

Linero, Alvaro

From: Osbourn, Scott [Scott_Osbourn@golder.com]
Sent: Monday, April 13, 2009 1:26 PM
To: Linero, Alvaro; Heron, Teresa
Cc: Hathaway, Richard; Lorne, Jacquelyn; Merrill, Rich; McCann, Bob; Kosky, Ken
Subject: CCEC/RBEC Air Permit Issues

Based on our discussions last Friday, this email serves to confirm several issues regarding the draft air permits for both the CCEC and the RBEC facilities. Specifically, we had addressed: 1) the proposed language revisions for excess emissions resulting from tuning, 2) the RBEC CO limit on gas-firing for long-term CEMs averaging, 3) the opacity limit and testing requirements for the gas compressor engines and, finally, 4) the proposed call with EPA to discuss the required testing schedule for the Siemens H machine.

Regarding the tuning issue, FPL would like to request the proposed language revision below:

DLN Tuning: CEMS data collected during initial or other major DLN tuning sessions shall be excluded from the CEMS compliance demonstration provided the tuning session is performed in accordance with the manufacturer's specifications. A "major tuning session" may occur after completion of initial construction, ~~a combustor change-out~~, a major repair or maintenance to a combustor, or other similar circumstances. Prior to performing any major tuning session, where the intent is to exclude data from the CEMS compliance demonstration, the permittee shall provide the Compliance Authority with an advance notice of at least 7 days that details the activity and proposed tuning schedule. The notice may be by telephone, facsimile transmittal, or electronic mail. [Design; Rule 62-4.070(3), F.A.C.]

Regarding the RBEC CO limit on gas-firing for long-term CEMs averaging, it was determined that a 7.5 ppm, 30-day rolling average for CO emissions on gas would result in a less than significant CO emissions increase (i.e., a net increase of 92.9 TPY). Therefore, at 7.5 ppm, this long-term average for RBEC will be slightly different from the 8 ppm value issued in the draft permit for CCEC, due to the lower historical CO emissions baseline that was established for RBEC.

We discussed the gas compressor engines and the applicability of the NSPS Subpart JJJJ provisions. Specifically, we understand that, if the vendor does not provide an emissions certification demonstrating compliance with these provisions, then it will be up to FPL to conduct emissions testing to demonstrate compliance. As the NSPS is applicable on a per unit basis, the testing would need to be done on each of the units, not just one of the units selected as representative. As these units will be firing only natural gas, it appears that an opacity limit of 10% will be acceptable, although we are continuing to research available vendor data to determine if this will be a concern.

Finally, we discussed coordinating a conference call with EPA to discuss the drafting of permit language to provide testing schedule relief in the event that the Siemens H technology is selected. Due to the nature of this request, FPL has determined that one of the exemptions provided under the NSPS Subpart KKKK, Specifically 60.4310(b), is an appropriate description of the testing that will occur upon startup. Siemens has conducted extensive in-house testing, however, this effort would represent the initial field testing effort for this model of CT. As such, this effort meets the intent of the exemption provided in Section 60.4310(b) above, related to research and development of equipment. This research and development effort on the first gas turbine in service would provide for an initial test period of up to three months. FPL would like to schedule a conference call with yourself and the EPA staff who are familiar with this issue (i.e., Dick Dubose, David McNeil, Jason Dressler and Heather Abrams). We would like to coordinate the call for this Wednesday, depending on availability. As we discussed, could you please forward the EPA staff email address or other contact

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information?

If you should have any questions on the above, please don't hesitate to contact me at the number below.

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