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BUREAU OF AIR REGULATION

bcc: Bill Brannen PRV  
Tony Renk PRV  
J.Hampp JES/JB  
File PRV Title V (JES/JB)

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

Tom Tittle  
400 Congress Ave.  
P.O.Box 15425  
West Palm Beach, Fl. 33416

James E. Stormer, Supervisor  
Air Pollution Control Section  
Palm Beach Public Health Unit  
P.O. Box 29  
West Palm Beach, Fl. 33402

2/1/00 cc: Scott Sheplak



January 25, 2000

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

Re: **Title V Permit No. 0990042-001-AV**  
**FPL Riviera Plant Administrative Change**

Dear Mr. Fancy:

Pursuant to a conversation on January 13, 2000, between Scott Sheplak of your Department and FPL's Mary Archer, an administrative change was discussed concerning the sulfur concentration in fuel oil burned during the annual particulate and visible emissions tests. The following language is proposed to avoid unnecessary emissions related specifically to unit testing. As this additional language does not relax the permit requirements it accommodates the administrative change definition.

Current language in Permit No. 0990042-001-AV

A. 26.a. When Burning Fuel Oil Up To 2.5% Sulfur. When only fuel oil containing less than or equal to 2.5% sulfur, by weight, is fired (or co-fired with natural gas) in an emissions unit, particulate matter and visible emissions tests during soot blowing and steady-state operation shall be performed on such emissions unit while firing solely fuel oil containing at least 90% of the average sulfur content of the fuel oils fired in the previous 12 month period, except that such test shall not be required to be performed during any year that testing is performed in accordance with Specific Condition **A.26.b.**

Recommended language change:

A. 26.a. When Burning Fuel Oil Up To 2.5% Sulfur. When only fuel oil containing less than or equal to 2.5% sulfur, by weight, is fired (or co-fired with natural gas) in an emissions unit, particulate matter and visible emissions tests during soot blowing and steady-state operation shall be performed on such emissions unit while firing solely fuel oil. One of the following two requirements must be met for the particulate matter and visible emissions testing: 1) The fuel oil fired must contain at least 90% of the average sulfur content of the fuel oils fired in the previous 12 month period, or 2) If fuel oil currently being burned does not meet this requirement, fuel oil of lesser sulfur content may be fired provided additional testing is performed when the sulfur content in the fuel oil being burned increases by more than 0.20%. If fuel oil is fired containing greater than

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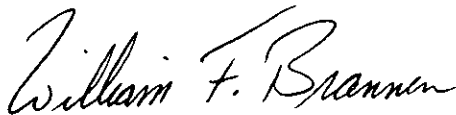
Title V Permit No. 0990042-001-AV

FPL Riviera Plant Administrative Change

0.20% sulfur above the percentage sulfur concentration fired during the most recent test, additional particulate matter and visible emissions tests shall be performed as soon as practicable, but in no event more than 60 days after firing such higher sulfur fuel oil, except that such test shall not be required to be performed during any year that testing is performed in accordance with Specific Condition A.26.b.

Thank you for your prompt attention to the issue raised in this correspondence. Please do not hesitate to contact Mary Archer at (561) 691-7057 regarding this issue.

Sincerely,

A handwritten signature in cursive script that reads "William F. Brannen".

William F. Brannen  
Plant Manager, Riviera Power Plant  
Florida Power & Light Company

Date: 6/9/98 3:18:00 PM  
From: Mary Fillingim TAL  
Subject: New Posting #0990042  
To: See Below

There is a new posting on Florida's website.

0990042001AV  
RIVIERA

Final

If you have any questions, please feel free to contact me.

Thanks,  
Mary

To: adams yolanda  
To: pierce carla  
To: Barbara Boutwell TAL  
To: Scott Sheplak TAL  
To: Terry Knowles TAL  
To: danois gracy  
To: Elizabeth Walker TAL  
CC: Susan DeVore TAL