES AND REGULATIONS OF THE DEPARTMENT.


K. K. Huffstutler, Chief
~~XXXXXXXXXXXX~~
BUREAU OF PERMITTING


Peter P. Baljet
~~XXXXXXXXXXXX~~
EXECUTIVE DIRECTOR

Unit #1
STATE OF FLORIDA

DEPARTMENT OF POLLUTION CONTROL

CONSTRUCTION PERMIT PROVISOS

AIR POLLUTION SOURCES

Permit No. AC-73044

Date: 3/20/73

- [X] 1. Construction of this installation shall be completed by 6/30/77
- [X] 2. This construction permit expires on 12/30/77 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Pollution Control Board.
- [X] 3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction.
- [X] 4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Pollution Control for consideration toward the issuance of an operation permit.
- [] 5. This _____ shall be tested for _____ within _____ days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted in duplicate to the DPC _____ Florida Regional Office _____
- [X] 6. The operation of this installation shall be observed for visible emissions in accordance with Method 9 - Visible Determination of the Opacity of Emissions from Stationary Sources (Federal Register, December 23, 1971). The observation results are required prior to our issuance of an operation permit, and shall be submitted in duplicate to the DPC Southeast Florida Regional Office, 200 S.E. 6th Street, Suite 500, Fort Lauderdale, Florida 33301
- [] 7. Stack sampling for total particulate or other contaminant emissions shall be conducted if found by the DPC _____ Florida Regional Office to be necessary as a basis for the issuance of an operation permit.
- [X] 8. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.

(TURN OVER)

The following items are required prior to our issuance of an operation permit in addition to the engineer of record's report of inspection:

- (a) An emission report for total particulates ~~and sulfur oxides~~ based upon actual operations.
- (b) A tabular summary of fuels used & sulfur content (as received basis).
- (c) A tabular summary of actual records of frequencies and durations of soot blowing as well as boiler blowdown characteristics and disposal practices.

These items are required prior to our issuance of an operation permit and shall be submitted in duplicate to the DPC Southeast Florida Regional Office, 200 S.E. 6th Street, Suite 504, Ft. Lauderdale, Florida 33301

- I 10. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.
- XI 11. All fugitive dust generated at this site shall be adequately controlled.

Unit # 1
RECEIVED

JUL 8 1977



STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION Mr. Env'l Affairs

SOUTH FLORIDA SUBDISTRICT BRANCH OFFICE
806 SOUTH SIXTH STREET
FORT PIERCE, FLORIDA 33450

REUBIN O'D ASKEW
GOVERNOR

June 30, 1977

JOSEPH W. LANDERS, JR.
SECRETARY

Mr. W. S. Tucker
Manager Environmental Affairs
Florida Power & Light Company
Post Office Box 013100
Miami, Florida 33101

Dear Mr. Tucker:

Pursuant to Section 403.061(16), Florida Statutes, your application, dated June 6, 1977, and plans submitted by your consultants to support this application have been reviewed and found acceptable to the department. We, therefore, are issuing to you the enclosed permit (No. AC56-4037) dated 6-30-77 to construct/~~operate~~ the subject pollution source.

This permit is not effective unless you accept it. If you do not accept this permit, including any and all of the conditions contained therein, you must file an appropriate petition for an administrative hearing pursuant to the provisions of Section 120.57, Florida Statutes, within fourteen (14) days from receipt of this letter. This petition must comply with the requirements of Section 28-5.15, Florida Administrative Code, and be filed with the Secretary of the Department of Environmental Regulation, 2562 Executive Center Circle East, Montgomery Building, Tallahassee, Florida 32301. If no petition is filed within the above time period, you will be deemed to have accepted this permit and waived your right to request an administrative hearing on this permit issuance, and it will constitute final agency action. Should you file a petition for hearing, it will be subject to dismissal by the Division of Administrative Hearings if it does not comply with the requirements of Section 28-5.15, Florida Administrative Code.

Sincerely,

Warren G. Strain
Subdistrict Manager

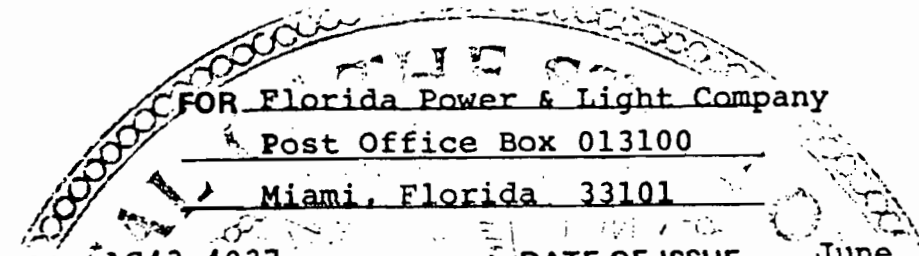
WGS/GH:dlg

Enclosure

Tallahassee File
cc: Mr. Cronfel, P.E.

28.1CA

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION CONSTRUCTION PERMIT



FOR Florida Power & Light Company
Post Office Box 013100
Miami, Florida 33101

PERMIT NO. AC43-4037 DATE OF ISSUE June 30, 1977

PURSUANT TO THE PROVISIONS OF SECTIONS 403.061 (18) AND 403.707 OF CHAPTER 403 FLORIDA STATUTES AND CHAPTERS 17-4 AND 17-7 FLORIDA ADMINISTRATIVE CODE, THIS PERMIT IS ISSUED TO:
W. S. Tucker, Manager Environmental Affairs

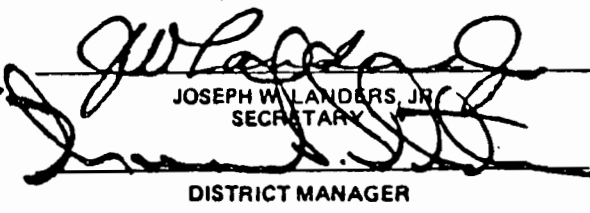
FOR THE CONSTRUCTION OF THE FOLLOWING: Steam Generator Unit #1,
producing 5,579 MBtu/hr., burning max. of 0.7% sulfur
Bunker "C" oil or natural gas subject to attached provisos
of approval, nos. 1, 2, 3, 4, 5, 7, 8, 9, 10, 11 & 13.

LOCATED AT Indiantown, Martin County
UTM Zone 17, East 542,600 M, North 2,991,500 M

IN ACCORDANCE WITH THE APPLICATION DATED June 6, 1977

ANY CONDITIONS OR PROVISOS WHICH ARE ATTACHED HERETO ARE INCORPORATED INTO AND MADE A PART OF THIS PERMIT AS THOUGH FULLY SET FORTH HEREIN. FAILURE TO COMPLY WITH SAID CONDITIONS OR PROVISOS SHALL CONSTITUTE A VIOLATION OF THIS PERMIT AND SHALL SUBJECT THE APPLICANT TO SUCH CIVIL AND CRIMINAL PENALTIES AS PROVIDED BY LAW.
THIS PERMIT SHALL BE EFFECTIVE FROM THE DATE OF ISSUE UNTIL February 1, 1982
OR UNLESS REVOKED OR SURRENDERED AND SHALL BE SUBJECT TO ALL LAWS OF THE STATE AND THE RULES AND REGULATIONS OF THE DEPARTMENT.


BRANCH OFFICE MANAGER


JOSEPH W. LANDERS, JR.
SECRETARY
DISTRICT MANAGER

GH

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

CONSTRUCTION PERMIT PROVISOS

AIR POLLUTION SOURCES

Permit No. AC43-4037

Date 6-30-77

- (X) 1. Construction of this installation shall be completed by December 1, 1981. Application for permit to operate to be submitted by January 1, 1982.
- (X) 2. This construction permit expires on February 1, 1982 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Environmental Regulation Commission.
- (X) 3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction.
- (X) 4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Environmental Regulation for consideration toward the issuance of an operation permit.
- (X) 5. This STEAM GENERATING UNIT #1 shall be tested for EPA "NEW SOURCE" COMPLIANCE TESTING within 30 days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted to the Department of Environmental Regulation, 806 S. Sixth Street, Fort Pierce, Fla. 33450-(305)464-8525.
Ke. 1/22/81
- () 6. The operation of this installation shall be observed for visible emissions in accordance with Method 9 - Visible Determination of the Opacity of Emissions from Stationary Sources (Federal Register, December 23, 1971) by a certified reader. A copy of the reader's certification card is to be submitted. The observation results are required prior to our issuance of an operation permit and shall be submitted to the Department of Environmental Regulation,
-
- (X) 7. Stack sampling for total particulates or other contaminant emissions shall be conducted if found by the Department of Environmental Regulation at the Fort Pierce,
Florida District Office to be necessary
as a basis for the issuance of an operation permit.

- (X) 8. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.
- (X) 9. The following items are required prior to our issuance of an operation permit in addition to the engineer of record's report of inspection:
 - (X) (a) An emission report for total particulates based upon actual operations.
 - (X) (b) A tabular summary of fuels used & sulfur content (as received basis).
 - (X) (c) A tabular summary of actual records of frequencies and durations of soot blowing as well as boiler blowdown characteristics and disposal practices.

These items are required prior to our issuance of an operation permit and shall be submitted to the Department of Environmental Regulation 806 South Sixth Street, Fort Pierce, Florida 33450, telephone (305) 464-8525.

- (X) 10. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.
- (X) 11. All fugitive dust generated at this site shall be adequately controlled. This includes, but is not limited to, roadway dust.
- () 12. This permit is associated with a Development of Regional Impact (D.R.I.). It does not waive any other permits that may be required from this or any other State, Federal, or local agency.
- (X) 13. Please be advised that the Department does not condone nor authorize the permittee to by-pass waste materials from either air or wastewater facilities at any time that would result in a violation of the rules and regulations of the Department.

In case of breakdown or lack of proper functioning of the facility causing or likely to cause discharge of improperly treated sewage or air emissions, it shall be the duty of the owner of the facility to promptly notify the Department. In addition to notifying this Department, the permittee shall notify the local County Health Officer.

The owner of the impaired facility causing the violation shall be responsible for any and all damages which may result. If violations of State standards occur, enforcement actions may be initiated.

ATTACHMENT 1

**Martin Power Plant - Unit 2
Construction Permit**



STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL
2562 EXECUTIVE CENTER CIRCLE, EAST
MONTGOMERY BUILDING, TALLAHASSEE, FLORIDA 32301

Peter P. Baljet
EXECUTIVE DIRECTOR

DAVID H. LEVIN
CHAIRMAN

Date: March 20, 1973

County: Martin County AP

Applicant: Florida Power & Light Company

Florida Power & Light Company
Mr.: Norris R. Kincaid
Director of Environmental Affairs
P. O. Box 3100
Miami, Florida 33101

Dear Mr. Kincaid : *construct

Pursuant to your recent application, please find enclosed a permit No. AC-73045, dated 3/20/73, to * construct the subject steam generator Unit #2

This construction permit is issued subject to the attached provisos.

Your continued cooperation will be appreciated.

Sincerely,

K. K. Huffstutler, Chief
Bureau of Permitting

411
KKH:hmj

cc: Southeast Regional Office
Board of County Commissioners (Martin County)
Project Engineer: W. H. Rogers, Jr.
Ft. Pierce Sub-Region

JOHN R. MIDDLEMAS
BOARD MEMBER

GEORGE RUPPEL
BOARD MEMBER

JAMES F. REDFORD, JR.
BOARD MEMBER

A. D. VINCENT
BOARD MEMBER

STATE OF FLORIDA
DEPARTMENT OF AIR AND WATER
POLLUTION CONTROL

CONSTRUCTION PERMIT

FOR Florida Power & Light Company
P. O. Box 3100
Miami, Florida 33101

PERMIT NO. AC-73045

DATE 3/20/73

PURSUANT TO THE PROVISION OF SECTION 403.061 (16) OF CHAPTER 403, FLORIDA STATUTES AND CHAPTER 17-4 FLORIDA ADMINISTRATIVE CODE, THIS PERMIT IS ISSUED TO: Norris R. Kincaid, Director of Environmental Affairs


FOR THE CONSTRUCTION OF THE FOLLOWING:

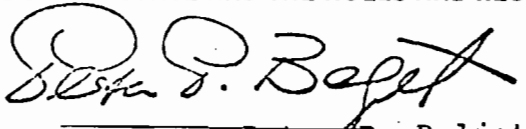
#2 Steam Generator Unit producing 13.38×10^{10} BTU/DAY
buring .7% sulfur Bunker "C" oil.

LOCATED AT: Martin County
UTM North 2991500 - East 542600

IN ACCORDANCE WITH THE APPLICATION DATED 12/18/72
AND IN CONFORMITY WITH THE STATEMENTS AND SUPPORTING DATA ENTERED THEREIN,
ALL OF WHICH ARE FILED WITH THE DEPARTMENT AND ARE CONSIDERED A PART OF THIS
PERMIT.

THIS PERMIT SHALL BE EFFECTIVE FROM THE DATE OF ITS ISSUANCE UNTIL 12/30/77
AND SHALL BE SUBJECT TO ALL APPLICABLE LAWS OF THE STATE AND THE RULES AND REGULATIONS OF THE DEPARTMENT.


K. K. Huffstutler, Chief
~~XXXXXXXXXXXX~~
BUREAU OF PERMITTING


Peter P. Baljet
~~XXXXXXXXXXXX~~
EXECUTIVE DIRECTOR

STATE OF FLORIDADEPARTMENT OF POLLUTION CONTROLCONSTRUCTION PERMIT PROVISOSAIR POLLUTION SOURCES

Permit No. AC-73045

Date: 3/20/73

- [X] 1. Construction of this installation shall be completed by 6/30/77
- [X] 2. This construction permit expires on 12/30/77 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Pollution Control Board.
- [X] 3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction.
- [X] 4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Pollution Control for consideration toward the issuance of an operation permit.
- [] 5. This _____ shall be tested for _____ within _____ days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted in duplicate to the DPC _____ Florida Regional Office _____
- [X] 6. The operation of this installation shall be observed for visible emissions in accordance with Method 9 - Visible Determination of the Opacity of Emissions from Stationary Sources (Federal Register, December 23, 1971). The observation results are required prior to our issuance of an operation permit, and shall be submitted in duplicate to the DPC Southeast _____ Florida Regional Office, 200 S.E. 6 Street, Fort Lauderdale, Florida 33301
- [] 7. Stack sampling for total particulate or other contaminant emissions shall be conducted if found by the DPC _____ Florida Regional Office to be necessary as a basis for the issuance of an operation permit.
- [X] 8. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.

(TURN OVER)

X] 9. The following items are required prior to our issuance of an operation permit in addition to the engineer of record's report of inspection:

- (a) An emission report for total particulates ~~AND SULFUR~~ based upon actual operations.
- (b) A tabular summary of fuels used & sulfur content (as received basis)
- (c) A tabular summary of actual records of frequencies and durations of soot blowing as well as boiler blowdown characteristics and disposal practices.

These items are required prior to our issuance of an operation permit and shall be submitted in duplicate to the DPC Southeast Florida Regional Office, 200 S.E. 6th Street, Suite 504,
Ft. Lauderdale, Florida 33301

- 10. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.
- X] 11. All fugitive dust generated at this site shall be adequately controlled.

Unit # 2
Der
RECEIVED
JUL 8 1977
Mgr. Envt. Affairs Cor



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTH FLORIDA SUBDISTRICT BRANCH OFFICE
806 SOUTH SIXTH STREET
FORT PIERCE, FLORIDA 33450

REUBIN O'D ASKEW
GOVERNOR

JOSEPH W. LANDERS, JR.
SECRETARY

June 30, 1977

Mr. W. G. Tucker,
Manager Environmental Affairs
Florida Power & Light Company
Post Office Box 013100
Miami, Florida 33101

Dear Mr. Tucker:

Pursuant to Section 403.061(16), Florida Statutes, your application, dated June 6, 1977, and plans submitted by your consultants to support this application have been reviewed and found acceptable to the department. We, therefore, are issuing to you the enclosed permit (No. AC43-4038) dated 6-30-77 to construct/~~operate~~ the subject pollution source.

This permit is not effective unless you accept it. If you do not accept this permit, including any and all of the conditions contained therein, you must file an appropriate petition for an administrative hearing pursuant to the provisions of Section 120.57, Florida Statutes, within fourteen (14) days from receipt of this letter. This petition must comply with the requirements of Section 28-5.15, Florida Administrative Code, and be filed with the Secretary of the Department of Environmental Regulation, 2562 Executive Center Circle East, Montgomery Building, Tallahassee, Florida 32301. If no petition is filed within the above time period, you will be deemed to have accepted this permit and waived your right to request an administrative hearing on this permit issuance, and it will constitute final agency action. Should you file a petition for hearing, it will be subject to dismissal by the Division of Administrative Hearings if it does not comply with the requirements of Section 28-5.15, Florida Administrative Code.

Sincerely,

Warren G. Strahm
Subdistrict Manager

WGS/GH:d1g

cc: Mr. Cronfel
Tallahassee File

Enclosure

28.1CA

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION CONSTRUCTION PERMIT

FOR Florida Power & Light Company
Post Office Box 013100
Miami, Florida 33101

PERMIT NO. AC43-4038 DATE OF ISSUE June 30, 1977

PURSUANT TO THE PROVISIONS OF SECTIONS 403.061 (16) AND 403.707 OF CHAPTER 403 FLORIDA STATUTES AND CHAPTERS 17-4 AND 17-7 FLORIDA ADMINISTRATIVE CODE, THIS PERMIT IS ISSUED TO:
W. S. Tucker, Manager Environmental Affairs

FOR THE CONSTRUCTION OF THE FOLLOWING: Steam generator unit #2,
producing 5,579 MBtu/hr., burning max. of 0.7% sulfur
Bunker "C" oil or natural gas. Subject to attached provisos
of approval no. 1,2,3,4,5,7,8,9,10,11,13.

LOCATED AT Indiantown, Martin County
UTM Zone 17, East 542,600 M, North 2,991,500 M

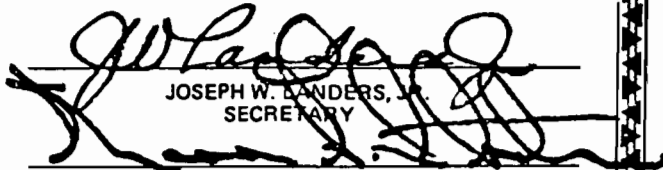
IN ACCORDANCE WITH THE APPLICATION DATED June 6, 1977

ANY CONDITIONS OR PROVISOS WHICH ARE ATTACHED HERETO ARE INCORPORATED INTO AND MADE A PART OF THIS PERMIT AS THOUGH FULLY SET FORTH HEREIN, FAILURE TO COMPLY WITH SAID CONDITIONS OR PROVISOS SHALL CONSTITUTE A VIOLATION OF THIS PERMIT AND SHALL SUBJECT THE APPLICANT TO SUCH CIVIL AND CRIMINAL PENALTIES AS PROVIDED BY LAW.

THIS PERMIT SHALL BE EFFECTIVE FROM THE DATE OF ISSUE UNTIL February 1, 1983
OR UNLESS REVOKED OR SURRENDERED AND SHALL BE SUBJECT TO ALL LAWS OF THE STATE AND THE RULES AND REGULATIONS OF THE DEPARTMENT.



BRANCH OFFICE MANAGER



JOSEPH W. LANDERS, JR.
SECRETARY
DISTRICT MANAGER

GH

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

CONSTRUCTION PERMIT PROVISOSAIR POLLUTION SOURCESPermit No. AC43-4038Date 6-30-77

- (X) 1. Construction of this installation shall be completed by December 1, 1982. Application for permit to operate to be submitted by January 1, 1983.
- (X) 2. This construction permit expires on February 1, 1983 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Environmental Regulation Commission.
- (X) 3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction.
- (X) 4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Environmental Regulation for consideration toward the issuance of an operation permit.
- (X) 5. This steam generating unit #2 shall be tested for EPA "New Source" compliance testing within 30 days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted to the Department of Environmental Regulation, 806 S. Sixth St., Fort Pierce, Fla. 33450--(305) 464-8525.
- () 6. The operation of this installation shall be observed for visible emissions in accordance with Method 9 - Visible Determination of the Opacity of Emissions from Stationary Sources (Federal Register, December 23, 1971) by a certified reader. A copy of the reader's certification card is to be submitted. The observation results are required prior to our issuance of an operation permit and shall be submitted to the Department of Environmental Regulation,
-
- (X) 7. Stack sampling for total particulates or other contaminant emissions shall be conducted if found by the Department of Environmental Regulation at the Fort Pierce, Florida District Office to be necessary as a basis for the issuance of an operation permit.

- (x) 8. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.
- (x) 9. The following items are required prior to our issuance of an operation permit in addition to the engineer of record's report of inspection:
 - (x) (a) An emission report for total particulates based upon actual operations.
 - (x) (b) A tabular summary of fuels used & sulfur content (as received basis).
 - (x) (c) A tabular summary of actual records of frequencies and durations of soot blowing as well as boiler blowdown characteristics and disposal practices.

These items are required prior to our issuance of an operation permit and shall be submitted to the Department of Environmental Regulation 806 South Sixth Street, Fort Pierce, Florida 33450 telephone (305) 464-8525.

- (x) 10. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.
- (x) 11. All fugitive dust generated at this site shall be adequately controlled. This includes, but is not limited to, roadway dust.
- () 12. This permit is associated with a Development of Regional Impact (D.R.I.). It does not waive any other permits that may be required from this or any other State, Federal, or local agency.
- (x) 13. Please be advised that the Department does not condone nor authorize the permittee to by-pass waste materials from either air or wastewater facilities at any time that would result in a violation of the rules and regulations of the Department.

In case of breakdown or lack of proper functioning of the facility causing or likely to cause discharge of improperly treated sewage or air emissions, it shall be the duty of the owner of the facility to promptly notify the Department. In addition to notifying this Department, the permittee shall notify the local County Health Officer.

The owner of the impaired facility causing the violation shall be responsible for any and all damages which may result. If violations of State standards occur, enforcement actions may be initiated.

ATTACHMENT 2

**Martin Power Plant - Unit 1
Air Operating Permit**



Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406 • 407-964-9668

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

Scott Benyon, Deputy Assistant Secretary

NOTICE OF PERMIT

Martin County
AP - Florida Power & Light Martin Unit 1
Fossil Fuel Steam Generator

RECEIVED

MAR 01 1990

MANAGER
ENVIRONMENTAL AFFAIRS

Mr. M. A. Smith
Manager - Environmental Permitting
and Programs
Florida Power & Light
P. O. Box 078768
West Palm Beach, Florida 33407-0768

Dear Mr. Smith:

Enclosed is Permit Number AO 43-170568, to operate an air pollution source issued pursuant to Section 403.087, Florida Statutes.

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 17-103 and 28-5.201, FAC, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, FL 32399-2400, within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes. This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, FAC. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, FL 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the Final Order is filed with the Clerk of the Department.

In addition, please be advised that some processes generate hazardous wastes. Please consult 40 C.F.R. Parts 260-271 and Chapter 17-730, F.A.C. for specific rules and regulations applicable to hazardous waste handlers. Attached for your use is a document entitled "Highlights of Hazardous Waste Regulations" which outlines typical compliance items applicable to various hazardous waste generators/facilities.

Executed in West Palm Beach, Florida

STATE OF FLORIDA
DEPARTMENT OF REGULATION

J. Scott Benyon
Deputy Assistant Secretary
1900 South Congress Ave., Suite A
West Palm Beach, FL 33406
407/964-9668

Mr. M. A. Smith
Florida Power & Light
West Palm Beach, Florida
Page 2 of 2

DER Permit Number AO 43-170568

CERTIFICATE OF SERVICE

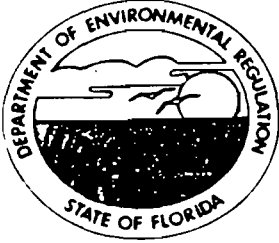
This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on FEB 26 1990 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to §120.52(10), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Phyllis J. Kern
Clerk

FEB. 26 1990
Date



Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406 • 407-964-9668

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Scott Benvon, Deputy Assistant Secretary

PERMITTEE:
Mr. M. A. Smith
Manager - Environmental Permitting
and Programs
Florida Power & Light
P. O. Box 078768
West Palm Beach, Florida 33407-0768

I.D. NUMBER: 50/WPB/43/0001/01
PERMIT/CERTIFICATION NUMBER: AO 43-170568 *
DATE OF ISSUE: FEB 23 1990
EXPIRATION DATE: November 29, 1994
COUNTY: Martin
LATITUDE/LONGITUDE: 27° 19 16N/80°33'53"W
UTM: Zone 17; 543.1 Km. E; 3022.0 Km. N
PROJECT: Florida Power & Light Martin Unit 1
Fossil Fuel Steam Generator

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule 17-2, and in conformance with all existing regulations of the Florida Department of Environmental Regulation. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

OPERATE: An air pollution source consisting of a 800 MW Class Fossil Fuel Steam Generator Unit Number 1 (900 megawatt gross capacity) equipped with Low NO_x Dual Fuel Firing Burners to reduce emissions of nitrogen oxides; and multicyclones to control particulate emissions. The unit burns low sulfur fuel oil and natural gas to control sulfur dioxide emissions. In addition, the unit has a continuous emission monitoring system for opacity and NO_x. The unit's heat input rate is 8650 MM BTU/hr. on oil and 9040 mm BTU/hr. on natural gas.

IN ACCORDANCE WITH: Application for Renewal of Permit to Operate Air Pollution Sources received September 25, 1989; and letter dated February 8, 1990; Permit AO 43-51169 dated November 29, 1984 as modified February 4, 1985; permit AC 43-4037 dated June 30, 1977 as modified January 22, 1981; and Permit AC 73044 dated March 20, 1973. (None are attached).

LOCATED AT: 6 miles NW of Indiantown off Highway 710 in Martin County, Florida.

TO SERVE: A fossil fuel steam generating plant (SIC # 4911).

SUBJECT TO: General Conditions 1-14. and Specific Conditions 1-13.

* This permit is a renewal of AO 43-51169 issued November 29, 1984 and a modification of AO 43-170568 issued December 16, 1989.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in the permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action on any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for as indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

- (a) Have access to and copy any records that must be kept under the conditions of the permit;
- (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in the permit, the permittee shall immediately notify and provide the Department with the following information:

- (a) A description of and cause of noncompliance; and
- (b) The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

BEST AVAILABLE COPY

GENERAL CONDITIONS:

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department, may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Rule 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. The permittee shall comply with the following :
 - (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically, unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit, records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.
14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

PERMITTEE:
Mr. M. A. Smith
Florida Power & Light
West Palm Beach, Florida

I.D. NUMBER: 50/WPB/43/0001/01
PERMIT/CERTIFICATION NUMBER: AO 43-170568
DATE OF ISSUE: FEB 23 1994
EXPIRATION DATE: November 29, 1994

SPECIFIC CONDITIONS:

1. Compliance testing shall be conducted for the source covered by this permit once every federal fiscal year in accordance with the methods specified below. Testing of emissions should be conducted with the source operating within 10% of its rated capacity. Testing may be conducted at less than 90% of rated capacity; however, if so, subsequent operation is limited to up to 110% of the test load. Once the unit is so limited, then operation at higher capacities is allowed for a cumulative total of no more than fifteen days for purposes of additional compliance testing to regain rated capacity, with prior notification to the Department.

Notification to the Department is required in writing at least fifteen (15) days prior to testing and will include the testing protocol. The 15-day requirement for rescheduling may be waived at the discretion of the Department.

2. Emission limiting standards are as follows:

In accordance with 40CFR60 Subpart D and Florida Administrative Code Rule 17-2.660:

<u>Pollutant</u>	<u>Emission Limit</u>
Particulate Matter	0.10 lb. per million BTU heat input
Sulfur Dioxide	0.80 lb. per million BTU heat input
Nitrogen Oxides	0.30 lb. per million BTU heat input on oil 0.20 lb. per million BTU heat input on gas
Opacity.	Not greater than 20 percent, except one six-minute period per hour of not more than 27 percent opacity.

3. All compliance tests shall be performed using reference test methods as given in 40CFR60 and as adopted by reference in 17-2. Any deviations from the test methodology in order to facilitate "representative" testing shall be approved by the Department pursuant to F.A.C. Rule 17-2.700(3) prior to conducting the tests.

4. Operation and maintenance of continuous emission monitoring (CEM) systems shall be carried out according to the requirements of 40 CFR60; reports thereof shall be submitted to the Department's Southeast Florida District Office within thirty (30) days following each calendar quarter and will include information required under 40CFR60.7(c). The Department reserves the right to modify the format of the reports. For any periods of excess emissions, as defined in 40CFR60.45(g), the reports shall specify the cause and corrective actions taken as well as the specific operational conditions existing (i.e., steady-state output, load charging rate; sootblowing, liming, or air preheated steam cleaning sequences), during the periods of excess emissions.

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 analysis program, provided that daily samples are composited and analyzed for sulfur content every seven (7) operating days, to demonstrate compliance with the 0.80 lb. SO₂ per million BTU based on the monthly composite. Monthly reports shall be submitted to the Department no later than thirty (30) days after the end of the month.

The Permittee shall be allowed 90 days after promulgation of fuel sampling and analysis methods to implement an EPA approved method of monitoring SO₂ emissions either by fuel sampling and analysis or continuous in-stack monitoring or other methods as approved under the provisions of 40CFR60.45.

6. The department may, after reviewing FPL's quarterly excess emission reports, require the Permittee to conduct Method 9 testing. The Department will notify FPL of such request, as well as the objective for such testing, at the request of the Permittee, the Department will take into account any potential instrument error or malfunction before requiring the scheduling of tests. Substantive opacity violations, as verified by Method 9, are subject to appropriate legal action; moreover, repetitive violations shall require the Permittee to revise operating and/or maintenance practices to abate these violations.

PERMITTEE:
Mr. M. A. Smith
Florida Power & Light
West Palm Beach, Florida

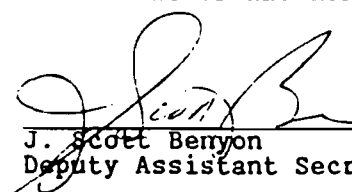
I.D. NUMBER: 50/WPB/43/0001/01
PERMIT/CERTIFICATION NUMBER: AO 43-170568
DATE OF ISSUE: FEB 23 1990
EXPIRATION DATE: November 29, 1994

SPECIFIC CONDITIONS:

7. "Start-up" is defined as referenced in 40CFR60 means the setting in operation of an affected facility for any purpose.
8. On or before March 1 of each calendar year, a completed DER Form 17-1.202(6), Annual Operations Report Form for Air Emissions Sources shall be submitted to the Department.
9. Excess emissions are allowed during startup, shutdown or malfunctions provided:
a) best operational practices are adhered to minimize emissions and b) the duration of the excess emissions is limited to no more than two (2) hours in any 24-hour period.
10. Emission limiting standards or test methods are subject to change should the Department adopt new rules applicable to this source in the future. Compliance with the standards shall be achieved in the time period required by the new rule.
11. All requirements pursuant to 40CFR60, as referenced in F.A.C. Rule 17-2.660, and not specifically addressed in this permit, must be complied with.
12. Burning of used oil meeting EPA specifications (40CFR S266.40) and generated from FPL operations shall be permitted under the following conditions:
 - (a) Each batch of used oil to be burned shall be sampled and analyzed for: Arsenic, Chromium, Cadmium, total Halogens, and Lead using EPA/DER or ASTM approved methods. Split samples of the used oil shall be retained for three (3) months after analysis for further testing if necessary.
 - (b) Results of used oil sampling and analysis performed pursuant to Specific Condition 12(a) shall be retained by permittee for at least three (3) years and made available for inspection by DER upon request.
 - (c) An estimate of the total quantity of used oil burned during the applicable calendar year shall be included in the Annual Operation Report (AOR) for Air Emissions Sources. The permittee will submit with the AOR a summary of the range of values for each constituent analyzed pursuant to Specific Condition 12(a).
13. The permittee shall be aware of and operate under the attached "General Permit Conditions #1 thru 14.". General Permit Conditions are binding upon the permittee and enforceable pursuant to Chapter 403 of the Florida Statutes.

Issued this 23rd day of February, 1990

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION


J. Scott Berryon
Deputy Assistant Secretary

ATTACHMENT 2

**Martin Power Plant - Unit 2
Air Operating Permit**



Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406 • 407-964-9668

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

Scott Benyon, Deputy Assistant Secretary

NOTICE OF PERMIT

FEB. 22 1990

AP - Martin County
Florida Power & Light Martin Unit 2
Fossil Fuel Steam Generator

RECEIVED

FEB 26 1990

Mr. M. A. Smith
Manager - Environmental Permitting
and Programs
Florida Power & Light
P. O. Box 078768
West Palm Beach, Florida 33407-0768

MANAGER
ENVIRONMENTAL AFFAIRS

Dear Mr. Smith:

Enclosed is Permit Number AO 43-170567, to operate an air pollution source issued pursuant to Section 403.087, Florida Statutes.

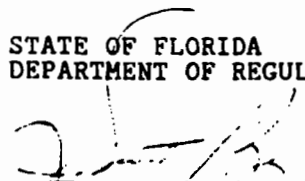
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In addition, please be advised that some processes generate hazardous wastes. Please consult 40 C.F.R. Parts 260-271 and Chapter 17-730, F.A.C. for specific rules and regulations applicable to hazardous waste handlers. Attached for your use is a document entitled "Highlights of Hazardous Waste Regulations" which outlines typical compliance items applicable to various hazardous waste generators/facilities.

Executed in West Palm Beach, Florida

STATE OF FLORIDA
DEPARTMENT OF REGULATION


Jr/Scott Benyon
Deputy Assistant Secretary
1900 South Congress Ave., Suite A
West Palm Beach, FL 33406
407/964-9668

JSB:SBk53

Mr. M. A. Smith
Florida Power & Light
West Palm Beach, Florida
Page 2 of 2

DER Permit Number AO 43-170567

CERTIFICATE OF SERVICE

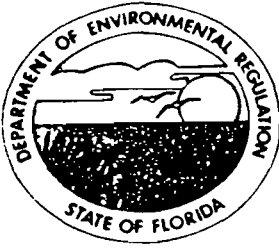
This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on FEB. 22 1990 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to §120.52(10), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Phyllis J. Kern
Clerk

FEB. 22 1990
Date



Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406 • 407-964-9668

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Scott Benyon, Deputy Assistant Secretary

PERMITTEE:

Mr. M. A. Smith
Manager - Environmental Permitting
and Programs
Florida Power & Light
P. O. Box 078768
West Palm Beach, Florida 33407-0768

I.D. NUMBER: 50/WPB/43/0001/02
PERMIT/CERTIFICATION NUMBER: AO 43-170567 *
DATE OF ISSUE: FEB. 20 1990
EXPIRATION DATE: November 29, 1994
COUNTY: Martin
LATITUDE/LONGITUDE: 27° 19 16N/80°33'53"W
UTM: Zone 17; 543.1 Km. E; 3022.0 Km. N
PROJECT: Florida Power & Light Martin Unit 2
Fossil Fuel Steam Generator

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule 17-2, and in conformance with all existing regulations of the Florida Department of Environmental Regulation. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

OPERATE: An air pollution source consisting of a 800 MW Class Fossil Fuel Steam Generator Unit Number 2 (900 megawatt gross capacity) equipped with Low NO_x Dual Fuel Firing Burners to reduce emissions of nitrogen oxides; and multicyclones to control particulate emissions. The unit burns low sulfur fuel oil and natural gas to control sulfur dioxide emissions. In addition, the unit has a continuous emission monitoring system for opacity and NO_x. The unit's heat input rate is 8650 mm BTU/hr. on oil and 9040 mm BTU/hr. on natural gas.

IN ACCORDANCE WITH: Application for Renewal of Permit to Operate Air Pollution Sources received September 25, 1989, and letter dated February 8, 1990; Permit AO 43-64102 dated November 29, 1984 as modified February 4, 1985; Permit AC 43-4038 dated June 30, 1977 as modified January 22, 1981; and Permit AC-73045 dated March 20, 1973. (none are attached).

LOCATED AT: 6 miles NW of Indiantown off Highway 710 in Martin County, Florida.

TO SERVE: A fossil fuel steam generating plant (SIC # 4911).

SUBJECT TO: General Conditions 1-14. and Specific Conditions 1-13.

* This permit is a renewal of AO 43-64102 issued November 29, 1984 and a modification of AO 43-170567 issued December 20, 1989.

1. The terms, conditions, requirements, limitations, and restrictions set forth in the permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action on any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

- (a) Have access to and copy any records that must be kept under the conditions of the permit;
- (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in the permit, the permittee shall immediately notify and provide the Department with the following information:

- (a) A description of and cause of noncompliance; and
- (b) The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

GENERAL CONDITIONS:

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department, may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Rule 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. The permittee shall comply with the following :
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically, unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit, records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.
14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

PERMITTEE:
Mr. M. A. Smith
Florida Power & Light
West Palm Beach, Florida

I.D. NUMBER: 50/WPB/43/0001/02
PERMIT/CERTIFICATION NUMBER: AO 43-170567
DATE OF ISSUE: FEB 20 1990
EXPIRATION DATE: November 29, 1994

SPECIFIC CONDITIONS:

1. Compliance testing shall be conducted for the source covered by this permit once every federal fiscal year in accordance with the methods specified below. Testing of emissions should be conducted with the source operating within 10% of its rated capacity. Testing may be conducted at less than 90% of rated capacity; however, if so, subsequent operation is limited to up to 110% of the test load. Once the unit is so limited, then operation at higher capacities is allowed for a cumulative total of no more than fifteen days for purposes of additional compliance testing to regain rated capacity, with prior notification to the Department.

Notification to the Department is required in writing at least fifteen (15) days prior to testing. The 15-days requirement for rescheduling may be waived at the discretion of the Department.

2. Emission limiting standards are as follows:

In accordance with 40CFR60 Subpart D and Florida Administrative Code Rule 17-2.660:

<u>Pollutant</u>	<u>Emission Limit</u>
Particulate Matter	0.10 lb. per million BTU heat input
Sulfur Dioxide	0.80 lb. per million BTU heat input
Nitrogen Oxides	0.30 lb. per million BTU heat input on oil 0.20 lb. per million BTU heat input on gas
Opacity.	Not greater than 20 percent, except one six-minute period per hour of not more than 27 percent opacity.

3. All compliance tests shall be performed using reference test methods as given in 40CFR60 and as adopted by reference in 17-2. Any deviations from the test methodology in order to facilitate "representative" testing shall be approved by the Department pursuant to F.A.C. Rule 17-2.700(3) prior to conducting the tests.

4. Operation and maintenance of continuous emission monitoring (CEM) systems shall be carried out according to the requirements of 40CFR60; reports thereof shall be submitted to the Department's Southeast Florida District Office within thirty (30) days following each calendar quarter and will include information required under 40CFR60.7(c). The Department reserves the right to modify the format of the reports. For any periods of excess emissions, as defined in 40CFR60.45(g), the reports shall specify the cause and corrective actions taken as well as the specific operational conditions existing (i.e., steady-state output, load charging rate; sootblowing, liming, or air preheater steam cleaning sequences), during the periods of excess emissions.

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 analysis program, provided that daily samples are composited and analyzed for sulfur content every seven (7) operating days, to demonstrate compliance with the 0.80 lb. SO₂ per million BTU based on the monthly composite. Monthly reports shall be submitted to the Department no later than thirty (30) days after the end of the month.

The Permittee shall be allowed 90 days after promulgation of fuel sampling and analysis methods to implement an EPA approved method of monitoring SO₂ emissions either by fuel sampling and analysis or continuous in-stack monitoring or other methods as approved under the provisions of 40CFR60.45.

6. The department may, after reviewing FPL's quarterly excess emission reports, require the Permittee to conduct Method 9 testing. The Department will notify FPL of such request, as well as the objective for such testing. At the request of the Permittee, the Department will take into account any potential instrument error or malfunction before requiring the scheduling of tests. Substantive opacity violations, as verified by Method 9, are subject to appropriate legal action; moreover, repetitive violations shall require the Permittee to revise operating and/or maintenance practices to abate these violations.

PERMITTEE:
Mr. M. A. Smith
Florida Power & Light
West Palm Beach, Florida

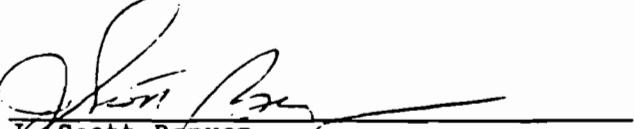
I.D. NUMBER: 50/WPB/43/0001/02
PERMIT/CERTIFICATION NUMBER: AO 43-170567
DATE OF ISSUE: FEB. 20 1990
EXPIRATION DATE: November 29, 1994

SPECIFIC CONDITIONS:

7. "Start-up" is defined as referenced in 40CFR60 and means the setting in operation of an affected facility for any purpose.
8. On or before March 1 of each calendar year, a completed DER Form 17-1.202(6), Annual Operations Report Form for Air Emissions Sources shall be submitted to the Department.
9. Excess emissions are allowed during startup, shutdown or malfunctions provided:
a) best operational practices are adhered to minimize emissions and b) the duration of the excess emissions is limited to no more than two (2) hours in any 24-hour period.
10. Emission limiting standards or test methods are subject to change should the Department adopt new rules applicable to this source in the future. Compliance with the standards shall be achieved in the time period required by the new rule.
11. All requirements pursuant to 40CFR60, as referenced in F.A.C. Rule 17-2.660, and not specifically addressed in this permit, must be complied with.
12. Burning of used oil meeting EPA specifications (40 CFR S266.40) and generated from FPL operations shall be permitted under the following conditions:
 - (a) Each batch of used oil to be burned shall be sampled and analyzed for: Arsenic, Chromium, Cadmium, total Halogens, and Lead using EPA/DER or ASTM approved methods. Split samples of the used oil shall be retained for three (3) months after analysis for further testing if necessary
 - (b) Results of used oil sampling and analysis performed pursuant to Specific Conditions 12(a) shall be retained by permittee for at least three (3) years and made available for inspection by DER upon request.
 - (c) An estimate of the total quantity of used oil burned during the applicable calendar year shall be included in the Annual Operation Report (AOR) for Air Emissions Sources. The permittee will submit with the AOR a summary of the range of values for each constituent analyzed pursuant to Specific Conditions (a)
13. The permittee shall be aware of and operate under the attached "General Permit Conditions #1 thru 14.". General Permit Conditions are binding upon the permittee and enforceable pursuant to Chapter 403 of the Florida Statutes.

Issued this 20th day of February, 1990

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION


Scott Benyon
Deputy Assistant Secretary



Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406 • 407-964-9000

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Scott Benvon, Deputy Assistant Secretary

HIGHLIGHTS OF HAZARDOUS WASTE REGULATIONS (October, 1989)

This write-up is provided to assist hazardous waste (HW) handlers in meeting the regulations. HWs are wastes which are either listed by the U.S. E.P.A., or are ignitable (i.e. flash point $< 140^{\circ}$ F, or an oxidizer), corrosive (e.g. pH < 2 or ≥ 12.5), reactive, or toxic, as defined in 40 CFR Part 261. A HW determination must be made of any waste generated (§262.11). If the waste is hazardous, then it must be recycled, treated, stored or disposed of at a proper HW facility. HW cannot be disposed of on or in the ground, nor at local landfills, septic tanks, or injection wells. Regardless of quantity, the generator of HW is ultimately responsible for the waste from "cradle to grave", and can be held liable for improper management of HW even though it may have been sent to a "proper" HW management facility using a licensed transporter. A copy of the hazardous waste regulations (40 CFR Parts 190-299 (specifically 260-270) can be obtained from a public, college or law library, or EPA Region IV (Atlanta, GA 30365), or the U. S. Government Printing Office (Washington, D.C. 20402) or the U.S. Government Printing Office, P.O. Box 35089, Jacksonville, Florida 32202, telephone 904/791-3801.

I. SMALL QUANTITY GENERATORS (SQG)

A. Conditionally Exempt Small Quantity Generators. (40 CFR 261.5; F.A.C. 17-730)

1. Perform HW determination (§262.11).
2. * Generate < 100 kg/month (< 1 kg month acute HW).
3. Accumulate < 1000 kg at any time.
4. Ensure delivery of HW to a proper recycling or Treatment/Storage/Disposal (TSD) facility.
5. For SQGs generating > 100 kg/month (approx. 25 gal.), use manifest for shipments.
6. Comply with land disposal restrictions (LDR) Part 268, unless exempt.

* Many wastes which are recycled are included in the quantity determination, as well as influent wastewaters prior to treatment, neutralization, etc.

B. SQG 100-1000 kg/month (40 CFR 262.34; F.A.C. 17-730)

1. Obtain a DER/EPA ID number [§262.12].
2. Use manifest system (unless there is a reclamation agreement pursuant to §262.20(e), and ship only to a permitted facility (262, Subpart B)).
3. Never exceed the 6000 kg accumulation/180 day storage time limit.

NOTE: DER is more stringent here (i.e., eliminate the 200 mile/270 day exception), and will require SQG to file an exception report for late or missing manifests from the designated facility.

4. Emergency Planning

- a) Have at least one employee with authority as Emergency Coordinator (E.C.) that is on 24 hour call (§262.34(d)(5)).
- b) Next to the telephone, post (i) the E.C. name and phone number, (ii) fire department's number, (iii) location of fire extinguishers, spill control equipment/material, and fire alarm (if any) (§262.34(d)(5)).
- c) Follow emergency procedures in §262.34(d)(4), including taking necessary steps to address spills and fires, and notify National Response Center (24 hr. number: 800/424-8802).
- d) Upon request, the Department will provide a concise, easy-to-follow contingency plan guidance document which describes the contingency plan requirements for full generators, if the facility wishes to develop a more comprehensive emergency plan than required of 100-1000 kg/month generators.

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Highlights of Hazardous Waste Regulations
Page 2 of 4

5. Training of personnel regarding proper HW handling and emergency response (§262.34)(d)(5)(iii).
6. Keep records (§262.44), including manifests, test results, etc. a minimum of three years.
7. If tanks are used for management of HW, meet the tank requirements of (265.201).
8. Meet the following requirements under II, below: items 7 through 21.
9. If a SQG fails to meet applicable requirements, the full generator standards (and possibly TSD standards) may apply.
10. Comply with Land Disposal Restrictions requirements set forth in 40 CFR §268.

NOTE: SQGs must be able to demonstrate proper management of HW, and records should be kept. Effective 9/22/86, the rules require 100-1000 kg/mo. generators to meet the following additional requirements (Federal Register, Vol. 51, No. 56, p. 10178, March 24, 1986).

II. GENERATORS (40 CFR 262, 265, and 268: F.A.C. 17-630)

1. Perform HW Determination [262.11].
2. Obtain a DER/EPA ID number [262.12].
3. Generate > 1000 kg/mo. or > 1 kg/mo. acute HW, or otherwise do not qualify for (or fails to fulfill certain) SQG requirements.
4. Accumulate wastes < 90 days [§262.34(b)].
5. File annual report for all HW shipped off site [F.A.C. 17-730.16].
6. Meet personnel training requirements, including documentation [§265.16].
7. Use manifest system, and ship to a permitted facility [262 Subpart B].
8. File exception report for late or missing manifests from the designated facility [§262.42].
9. Label containers with the words "hazardous waste" and accumulation start dates, and label tanks "hazardous waste: [§262.34(a)].
10. Meet satellite accumulation rules [§262.34(c)].
11. Meet pre-transport requirements re: packaging, labeling, marking and placarding [262 Subpart C].
12. Keep all records for at least 3 years (e.g., manifests, test data, waste analyses, annual report, etc.) [262 Subpart D].
13. Special cautions (including "No Smoking" signs) are required for ignitable or reactive wastes (§265.17).
14. Security (e.g. a locked fence) and bermed containment areas (with roof and impermeable floor) for HW storage areas are strongly recommended.
15. Maintain and operate the facility in a clean, safe manner [§265.31]. It is the facility's responsibility to comply with OSHA worker safety and protective clothing rules, Fire Codes, Florida's Right to Know Law, local government codes, etc.].
16. Emergency equipment (§265.32).
 - a) telephone or hand-held two-way radio;
 - b) internal communication or alarm system;
 - c) fire and spill control equipment (e.g., fire extinguishers, hoses, sprinklers, etc.);
 - d) neutralizing agents, spill adsorbants, overpack drums, standby 55-gallon drums, etc.;
 - e) test and maintain the emergency equipment [§265.33];
17. Maintain adequate aisle space for evacuation, inspecting drums, etc. [§265.35] (e.g., No less than 3 feet).

18. Attempt to make arrangements with local fire and police departments, hospitals, and emergency response contractors/equipment suppliers with regards to HW-related emergencies [§265.37].
19. Containers (e.g., drums, cans, etc.) must be kept closed and in good condition, inspected at least weekly, be compatible with the HW stored, and separated from other incompatible wastes (e.g., keep cyanides away from acids and oxidizers). [265 Subpart I].
20. Tanks must meet the requirements of 265 Subpart J (structural integrity; containment and detection of releases; inspection; response to leaks or spills; operating requirements; closure and post-closure care; special requirements for ignitable, reactive and/or incompatible wastes; waste analysis and trial test).
21. Comply with LDR requirements set forth in §268. Certification (land disposal restricted waste does not exceed treatment standards) or Notification (land restricted waste or exemption) must accompany all manifests of restricted wastes (§268.7), unless exempt.
22. Have a written contingency plan [265 Subpart D]. Upon request, the DER/West Palm Beach HW Section will provide a concise, easy-to-follow contingency plan guidance document.
23. Ignitable or reactive HW must be stored at least 50 feet from the facility's boundary line. [265 Subpart I].

III. TRANSPORTERS [40 CFR 265]

1. Obtain DER/EPA ID # [§263.11].
2. Use manifests [263 Subpart B].
3. Keep records (§263.22).
4. Ability to clean up discharges during transportation-related incidents (§263 Subpart C).
5. Documentation for financial liability [F.A.C. 17-730.170].
6. Transporter picking up HW from SQGs are exempt from manifest and recordkeeping requirements of §263.20.22, provided:
 - (a) the waste transported is pursuant to a reclamation agreement, and
 - (b) the transporter logs certain information and retains the record for 3 years after cessation of the agreement [§262.34(d)].
7. Transporters in Florida, storing HW > 24 hours, and < 10 days are considered a transfer facility and must notify the Department and comply with certain storage facility requirements such as personnel training, contingency plan, preparedness and prevention requirements, records maintenance, closure plan, security, container requirements, certain notification requirements, etc. HW stored in vehicles (or containers) at transfer facilities shall be on a manmade surface which is capable of preventing spills from reaching the ground [F.A.C. 17-730.171(2)].

IV. TREATMENT, STORAGE AND DISPOSAL FACILITIES (TSDF) (40 CFR 264 OR 265 AND 268)

Must notify as a TSDF, obtain a HW permit unless exempt (e.g., wastewater treatment units, elementary neutralization, etc.). Must meet applicable generator standards (II above) plus security, additional recordkeeping, containment system, closure and financial liability standards, waste analysis plan, inspection logs, post-closure and groundwater monitoring for certain operations, ensure that LDR Part 268 Standards are met; meet additional requirements for impoundments, waste piles, incinerators, etc. Facilities receiving HW from off-site (incl. certain recycling facilities) may be subject to TSDF requirements. A TSDF which has been issued a HW operating permit must comply with the provisions of it's HW permit and the applicable provisions of 40 CFR Part 264.

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Highlights of Hazardous Waste Regulations
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LAND DISPOSAL RESTRICTIONS

On November 8, 1984, the President signed into law the Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA). The Amendments require the EPA to evaluate all listed and characteristic hazardous wastes according to a strict schedule to determine which wastes should be restricted from land disposal. These restrictions are called Land Disposal Restrictions (LDR's). The LDR rule has been gradually applied, with more wastes being added every year. As of May 8, 1990 no hazardous wastes may be disposed of into land disposal units without first being treated to meet federally mandated treatment standards.

The generator of treated hazardous waste must provide signed certification (for each shipment) that his waste meets the treatment standard or, if it does not, the generator must send a signed notification to the TSD facility that the wastes do not meet treatment standards. The generator must also determine:

- a) whether the waste is subject to the LDR rules;
- b) what constituent levels are in the waste;
- c) which treatment standards or prohibition levels apply; and
- d) whether the waste must be treated or already meets the applicable treatment standard or prohibition level upon generation.

For each shipment of waste the generator must also:

- a) provide EPA hazardous waste number(s);
- b) determine the applicable treatment standard(s) for his waste;
- c) provide the manifest number associated with the waste shipment, and
- d) provide waste analysis data (if applicable).

All notifications, certifications, and waste analysis data must be kept on-site for at least five (5) years.

The LDR rule prohibits the dilution of restricted wastes as a substitute for adequate treatment.

The LDR rule provides for a few limited opportunities for delaying the effective date of prohibition, for a treatability variance, or for gaining an exemption from the prohibitions. Contact the EPA for additional details.

This LDR explanation is a very brief synopsis of a complex set of rules and regulations and is not meant to be all inclusive. The generator is responsible for familiarizing himself with the details of the LDR regulations. Contact the EPA or the Florida Department of Environmental Regulation for detailed information.

CAUTION

This hand out, written in plain English, is based on the staff's understanding of HW regulations. It should be read in conjunction with (and not as a substitute for) the Federal or State HW regulations. This write up includes only what the staff believes as the principal components of the HW regulations. The regulatory requirements indicated in this hand-out may change in time because of changes in regulations, new interpretations/guidance from EPA or DER, judicial ruling, and the like.

Ultimately, it is the facility's responsibility to stay current with applicable HW regulations and be in compliance of all applicable environmental regulations. Failure to meet the applicable rules may subject facilities to more stringent standards. For example, SQGs dumping HW illegally not only become subject to disposal facility standards but could also be subject to enforcement actions. Also, please note that the DER has an agreement with the U.S. EPA which mandates the assessment of penalties for violations of Resource Conservation Recovery Act (RCRA) requirements.

If you have questions on this write-up or HW compliance in general, please call the Waste Programs Section, telephone (407) 964-9668.

CO:s/d/245

August 1986

Revised July 1987

- " October 1987
- " September 1988
- " October 1989

ATTACHMENT 3

**Fuel Oil Analyses Comparison
for 0.7 and 1.0 Percent Sulfur Fuel Oils**

**Fuel Oil Analyses Comparison
for 0.7 and 1.0 Percent Sulfur Fuel Oils**

The following is a summary of the as fired fuel oil analyses for the month of June 1992 for 0.7 and 1.0 percent sulfur fuel oils used at FPL's power generation facilities.

Parameter	0.7 Percent Sulfur Oil	1.0 Percent Sulfur Oil
API Gravity	12.6	10.7
Btu/lb.	18,554	18,372
MBtu/Barrel	6,373	6,394
Water (wt.%)	0.1	0.3
Sediment (wt.%)	0.03	0.04
Sulfur (wt.%)	0.68	1.00
Ash (wt%)	0.03	0.05
Vanadium (ppm)	10	20
Viscosity (SSF@122°)	167	165
Asphaltene (wt%)	1.3	3.1

ATTACHMENT 4

**Martin Power Plant
Proposed Fuel Oil handling System Design
and Best Operational Practices Description**



POWER RESOURCES

LOCATION

MARTIN POWER PLANT

PROCEDURE NUMBER

D:\GENOILBURN

TITLE

BOILER FUEL HANDLING
SYSTEM CONFIGURATION FOR
COFIRING NATURAL GAS WITH
ONE PERCENT SULFUR FUEL OIL

REV.

ISSUE
DATE

07/30/92

Page

2

of

6

1.0 OBJECTIVE

- 1.1 The objective of this document is to outline the best operating practice necessary to successfully co-fire natural gas with 1.0% sulfur fuel oil while ensuring compliance with all air operating permits, and other environmental regulations.

2.0 DISCUSSION

- 2.1 To comply with FAC 17-762, periodic tank cleaning/inspections are required. To comply with such, piping modifications will be made to maintain unit availability during tank cleaning/inspections. **See attachment #1** on page 4.

Plans have been completed which will allow the cofiring of 1.0% sulfur fuel oil at Martin Plant with sufficient quantities of natural gas to meet applicable SO₂ emission limits. Applicable emission standards have not changed (ie: opacity, particulate matter, SO₂, NO_x). It is imperative that the 1.0% sulfur oil be burned with sufficient quantities of natural gas in order to comply with all applicable air operating permit requirements.

In order to allow a rapid change from 1.0% sulfur oil to 0.7% sulfur oil, the storage and metering tanks for the 1.0% and 0.7% oil will be split. Tank switching will thus accomplish the change from one fuel oil to the other.

Because of the importance of keeping the two types of oil (1.0% and 0.7% sulfur) separated in the metering tanks, changeovers will be performed as shown in **attachments #2 and #3** on pages 5 and 6. It is essential that the 1.0% sulfur oil be purged from the transfer line before filling the metering tank with 0.7% sulfur oil.



POWER RESOURCES

LOCATION	MARTIN POWER PLANT	PROCEDURE NUMBER	D:\GENOILBURN
TITLE	BOILER FUEL HANDLING SYSTEM CONFIGURATION FOR COFIRING NATURAL GAS WITH ONE PERCENT SULFUR FUEL OIL	REV.	
		ISSUE DATE	07/30/92
		Page	3 of 6

3.0 OPERATIONAL CONSIDERATIONS

The following operational parameters and adjustments must be considered prior to making any change from 0.7% to 1.0% sulfur oil.

- 3.1 Fuel oil temperature must be adjusted to the value required.
- 3.2 Gas must be raised to 40% before changing to 1.0% sulfur oil.
- 3.3 Load changes are generally not feasible when changing tanks (a period of one hour)

4.0 SPECIFIC INSTRUCTIONS

The aforementioned specific instruction(s) shall be strictly adhered to when performing each respective operation.

- 4.1 All metering and storage tank changeovers and transfers will be performed using an approved check sheet.
- 4.2 Anytime that the opacity, or SO₂ limits cannot be met, or percent natural gas of total fuel mixture goes below 30% (and cannot be raised back to 30%), the metering tanks will be immediately lined up to the 0.7% sulfur oil metering tank.



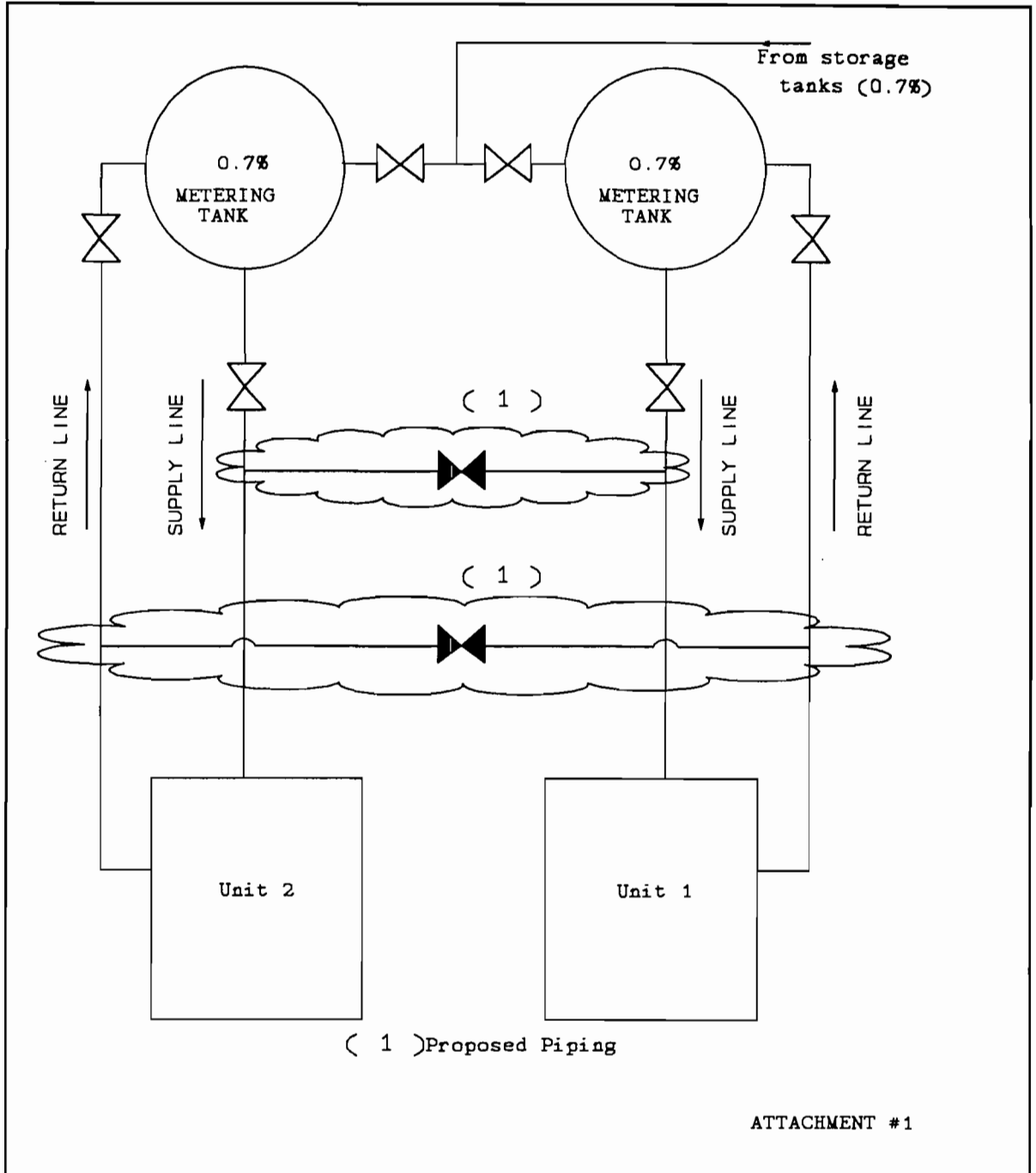
POWER RESOURCES

LOCATION	MARTIN POWER PLANT
TITLE	BOILER FUEL HANDLING SYSTEM CONFIGURATION FOR COFIRING NATURAL GAS WITH ONE PERCENT SULFUR FUEL OIL

PROCEDURE NUMBER	D:\GEN\OILBURN
REV.	
ISSUE DATE	07/30/92
Page	4 of 6

5.0 ATTACHMENTS

5.1 NORMAL CONFIGURATION



ATTACHMENT #1



POWER RESOURCES

LOCATION
MARTIN POWER PLANT

TITLE
**BOILER FUEL HANDLING
SYSTEM CONFIGURATION FOR
COFIRING NATURAL GAS WITH
ONE PERCENT SULFUR FUEL OIL**

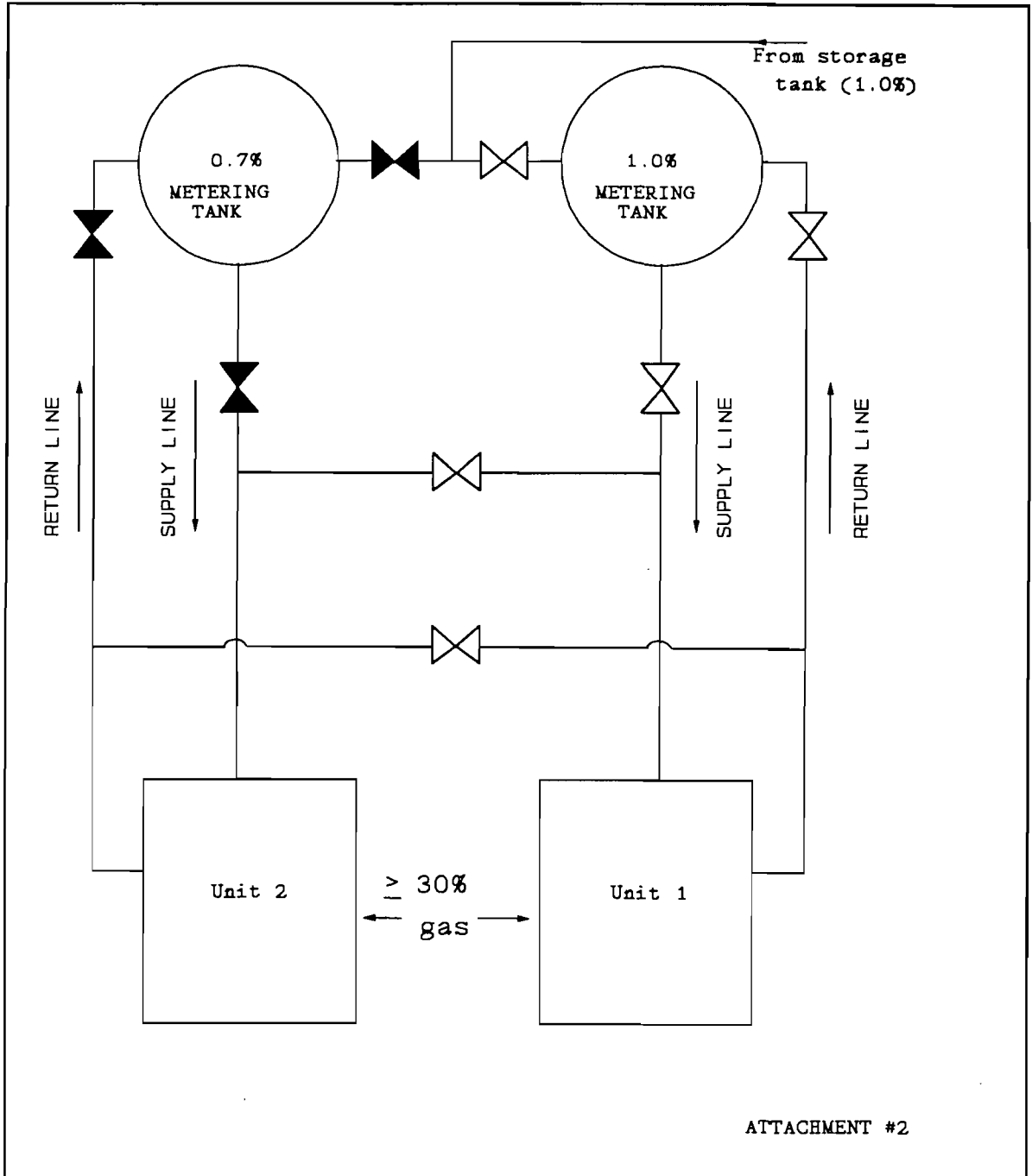
PROCEDURE NUMBER
D:AGENOILBURN

REV.

ISSUE DATE
07/30/92

Page **5** of **6**

5.2 1.0% SULFUR FUEL OIL BURN CONFIGURATION





POWER RESOURCES

LOCATION
MARTIN POWER PLANT

PROCEDURE NUMBER
D:\GEN\OILBURN

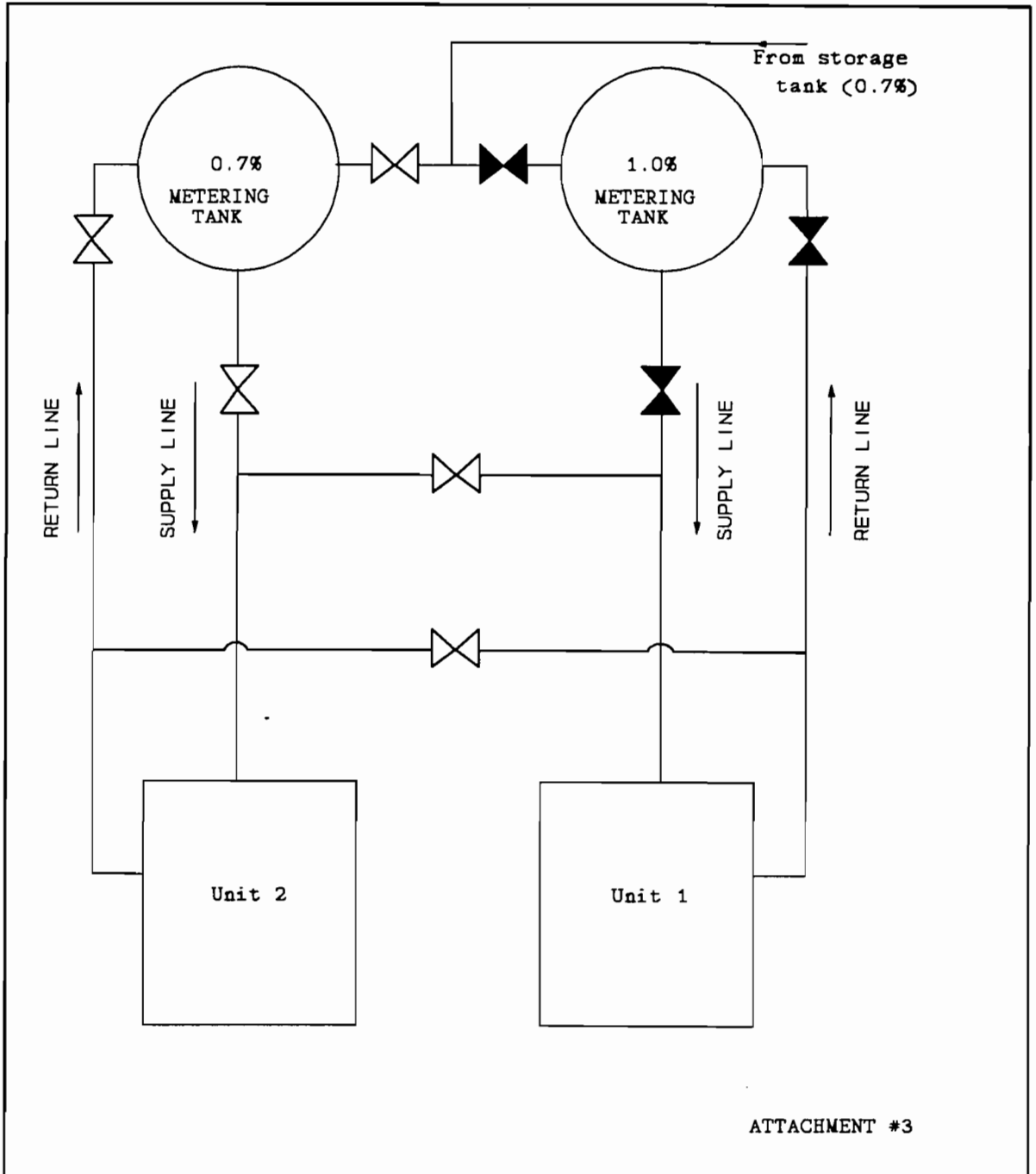
TITLE
**BOILER FUEL HANDLING
SYSTEM CONFIGURATION FOR
COFIRING NATURAL GAS WITH
ONE PERCENT SULFUR FUEL OIL**

REV.

ISSUE DATE **07/30/92**

Page **6** of **6**

5.3 0.7% SULFUR FUEL OIL BURN CONFIGURATION



ATTACHMENT #3



FPL

August 6, 1992

Florida Power & Light Company, P.O. Box 078768, West Palm Beach, FL 33407-0768

RECEIVED
DER - MAIL ROOM

1992 AUG 11 AM 11:12

Mr. Preston Lewis, Supervisor
Permitting and Standards Section
State of Florida
Department of Environmental Regulation
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

RE: **Florida Power & Light Company**
Martin Power Plant - Units 1 and 2
Request for Amendment of Construction Permits

Dear Mr. Lewis:

Florida Power & Light Company (FPL) is planning to co-fire higher sulfur (1.0 percent sulfur) fuel oil and natural gas at the Martin Power Plant Units 1 and 2. The Martin Plant Units 1 and 2 currently burn 0.7 percent sulfur fuel oil and/or natural gas to meet an SO₂ emission limitation of 0.80 pound/MMBtu heat input. The plant uses fuel sampling and analysis to determine compliance with the SO₂ emission limitation.

FPL proposes to burn a variable combination of 1.0 percent sulfur fuel oil and natural gas to meet the SO₂ permit emission limitation specified above for Units 1 and 2. The air operating permit specifies an SO₂ emission limitation of 0.80 pound/MMBtu heat input which allows FPL to burn a variable combination of fuel oil and natural gas. However, the construction permits for Units 1 and 2 describe the use of 0.7 percent sulfur fuel oil or natural gas. It is my understanding based on previous discussions with you and your staff that only the construction permits for Units 1 and 2 would need to be amended to allow FPL to burn a variable combination of 1.0 percent sulfur fuel oil and natural gas to meet the SO₂ permit emission limitation.

KNOW YOUR ENDORSER - REQUIRE IDENTIFICATION



Florida Power & Light Company

FPL
P. O. BOX 078768, WEST PALM BEACH, FL 33407-0768
TELEPHONE: (407) 697-6941

VOID IF NOT PRESENTED FOR
PAYMENT WITHIN SIX MONTHS
FROM DATE OF CHECK

No. 0093

63-623

670

Not valid for more
than \$9,999.99

8/5 1992

Pay

THE SUM 250 DOLS 00 CTS \$250.⁰⁰

To: The Order Of

REFERENCE:

STATE OF Florida
Department of Environmental
Regulation

PMR Modification Fee
Construction Permit
Units 1&2

NCSB NATIONAL BANK OF FLORIDA

ENVIRONMENTAL AFFAIRS MANAGERS

Joseph R. Siebold