



March 7, 2013

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Florida Department of Environmental Protection
Office of Permitting and Compliance
Division of Air Resources Management
2600 Blair Stone Road, MS # 5505
Tallahassee, Florida 32399-2400

Re: NSPS, KKKK Applicability Determination for Combustion Turbine Improvements for Unit 8 at Martin Florida Power & Light (FPL)
Permit No. 0850001-026-AC/PSD-FL-327E

In accordance with the Permit No. 0850001-026-AC/PSD-FL-327E Section 3, Condition 5 FPL is providing the required information regarding NO_x Emission Rate Change due to Combustion Turbine Improvements for Unit 8.

FPL is using Continuous Emission Monitoring System (CEMS) for determining the short-term NO_x emission rates (in pounds per hour), while operating in the normal combined cycle mode (140-160 MW) and burning natural gas.

Reviewing the data for all four units 8 (8A, 8B, 8C and 8D) prior to and after improvements, the post change data indicates a reduction in NO_x air pollution emissions on all four units.

Unit 8B was chosen for NSPS, KKKK Applicability Determination since it is the unit having the least amount of improvement in NO_x air pollution emissions.

The result of such testing for unit 8B using the 8 tests (three (3) hours per each test) average of the NO_x data prior to and after the allowed improvements shows that NO_x emissions are reduced with 95% confidence. The number (n) of runs used in the testing was 24 runs, each run of one (1) hour duration.

Please see below the Table1, NO_x Emissions Summary Data.

Table 1. NOx Emissions Summary for Unit 8B

| Date of the Testing* | NOx (lbs/hr)Average of 8 Tests (3 hr each) | MWh Average of 8 Tests | NOx (lbs/MW) |
|----------------------|---|------------------------|--------------|
| January of 2011 | 13.62 | 155.4 | 0.08765 |
| February of 2013 | 13.07 | 152.7 | 0.08564 |

* Please note that Unit 8B was in operation on November 30, 2012 after improvements.

As you can see that the NOx emissions (lbs/MW) average of 24 hours for January 2011 and February 2013 is much below the NSPS, Subpart KKKK, NOx emissions limit of 2.0 lb/MWh.

Therefore, based on FPL analysis of the post change NOx emissions data, these units are not subject to Subpart KKKK.

If you have any question or need additional information, please contact me at your convenience.

Sincerely,



Christian Kiernan
 PGD Technical Services Environmental General Manger
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