Florida Power & Light Company, 392 US Highway 17 South, E. Palatka, Florida, 32131

FPL

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BUREAU OF AIR REGULATION

September 19, 2008

Trina L. Vielhauer, Chief
Bureau of Air Regulation
State of Florida
Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5505
Tallahassee, FL 32399-2400

Re: Comments to Draft Air Operating Permit; Putnam Power Plant, Permit No. 1070014-006-AV

Dear Trina,

As an initial matter, FPL requests that the Department involve major stakeholders in the development of permitting format changes to avoid extended delays in permit review. FPL specifically requests confirmation from FDEP that these formatting changes are not intended to, and in fact do not, result in any changes to the substantive requirements applicable to this facility. Also, the size of the permit for such a simple facility as Putnam has grown unwieldy especially in this day of conservation, and moving specific requirements into Appendices makes it much more difficult to determine precisely what requirements are applicable. We are anticipating permits plus attachments to exceed 1000 plus pages for some of our facilities if this trend is continued.

Regarding the Draft Title V Permit referenced above, FPL has the following comments:

- Statement of Basis: Please provide a list of all changes made in the draft permit no. 1070014-006-AV as compared to the current air operating permit no. 1070014-005-AV.

- Page 2,
Subsection C. Applicable Regulations: FPL requests that the Table indicating Regulation and EU No(s) be removed from the permit.

- Page 6,
Specific Condition No.A.1 Permitted Capacity:

A.1. Permitted Capacity. The maximum operation heat input rate is as follows:
Unit No. MMBtu/hr Heat Input Fuel Type
003
004
005
006
Heat input is limited at any given ambient temperature in accordance with the curves attached in Appendix T of this permit.
Natural Gas and Fuel Oil
[Rules 62-4.160(2), 62-204.800, and 62-210.200(PTE), F.A.C.]

FPL requests the condition be revised to reflect the following.

Specific Condition No.A.1 Permitted Capacity:

A.1. Permitted Capacity. The maximum operation heat input rate is limited for Emission Units 003, 004, 005, and 006 in accordance with a 3-hour block average that is limited at any given ambient temperature as identified on the curves attached in Appendix T of this permit for Natural Gas and Fuel Oil. The ambient temperature for heat input calculation or look up curves is equivalent to the compressor inlet temperature.
The heat input will be demonstrated annually in accordance with the 3-hour run time of the performance test and will be provided as a part of the test submittal.
The CEMs Data Handling & Acquisition System (DAHS) calculated heat input shall not be used for compliance purposes.

(An estimated "real time" heat input value can be calculated for agency compliance inspectors upon request. The averaging time for the estimated heat input will be a 3-hour block that may utilize fuel flow or tank drop data to determine the fuel usage which will be multiplied by the last available heating value of the fuel. If sampling is needed to determine the current heat input value, the adjusted heat input value will be provided to the inspector after test results are received for the heat value of the fuel and a corrected fuel heat input is calculated.)

Heat input is not required to be recorded other than the instances as addressed previously in this condition.

[Rules 62-4.160(2), 62-204.800, and 62-210.200(PTE), F.A.C.]

- Page 7,

Specific Condition No.A.6: Linking of conditions throughout the permit aids in permit clarity: please add this note at the end of the condition: **"See SC. A.12. "**

- Page 7,

Specific Condition No.A.7: FPL requests that this condition be removed and replaced with specific condition A. 11. from permit no. 1070014-005-AV.

Please insert the following condition with renumbering to A.7:

> **"A.11.** Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
> [Rule 62-210.700(1), F.A.C.]"

- Page 8,

Specific Condition No. A.12. Linking of conditions throughout the permit aids in permit clarity: please add this note at the end of the condition:
"See Specific Conditions A.6. and A.13. "

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Specific Condition **A.15.** Annual Compliance Tests. States "During each federal fiscal year (October 1st to September 30th), each EU shall be tested to demonstrate compliance with the emissions standards for VE. Annual compliance tests for these pollutants shall be performed on each unit for each fuel fired for 400 hours or more during the federal fiscal year. Unless specifically requested by the Compliance Authority pursuant to Rule 62-297.310(7)(b), F.A.C., periodic opacity tests are not required when firing natural gas. [Rule 62-297.310(7), F.A.C."

This specific condition is contradictory for the VE test requirement. FPL requests the following changes to make it clear that an annual test is not required when only natural gas is fired.

Please change **A.15.** Annual Compliance Tests to the following "During each federal fiscal year (October 1st to September 30th), each EU shall be tested to

demonstrate compliance with the emissions standards for VE **except as noted in Specific Conditions D.1 and D.2.**. Annual compliance tests for these pollutants shall be performed on each unit for ~~each~~ **which liquid** fuel fired for 400 hours or more during the federal fiscal year. Unless specifically requested by the Compliance Authority pursuant to Rule 62-297.310(7)(b), F.A.C., periodic opacity tests are not required when firing natural gas. [Rule 62-297.310(7), F.A.C."

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Specific Condition **B.11.** occurs twice on page 11 and could cause some confusion. Please renumber as appropriate.
As discussed with John Holtom and Tom Cascio of FDEP on September 12, 2008, the Department will renumber.

- Page 11 - 12

Specific Condition **B.11.** Test Methods:

The table in SC B.11 contains test methods that are not used by the facility. Please add Method 3A to the table. Methods that need to be in the table are Methods 3A, 7E, and Method 9. All other listed methods in the table may be deleted.

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Specific Condition **B.14.** Annual Compliance Tests states " During each federal fiscal year (October 1st to September 30th), each EU shall be tested to demonstrate compliance with the emissions standards for VE and NOx. Annual compliance tests for these pollutants shall be performed on each unit for each fuel fired for 400 hours or more during the federal fiscal year. Unless specifically requested by the Compliance Authority pursuant to Rule 62-297.310(7)(b), F.A.C., periodic opacity tests are not required when firing natural gas.
[Rule 62-297.310(7), F.A.C.]"

This specific condition is contradictory for the VE and NOx test requirements. FPL requests the following changes to make it clear that an annual test is not required when only natural gas is fired.

Please change **B.14.** Annual Compliance Tests to the following "During each federal fiscal year (October 1st to September 30th), each EU shall be tested to demonstrate compliance with the emissions standards for VE and NOx **except as noted in Specific Conditions D.1 and D.2.**. Annual compliance tests for these pollutants shall be performed on each unit for ~~each~~ **liquid** fuel fired for 400 hours or more during the federal fiscal year. Unless specifically requested by the Compliance Authority

pursuant to Rule 62-297.310(7)(b), F.A.C., periodic opacity tests are not required when firing natural gas. [Rule 62-297.310(7), F.A.C.]"

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Specific Condition **No B.1**. Permitted Capacity:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum operation heat input rate is as follows:
Unit No. MMBtu/hr Heat Input Fuel Type
007, 008, 009
and 010
250 Natural Gas
250 Fuel Oil
See Appendix T.
[Rules 62-4.160(2), 62-204.800, and 62-210.200(PTE), F.A.C.]

FPL requests the condition be revised to reflect the following.

Specific Condition No.B.1 Permitted Capacity:

B.1. Permitted Capacity. The maximum operation heat input rate is limited for Emission Units 007, 008, 009, and 010 to
250 Natural Gas and 250 Fuel Oil
See Appendix T.
in accordance with a 3-hour block average that is limited at any given ambient temperature as identified on the curves attached in Appendix T of this permit for Natural Gas and Fuel Oil. The ambient temperature for heat input calculation or look up curves is equivalent to the compressor inlet temperature.
The heat input will be demonstrated annually in accordance with the 3-hour run time of the performance test and will be provided as a part of the test submittal.
The CEMs Data Handling & Acquisition System (DAHS) calculated heat input shall not be used for compliance purposes.

(An estimated "real time" heat input value can be calculated for agency compliance inspectors upon request. The averaging time for the estimated heat input will be a 3-hour block that may utilize fuel flow or tank drop data to determine the fuel usage which will be multiplied by the last available heating value of the fuel. If sampling is needed to determine the current heat input value, the adjusted heat input value will be provided to the inspector after test results are received for the heat value of the fuel and a corrected fuel heat input is calculated.)
Heat input is not required to be recorded other than the instances as addressed previously in this condition.

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Section V, Appendices: FPL requests revision to the statement "**The Following Appendices Are Enforceable Parts of This Permit:**"

Some of the Appendices listed are an attachment of regulations. All appendices in the list that contain copies of rules should be labeled for "convenience purposes". These regulations do not have a "blanket " applicability as the statement implies..

FPL suggests modifying the statement to: "**The Following Appendices Are Supporting Documents for the Air Operating Permit and are Enforceable as allowed by rule applicability.**"

- The following refers to Attachment: "Table 1 and 2 2008.pdf"
- Page 4 and 5 of 6

Table 2-1 needs to be corrected per the marked up copies attached

Thanks for your consideration in this matter, and, if you should have any questions, please do not hesitate to contact Mary Archer at (561) 691-7057.

Sincerely,

Gary Kowalczyk

Gary Kowalczyk
Plant General Manager
Putnam Power Plant
Florida Power and Light Company

Cc: Tom Cascio, FDEP;
District Office, FDEP

Table 2-1, Summary of Compliance Requirements

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Emissions Unit	Brief Description
003	Combustion Turbine for Combined Cycle Heat Recovery Steam Generator, HRSG11. The maximum heat input at 85 degrees F ambient temperature for natural gas and fuel oil is 968.3 MMBtu/hr and 910.6 MMBtu/hr, respectively.
004	Combustion Turbine for Combined Cycle Heat Recovery Steam Generator, HRSG12. The maximum heat input at 85 degrees F ambient temperature for natural gas and fuel oil is 968.3 MMBtu/hr and 910.6 MMBtu/hr, respectively.
005	Combustion Turbine for Combined Cycle Heat Recovery Steam Generator, HRSG21. The maximum heat input at 85 degrees F ambient temperature for natural gas and fuel oil is 968.3 MMBtu/hr and 910.6 MMBtu/hr, respectively.
006	Combustion Turbine for Combined Cycle Heat Recovery Steam Generator, HRSG22. The maximum heat input at 85 degrees F ambient temperature for natural gas and fuel oil is 968.3 MMBtu/hr and 910.6 MMBtu/hr, respectively.

Pollutant or Parameter	Fuel(s)	Compliance Method	Testing Frequency	Frequency Base Date[1]	Minimum Compliance Test Duration	CMS[2]	See Permit Condition(s)
SO_2	Oil	Fuel analysis, the fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90(95), ASTM D1552-95, ASTM D1266-91, or both ASTM D4057-88 and ASTM D129-95 (or latest edition)	Upon each fuel delivery	Upon each fuel delivery		No	**A.12. & A.13.**
VE	Oil ~~or Natural Gas~~	DEP Method 9	~~*3~~ Annual	September 30	One hour	No	**A.11.** ~~3 x A.15~~ ←
SO_2	Oil	Measure wind velocity and direction, at hourly intervals in the plant vicinity, only for those hours during which any combustion turbine at the plant burns fuel oil containing more than 0.50% S, by wt.	As required			No	**A.10.**

Table 2-1, Summary of Compliance Requirements Continued

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Emissions Unit	Brief Description
007	Duct Burners for Combined Cycle Heat Recovery Steam Generator, HRSG11. The maximum heat input is 250 MMBtu/hr.
008	Duct Burners for Combined Cycle Heat Recovery Steam Generator, HRSG12. The maximum heat input is 250 MMBtu/hr..
009	Duct Burners for Combined Cycle Heat Recovery Steam Generator, HRSG21. The maximum heat input is 250 MMBtu/hr.
010	Duct Burners for Combined Cycle Heat Recovery Steam Generator, HRSG22. The maximum heat input is 250 MMBtu/hr.

Pollutant or Parameter	Fuel(s)	Compliance Method	Testing Frequency	Frequency Base Date[1]	Minimum Compliance Test Duration	CMS[2]	See Permit Condition(s)
SO_2	Oil	Maintain fuel receipts as described in 40 CFR 60.49b.	Fuel supplier certification			No	**B.18.**
VE	Oil ~~or Natural Gas~~	EPA Method 9	*3 Annual	September 30	One hour	Yes, when burning fuel oil	**B.11.** 3 * B.14
NO_x	Oil ~~or Natural Gas~~	EPA Methods 7E and 3A, of 40 CFR 60. Appendix A	*3 Annual	September 30	3 hours	No	**B.11.** 3 * B.14

Table 2-1, Summary of Compliance Requirements Continued

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Emissions Unit	Brief Description
011	Auxiliary boiler with a maximum heat input for natural gas and No. 2 fuel oil of 16.275 MMBtu/hr and 14.28 MMBtu/hr, respectively.

Pollutant or Parameter	Fuel(s)	Compliance Method	Testing Frequency	Frequency Base Date[1]	Minimum Compliance Test Duration	CMS[2]	See Permit Condition(s)
SO_2	Oil	Certification from the fuel supplier, as described under 40 CFR 60.48c.	Fuel supplier certification			No	**C.14.**

Notes:

[1] Frequency base date established for planning purposes only: see Rule 62-297.310, F.A.C.
[2] CMS = continuous monitoring system
3 Testing is required when >400hours of liquid Fuel is burned annually