Florida Power & Light Company, Environmental Services Dept., P.O. Box 14000, Juno Beach, FL 33408

FPL

November 10, 1997

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

Re: Draft Permit No. 1070014-001-AV
Heat Input Information for Oil Firing
FPL Putnam Plant Initial Title V Permit

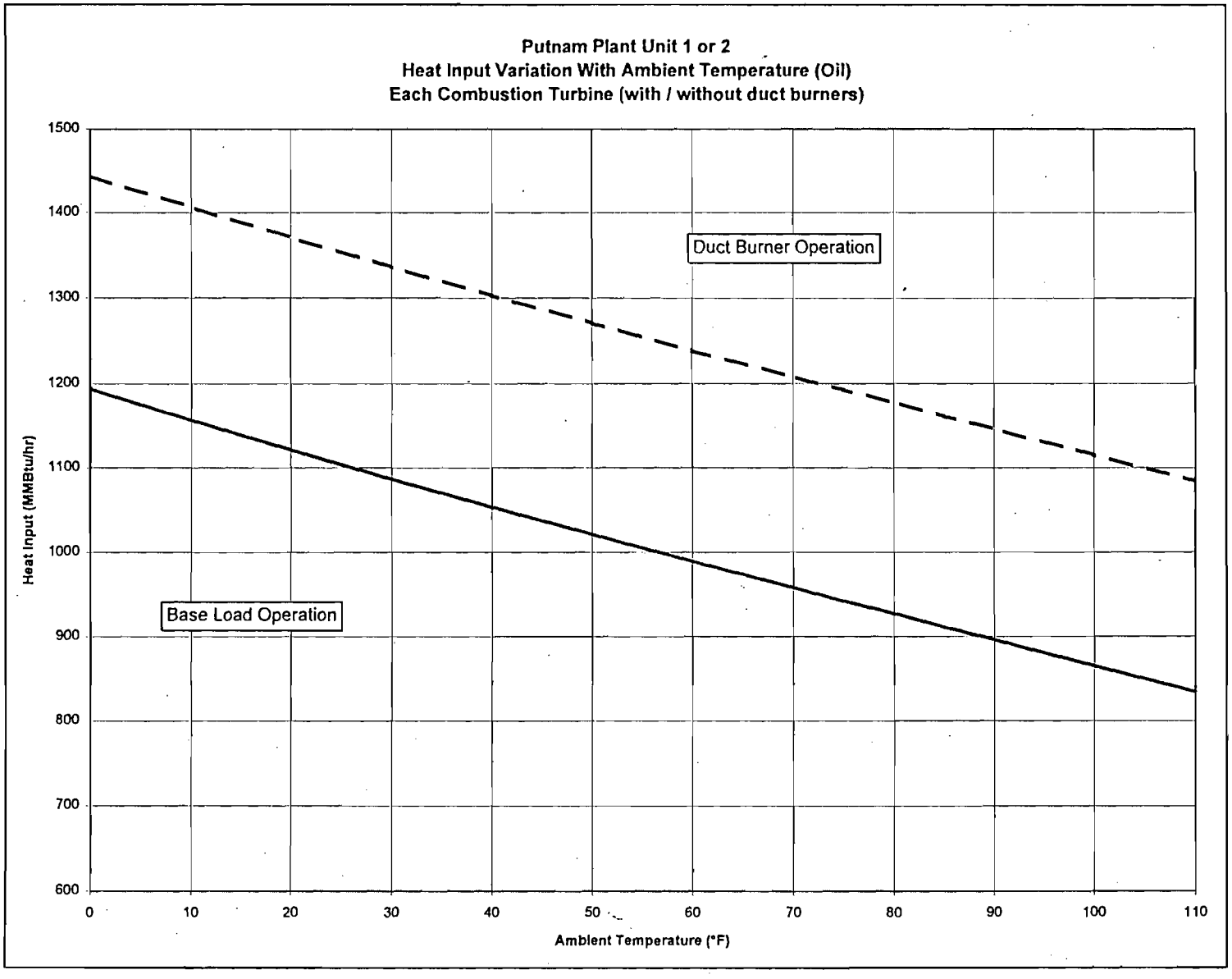
Dear Mr. Sheplak:

Attached for your use please find a graph of the ambient temperature vs. heat input data for the Putnam plant combustion turbine units for distillate oil firing.

If you have any questions, please do not hesitate to contact me at (561) 691-7058.

Very truly yours,

Rich Piper
Senior Environmental Specialist
Florida Power & Light Company


Putnam Plant Unit 1 or 2
Heat Input Variation With Ambient Temperature (Oil)
Each Combustion Turbine (with / without duct burners)
Heat Input (MMBtu/hr)
1500
1400
1300
1200
1100
1000
900
800
700
600
Duct Burner Operation
Base Load Operation
0
10
20
30
40
50
60
70
80
90
100
110
Ambient Temperature (°F)

Florida Power & Light Company, Environmental Services Dept., P.O. Box 14000, Juno Beach, FL 33408

FPL

September 18, 1997

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

Re: Draft Permit No. 1070014-001-AV
FPL Putnam Plant Initial Title V Permit

Dear Mr. Sheplak:

Enclosed for your use please find a copy of the heat input vs. ambient temperature graph for the subject facility.

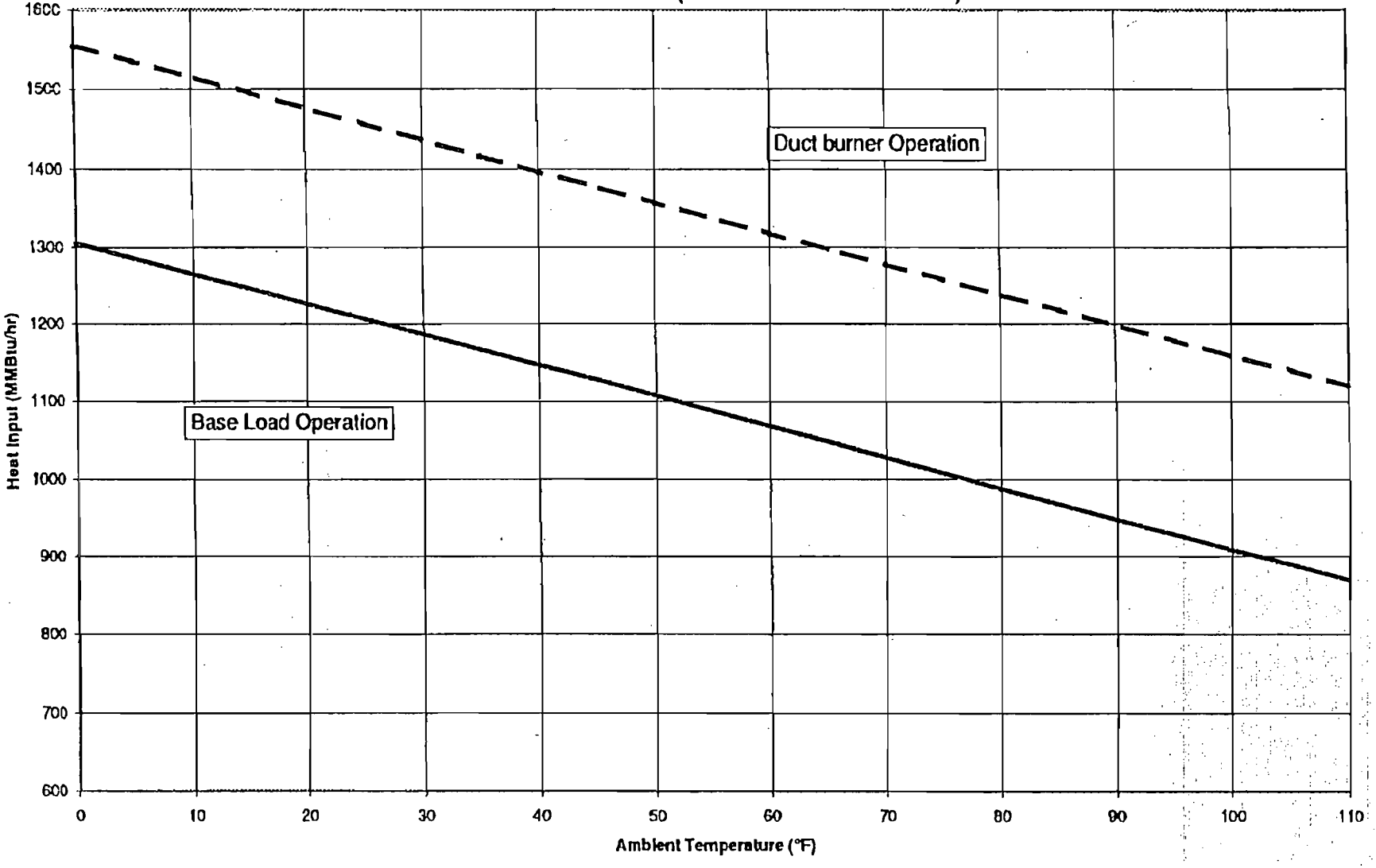
If you have any questions, please do not hesitate to contact me at (561) 691-7058.

Very truly yours,

Richard Piper
Senior Environmental Specialist
Florida Power & Light Company

cc: Pat Wilson PPN / PPN

Putnam Plant Unit 1 or 2
Heat Input Variation With Ambient Temperature
Each Combustion Turbine (with / without duct burners)



HI Limit Chart 1
9/12/97 2:32 PM

Florida Power & Light Company, Environmental Services Dept., P.O. Box 14000, Juno Beach, FL 33408

FPL

November 10, 1997

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

Re: Draft Permit No. 1070014-001-AV
Heat Input Information for Oil Firing
FPL Putnam Plant Initial Title V Permit

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Attached for your use please find a graph of the ambient temperature vs. heat input data for the Putnam plant combustion turbine units for distillate oil firing.

If you have any questions, please do not hesitate to contact me at (561) 691-7058.

Very truly yours,

Rich Piper
Senior Environmental Specialist
Florida Power & Light Company

11/18/97 cc: Joe Kahn
Susan DeVore

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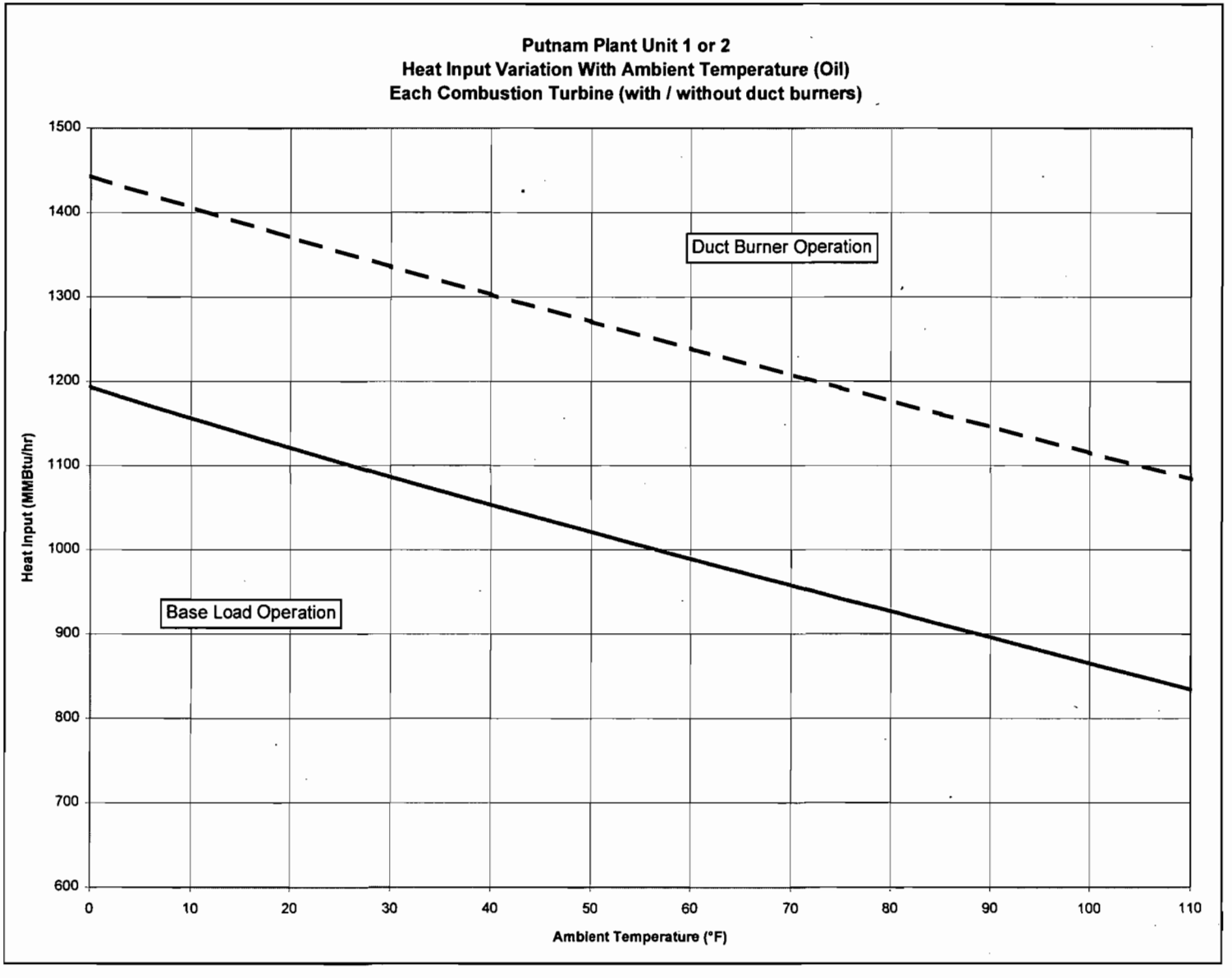
AIR REGULATION


Putnam Plant Unit 1 or 2
Heat Input Variation With Ambient Temperature (Oil)
Each Combustion Turbine (with / without duct burners)
Heat Input (MMBtu/hr)
1500
1400
1300
1200
1100
1000
900
800
700
600
Duct Burner Operation
Base Load Operation
0
10
20
30
40
50
60
70
80
90
100
110
Ambient Temperature (°F)

Florida Power & Light Company, Environmental Services Dept., P.O. Box 14000, Juno Beach, FL 33408

FPL

September 18, 1997

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

Re: Draft Permit No. 1070014-001-AV
FPL Putnam Plant Initial Title V Permit

Dear Mr. Sheplak:

Enclosed for your use please find a copy of the heat input vs. ambient temperature graph for the subject facility.

If you have any questions, please do not hesitate to contact me at (561) 691-7058.

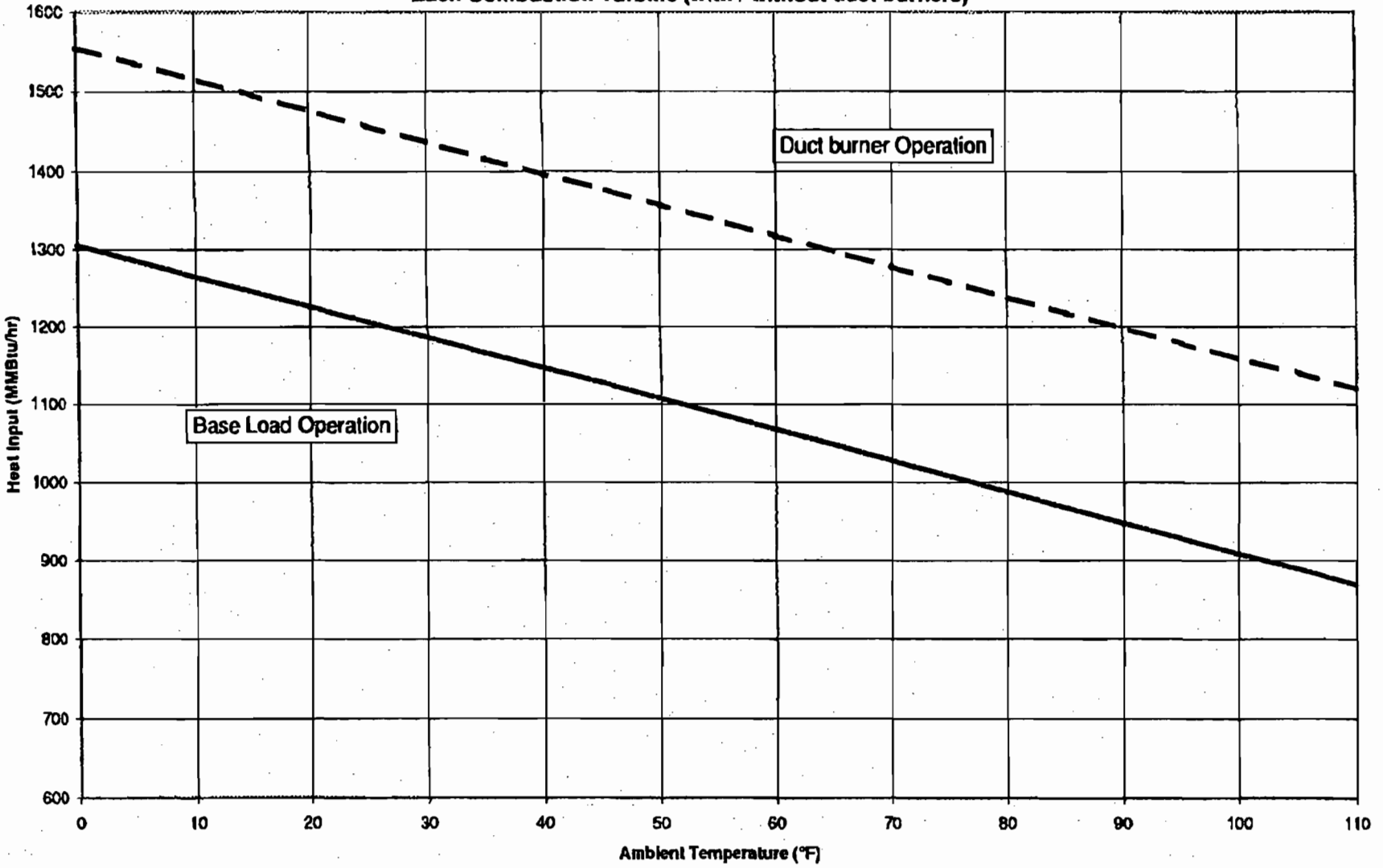
Very truly yours,

Richard Piper
Senior Environmental Specialist
Florida Power & Light Company

cc: Pat Wilson PPN / PPN

9/22/97 cc: Scott Sheplak
Susan DeVore
Joe Kahn

Putnam Plant Unit 1 or 2
Heat Input Variation With Ambient Temperature
Each Combustion Turbine (with / without duct burners)



HI Limit Chart 1
9/12/97 2:32 PM

FPL
ENVIRONMENTAL SERVICES DEPARTMENT
PO BOX 14000
JUNO BEACH, FLORIDA 33408

DATE: September 12, 1997

SEND TO:

NAME: Joe Kahn

COMPANY: FDEP

FAX NUMBER: 850 922 6979

PHONE NUMBER:

FROM: RICH PIPER

PHONE NUMBER: (561) 691- 7058

FAX NUMBER: (561) 691- 7070

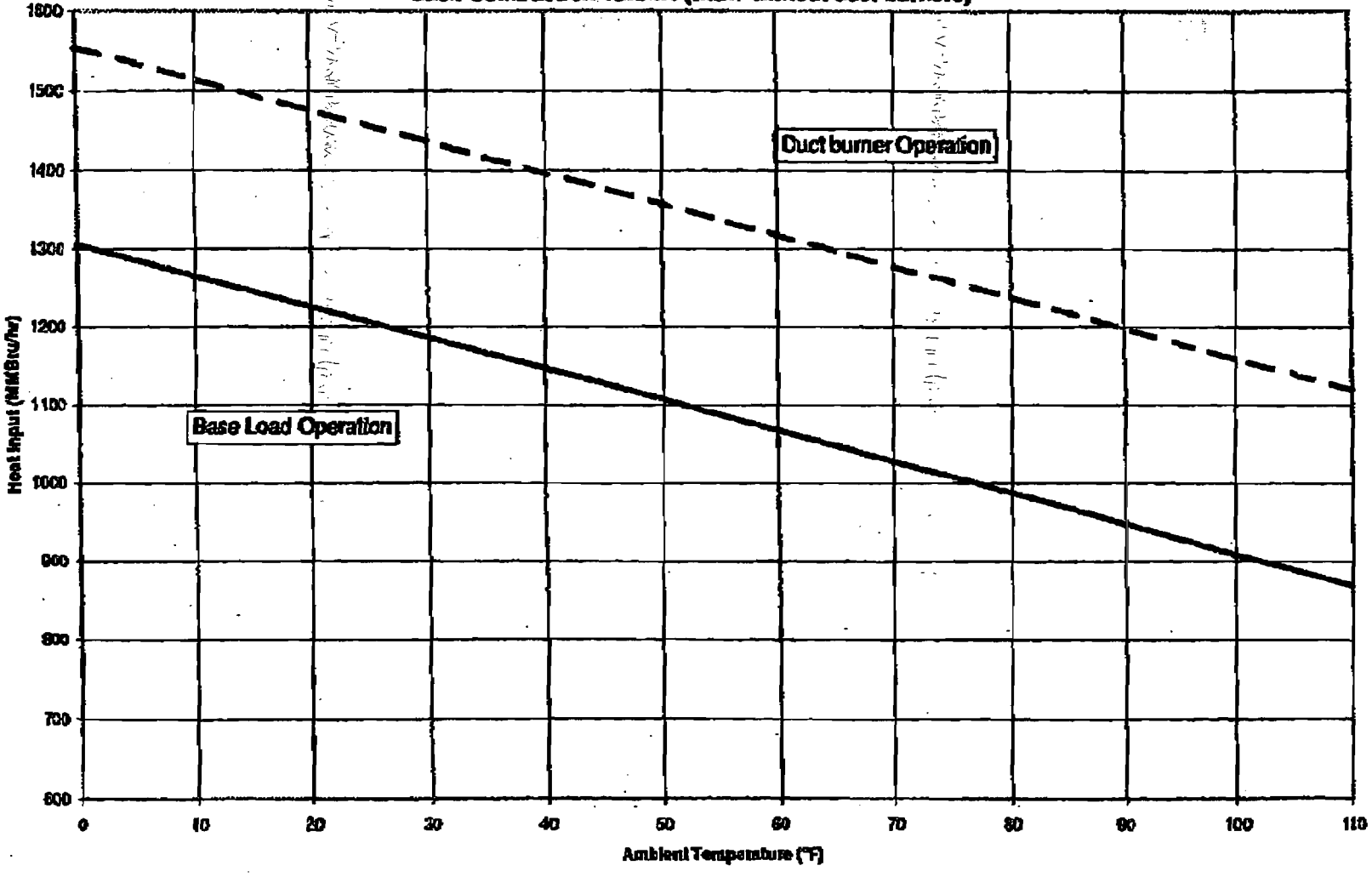
NUMBER OF PAGES (INCLUDING COVER SHEET): 2

COMMENTS/INSTRUCTIONS:

Putnam Plant heat input → the number to use as a reference in the various places in the permit is 12625 mmBTU's at 10°F.

Rich

Putnam Plant Unit 1 or 2
Heat Input Variation With Ambient Temperature
Each Combustion Turbine (with / without duct burners)



HI Limit Chart 1
9/12/97 2:32 PM

Florida Power & Light Company, Environmental Services Dept., P.O. Box 14000, Juno Beach, FL 33408

FPL

Vf: Je

Post-it™ Fax Note 7671	Date 9-12-97	# of pages ▶ 3
To Scott Sheplak	From RICH PIPER	
Co./Dept. FDEP	Co. FPL	
Phone #	Phone # 561 691 7058	
Fax # 850 922 6979	Fax #	

September 10, 1997

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

Re: Draft Permit No. 1070014-001-AV
FPL Putnam Plant Initial Title V Permit

Dear Mr. Sheplak:

After reviewing the subject draft Title V permit, FPL has identified several issues which need to be addressed. Please contact me at your earliest convenience to discuss them.

Subsection A.

Page 6 of 29 - Essential Potential to Emit (PTE) Parameters – Permitted Capacity The mmBtu/hr Heat Input values do not identify the temperature at which these heat inputs were derived. This section should read:

Unit No.	mmBtu/hr Heat Input	Fuel Type
003, 004, 005, 006	968.3 (at 85 degrees F ambient temperature)	Natural Gas
	910.6 (at 85 degrees F ambient temperature)	Fuel Oil

Subsection B.

Page 9 of 29 – This section addresses the following emissions units: The descriptions for emission units 007 through 010 are incorrect. This second sentence for emission units 007 through 010 should read "This emissions unit consists of duct burners for the heat recover steam generator, HRSG11", "This emissions unit consists of duct burners for the heat recover steam generator, HRSG12", "This emissions unit consists of duct burners for the heat recover steam generator, HRSG21", "This emissions unit consists of duct burners for the heat recover steam generator, HRSG22" respectively.

Page 10 of 29 – B.10.Annual Tests Required – VE and NOx : FPL tests for these have demonstrated negative NOx emissions by difference . FPL requests that the frequency of testing be changed to once every five years unless liquid fuel is fired in the units for more than 400 hours per year.

Subsection C.

Page 14 of 29 – C.6. Reporting and Record Keeping Requirements (2) , (3) , (4) –These conditions relate to the SO_2 emission rate calculation and reporting when combusting Fuel Oil. The Natural Gas SO_2 emission rates for this unit is 0.01 lb/hr. These statements should be preceded with "For any period in which Fuel Oil is combusted, ..." to identify those requirements associated with the combustion of Fuel Oil.

Subsection D.

Page 19 of 29 D.9. Operating Rate During Testing The permitted capacity of the Emission Units 003, 004, 005, and 006 should refer to the Heat Input associated with variable ambient operating temperatures. The combustion turbine heat input versus temperature curves should be the basis for determining the 90 % to 100 % test requirement. FPL will provide the Heat Input versus Ambient Temperature curves for the combustion turbine units.

Subsection E.

Page 22 of 29 E.1. NSPS Common Conditions Sections (c) (1) does not apply to these units. FPL does not use Continuous Opacity Monitoring System (COMS) for the NSPS units. FPL requests that this language be removed from the permit for clarity.

Page 25 of 29 E.3. Compliance With Standards And Maintenance Requirements Sections (d) (5) does not apply to these units. FPL does not use Continuous Opacity Monitoring System (COMS) for the NSPS units. FPL requests that this language be removed from the permit for clarity.

Page 25 of 29 E.5. Monitoring Requirements All Sections. FPL requests that references to Continuous Opacity Monitoring Systems and COMS be removed from the permit for clarity. This language is unnecessary.

Appendix S – Permit Summary Tables

Page S1 of (6) Table 1-1. Summary of Air Pollutant Emission Standards The Description for Emission Units 003, 004, 005, and 006 does not identify the temperature at which the heat inputs were derived. The description should be modified so that the second sentence for each of these emission units reads "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."

Page S4 of (6) Table 2-1. Summary of Compliance Requirements The Description for Emission Units 003, 004, 005, and 006 does not identify the temperature at which the heat inputs were derived. The description should be modified so that the second sentence for each of these emission units reads "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."

Thank you once again for your assistance in resolving these issues. If you have any questions, please do not hesitate to contact me at (561) 691-7058.

Very truly yours,

Rich Piper
Senior Environmental Specialist
Florida Power & Light Company

Florida Power & Light Company, P.O. Box 14000, Juno Beach, FL 33408-0420

FPL

August 26, 1997

Ms. Virginia B. Wetherell, Secretary
State of Florida
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

Re: Change of Responsible Official Designation
Title V Program

Dear Ms. Wetherell:

This correspondence is to certify that Ms. Roxane Kennedy has replaced Mr. Tom Bethea as Plant General Manager of the FPL Putnam power plant. As Plant General Manager, Ms. Kennedy is authorized to act as the "Responsible Official" for the Putnam facility, pursuant to State Rule 62-213.200, F.A.C.. Ms. Kennedy is hereby authorized to act on behalf of Florida Power & Light Company on all Title V permit related activities for the facility named above.

Sincerely,

A. Alfonso

Adalberto Alfonso
Vice President
Power Generation Business Unit
Florida Power & Light Company

cc:
Scott Sheplak FDEP DARM
Mort Benjamin FDEP Northeast District

9/4/97 Susan DeVore
Joe Kahn

Florida Power & Light Company, P.O. Box 14000, Juno Beach, FL 33408-0420

FPL

August 8, 1997

Mr. Tom Cascio
State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: FPL Putnam Plant

Title V Permit

Dear Mr. Cascio,

This correspondence is in response to Mr. Scott M. Sheplak's letter of May 13, 1997. Following are responses to each of the concerns raised in Scott's letter:

Facility Information

1. Facility Regulatory Classifications, Section A, page2, number 9, is marked that emissions units are subject to NESHAP. It appears that this item was only marked because units at the facility may be subject to some of the requirements of 40 CFR 61, Subpart M. Please confirm or clarify.

Response: PPN has been marked as subject to NESHAP because units at the facility are subject to some requirements of 40 CFR 61, Subpart M.

2. In Facility Pollutants, Section C, page 3, what does "HAP" refer to? (Note that HAP is listed elsewhere in each of the regulated emissions unit pollutant sections, Section G, also.)

Response: The references to HAP should have been "HAPS" for Sections C and G of each of the regulated emission units.

3. The document identified in Facility Supplemental Information, Section E, page 2, item 11, Identification of Additional Applicable Requirements, PPNFS_11.doc, appears to be missing. Please provide a copy of this document.

Response: The reference to the document was in error and should read "N/A" (Not Applicable). Additional applicable requirements are listed in each of the Emission Unit sections of the application.

4. Also in Section E, on the Facility Plot Plan, Attachment FS-2, a sandblast pit is shown but not mentioned in the rest of the application. Please provide information indicating whether this is an unregulated emission unit or exempt activity.

Response: The sandblasting pit has been included in the request for exemption as an Unregulated Emission Unit. Sandblasting activities are discussed in attachment PMTFS_4.txt of the Facility Information Section. The paint shop facility is included in the Unregulated Activities Section under the proposed unregulated activity Painting of Plant Equipment.

Emission Unit Information

Gas Turbines

1. The Comments fields in the Continuous Monitor Sections (Section J, item 7) for carbon dioxide and nitrogen dioxides refer to 40 CFR 75, Appendix E, Eqn E-3. We are unable to find this equation. Please supply this equation and any pertinent information.

Response: The Continuous Monitor Comment (Section J, item 7) for each of the Gas Turbine units should read: "The CO2 data is calculated using 40 CFR 75 Appendix G, eqn G-4, due to the absence of a flow monitor."

2. The document identified in Emissions Unit Supplemental Information, Section L, page 1, item 3, Detailed Description of Control Equipment, PPNU1_3.txt, appears to be missing. Please provide a copy of this document, or specify that this document is not applicable.

Response: The reference to the document was in error, the comment should read NA (Not Applicable).

3. The document identified for the unit 1 GT1 combustion turbine in Emission Unit Supplemental Information, section L, page 2, item 12, Identification of Additional Applicable Requirements, PPNU1_13.txt, appears to be labeled as PPNU1_12.txt. Note that for each of the other gas turbines, this item refers to PPNU1_13.txt, even though separate documents were submitted for each turbine. Please clarify.

Response: The document specified in Emission Unit 1, section L, page 2, item 12, Identification of Additional Applicable Requirements should read "PPNU1_12.txt". The same reference for Emission Unit 2 should read "PPNU2_12.txt", the reference for Emission Unit 3 should read "PPNU3_12.txt", and the reference for Emission Unit 4 should read "PPNU4_12.txt.

Duct Burners

1. For each of the ductburners, sulfur dioxide is listed as an emission limited pollutant in section G, Emission Unit Pollutants. However, no pollutant detail information was submitted in Section H for sulfur dioxide. Please submit this information.

Response: The requested information has been provided as an attachment.

2. The documents identified for the unit 1 GT 1 ductburner in Emissions Unit Supplemental Information, Section L, items 3, 4, 6, and 10, were not submitted. Note that for each of the other ductburners, these items refer to the documents for 1 GT 1. Please submit these documents.

Response: The reference to the document in Item 3 of Section L for each of the ductburners was in error. Item 3 should be changed to Not Applicable (NA) for each ductburner. The reference to the document in Item 4 of Section L for each of the ductburners was in error. There are no separate stack sampling facilities for the ductburners. Item 4 for each of the ductburners should be changed to reference PPNU1_1.bmp. The document referenced in Item 6, PPNU5_6.txt has been provided as an attachment for unit 1 GT 1 ductburner. Attachments for 1 GT 2 ductburner, 2 GT 1 ductburner, 2 GT 2 ductburner have been provided as attachments PPNU6_6.txt, PPNU7_6.txt and PPNU8_6.txt respectively. The document referenced in Item 10, PPNU5_10.txt has been provided as an attachment for unit 1 GT 1 ductburner. Attachments for 1 GT 2 ductburner, 2 GT 1 ductburner, 2 GT 2 ductburner have been provided as attachments PPNU6_10.txt, PPNU7_10.txt and PPNU8_10.txt respectively.

3. The document identified for the unit 1 GT 1 ductburner in Emissions Unit Supplemental Information, Section L, item 12, Identification of Additional Applicable Requirements, PPNU5_13.txt, appears to be labeled as PPNU5_12.txt. Note that for each of the other ductburners, this item refers to PPNU5_13.txt, even though separate documents (with different information) were submitted for each turbine. Please clarify.

Response : The reference for item 12 of Section L for 1 GT 1 ductburner should read PPNU5_12.txt. Additionally, the reference for item 12 for 1 GT 2 ductburner should read PPNU6_12.txt , the reference for item 12 for 2 GT 1 ductburner should read PPNU7_12.txt , the reference for item 12 for 2 GT 2 ductburner should read PPNU8_12.txt

4. In Section L, item 14, for each ductburner, "Previously Submitted" should have been entered in the Acid Rain Application Phase II form information blank instead of "Not Applicable" since the Department received the application dated 12/4/95, signed by William M. Reichel.

Response: The references for each ductburner were in error and should read "Previously Submitted".

Auxiliary Boiler

1. The document identified for the auxiliary boiler in Emissions Unit Supplemental Information, Section L, item 10, PPNU9_10 was not submitted. Please submit this document.

Response: The reference to the document in Item 10 of Section L for each of the Auxiliary Boiler was in error. Item 10 should be changed to Not Applicable (NA).

2. In Emissions Unit Supplemental Information, Section L, item 12, Identification of Additional Applicable Requirements, is marked "Not Applicable", although a document PPNU_12, identified as Identification of Additional Applicable Requirements, was submitted. Please clarify.

Response: The reference to item 12 in Section L which read "Not Applicable" *was in error. The reference for Item 3 should read "PPNU_12.txt" which was previously submitted.*

Unregulated Emissions Units

1. Please review the activities listed in Attachment PPN-FW and determine which activities qualify for exemption or are unregulated emission units. Please propose exemption only for those activities that are stationary sources of air pollution that qualify for exemption under the provisions of Rule 62-213.420(6), F.A.C., pursuant to Rule 62-213.420(3)(m), F.A.C. Please identify unregulated emission units in attachment PPN-FW and indicate any that emit pollutants greater than the threshold levels specified in Rules 62-213.420(3)(c)3 and 4, F.A.C. Please revise and resubmit the attachment and list only unregulated emission units and exempt activities. Please do not list trivial activities at all on the revised list.

Response: The majorities of the activities are, in fact trivial, and have been eliminated from our list per your request. ***Activities requested for exemption*** *are as follows:*

Item	Rationale
Gas metering area relief valves	Safety equipment is exempted by Rule 62-210.300(3)(a) 22 F.A.C.
Hydrazine mixing tank & relief valves	This is a 33% aqueous product. Typically the facility uses 110-gallons per year; therefore the emissions of hydrazine are below the 1,000-lb. threshold.
Fuel Oil storage tanks and related equipment	Combined VOC emissions of the fuel oil storage tanks & equipment are less than the 5 ton threshold.
Lube Oil tank vents & extraction vents	These items concern lubricating oils which have a low volatility. There is insufficient quantity on hand as the facility to produce a 5-ton release.

Oil / Water Separators and related equipment	VOC's are below the 5-ton threshold. There is insufficient quantity on hand at the facility to produce a 5-ton release.
Sandblasting Facility	Operation of the sandblasting facility is maintained in accordance with Rule 17.296.310 F.A.C.
Fire Protection Equipment	Fire Safety equipment is exempted by Rule 62-210.300(3)(a) 5 F.A.C.
Miscellaneous mobile vehicle operation (cars, light trucks, heavy-duty trucks, backhoes, tractors, forklifts, cranes, etc.)	Exempted by Rule 62-210.300(3)(a) 5.

Unregulated Activities are proposed as follows:

Emergency Diesel Generator
(NOx, CO, VOC, PM, and SO2 could each exceed 5 tons per year if operated 8,760 hours)

Painting of Plant equipment & Non-halogenated solvent cleaning operations
(Combined VOC emissions from these activities combined could exceed 5 tons per year)

Miscellaneous mobile equipment & internal combustion engines.
(Combined NOx emissions could exceed 5 tons per year)

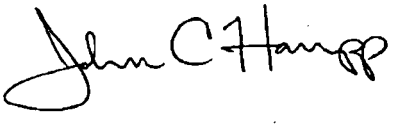
2. Are there any heaters associated with the storage and delivery systems for the number 6 fuel oil? If so, please describe.

Response: There are no number 6 fuel oil heaters used at the Putnam facility.

No other pollutants approach the relevant permitting thresholds.

Should you have any questions, or need any additional information, you may contact me by telephone at (561) 691-2894 or at the address provided below.

Sincerely,



John C. Hampp
Sr. Regulatory Specialist
Florida Power & Light Company

P 263 584 965

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail *(See reverse)*

Sent to Tom Bethea / Fla. Power and Light Co.	
Street & Number 11770 U.S. Highway One	
Post Office, State, & ZIP Code N. Palm Bch., FL 33408	
Postage	$
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Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date 05-13-97	

PS Form **3800**, April 1995

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:
Mr. Tom Bethea, Plant General Manager
Florida Power and Light Company
11770 U.S. Highway One
North Palm Beach, Florida 33408

4a. Article Number P 263 584 965

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery 5/19/97

5. Signature (Addressee)

6. Signature (Agent)

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

Thank you for using Return Receipt Service.

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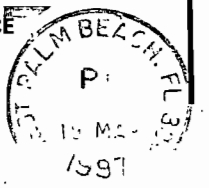

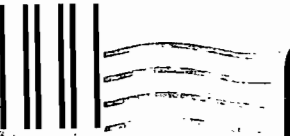

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Official Business

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MAY 22 1997

BUREAU OF AIR REGULATION

Print your name, address and ZIP Code here

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR RESOURCES MANAGEMENT
BUREAU OF AIR REGULATION - TITLE V
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

FLORIDA

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

May 13, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Tom Bethea
Plant General Manager
Florida Power and Light Company
11770 U.S. Highway One
North Palm Beach, FL 33408

Re: Request for Additional Information Regarding Initial Title V Permit Application
File No. 1070014-001-AV
Putnam Plant, Putnam County

Dear Mr. Bethea:

Your initial Title V permit application for the Putnam Plant was "timely and complete" for purposes of the initial Title V application submission (see Rule 62-213.420(1)(a)1. and (b)2., F.A.C.).

However, in order to continue processing your application, the Department will need the below additional information pursuant to Rule 62-213.420(1)(b)3., F.A.C., and Rule 62-4.070(1), F.A.C. The additional information requested is organized by topic.

Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

Facility Information

1. Facility Regulatory Classifications, Section A, page 2, number 9, is marked that emissions units are subject to NESHAP. It appears that this item was only marked because units at the facility may be subject to some of the requirements of 40 CFR 61, Subpart M. Please confirm or clarify.

2. In Facility Pollutants, Section C, page 3, what does "HAP" refer to? (Note that HAP is listed elsewhere in each of the regulated emissions unit pollutant sections, Section G, also.)

3. The document identified in Facility Supplemental Information, Section E, page 2, item 11, Identification of Additional Applicable Requirements, PPNFS_11.doc, appears to be missing. Please provide a copy of this document.

Date: 8/26/97 3:47:53 PM
From: Elizabeth Walker TAL
Subject: New posting
To: See Below

There is a new posting available on the Florida Website

FLORIDA POWER & LIGHT COMPANY
PUTNAM POWER PLANT 1070014001AV Draft

The notification letter is encoded and attached. Please let me know if you have any questions.

Thanks,
Elizabeth

Department of Environmental Protection

Division of Air Resource Management

RESPONSIBLE OFFICIAL NOTIFICATION FORM

Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.

Identification of Facility

1. Facility Owner/Company Name: FLORIDA POWER & LIGHT COMPANY
2. Site Name: PUTNAM PLANT
3. County: PUTNAM
4. Title V Air Operation Permit/Project No. *(leave blank for initial Title V applications)*: 1070014-004-AV

Notification Type *(Check one or more)*

- ☐ **INITIAL**: Notification of responsible officials for an initial Title V application.
- ☐ **RENEWAL**: Notification of responsible officials for a renewal Title V application.
- ☒ **CHANGE**: Notification of change in responsible official(s).
  Effective date of change in responsible official(s): _____

Primary Responsible Official

1. Name and Position Title of Responsible Official: JIM COAKLEY PLANT MANAGER
2. Responsible Official Mailing Address:
   Organization/Firm: FPL PUTNAM PLANT
   Street Address: 3925 HWY 17 SOUTH
   City: EAST PALATKA State: FLA Zip Code: 32131
3. Responsible Official Telephone Numbers:
   Telephone: (386) 329-4644 Fax: (386) 329-4699
4. Responsible Official Qualification *(Check one or more of the following options, as applicable)*:

[X] For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.

[ ] For a partnership or sole proprietorship, a general partner or the proprietor, respectively.

[ ] For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.

[ ] The designated representative at an Acid Rain source.

5. Responsible Official Statement:

I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.

J.W. G — 9/10/02

Signature Date

Additional Responsible Official

1. Name and Position Title of Responsible Official:
   ROD OVERBY PRODUCTION MANAGER.
2. Responsible Official Mailing Address:
   Organization/Firm: FPL PUTNAM PLANT.
   Street Address: 392 HWY 17 SOUTH.
   City: EAST PALATKA State: FLA Zip Code: 32131
3. Responsible Official Telephone Numbers:
   Telephone: (386)329 - 4642 Fax: (386)329 - 4699
4. Responsible Official Qualification *(Check one or more of the following options, as applicable)*:

[X] For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.

[ ] For a partnership or sole proprietorship, a general partner or the proprietor, respectively.

[ ] For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.

[ ] The designated representative at an Acid Rain source.

Additional Responsible Official

1. Name and Position Title of Responsible Official:
2. Responsible Official Mailing Address:
   Organization/Firm:
   Street Address:
   City: State: Zip Code:
3. Responsible Official Telephone Numbers:
   Telephone: ( ) - Fax: ( ) -
4. Responsible Official Qualification *(Check one or more of the following options, as applicable)*:

[ ] For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.

[ ] For a partnership or sole proprietorship, a general partner or the proprietor, respectively.

[ ] For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.

[ ] The designated representative at an Acid Rain source.

Florida Power & Light Company, Environmental Services Dept., P.O. Box 14000, Juno Beach, FL 33408

FPL

July 13, 1998

Ms. Virginia Wetherell, Secretary
State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Change of Responsible Official Designation
Title V Program

Dear Ms. Wetherell:

This correspondence is to certify that Mr. Robert Bergstrom has replaced Ms. Roxane Kennedy as Plant General Manager of the FPL Putnam Plant. As Plant General Manager Mr. Bergstrom is authorized to act as the "Responsible Official" for that facility, pursuant to State Rule 62-213.200, F.A.C. Mr. Bergstrom is hereby authorized to act on behalf of Florida Power & Light Company on all Title V permit related activities for the Putnam Plant.

Sincerely,

Adalberto Alfonso
Vice President
Power Generation Business Unit
Florida Power & Light Company

Cc: Scott Sheplak FDEP DARM
District

an FPL Group company

Florida Power & Light Company, Environmental Services Dept., P.O. Box 14000, Juno Beach, FL 33408

FPL

August 18, 1998

Ms. Virginia B. Wetherell, Secretary
State of Florida
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

Re: Change of Responsible Official Designation
Title V Program

Dear Ms. Wetherell:

This correspondence is to certify that Mr. Robert Bergstrom replaced Ms. Roxane Kennedy as Plant General Manager of the FPL Putnam power plant. As Plant General Manager, Mr. Bergstrom is authorized to act as the "Responsible Official" for the Putnam facility, pursuant to State Rule 62-213.200, F.A.C.. Mr. Bergstrom is hereby authorized to act on behalf of Florida Power & Light Company on all Title V permit related activities for the facility named above.

Sincerely,

Adalberto Alfonso
Vice President
Power Generation Business Unit
Florida Power & Light Company

cc:
Scott Sheplak FDEP DARM
Mort Benjamin FDEP Northeast District

Scott claim
AIR RES

Florida Power & Light Company, Environmental Services Dept., P.O. Box 14000, Juno Beach, FL 33408

FPL

July 13, 1998

Ms. Virginia Wetherell, Secretary
State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Change of Responsible Official Designation
Title V Program

Dear Ms. Wetherell:

This correspondence is to certify that Mr. Robert Bergstrom has replaced Ms. Roxane Kennedy as Plant General Manager of the FPL Putnam Plant. As Plant General Manager Mr. Bergstrom is authorized to act as the "Responsible Official" for that facility, pursuant to State Rule 62-213.200, F.A.C. Mr. Bergstrom is hereby authorized to act on behalf of Florida Power & Light Company on all Title V permit related activities for the Putnam Plant.

Sincerely,

Adalberto Alfonso
Vice President
Power Generation Business Unit
Florida Power & Light Company

Cc: Scott Sheplak FDEP DARM
District

an FPL Group company

File Copy - General

Florida Power & Light Company, P. O. Box 14000, Juno Beach, FL 33408-0420
700 Universe Boulevard

FPL

June 4, 1998

Mr. Bruce Mitchell, Environmental Administrator
Department of Environmental Protection
2600 Blair Stone Road
Mail Station 5505
Tallahassee, Florida 32399-2400

RE: FLORIDA POWER & LIGHT COMPANY ANNUAL EMISSION FEES - 1997

Dear Mr. Mitchell:

In response to your fax dated June 3, 1998, summarized below are the adjustments made by FPL and your Office from the initial wire transfer payment on February 24, 1998 for our 1997 Annual Emission Fees.

Total Remitted by Wire Transfer on 2/24/98		**$1,865,081.59**
Net Over-Payments by FPL (Wire vs Calculation Packages):		**(1,529.92)**
Putnam Plant	($1,536.92)	
Lauderdale Plant	7.00	
Net Under-Payment by FPL (Adjustments made by FDEP):		**348.66**
Putnam - Over-payment due to inclusion of SO2 limitation on natural gas	($ 173.82)	
Fort Myers - Under-payment due to an incorrect computation for NOx Emissions	522.48	
Total Adjusted 1997 FPL Annual Emission Fees:		**$1,863,900.33**
Net Over-Payment Due FPL:		**$ 1,181.26**

I hereby authorize your office to deduct the net under-payment by FPL in the amount of $348.66 from the net amount overpaid by our original wire transfer. Also per your request is a signed Application for Refund Form which is attached.

Please remit the amount due FPL to my attention: Mr. David W. Knutson, Florida Power & Light Company, P. O. Box 14000, Juno Beach, Florida 33408-0420.

Please contact Mike Szybinski at (561) 691-2898 or Scott Busa at (561) 691-2889 if you have any questions. Thank you for your assistance in this matter.

Very truly yours,

David W. Knutson
Manager Technical Services

DWK:mjs

cc: Richard Piper - JES/JB
Scott Busa - GPA/JB
File
Scott
Ed
Jonathan } 6-9-98 Pran

6-9-94 Original sent to F&A for processing BRM

DEP 14-081
DBF AA-4

REFUND REQUEST #: 3972

APPLICATION FOR REFUND FORM
THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OF FLORIDA, COUNTY OF _____

Pursuant to the provisions of Section 215.26, or Section _____*, Florida Statutes, I hereby apply for a refund and request that a State Warrant be drawn in favor of:

NAME: FLORIDA POWER AND LIGHT
ADDRESS: MR. RICH PIPER P.O. BOX 14000 JUNO BEACH, FL 33408-8801
FEID OR SS NUMBER:
AMOUNT: $1,181.26 DEPOSIT DATE: 24-FEB-98 DEPOSIT: 22498
DOCUMENT NUMBER: SYS RECEIPT#: 189131
REV OBJECT CODE: 2275 TITLE V MAJOR SOURCE

which represents moneys I paid into the State Treasury subject to refund, and to substantiate such claim the following facts are submitted:

REASON FOR CLAIM: OVER PAYMENT

CERTIFIED TRUE AND CORRECT this ___ day of _____, 19__.

* _____
Applicant's Signature

*Must be completed if authority is other than Section 215.26, Florida Statutes.

****

(FOR AGENCY USE ONLY)

(1) Agency recommends denial of above claim based on the following facts, including statutory authority for collection:

_____

OR

(2) Agency recommends approval of above claim and submits the following information to substantiate such claim. $1,181.26 was originally deposited into the State Treasury, Receipt _____, dated _____.

NAME OF ACCOUNT:

SAMAS ACCOUNT CODE
3720203500137_____00000000020000

Statutory Authority for Collection _____

It is requested that payment be made from:

NAME OF ACCOUNT:

SAMAS ACCOUNT CODE
3720203500137_____00000022000000

****

CERTIFIED TRUE AND CORRECT this ___ day of _____, 19__.

_____
Signature and Title of Authorized Person

****

SECTION 215.26 STATES, IN PART: "APPLICATION FOR REFUNDS AS PROVIDED BY THIS SECTION SHALL BE FILED WITH THE COMPTROLLER, EXCEPT AS OTHERWISE PROVIDED HEREIN, WITHIN 3 YEARS AFTER THE RIGHT TO SUCH REFUND SHALL HAVE ACCRUED ELSE SUCH RIGHT SHALL BE BARRED." Three years is interpreted as meaning three years from the date of payment into State Treasury.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW
ATLANTA, GEORGIA 30303-8909

MAR 16 1998

4APT-ARB

C.H. Fancy, Chief
Bureau of Air Regulation
Division of Air Resources Management
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399

SUBJ: Proposed Title V Permits for Florida Power & Light

Dear Mr. Fancy:

This is in response to your letter dated March 10, 1998, regarding proposed changes to seven Florida Power & Light (FP&L) proposed title V permits. These proposed permits were the subject of the U.S. Environmental Protection Agency's (EPA) December 11, 1997, objection. EPA Region 4 has completed its review of the Florida Department of Environmental Protection's (FDEP) proposed changes to the FP&L permits (and the associated Statements of Basis). Based on our review, we have one remaining comment which is outlined below.

On Page 4, Statement of Basis revision for the Manatee, Martin, Port Everglades, Riviera, and Turkey Point Permits, in order to avoid misinterpretation, we recommend that the State revise the paragraph as follows:

> "These units are subject to a steady-state PM emission limit of 0.1 lb/mmBtu, ~~which is effectively equivalent to 0.149 lb/mmBtu because of rounding,~~ and 0.3 lb/mmBtu for soot blowing ~~which is equivalent to 0.349 lb/mmBtu~~." FPL has presented historical PM test results which show that the steady-state and soot blowing average results are less than ~~half the applicable effective standards~~ 0.075 lb/mmBtu. The Department has determined that sources with steady-state emissions less than ~~half of the effective standard~~ 0.075 lb/mmBtu shall test annually. . . .

FDEP has adequately addressed all the issues outlined in EPA's December 11, 1997, objection letter and considers the objection to be resolved. Therefore, once all the proposed changes are incorporated into the seven FP&L permits, the State may proceed with permit issuance.

We commend you and your staff for facilitating the resolution of these issues with Florida Power & Light. If you have any further questions regarding this matter, please contact Carla Pierce, Chief, Operating Source Section at (404) 562-9099.

Sincerely,

R. Douglas Neeley
Chief
Air, Radiation &
Technology Branch

cc: Florida Power & Light

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW
ATLANTA, GEORGIA 30303-8909

4APT-ARB

Howard L. Rhodes, Director
Air Resources Management Division
Florida Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: EPA's Review of Proposed Title V Permits for Florida Power & Light

Dear Mr. Rhodes:

The purpose of this letter is to provide comments to the Florida Department of Environmental Protection (DEP) on the following proposed title V operating permits for Florida Power & Light (FP&L): Manatee Plant, Putnam Plant, Lauderdale Plant, Martin Plant, Port Everglades Plant, Riviera Plant, and Turkey Point Plant, which were consecutively posted on DEP's web site from October 31, 1997, to November 17, 1997. Based on the Environmental Protection Agency's (EPA's) review of these proposed permits and the supporting information for each plant, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. § 70.8(c) (see also Florida Regulation 62-213.450), to the issuance of all seven permits on the basis that the permits do not fully meet the periodic monitoring requirements of § 70.6(a)(3)(i). In addition, EPA objects to some of the proposed permits because they contain deviations from applicable requirements and some of the permits do not ensure practical enforceability of certain permit terms.

As you know, 40 C.F.R. § 70.8(c) requires EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information) if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 C.F.R. Part 70. Section 70.8(c)(4) and Section 505(c) of the Act further provide that if the State fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA and EPA will act accordingly. Because the objection issues must be fully addressed within the 90 days, we suggest that the revised permits be submitted in advance in order that any outstanding issues may be addressed prior to the expiration of the 90-day period.

Pursuant to 40 C.F.R. § 70.8(c), this letter and the enclosures to it provide a statement of EPA's reasons for its objection. Enclosures 1 through 7 contain a detailed

explanation of the objection issues specific to each permit and the changes necessary to make each permit consistent with the requirements of 40 C.F.R. Part 70. In some cases, the enclosure also contains general comments with regard to the individual permit.

With regard to the objection issue relating to periodic monitoring, EPA would like to emphasize that a permit that does not contain adequate periodic monitoring, does not meet the requirements of 40 C.F.R. Part 70. Florida rule 62-213.440(1)(b)1.b. states that each Part 70 permit shall specify the following requirements with respect to monitoring:

> "Where the applicable requirement does not specify a method for periodic testing or instrumental or noninstrumental monitoring, periodic monitoring sufficient to yield reliable data and demonstrate compliance with the permit. Such monitoring requirements shall assure use of recordkeeping terms, test methods, units, averaging periods, and other statistical conventions consistent with the applicable requirement."

The cited State regulation is based on 40 C.F.R. § 70.6(a)(3)(i)(B), which requires each Part 70 permit to contain the following requirements with respect to monitoring: "Where the applicable requirement does not require periodic testing or instrumental or noninstrumental monitoring (which may consist of recordkeeping designed to serve as monitoring), periodic monitoring sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit. . ."

Part 70's periodic monitoring requirements implement, in part, Section 504(a) of the Act, which requires that Part 70 permits contain "conditions as are necessary to assure compliance with applicable requirements of [the] Act, including the requirements of the applicable implementation plan" and Section 504(c), which requires "monitoring, compliance certification, and reporting requirements to assure compliance with the permit terms and conditions." In addition, Section 114 of the Act requires "enhanced monitoring" for major stationary sources. The EPA's recently-issued compliance assurance monitoring (CAM) rule indicates that Part 70 periodic monitoring satisfies enhanced monitoring under the Act for emissions units not subject to Part 64's CAM requirements. See 62 Fed. Reg. 54900, 54904 (Oct. 22, 1997).

In determining whether a permit application has appropriate periodic monitoring to assure compliance with all permit terms and conditions and all applicable requirements, a permitting authority must first determine whether an applicable requirement

already requires periodic testing or instrumental or noninstrumental monitoring. See 40 C.F.R. § 70.6(a)(3)(i)(B); 62-213.440(1)(b)1.b, F.A.C. Whether an underlying applicable requirement contains periodic monitoring or testing must be judged according to the criteria defining and governing periodic monitoring: namely, whether it is sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit. In order for each permit to include monitoring that is sufficient to assure compliance with all applicable requirements, an applicant or permitting authority may have to enhance or supplement monitoring or testing in an existing applicable requirement through periodic monitoring that yields reliable and representative compliance data.[1] Alternatively, the underlying applicable requirement may already contain monitoring or testing sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit, in which case the periodic monitoring requirement is satisfied and no additional monitoring is necessary.

We understand DEP's view of periodic monitoring to be that "additional monitoring requirements are to be imposed only when the applicable requirement does not specify or require any monitoring." [Letter from C.H. Fancy, Chief, Bureau of Air Regulation, Florida DEP to R. Douglas Neeley, Chief, Air and Radiation Technology Branch, Air, Pesticides and Toxics Management Division, U.S. EPA Region 4, (Nov. 6, 1997) (emphasis in original).] DEP has asserted that "[t]he 'adequacy' of such monitoring is not addressed nor defined in either Part 70 or Chapter 62-213, F.A.C." Id. We do not agree. As discussed above, periodic monitoring under Part 70 — which is identical in material respects to Florida's regulations — is defined by the criteria that govern the adequacy of periodic monitoring, whether that monitoring is contained in an applicable requirement or supplements an applicable requirement. All monitoring must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit.

One of our concerns is that DEP's view of periodic monitoring means that monitoring in an existing applicable requirement — no matter how infrequent and no matter how inadequate to the task of compliance assurance — may never be enhanced in order to assure compliance with an applicable

---

[1] See, e.g., 62 Fed. Reg. at 54904 ("Part 70 currently requires all title V operating permits to include monitoring to assure compliance with the permit. This includes all existing monitoring requirements as well as additional monitoring (generally referred to as 'periodic monitoring') if current requirements fail to specify appropriate monitoring. ...[E]xisting monitoring when supplemented as necessary by periodic monitoring is sufficiently enhanced for emissions units not subject to part 64.")

requirement of the Clean Air Act. We do not believe that this gives the meaning due "enhanced monitoring" under Section 114 of the Act. If existing monitoring is inadequate to assure compliance and we accept DEP's view that the adequacy of such monitoring may not be addressed through supplemental periodic monitoring, then Title V permits would not meet the statutory and regulatory requirement to contain monitoring that is adequate to assure compliance with all applicable requirements. An applicable requirement which contains any monitoring that recurs on some cyclical basis — which presumably could be once every year, five years, ten years or more — does not mean such monitoring is "periodic" for purposes of Title V and the Clean Air Act.

Where EPA determines that permits do not contain periodic monitoring that will assure compliance with a permit's terms and conditions, EPA may object to those proposed permits and require that any final issued permits be reopened to address any deficiencies. EPA Region 4 will work with DEP to determine whether any of the State's final issued permits must be reopened to address issues relative to periodic monitoring.

We regret that we were unable to resolve these issues with your office prior to the expiration of the 45-day review period. However, we are fully confident that Florida DEP will act to respond to these concerns in a timely manner. If you have any questions or wish to discuss this further, please contact Mr. Douglas Neeley, Chief, Air & Radiation Technology Branch or Ms. Carla Pierce, Chief, Operating Source Section at (404) 562-9105. Should your staff need additional information they may contact Ms. Yolanda Adams, Title V Technical Expert at (404) 562-9116, Mr. David McNeal, Monitoring Expert, at (404) 562-9102, or Ms. Lynda Crum, Associate Regional Counsel, at (404) 562-9524.

Sincerely,

James D. Kutzman for

Winston A. Smith
Director
Air, Pesticides & Toxics
Management Division

Enclosures

cc: Mr. Adalberto Alfonso
Plant General Manager
FPL - Turkey Point Plant
P.O. Box 088801
North Palm Beach, FL 33408

Mr. John Stanton
Plant General Manager
FPL - Port Everglades and Lauderdale Plants
11770 U.S. Highway One
North Palm Beach, FL 33408

Mr. W.T. Bethea
Plant General Manager
FPL - Putnam Plant
11770 U.S. Highway One
North Palm Beach, FL 33408

Mr. James A. Keener
Plant General Manager
FPL - Martin Plant
11770 U.S. Highway One
North Palm Beach, FL 33408

Mr. John M. Lindsay
Plant General Manager
FPL - Riviera Plant
11770 U.S. Highway One
North Palm Beach, FL 33408

Mr. J.M. Parent
Plant General Manager
FPL - Manatee Plant
11770 U.S. Highway One
North Palm Beach, FL 33408

Enclosure 1

U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Florida Power & Light, Manatee Plant

EPA objects to the issuance of this permit due to the following reasons:

(1) Periodic Monitoring - The permit does not require sufficient periodic monitoring to ensure compliance with the applicable opacity standard. The Manatee permit only requires an annual one hour Method 9 visible emissions reading. This does not constitute adequate periodic monitoring to ensure continuous compliance with the opacity standard. Since continuous opacity monitors (COMs) have been installed on the units in question, these monitors should be used to ensure compliance with the opacity standard. Requiring that the opacity monitors be used for conducting periodic monitoring imposes little or no additional burden on FP&L.

(2) Periodic Monitoring - The permit does not require sufficient periodic monitoring to ensure compliance with the applicable particulate matter standard. The Manatee permit requires an annual emission test to verify compliance with the applicable three-hour particulate emission standard. It has not been demonstrated that an annual emission test alone will constitute the basis for a credible certification of compliance with the particulate emission standard for units 001 and 002. If the State believes that no additional monitoring is warranted to ensure compliance with the particulate standard it must provide a technical demonstration in the statement of basis identifying the rationale for basing the compliance certification only on data from a short-term annual test. Otherwise, the permit must be revised to identify additional monitoring that will be conducted in order to ensure compliance with the particulate matter standard. We suggest the following approaches to periodic monitoring:

a) Correlate COM data to PM standard - this approach would not require additional monitoring equipment to be installed.
b) Correlate injection rate of specific compounds to ash content of the fuel and emission rate. Recordkeeping would consist of ash content and corresponding injection rate.
c) Other monitoring approach demonstrated by the permittee to be a valid method for assuring compliance with the applicable three-hour particulate matter standard.

In addition, the Manatee permit contains a provision regarding operating conditions during the annual testing for particulate matter and visible emissions which states 'that the tests shall be conducted under both sootblowing and non-sootblowing conditions, and shall be conducted while injecting the maximum quantity of additives approved by the Department.' Information provided to EPA indicates that these additives are used to control both particulate matter and nitrogen oxide emissions and that the amount of additive is dependent upon the ash content of the fuel. No provision exists within the permit which requires the unit to continue operating under the same conditions which existed during the test. Condition A.27 should be modified to reflect that 'the tests shall be conducted under both sootblowing and non-sootblowing conditions, and shall be conducted while injecting additives consistent with normal operating practices approved by the Department.'

(3) Deviation from Applicable Requirement - Florida rule 62-296.405(1)(f) 1.a., requires all emissions units to install continuous monitoring systems for monitoring opacity. The only exemption appears to be for units that do not use emission control equipment. Since emissions from units 001 and 002 are controlled with multiple cyclones, it appears that Florida regulations would require the use of COMs to determine compliance with the opacity standard. This applicable requirement must be included in the permit, or clarification must be provided in the statement of basis as to why this requirement does not apply.

(4) Deviation from Applicable Requirement - Florida rule 62-296.405(1)(a) requires fossil fuel steam generators to comply with a 20 percent opacity standard, with the exception that sources electing to test for particulate matter emission compliance quarterly shall be allowed visible emissions of 40 percent opacity. The Manatee permit requires compliance with a 40 percent opacity standard; however, it only requires an annual compliance test for particulate matter emissions. We understand that this variance from the SIP's quarterly testing requirement was granted by a State Order. However, this variance was never submitted by the State of Florida as a SIP revision, and therefore, was never approved into the SIP. Therefore, the Manatee permit must ensure compliance with the requirements of the SIP as stated in rule 62-296.405(1)(a).

(5) Practical Enforceability - Florida rule 62-296.405(1)(c)1.g. does not contain an averaging time that can serve as an enforceable component to determine compliance with the applicable SO_2 standard for units 001 and 002. In instances where the SIP regulations do not indicate an averaging time

for the standard, the permit must include one to determine compliance with the applicable requirement. Even though the source has installed and certified CEMs, we understand that they have opted to demonstrate compliance with the SO_2 limit via fuel sampling and analysis, as allowed by Florida rule 62-296.405(1)(e)3. Florida rule 62-296.405(1)(e)3. does not specify a sampling frequency, thereby giving DEP the flexibility to specify a frequency that would ensure compliance with the standard.

Florida rule 62-296.405(1)(f)1.b. states that "Those emission units not having an operating flue gas desulfurization device may monitor sulfur dioxide emissions by fuel sampling and analysis according to methods approved by EPA." The fuel sampling approach stated in the proposed permit would allow for a determination of compliance on a monthly basis only. As stated in Rule 62-213.440(1)(b)1.b., "...monitoring requirements shall assure use of recordkeeping terms, test methods, units, averaging periods, and other statistical conventions consistent with the applicable requirement;" The fuel sampling analysis method stated in the proposed permit is not adequate to demonstrate compliance with the applicable SO_2 standard which we understand to be in place to ensure compliance with the National Ambient Air Quality Standards (NAAQS). As indicated in DEP's response to comments memorandum dated October 23, 1997, DEP has determined that the averaging period for this standard should be 3 hours. Accordingly, the best course of action would be to use the CEMs data to derive 3 hour averages. Properly conducted fuel sampling may be an adequate substitute for the Manatee plant since it is permitted to burn only oil and gas. However, EPA realizes that conducting fuel analysis based on a 3 hour average would be too burdensome for the source. Given the relative consistency of the oil and gas fuel sources, 24 hour averaging of the fuel data may be sufficiently representative of the source's compliance with the 3 hour emission limit. Therefore, EPA is willing to accept a 24 hour averaging time for the fuel sampling analysis to ensure compliance with the applicable standard. The Region has accepted a 24 hour averaging time, which is still protective of the NAAQS, in other title V permits where the averaging time is not specified in the regulations. Please, refer to the Turkey Point Plant permit, condition A.19., for an example of an acceptable sampling protocol.

Based on the above information, DEP must revise the Manatee permit to either require that the fuel analysis be conducted on a daily basis, rather than a monthly basis, or require the use of the CEMs to determine compliance with this standard. Requiring that the CEMs be used for conducting

periodic monitoring imposes little or no additional burden on FP&L. Please, refer to the Riviera and Turkey Point permits. Even though use of CEMs are not the compliance method pursuant to the SIP, the State has required the use of the CEMs to ensure compliance with the same SIP SO_2 standard in those permits.

(6) Exemptions from Permitting: Appendix E-1- It is our understanding that the changes to F.A.C. rules 62-213.300, and 62-213. 420-440 addressed in a preliminary draft dated June 2, 1997, were officially adopted by the State on November 13, 1997. Therefore, the State needs to revise the permit, specifically Section II, item 6 and Appendix E-1, to delete the term "exempted from permitting" and replace it with the language contained in rules 62-213.300, and 62-213. 420-440. Additionally, as agreed in previous conversations between Regional staff and the State, the State needs to remove the reference to F.A.C. rule 62-4, since it in not related to activities that may be considered "insignificant" under the title V program.

(7) Periodic Monitoring - It is unclear how the permittee will show compliance with the heat input limitations in condition A.1. of the permit. The permit must require that the facility maintain fuel usage records to demonstrate compliance with the applicable heat input limit. Since this recordkeeping will be used to determine compliance with an hourly heat input rate limitation, the permit should contain an hourly fuel usage recordkeeping requirement in order to ensure that the facility remains in compliance with the hourly heat input limit.

(8) Periodic Monitoring - Condition A.8 allows particulate matter emissions up to an average of 0.3 lbs. per million BTU heat input during a 3-hour period in any 24-hour period for soot blowing and load change. In addition, Condition A.6 allows visible emissions up to 60 percent opacity during soot blowing and load changes. A load change is defined to occur when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more. There does not, however, appear to be any conditions that require the source to record the time, date, and duration of these events. The permit must require that the facility keep records of these events to ensure compliance with this requirement.

In addition to the above objections, our review has identified the following concern regarding the Manatee permit:

1. Section II, Facility-Wide Conditions

Condition 7. should be identified as "Not Federally Enforceable."

Enclosure 2

U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Florida Power & Light, Putnam Plant

EPA objects to the issuance of this permit due to the following reasons:

(1) Exemptions from Permitting: Appendix E-1- It is our understanding that the changes to F.A.C. rules 62-213.300, and 62-213. 420-440 addressed in a preliminary draft dated June 2, 1997, were officially adopted by the State on November 13, 1997. Therefore, the State needs to revise the permit, specifically Section II, item 6 and Appendix E-1, to delete the term "exempted from permitting" and replace it with the language contained in rules 62-213.300, and 62-213. 420-440. Additionally, as agreed in previous conversations between Regional staff and the State, the State needs to remove the reference to F.A.C. rule 62-4, since it in not related to activities that may be considered "insignificant" under the title V program.

(2) Periodic Monitoring - It is unclear how the permittee will show compliance with the heat input limitations in conditions A.1. and B.1. of the permit. The permit must require that the facility maintain fuel usage records to demonstrate compliance with the applicable heat input limit. Since this recordkeeping will be used to determine compliance with an hourly heat input rate limitation, the permit should contain an hourly fuel usage recordkeeping requirement in order to ensure that the facility remains in compliance with the hourly heat input limit.

In addition to the above objections, our review has identified the following concerns regarding the Putnam permit:

1. Subsection D - Permit condition D.4. needs to be renumbered. It seems that several portions of the boilerplate language that were not applicable were deleted without renumbering/editing the contents of the condition.

2. The NSPS Common Conditions (Section E) should contain language similar to Conditions A.1 and B.1 of Section II of the Martin Plant permit, i.e., "For the purposes of Rule 62-204.800(7), F.A.C., the definitions contained in the various provisions of 40 CFR 60, shall apply except that the term "Administrator" when used in 40 CFR 60, shall mean the Secretary or the Secretary's designee." In addition, similar language should be added either to Condition A.1 or to a new Condition, which puts the reader on notice that the 40 CFR 60 term "owner and operator," means "permittee" in

this permit. In addition, the phrase "[t]o the extent allowed by law" in the Note above Condition E.1 should be deleted. It is ambiguous and not repeated in any of the other permits in this context.

Enclosure 3

U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Florida Power & Light, Lauderdale Plant

EPA objects to the issuance of this permit due to the following reasons:

(1) Periodic Monitoring - The permit does not require sufficient periodic monitoring to ensure compliance with the applicable opacity standards. For the four combined-cycle turbines with heat recovery steam generators, condition A.10. specifies that visible emissions shall not exceed 10% opacity while burning natural gas, or 20% opacity while burning distillate oil. Condition A.19 specifies a requirement for annual opacity tests to be performed on each combustion turbine with the fuel(s) used for more than 400 hours in the preceding 12-month period. For the two banks of 12 combustion turbines, condition B.6. specifies a 20 percent opacity limit, and condition B.14. specifies that a visible emissions compliance test shall be conducted on each combustion turbine that operates more than 400 hours in a federal fiscal year. The permit specifies that at least one combustion turbine shall be tested per year, and at least one compliance test shall be conducted on all 24 combustion turbines every five years. This does not constitute adequate periodic monitoring to ensure compliance with the opacity standards when burning fuel oil.

We recommend that the source be required to conduct visible emissions readings on a daily basis for the combined-cycle turbines and for the banks of combustion turbines, when these units burn fuel oil. The State may propose alternative monitoring so long as it yields reliable data that ensure compliance with the opacity standard.

(2) Periodic Monitoring - The permit does not require sufficient periodic monitoring to ensure compliance with the applicable particulate matter standard. Condition A.7 of the permit specifies a PM/PM10 emission limitation of 14.7 lb/hr for each combined-cycle combustion turbine fired with natural gas, and an emission limitation of 58 lb/hr for each combustion turbine fired with oil. Annual testing of PM using Method 5 or 17 is required in condition A.19 of the permit for combustion turbines with fuels used for more than 400 hours in the preceding 12-month period. It has not been demonstrated that an annual emission test alone will constitute the basis for a credible certification of compliance with the particulate emission standard. If the State believes that no additional monitoring is warranted to ensure compliance with the particulate standard, it must

provide a technical demonstration in the statement of basis identifying the rationale for basing the compliance certification only on data from a short-term annual test. Otherwise, the permit must be revised to identify additional monitoring that will be conducted in order to ensure compliance with the particulate matter standard.

(3) Periodic Monitoring - It is unclear how the permittee will show compliance with the heat input limitations in conditions A.3, and B.1 of the permit. The permit must require that the facility maintain fuel usage records to demonstrate compliance with the applicable heat input limit. Since this recordkeeping will be used to determine compliance with an hourly heat input rate limitation, the permit should contain an hourly fuel usage recordkeeping requirement in order to ensure that the facility remains in compliance with the hourly heat input limit. As an example, please refer to condition B.25, which ensures compliance with condition B.2, the heat input limitation for each bank of gas turbines.

(4) Practical Enforceability - Condition A.13 limits the sulfur content of light distillate oil fired in the turbines to a maximum of 0.3 weight percent and to a 12-month average value of no more than 0.2 weight percent. In order to constitute a practically enforceable requirement, this condition must be revised to clearly specify the procedures for calculating the sulfur content of the oil on a 12-month rolling average basis. This clarification is necessary because the current permit language could be interpreted to mean that the 12-month average sulfur content is calculated either as of the average of the daily sulfur analyses or as a weighted average based upon the sulfur content of the oil and amount burned on a daily basis. Of these two approaches, the only one that we consider acceptable is to calculate the average sulfur content on a mass-weighted basis. The basis for this position is that if Florida Power and Light is allowed to merely average the daily sulfur content of the oil, the company could burn large quantities of higher sulfur oil on a few days and achieve compliance by burning smaller quantities of lower sulfur content on a large number of days. Since this method of complying would circumvent the of the permit's intent to limit the annual average sulfur content of the oil combusted, the permit must be revised to eliminate the ambiguity about the calculation approach that will used to verify compliance with the annual average sulfur content limit.

(5) Exemptions from Permitting: Appendix E-1- It is our understanding that the changes to F.A.C. rules 62-213.300, and 62-213. 420-440 addressed in a preliminary draft dated June 2, 1997, were officially adopted by the State on

November 13, 1997. Therefore, the State needs to revise the permit, specifically Section II, item 6 and Appendix E-1, to delete the term "exempted from permitting" and replace it with the language contained in rules 62-213.300, and 62-213.420-440. Additionally, as agreed in previous conversations between Regional staff and the State, the State needs to remove the reference to F.A.C. rule 62-4, since it in not related to activities that may be considered "insignificant" under the title V program.

In addition to the above objections, our review has identified the following concerns regarding the Lauderdale permit:

1. VOC Emission Limit - Page 4, Facility-wide Conditions for Volatile Organic Compounds (VOCs): The permit specifies a limit for total VOC emissions from all emissions units at this facility (excluding the combined-cycle units) of 99.92 tons per year. The basis for this limit needs to be explained.

   It is not clear how the throughput, record keeping, and reporting requirements for the fuel storage tanks (Section III.C., p. 24 & 25) and for solvent usage (Section III.D., p. 26) will ensure compliance with the total VOC emission limit of 99.92 tons per year. The permit (Conditions C.2. and D.2.) should specify that VOC emissions will be calculated at least monthly, rather than on an annual basis. Of note is that the models for estimating air emissions from organic liquid storage tanks are contained in Chapter 7 of AP-42, not in Section 4-3. The permit (Conditions C.3. and D.3.) should also require the actual throughput for each tank and the quantities of solvents used to be recorded on a monthly basis.

2. Fuel Monitoring Schedule - Permit Condition A.12 refers to a customized fuel monitoring schedule approved by EPA. We recommend that this schedule be included in this permit condition, rather than referencing it.

3. Permit Condition Language - Condition 9 in Section II does not appear to be complete. It seems as though the language, "No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity without taking reasonable precautions to prevent such emissions." should be added as the first sentence in the paragraph.

4. Permit Terms - EPA recommends that the monitoring and operations section of the permit contain language, such as "For the purposes of Rule 62-204.800(7), F.A.C., the definitions contained in the various provisions of 40 CFR 60

shall apply except that the term "Administrator" when used in 40 CFR 60, shall mean the Secretary or the Secretary's designee." In addition, EPA recommends that similar language be added either to Condition A.1 or to a new condition, which puts the reader on notice that the 40 CFR 60 term "owner and operator," means "permittee" in this permit.

Enclosure 4

U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Florida Power & Light, Martin Plant

EPA objects to the issuance of this permit due to the following reasons:

(1) Periodic Monitoring - The permit does not require sufficient periodic monitoring to ensure compliance with the applicable particulate matter standard. The Martin permit requires an annual emission test to verify compliance with the applicable particulate emission standard. It has not been demonstrated that an annual emission test alone will constitute the basis for a credible certification of compliance with the particulate emission standard for Units 1 and 2. If the State believes that no additional monitoring is warranted to ensure compliance with the particulate standard it must provide a technical demonstration in the statement of basis identifying the rationale for basing the compliance certification only on data from a short-term annual test. Otherwise, the permit must be revised to identify additional monitoring that will be conducted in order to ensure compliance with the particulate matter standard. We suggest the following approaches to periodic monitoring:

a) Correlate COM data to PM standard - this approach would not require additional monitoring equipment to be installed.
b) Correlate injection rate of specific compounds to ash content of the fuel and emission rate. Recordkeeping would consist of ash content and corresponding injection rate.
c) Other monitoring approach demonstrated by the permittee to be a valid method for assuring compliance with the applicable particulate matter standard.

In addition, the permit application states that magnesium hydroxide and related compounds may be injected into each boiler. Information provided to EPA indicates that these injected compounds (additives) are used to control both particulate matter and nitrogen oxide emissions and that the amount of additive is dependent upon the ash content of the fuel. No provision exists within the permit which addresses the approval and use of additives. The units should be required to operate during compliance tests at an injection rate consistent with normal operations.

(2) Practical Enforceability - Condition B.28 limits the sulfur

content of light distillate oil fired in the turbines to a maximum of 0.5 weight percent and to a 12-month average value of no more than 0.3 weight percent. In order to constitute a practically enforceable requirement, this condition must be revised to clearly specify the procedures for calculating the sulfur content of the oil on a 12-month rolling average basis. This clarification is necessary because the current permit language could be interpreted to mean that the 12-month average sulfur content is calculated either as of the average of the daily sulfur analyses or as a weighted average based upon the sulfur content of the oil and amount burned on a daily basis. Of these two approaches, the only one that we consider acceptable is to calculate the average sulfur content on a mass-weighted basis. The basis for this position is that if Florida Power and Light is allowed to merely average the daily sulfur content of the oil, the company could burn large quantities of higher sulfur oil on a few days and achieve compliance by burning smaller quantities of lower sulfur content on a large number of days. Since this method of complying would circumvent the of the permit's intent to limit the annual average sulfur content of the oil combusted, the permit must be revised to eliminate the ambiguity about the calculation approach that will used to verify compliance with the annual average sulfur content limit.

(3) Deviation from Applicable Requirement - Conditions A.7, B.9 and C.6 incorrectly cite the New Source Performance Standard (NSPS) (40 CFR 60.11(a)) to read as follows:

> "Compliance with standards in 40 CFR 60, other than opacity standards, shall be determined only by performance tests established by 40 CFR 60.8, unless otherwise specified in the applicable standard." (emphasis added)

This appears to be an oversight since the most recent version of the NSPS dated 2/24/97 was revised to remove the word "only" to clarify that credible evidence may be used in ascertaining and supporting enforcement actions. See 62 Fed. Reg. 8314, 8328 (Feb. 24, 1997).

The following language that should be substituted from the most recent revision to 40 CFR 60.11(a) is:

> "Compliance with standards in this part, other than opacity standards, shall be determined in accordance with performance tests established by §60.8, unless otherwise specified in the applicable standard."

(4) Periodic Monitoring - Condition A.6 allows particulate matter emissions up to an average of 0.3 lbs. per million

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

May 21, 1997

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

Dear Mr. Piper:

SUBJECT: Putnam Plant ; PA74-01
Conditions of Certification

It has come to my attention that FP&L has submitted an application to Department's Division of Air Resources Management regarding the Title V permit for the Putnam plant. As I understand, most, if not all of these changes would be essentially the same as those you suggested be made in the Conditions of Certification for Putnam. In my letter of April 9th, I had indicated that in order to make those changes, since they were substantive in nature, would require that you submit a formal request for modification of the conditions. However, if the Title V permit is changed, then the provision in the Power Plant Siting Act relating to automatic modifications to the conditions for federally delegated permit changes would go into effect, obviating the need for an independent modification request. Our Air Division staff and I would like to discuss this with you further, and suggest that a phone conference may suffice. Please call and notify me or Karen Skinner of your schedule so that we can work out a mutually satisfactory time.

One other matter has come to my attention regarding the suggestions you made for revising the Putnam Conditions. This relates to #21., "Free Available Chlorine". You had proposed language which was intended to make the condition consistent with the SPDES permit. However, upon consultation with our Bureau of Water Facilities Planning & Regulation, there appears to a problem with the specific language. Again, hopefully this can be worked out via telephone.

We can be reached at the address listed above, MailStop 48 or:

904-487-0472 (phone)
904-921-7250 (FAX)
OVEN_H@DEP.STATE.FL.US (Internet)
SKINNER_K@DEP.STATE.FL.US (Internet).

Sincerely,

Hamilton S. Oven

Hamilton S. Oven, Jr.
Professional Engineer Administrator
Siting Coordination Office

HSOjr/ks

cc: Jim Alves, Hopping et al.
Joseph Kahn, Air
Craig Diltz, BWFP&R

Date: 5/8/97 9:09:05 AM
From: Karen Skinner TAL
Subject: Putnam Plant
To: Joseph Kahn TAL
CC: Hamilton Buck Oven TAL

Rich Piper is out until the 12th (and his follow-up voice mail links were busy, too). So I left a message asking him to call so we could set up a phone-meeting. Buck feels that since they are asking for a Title V change, then, if that goes through, we could do some "automatic modificationing" to the conditions under a fairly new clause allowing the COCs to conform to federal permit changes, rather than FP&L having to request a formal modification plus pay the fee.

FYI, we also have a couple of minor things to work out with them re NPDES requirements, so a phone call might cover two subject areas.

Date: 5/7/97 8:04:38 AM
From: Joseph Kahn TAL
Subject: Florida Power & Light/Putnam
To: Bob Leetch JAX

Bob,

It's possible you have less of the paperwork from the siting coordination group than we do. We, of course, need the current PPS conditions to incorporate into the Title V permit. From the information we have in our files, it looks like FPL and the siting group are working on revisions to the site certification to simplify the conditions and delete obsolete items. It doesn't look like the changes substantially affect the air conditions. We'll check with them and get the latest information and pass it on to you.

Joe

Date: 5/6/97 4:43:09 P
From: Bob Leetch JAX
Subject: RE: Florida Power & Light/Putnam, #1070014

Susan,

As you know we do not process the site certifications. I am not sure that we even have the current one in the file but I will have someone check and get back with you. Regarding the proposed changes in the certification, again it would be best that you contact the site certification group in Tallahassee directly.

Thanks

Bob

Date: 5/6/97 4:25:00 PM
From: Susan DeVore TAL
Subject: Florida Power & Light/Putnam, #1070014
To: Bob Leetch JAX
CC: Joseph Kahn TAL

Bob,

Joe Kahn and I are working on the Title V permit for FPL/Putnam and with our copy of the power plant siting certification it is hard to tell when things changed. Could you send a current site certification? We also noted that the certification is in the midst of a change of conditions. Could you tell us more?

Thank you.

Susan DeVore
Bureau of Air Regulation
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

SUNCOM: 278-1344

Enclosure 2

U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Florida Power & Light, Putnam Plant

EPA objects to the issuance of this permit due to the following reasons:

(1) Exemptions from Permitting: Appendix E-1- It is our understanding that the changes to F.A.C. rules 62-213.300, and 62-213. 420-440 addressed in a preliminary draft dated June 2, 1997, were officially adopted by the State on November 13, 1997. Therefore, the State needs to revise the permit, specifically Section II, item 6 and Appendix E-1, to delete the term "exempted from permitting" and replace it with the language contained in rules 62-213.300, and 62-213. 420-440. Additionally, as agreed in previous conversations between Regional staff and the State, the State needs to remove the reference to F.A.C. rule 62-4, since it in not related to activities that may be considered "insignificant" under the title V program.

(2) Periodic Monitoring - It is unclear how the permittee will show compliance with the heat input limitations in conditions A.1. and B.1. of the permit. The permit must require that the facility maintain fuel usage records to demonstrate compliance with the applicable heat input limit. Since this recordkeeping will be used to determine compliance with an hourly heat input rate limitation, the permit should contain an hourly fuel usage recordkeeping requirement in order to ensure that the facility remains in compliance with the hourly heat input limit.

In addition to the above objections, our review has identified the following concerns regarding the Putnam permit:

1. Subsection D - Permit condition D.4. needs to be renumbered. It seems that several portions of the boilerplate language that were not applicable were deleted without renumbering/editing the contents of the condition.

2. The NSPS Common Conditions (Section E) should contain language similar to Conditions A.1 and B.1 of Section II of

the Martin Plant permit, i.e., "For the purposes of Rule 62-204.800(7), F.A.C., the definitions contained in the various provisions of 40 CFR 60, shall apply except that the term "Administrator" when used in 40 CFR 60, shall mean the Secretary or the Secretary's designee." In addition, similar language should be added either to Condition A.1 or to a new Condition, which puts the reader on notice that the 40 CFR 60 term "owner and operator," means "permittee" in

this permit. In addition, the phrase "[t]o the extent allowed by law" in the Note above Condition E.1 should be deleted. It is ambiguous and not repeated in any of the other permits in this context.

BTU heat input during a 3-hour period in any 24-hour period for soot blowing and load change. There does not, however, appear to be any conditions that require the source to record the time,date, and duration of these events. The permit must require that the facility keep records of these events to ensure compliance with this requirement.

(5) Periodic Monitoring - It is unclear how the permittee will show compliance with the heat input limitations in conditions A.2, and B.3 of the permit. The permit must require that the facility maintain fuel usage records to demonstrate compliance with the applicable heat input limit. Since this recordkeeping will be used to determine compliance with an hourly heat input rate limitation, the permit should contain an hourly fuel usage recordkeeping requirement in order to ensure that the facility remains in compliance with the hourly heat input limit.

(6) Exemptions from Permitting: Appendix E-1- It is our understanding that the changes to F.A.C. rules 62-213.300, and 62-213. 420-440 addressed in a preliminary draft dated June 2, 1997, were officially adopted by the State on November 13, 1997. Therefore, the State needs to revise the permit, specifically Section II, item 4 and Appendix E-1, to delete the term "exempted from permitting" and replace it with the language contained in rules 62-213.300, and 62-213. 420-440. Additionally, as agreed in previous conversations between Regional staff and the State, the State needs to remove the reference to F.A.C. rule 62-4, since it in not related to activities that may be considered "insignificant" under the title V program.

Enclosure 5

U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Florida Power and Light, Port Everglades Plant

EPA objects to the issuance of this permit due to the following reasons:

(1) Periodic Monitoring - The permit does not require sufficient periodic monitoring to ensure compliance with the applicable opacity standard. The Port Everglades permit only requires an annual one hour Method 9 visible emissions reading. This does not constitute adequate periodic monitoring to ensure continuous compliance with the opacity standard. Since continuous opacity monitors (COMs) have been installed on units 1 through 4, these monitors should be used to ensure compliance with the opacity standard for these units. Requiring that the opacity monitors be used for conducting periodic monitoring imposes little or no additional burden on FP&L. .Please note that while the permit indicates that units 1 through 4 have operational continuous opacity monitors, the "Permit Summary Tables" indicate that there are no "CMS."

The Region is concerned about the lack of periodic monitoring provisions for opacity for the 12 simple cycle turbines (unit #5) in the proposed Port Everglades permit. We question whether an annual visible emissions test alone will provide enough data for certifying compliance with the applicable opacity limit for an entire year, and we question how FP&L will be able to certify compliance with opacity limits, in good faith, in the absence of data to back up the certification. We recommend that the source be required to conduct visible emissions readings on a daily basis when these units burn fuel oil. The State may propose alternative monitoring so long as it yields reliable data that ensure compliance with the opacity standard.

(2) Periodic Monitoring - Conditions A.15 and B.15 of the proposed permit for Port Everglades Plant indicate that the source is required to maintain hourly fuel records of the amount of fuel fired, the ratio of fuel oil to natural gas if co-fired, the heating value, and sulfur content of each fuel fired. Conditions A.15 and B.15 also describe the methodology by which the sulfur content and heating value of the fuel will be determined. The analysis of the monthly composite of fuel is not adequate to ensure compliance with the applicable SO_2 standard which is based on a three-hour rolling average (see Conditions A.11, B.11). Since the fuel records required in Condition A.15 need to be "of sufficient detail" to identify the testing requirements of Condition A.14 (Operating Conditions During Testing - PM and

VE), and A.11 (sulfur dioxide monitoring operations to demonstrate compliance with the sulfur dioxide limit based on a 3-hour rolling average), a fuel record and sampling protocol similar to the one required in Condition A.19 of the proposed Title V permit for the Florida Power & Light, Turkey Point Fossil Plant, should be required in the proposed permit for the Port Everglades Plant. Condition A.19 of the Turkey Point proposed permit requires the source to take hourly fuel samples and analyze the daily composite on a daily basis.

(3) Periodic Monitoring - The permit does not require sufficient periodic monitoring to ensure compliance with the applicable particulate matter standard. The Port Everglades Plant permit requires an annual emission test to verify compliance (Conditions A.4, A.10, B.4, B.10) with the applicable three-hour particulate emission standard. It has not been demonstrated that an annual emission test alone will constitute the basis for a credible certification of compliance with the particulate emission standard for Units 1 through 4. If the State believes that no additional monitoring is warranted to ensure compliance with the particulate standard it must provide a technical demonstration in the statement of basis identifying the rationale for basing the compliance certification only on data from a short-term annual test. Otherwise, the permit must be revised to identify additional monitoring that will be conducted in order to ensure compliance with the particulate matter standard. We suggest the following approaches to periodic monitoring:

a) Correlate COM data to PM standard - this approach would not require additional monitoring equipment to be installed.
b) Correlate injection rate of specific compounds to ash content of the fuel and emission rate. Recordkeeping would consist of ash content and corresponding injection rate.
c) Other monitoring approach demonstrated by the permittee to be a valid method for assuring compliance with the applicable three-hour particulate matter standard.

In addition, the permitting notes under Section III, Subsection A and Subsection B of the proposed permit for Port Everglades indicate that units 1 through 4 may inject additives such as magnesium hydroxide and related compounds into each boiler. Information provided to EPA indicates that these injected additives are used to control particulate matter and nitrogen oxide emissions and that the amount of additive is dependent upon the ash content of the fuel. The proposed permit does not, however, address the approval and

use of these additives. These units should be required to operate during compliance tests using an injection rate consistent with normal operations. This could be corrected by adding to the particulate compliance language: "that the tests shall be conducted under both sootblowing and non-sootblowing conditions, and shall be conducted while injecting approved additives consistent with normal operating practices approved by the department."

(4) Practical Enforceability - A note under Conditions A.14 and B.14 in the proposed permit for Port Everglades, references an "informal agreement" between the facility and Broward County to limit the visible emissions to less than 20% opacity . This condition does not appear to be enforceable and should be removed from the permit. If the source is actually required to maintain opacity below 20% rather than the 40% standard indicated in Condition A.4 and B.4 then an enforceable condition needs to be included in the permit that indicates the correct opacity standard (see comment (5) below).

(5) Deviation from Applicable Requirement - Florida rule 62-296.405(1)(a) requires fossil fuel steam generators to comply with a 20 percent opacity standard, with the exception that sources electing to test for particulate matter emission compliance quarterly shall be allowed visible emissions of 40 percent opacity. The Port Everglades permit requires compliance with a 40 percent opacity standard; however, it only requires an annual compliance test for particulate matter emissions. We understand that this variance from the SIP's quarterly testing requirement requirements was granted by a State Order. However, this variance was never submitted by the State of Florida as a SIP revision, and therefore, was never approved into the SIP. Therefore, the Port Everglades permit must ensure compliance with the requirements of the SIP as stated in rule 62-296.405(1)(a).

(6) Deviation from Applicable Requirement - Florida rule 62-296.405(1)(f) 1.a, requires all emissions units to install continuous monitoring systems for monitoring opacity. The only exemption appears to be for units that do not use emission control equipment. Since emissions from these units (units 1 through 4) are controlled with multiple cyclones, it appears that Florida regulations would require the use of COMs to determine compliance with the opacity standard. This applicable requirement must be included in the permit, or clarification must be provided as to why this requirement does not apply.

(7) Periodic Monitoring - Conditions A.7 and B.7 allow

particulate matter emissions up to an average of 0.3 lbs. per million BTU heat input during a 3-hour period in any 24-hour period for soot blowing and load change. In addition, Condition A.5 allows visible emissions up to 60 percent opacity during soot blowing and load changes. A load change is defined to occur when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more. There does not, however, appear to be any conditions that require the source to record the time,date, and duration of these events. The permit must require that the facility keep records of these events to ensure compliance with this requirement.

(8) Exemptions from Permitting: Appendix E-1- It is our understanding that the changes to F.A.C. rules 62-213.300, and 62-213. 420-440 addressed in a preliminary draft dated June 2, 1997, were officially adopted by the State on November 13, 1997. Therefore, the State needs to revise the permit, specifically Section II, item 6 and Appendix E-1, to delete the term "exempted from permitting" and replace it with the language contained in rules 62-213.300, and 62-213. 420-440. Additionally, as agreed in previous conversations between Regional staff and the State, the State needs to remove the reference to F.A.C. rule 62-4, since it in not related to activities that may be considered "insignificant" under the title V program.

In addition to the above objections, our review has identified the following concern regarding the Port Everglades permit:

1. Conditions A.11 and A.13 indicate that the permittee shall demonstrate compliance with the sulfur dioxide limit using CEMs. Condition A.13 also appears to offer the source the opportunity to use EPA test methods 6, 6A, 6B, 6C for demonstrating compliance with the applicable SO2 standard. If the source is required to use CEMs as a method of demonstrating compliance, it is unclear why Condition A.13 indicates alternative test methods. The Region recommends that the language in A.13, which allows the above test methods for measuring sulfur dioxide emissions, be removed from Condition A.13 in order to avoid confusion.

   Condition A.13 also allows the source to obtain an alternate procedure under the provisions of Rule 62-297.620, F.A.C.. Rule 62-297.620 (Exceptions and Approval of Alternate Procedures and Requirements) does not allow the source to obtain an alternative to continuous monitoring requirements. Therefore, it appears that the language in Condition A.13

which suggests that the source has the option of obtaining an alternative procedure to CEMs for demonstrating compliance with the SO_2 limit should be removed to avoid confusion. Please, refer to the Turkey Point permit which contains requirements for CEMs in conditions A.9 and A.13, but does not include the confusing language mentioned above.

Enclosure 6

U.S. EPA Region 4 Objections
Proposed Part 70 Operating Permit
Florida Power & Light, Riviera Plant

EPA objects to the issuance of this permit due to the following reasons:

(1) Periodic Monitoring - The permit does not require sufficient periodic monitoring to ensure compliance with the applicable opacity standard. The Riviera permit only requires an annual one hour Method 9 visible emissions reading. This does not constitute adequate periodic monitoring to ensure continuous compliance with the opacity standard. Since continuous opacity monitors (COMs) have been installed on the units in question, these monitors should be used to ensure compliance with the opacity standard. Requiring that the opacity monitors be used for conducting periodic monitoring imposes little or no additional burden on FP&L.

(2) Periodic Monitoring - The permit does not require sufficient periodic monitoring to ensure compliance with the applicable particulate matter standard. The Riviera permit requires an annual emission test to verify compliance with the applicable three-hour particulate emission standard. It has not been demonstrated that an annual emission test alone will constitute the basis for a credible certification of compliance with the particulate emission standard for Units 1 and 2. If the State believes that no additional monitoring is warranted to ensure compliance with the particulate standard it must provide a technical demonstration in the statement of basis identifying the rationale for basing the compliance certification only on data from a short-term annual test. Otherwise, the permit must be revised to identify additional monitoring that will be conducted in order to ensure compliance with the particulate matter standard. We suggest the following approaches to periodic monitoring:

a) Correlate COM data to PM standard - this approach would not require additional monitoring equipment to be installed.
b) Correlate injection rate of specific compounds to ash content of the fuel and emission rate. Recordkeeping would consist of ash content and corresponding injection rate.
c) Other monitoring approach demonstrated by the permittee to be a valid method for assuring compliance with the applicable three-hour particulate matter standard.

In addition, the Riviera permit states that magnesium oxide, magnesium hydroxide and related compounds may be injected into each boiler. Information provided to EPA indicates that these injected compounds (additives) are used to control both particulate matter and nitrogen oxide emissions and that the amount of additive is dependent upon the ash content of the fuel. No provision exists within the permit which addresses the approval and use of additives. The units should be required to operate during compliance tests at an injection rate consistent with normal operations. This could be corrected by adding to the particulate compliance language: "the tests shall be conducted under both sootblowing and non-sootblowing conditions, and shall be conducted while injecting approved additives consistent with normal operating practices approved by the Department."

(3) Deviation from Applicable Requirement - Florida rule 62-296.405(1)(f) 1.a, requires all emissions units to install continuous monitoring systems for monitoring opacity. The only exemption appears to be for units that do not use emission control equipment. Since emissions from these units are controlled with multiple cyclones, it appears that Florida regulations would require the use of COMs to determine compliance with the opacity standard. This applicable requirement must be included in the permit, or clarification must be provided in the statement of basis as to why this requirement does not apply.

(4) Deviation from Applicable Requirement - Florida rule 62-296.405(1)(a) requires fossil fuel steam generators to comply with a 20 percent opacity standard, with the exception that sources electing to test for particulate matter emission compliance quarterly shall be allowed visible emissions of 40 percent opacity. The Riviera permit requires compliance with a 40 percent opacity standard; however, it only requires an annual compliance test for particulate matter emissions. We understand that this variance from the SIP's quarterly testing requirement was granted by a State Order. However, this variance was never submitted by the State of Florida as a SIP revision, and therefore, was never approved into the SIP. Therefore, the Manatee permit must ensure compliance with the requirements of the SIP as stated in rule 62-296.405(1)(a).

(5) Deviation from Applicable Requirement - Condition A.9 states that 'The sulfur dioxide emission limitation shall apply at all times including startup, shutdown, and load change, but shall not apply during malfunction provided best operational practices to minimize emissions are adhered to and the duration of excess emissions are minimized and does not exceed two hours in any 24-hour period.' These units do not have sulfur dioxide controls. Please provide a definition

of what constitutes a malfunction as used in this permit condition for the Riviera Plant. The SIP rules (62-296.405(1)(c) and 62-296.405)(1)(c)) do not provide for a relaxation of the SIP limit during a malfunction. This condition should be revised to be consistent with the applicable regulations.

(6) Exemptions from Permitting: Appendix E-1- It is our understanding that the changes to F.A.C. rules 62-213.300, and 62-213. 420-440 addressed in a preliminary draft dated June 2, 1997, were officially adopted by the State on November 13, 1997. Therefore, the State needs to revise the permit, specifically Section II, item 6 and Appendix E-1, to delete the term "exempted from permitting" and replace it with the language contained in rules 62-213.300, and 62-213. 420-440. Additionally, as agreed in previous conversations between Regional staff and the State, the State needs to remove the reference to F.A.C. rule 62-4, since it in not related to activities that may be considered "insignificant" under the title V program.

(7) Periodic Monitoring - Condition A.8 allows particulate matter emissions up to an average of 0.3 lbs. per million BTU heat input during a 3-hour period in any 24-hour period for soot blowing and load change. In addition, Condition A.6 allows visible emissions up to 60 percent opacity during soot blowing and load changes. A load change is defined to occur when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more. There does not, however, appear to be any conditions that require the source to record the time,date, and duration of these events. The permit must require that the facility keep records of these events to ensure compliance with this requirement.

In addition to the above objections, our review has identified the following concerns regarding the Riviera permit:

1. Section II, Facility-Wide Conditions.

   Condition 7 should be identified as "Not Federally Enforceable."

2. Conditions A.15 and A.23 indicate that the permittee shall demonstrate compliance with the sulfur dioxide limit using CEMs. Condition A.23 also appears to offer the source the opportunity to use EPA test methods 6, 6A, 6B, 6C for demonstrating compliance with the applicable SO_2 standard. If the source is required to use CEMs as a method of

demonstrating compliance, it is unclear why Condition A.23 indicates alternative test methods. The Region recommends that the language in A.23, which allows the above test methods for measuring sulfur dioxide emissions, be removed from Condition A.23 in order to avoid confusion.

Condition A.23 also allows the source to obtain an alternate procedure under the provisions of Rule 62-297.620, F.A.C.. Rule 62-297.620 (Exceptions and Approval of Alternate Procedures and Requirements) does not allow the source to obtain an alternative to continuous monitoring requirements. Therefore, it appears that the language in Condition A.23 which suggests that the source has the option of obtaining an alternative procedure to CEMs for demonstrating compliance with the SO_2 limit should be removed to avoid confusion. Please, refer to the Turkey Point permit which contains requirements for CEMs in conditions A.9 and A.13, but does not include the confusing language mentioned above.

Enclosure 7

U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Florida Power & Light, Turkey Point Plant

EPA objects to the issuance of this permit due to the following reasons:

(1) Periodic Monitoring - The permit does not require sufficient periodic monitoring to ensure compliance with the applicable opacity standard. The Turkey Point permit only requires an annual one hour Method 9 visible emissions reading. This does not constitute adequate periodic monitoring to ensure continuous compliance with the opacity standard. Since continuous opacity monitors (COMs) have been installed on the units in question, these monitors should be used to ensure compliance with the opacity standard. Requiring that the opacity monitors be used for conducting periodic monitoring imposes little or no additional burden on FP&L.

(2) Periodic Monitoring - The permit does not require sufficient periodic monitoring to ensure compliance with the applicable particulate matter standard. The Turkey Point permit requires an annual emission test to verify compliance with the applicable three-hour particulate emission standard. It has not been demonstrated that an annual emission test alone will constitute the basis for a credible certification of compliance with the particulate emission standard for Units 1 and 2. If the State believes that no additional monitoring is warranted to ensure compliance with the particulate standard it must provide a technical demonstration in the statement of basis identifying the rationale for basing the compliance certification only on data from a short-term annual test. Otherwise, the permit must be revised to identify additional monitoring that will be conducted in order to ensure compliance with the particulate matter standard. We suggest the following approaches to periodic monitoring:

a) Correlate COM data to PM standard - this approach would not require additional monitoring equipment to be installed.
b) Correlate injection rate of specific compounds to ash content of the fuel and emission rate. Recordkeeping would consist of ash content and corresponding injection rate.
c) Other monitoring approach demonstrated by the permittee to be a valid method for assuring compliance with the applicable three-hour

particulate matter standard.

(3) Exemptions from Permitting: Appendix E-1- It is our understanding that the changes to F.A.C. rules 62-213.300, and 62-213. 420-440 addressed in a preliminary draft dated June 2, 1997, were officially adopted by the State on November 13, 1997. Therefore, the State needs to revise the permit, specifically Section II, item 6 and Appendix E-1, to delete the term "exempted from permitting" and replace it with the language contained in rules 62-213.300, and 62-213. 420-440. Additionally, as agreed in previous conversations between Regional staff and the State, the State needs to remove the reference to F.A.C. rule 62-4, since it in not related to activities that may be considered "insignificant" under the title V program.

(4) Deviation from Applicable Requirement -Florida rule 62-296.405(1)(a) requires fossil fuel steam generators to comply with a 20 percent opacity standard, with the exception that sources electing to test for particulate matter emission compliance quarterly shall be allowed visible emissions of 40 percent opacity. The Turkey Point permit requires compliance with a 40 percent opacity standard; however, it only requires an annual compliance test for particulate matter emissions. We understand that this variance from the SIP's quarterly testing requirement was granted by a State Order. However, this variance was never submitted by the State of Florida as a SIP revision, and therefore, was never approved into the SIP. Therefore, the Turkey Point permit must ensure compliance with the requirements of the SIP as stated in rule 62-296.405(1)(a).

(5) Periodic Monitoring - It is unclear how the permittee will show compliance with the heat input limitations in conditions A.1, and B.1 of the permit. The permit must require that the facility maintain fuel usage records to demonstrate compliance with the applicable heat input limit. Since this recordkeeping will be used to determine compliance with an hourly heat input rate limitation, the permit should contain an hourly fuel usage recordkeeping requirement in order to ensure that the facility remains in compliance with the hourly heat input limit.

(6) Periodic Monitoring - Condition A.8 allows particulate matter emissions up to an average of 0.3 lbs. per million BTU heat input during a 3-hour period in any 24-hour period for soot blowing and load change. In addition, Condition A.6 allows visible emissions up to 60 percent opacity during soot blowing and load changes. A load change is defined to

occur when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more. There does not, however, appear to be any conditions that require the source to record the time, date, and duration of these events. The permit must require that the facility keep records of these events to ensure compliance with this requirement.

In addition to the above objections, our review has identified the following concerns regarding the Turkey Point permit:

1. Section III, condition A.3 allows the use of magnesium hydroxide fuel additives. However, in the permit application, FP&L stated their "right to use other additives if they are suitable." If the State's intent is to limit the use of additives to only magnesium hydroxide, it should clearly establish that in the permit. However, the State may want to address the use of other additives via alternative operating scenarios, or another type of procedure.

2. Section II, Facility-Wide Conditions.

   Condition 7 should be identified as "Not Federally Enforceable."

   Condition 8, as written does not appear to be complete. It seems as though the language, "No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity without taking reasonable precautions to prevent such emissions." should be added as the first sentence in the paragraph.

3. Condition B.6 states that Unit-003 is subject to a NO_x standard such that "emissions shall not exceed 4.75 lb per million Btu heat input. These limits shall apply at all times except during periods of startup, shutdown, or malfunction as provided by Rule 62-210.700, F.A.C." Condition B.8 requires infrequent testing, on the order of "Annual emission testing shall be conducted during each federal fiscal year (October 1 - September 30). In addition, testing is waived entirely during years in which units operate less than 400 hours." Because this requirement

entails infrequent sampling, we recommend that information justifying this frequency be added to the statement of basis. Such justification could include a demonstration that the unit is unlikely to exceed this limit.

Appendix H-1, Permit History/ID Number Changes

Florida Power & Light
Putnam Plant

[DRAFT/PROPOSED/FINAL]Permit No.: 1070014-001-AV
Facility ID No.: 1070014

Permit History (for tracking purposes):

E.U. ID No	Description	Permit No.	Issue Date	Expiration Date	Extended Date	Revised Date(s)
-001	#1 A & B Elect Gen Plant Comb Cycle	PPS PA74-01	10/16/74			
-002	#2 A & B Elect Gen Plant Comb Cycle	PPS PA74-01	10/16/74			

(if applicable) ID Number Changes (for tracking purposes):

From: **Facility ID No.:** 31JAX540014

To: **Facility ID No.:** 1070014

Notes:
1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.
{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate

File

Florida Department of

Memorandum

Environmental Protection

TO: Chris Kirts, NED

FROM: Bruce Mitchell

DATE: April 29, 1997

SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit
Florida Power & Light, Putnam Plant: 1070014-001-AV

Enclosed is an application package for a Title V operation permit that is being processed in Tallahassee. Please review the package for completeness and respond in writing by May 30, 1997, if you have any comments. Otherwise, no response is required.

It is very important to verify the compliance statement regarding the facility, since we do not have a readily effective means of determining compliance at the time the application was submitted. Please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. You should have a copy on file of the original initial Title V permit application submittal. Also, please do not write on these documents.

If there are any questions, please call the project engineer, Susan DeVore, at 904/488-1344 or SC: 278-1344.

RBM/bjb

Enclosure

cc: Bob Leech

4/30/97 Susan DeVore
Reading File

BEFORE THE GOVERNOR AND CABINET
OF THE STATE OF FLORIDA

In RE:
FLORIDA POWER & LIGHT COMPANY)
PUTNAM POWER PLANT)
MODIFICATION OF CERTIFICATION)
PA 74-01F)
PUTNAM COUNTY, FLORIDA)
)

FINAL ORDER MODIFYING CONDITIONS
OF CERTIFICATION

On July 16, 1991, the Secretary of the Florida Department of Environmental Regulation (DER) issued a Final Order modifying Certification No. PA 74-01F for the Florida Power & Light Company (FPL) Putnam Power Plant. Those modifications were necessary to incorporate new source performance standards applicable to the heat recovery steam generators as a result of proposed refurbishments and to allow the construction activities which were necessary for those refurbishments to occur. Included within the July, 1991, modification was a requirement that FPL and DER examine the ambient monitoring program and decide whether "to upgrade the program, modify or delete it." On March 18, 1992, DER issued notice that it intended to issue a modification of the conditions of certification to allow termination of the intermittent ambient air quality monitoring program at the Putnam Power Plant.

On March 27, 1992, a notice of Intent to Issue Proposed Modification of Power Plant Certification regarding elimination of the ambient air quality monitoring program was published in the Florida Administrative Weekly and served on all parties. The notice specified that a hearing would be held if requested on or before 45 days from receipt by the parties. No hearing was requested. No person has objected to the the proposed modification.

Subsequently, on April 2, 1992, FPL submitted to DER a request to modify the conditions of certification for the Putnam Power Plant concerning the nitrogen oxides compliance test method and clarification of the nitrogen oxides emission compliance requirement for the duct burners. The modification of conditions would allow FPL to use Method 7E rather than Method 20 for the nitrogen oxides emissions compliance testing and clarify that compliance is to be determined through initial

and annual compliance testing rather than on a 30-day rolling average basis. The requested modification was submitted pursuant to Section 403.516(1)(b), F.S., and Condition 33 (formerly Condition 32) of the conditions of certification, which delegated authority to modify certain conditions of certification to the Department.

On April 2, 1992, a copy of FPL's letter to DER requesting modification of the conditions of certification regarding the nitrogen oxides emissions test method and nitrogen oxides emissions compliance requirements was served on all parties. On April 17, 1992, an Amended Notice of Intent to Issue Proposed Modification of Power Plant Certification was published in the Florida Administrative Weekly. The notice specified that a hearing would be held if requested on or before 45 days from receipt of the request for modification by the parties. No hearing was requested. No person has objected to the proposed modification.

Accordingly, in the absence of any dispute,

IT IS ORDERED:

The Department hereby modifies the conditions of certification for Putnam Power Plant as follows:

Condition No. 1 is modified to read as follows:

1.C. Heat Recovery Steam Generators:

...

(ii)(d) Nitrogen oxides emission shall not exceed 0.2 lb/mmBtu heat input when natural gas or distillate oil is combusted or 0.4 lb/mmBtu heat input when residual oil is combusted. ~~Compliance is determined on a 30-day rolling average basis.~~ The nitrogen oxides standard applies at all times, including periods of startup, shutdown, or malfunction.

...

(v) To determine compliance with the nitrogen oxides emissions limit, FPL shall conduct <u>a performance test using EPA Reference Methods 7E and 3, (as codified in 40 CFR Part 60, Appendix A).</u> ~~the performance test described in 40 CFR § 60.49b(f) (July 1, 1990 Edition) and required under 40 CFR § 60.8 (July 1, 1990 Edition) using the nitrogen oxides and oxygen measurement procedures in 40 CFR Part 60 Appendix A, Method 20 (July 1, 1990 Edition).~~ The initial compliance test shall be performed within 60 days after achieving the maximum production rate for the HRSGs, but not later that 180 days after initial startup. An annual compliance test shall be performed at least once during each federal fiscal year (October 1 - September 30).

Thirty (30) days prior to the initial compliance test and fifteen (15) days prior to each annual compliance test, notice shall be provided to the Northeast District Office. The results of each test shall be submitted to the Northeast District Office within 45 days of test completion.

Conditions No. 5 is deleted and subsequent conditions are renumbered.

Any party to this 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 of Environmental Regulation in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 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 date that the Final Order is filed with the clerk of the Department of Environmental Regulation.

DONE AND ENTERED THIS 28 day of May, 1992, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Carol M. Browner

CAROL M. BROWNER
Secretary

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400
Telephone: (904) 488-9730

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to S120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Kathy C. Carter 5-29-92
Clerk Date

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing Final Order Modifying Conditions of Certification for Florida Power & Light Company's Putnam Power Plant were furnished to the following by United States Mail, postage prepaid, this 7th day of May, 1992:

Steven Pfeiffer, General Counsel
Department of Community Affairs
The Rhyne Building, Room 138
2740 Centerview Drive
Tallahassee, FL 32399-2100

Susan F. Clark, General Counsel
Florida Public Service Commission
Fletcher Building
101 E. Gaines Street
Tallahassee, FL 32399-0850

John Thompson, Chairman
Putnam County Board of
County Commissioners
Post Office Box 758
Palatka, FL 32178

William H. Green
Angela R. Morrison
Hopping, Boyd Green
and Sams
123 S. Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314

R. Donelan

Richard T. Donelan
Assistant General Counsel
State of Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Florida Department of Environmental Regulation
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400
Lawton Chiles, Governor
Carol M. Browner, Secretary

June 4, 1992

Mr. Steven Pfeiffer, General Counsel
Department of Community Affairs
The Rhyne Building, Room 138
2740 Centerview Drive
Tallahassee, FL 32399-2100

RE: Final Order Modifying Conditions of Certification for Putnam Power Plant #PA 74-01F

Dear Mr. Pfeiffer:

Enclosed is a replacement page for the Final Order Modifying Conditions of Certification for Putnam Power Plant #PA 74-01F that was mailed to you on May 29, 1992.

A typographical error was discovered on page 2 under Conditions No. 1 (v): "EPA Reference Methods 7E and 3" should read: "EPA Reference Methods 7E and 3A".

Sincerely,

Hamilton S. Oven, Jr.

Hamilton S. Oven, Jr., P.E.
Administrator
Siting Coordination Office

HSO/ah

Enc.

Florida Power & Light Company, Environmental Services Dept., P.O. Box 14000, Juno Beach, FL 33408

FPL

March 21, 1997

Hamilton S. Oven, Jr.
Professional Engineer Administrator
Siting Coordination Office
State of Florida
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: FPL Putnam Plant ; PA74-01
Conditions of Certification

Dear ~~Mr. Oven:~~ Buck

This correspondence is in response to your letter of February 24, 1997 regarding the revised Conditions of Certification for the Putnam facility. In our review of the revised conditions, several items were apparent which could be addressed for purpose of clarity:

Page 2, item iv: The sentence that begins "The initial performance test shall be performed...." can be stricken entirely, as this testing was completed years ago.

Page 3, item 2: The sentence that begins "Stacks with a height of...." can be deleted since the Ambient Air Sampling required in Condition 5 has been eliminated.

Page 4, item 3: "Sampling Platform - The permittee shall install...." As above, this condition was completed several years ago, so this language can be stricken.

Page 4, item 5: "Ambient Air Samplers" - The samplers referenced in the condition were removed several years ago, with concurrence from the Department. This condition can be deleted.

Page 4, item 6: "Water Effluents" The parameter of copper has been omitted from the sentence "Iron, chlorine, nickel and zinc shall...." It should read "Iron, chlorine, copper, nickel and zinc shall...."

Page 4, item 7: "Monitoring" - The first sentence lists the waste streams for which monitoring is required. The North Fuel Oil Tank Farm (OSN 004) was deleted as an outfall in the December 15, 1995 modification. This language change was not addressed in the "Final Order". This "correction should be made now.

Page 4, item 7: "Monitoring" - The final sentence of this section requires quarterly submittal of surface water monitoring reports to the DEP's Northeast District Office. The current requirement in the SPDES permit, as a result of delegation of the NPDES program on May 1, 1995, is monthly reporting through DEP-Tallahassee. This section should be updated.

Page 5, Table of Effluent Characteristics, Limitation and Monitoring - In previous editions of the Conditions of Certification, this table has contained a fourth heading - Waste Stream. It is necessary to have this column since it is not clear which Serial Discharge Streams are to be monitored for the listed effluent characteristic. Additionally, the limitation on combined flow to the St. Johns River from the cooling tower and the chemical waste treatment system of 2,200 gpm has not been a part of previous permits. The table should read:

Effluent Characteristics	Limitation	Monitoring	Waste Stream
* Flow	To existing plant discharge area. Cooling tower blowdown shall be minimized to the degree allowed by best engineering practice.	Continuous recorders or pump logs	Cooling tower blowdown, Physical / Chemical Treatment System, West EP Pond
* Temperature	Not to exceed 98 F. at the P.O.D. and not to exceed 92 F. or 5 F. above ambient at the boundary of a 3-dimensional zone of mixing described by a cylinder of 50 meters radius running horizontally from the P.O.D. and which extends vertically to the river surface and river bottom.	Continuous (recorder or pump logs) at any point between the blowdown discharge at the cooling tower and the P.O.D. of cooling water into the river.	Cooling tower blowdown
* Phosphate	50 ppm	Weekly	Physical Chemical Treatment System
* Dissolved solids	6000 ppm	Daily	Cooling tower blowdown, Physical Chemical Treatment System, West EP Pond

* pH	6.0 - 8.5	Daily	Cooling tower blowdown, Physical Chemical Treatment System, West EP Pond
*Floating solids and visible foam	None visible	Daily	Cooling tower blowdown, Physical Chemical Treatment system

Page 8, item 22: "Free Available Chlorine" - Much of this section should be deleted since it has long ago been completed. The language of the remainder should be changed to reflect the requirements of the NPDES permit concerning free available chlorine. The section should read:

"Chlorine concentration monitoring shall be conducted two times per week, during the period of maximum expected residual, at any point beween the exit from the cooling tower and the P.O.D. of cooling water in the river. If the grab sample for total residual chlorine (TRC) taken prior to discharge from the cooling tower indicates that no TRC is present, sampling for FAC is not required. If FAC is present, multiple grabs shall be conducted hourly until it can no longer be detected. When TRC measures "less than detectable" and the cooling tower blowdown has been established, it is not required to sample for TRC again until a chlorination of the cooling tower water has been performed."

The statement requiring reporting of monitoring results should be updated to reflect the delegation of the NPDES program to the FDEP from EPA.

With respect to the History Notes section, in general the dates provided appear to be correct. I would add that the date of 5/20/80 should be inserted as the date for the fourth change to the Conditions of Certification. FPL also has archived many of our older files, and thus some of this information is not easiliy accessible.

I would be pleased to discuss this further with you, or with other members of the Department if you have any questions.

Very truly yours,

Rich Piper
Senior Environmental Specialist
Florida Power & Light Company

cc:

Clair Fancy	DARM
Craig Diltz	DWF

Date: 3/24/97 11:13:24 AM
From: Karen Skinner TAL
Subject: Putnam Power Plant
To: Clair Fancy TAL
To: Craig Diltz TAL
CC: Hamilton Buck Oven TAL
CC: Chip Collette TAL

Rich Piper from FP&L cc:ed you on a letter he sent to Buck/us re the proposed update/cleanup to the conditions we are proposing (Chip, I'll send you a copy through InterOffice mail). In that I don't think you saw the final draft we sent him, I am attaching it to this E-mail, so Rich's comments will make better sense. I suspect we will have to do a formal modification rather than a "technical revisition" to make all the changes he suggested -- many of the deletions and so forth can be construed as substantive versus our editorial changes, although I doubt they will be particularly objectionable.

State of Florida Department of Environmental Protection
Florida Power & Light Company, Putnam Plant ~~Palatka Station~~
Case No. PA-74-01
CONDITIONS OF CERTIFICATION

Table of Contents

State of Florida Department of Environmental Protection
Florida Power & Light Company, Putnam Plant ~~Palatka Station~~
Case No. PA 74-01
CONDITIONS OF CERTIFICATION

The permittee shall comply with the following conditions of certification:

1. Fuel

A. Auxiliary Boilers:

Fuel consumed should not contain more than 0.7% sulfur nor should stack emissions exce
rule 62-296, F.A.W. ~~chapter 17-2.600(6)~~

B. Combustion Turbines:

(i) Only fuel oil with not more than 0.7 percent sulfur content or natural gas may be t

(ii) Opacity shall not exceed 20 percent opacity except for one 6-minute period per
opacity shall not exceed 27 percent.

C. Heat Recovery Steam Generators

(i) Only the following fuels may be fired: (a) natural gas or (b) fuel oil with not more
sulfur content by weight.

(ii) Emissions shall not exceed the following limitations

(a) Opacity emissions shall not exceed 20 percent
(6-minute average), except for one 6-minute period per hour of not more than 27 percent.

(b) Excess opacity resulting from malfunctions is permitted provided that bes
practice to minimize emissions are adhered to and the duration of excess opacity shall be minimiz
exceed two hours in any 24-hour period unless specifically authorized by the Department for long

(c) Excess opacity resulting from startup or shutdown is permitted, provided t
operational practices to minimize emissions are adhered to and the duration of excess emissions

(d) Nitrogen oxides emissions shall not exceed 0.2 lb/ mmBtu heat input whe
distillate oil is combusted or 0.4 lb/mmBtu heat input when residual oil is combusted. The nitrogen
at all times, including periods of startup, shutdown, or malfunction.

(iii) To determine compliance with the emissions limit for sulfur dioxide, receipts fro
shall be maintained for each shipment which certify that the oil complies with the specifications fo
2, as defined by the American Society of Testing and Materials in ASTM D396-78, standard speci

Quarterly reports based on such receipts shall be submitted to the Northeast District Office certify containing no more than 0.5 weight percent sulfur or oil that has a sulfur dioxide emission rate eq 0.5 lb/mmBtu heat input and which meets the ASTM specifications was combusted in the duct bur preceding quarter. All quarterly reports shall be postmarked by the 30th day following the end of quarter.

(iv) To determine compliance with the opacity limit, Method 9 shall be used as requi s. 60.8 (July 1, 1990) Edition). The initial performance test shall be performed within 60 days afte production rate for the HRSGs, but not later than 180 days after initial startup. Annual complianc performed at least once during each federal fiscal year (October 1 - September 30). Thirty (30) d compliance test and fifteen (15) days prior to each annual compliance test, notice shall be provid District Office. The results of each test shall be submitted to the Northeast District Office within 45 completion. Other Department-approved methods may be used for compliance testing after prior

(v) To determine compliance with the nitrogen oxides emissions limit, FPL shall con test using EPA Reference Methods 7E and 3A, gas codified in 40 CFR part 60 Appendix A). The i shall be performed within 60 days after achieving the maximum production rate for the HRSGs, bu days after initial startup. Annual compliance tests shall be performed at least once during each fe (October 1-September 30). Thirty (30) days prior to the initial compliance test and fifteen (15) da annual compliance test, notice shall be provided to the Northeast District Office. The results of ea submitted to the Northeast District Office within 45 days of test completion.

(vi) FPL shall maintain records of opacity and must submit excess emissions report quarter during which there are excess emissions from the HRSGs. If there are no excess emissio quarter, FPL shall submit a report stating that no excess emissions occurred during the quarterly r quarterly reports shall be submitted to the Department's Northeast District Office.

(vii) FPL shall satisfy any applicable nitrogen oxides emissions records maintenanc forth in 40 CFR s. 60.49b(g) (July 1, 1990 Edition).

(viii) All records required under this condition shall be maintained by FPL for a per following the date of such record.

D. Wind Restrictions and Monitoring

(i) Wind Restriction

The permittee will burn fuel oil containing no more than 0.50% sulfur when sustaine miles per hour for any continuous period of three hours or longer.

(ii) Wind Monitoring

The permittee shall measure wind velocity and wind direction at hourly intervals in t only for those hours during which combustion turbines at either of the combined cycle units of the with greater than 0.5 percent sulfur content. Wind data for the hours during which oil with greater content was burned each month, or, if applicable, a statement that no oil with greater than 0.5 per burned during that month, shall be reported to the Northeast District Office of the Department by t

month following each reporting period. Wind velocity and direction measurements required by this made in accordance with recognized methods and procedures.

2. Stack Height

Minimum stack heights for the paired combined cycle unit exhaust stacks shall be 71 feet a with a height of at least 150 feet shall be constructed if monitoring data per Condition 5 indicates have been violated.

~~Wind Restriction~~

~~The permittee will burn fuel oil containing no more than 0.50% sulfur when sustained winds hour for any continuous period of three hours or longer.~~

~~Wind Monitoring~~

~~The permittee shall measure wind velocity and wind direction at hourly intervals in the plan those hours during which combustion turbines at either of the combines cycle units of the plant op greater than 0.5 percent sulfur content. Wind data for the hours during which oil with greater than content was burned each month, or, if applicable, a statement that no oil with greater than 0.5 per burned during that month, shall be reported to the Northeast District Office of the Department by t month following each reporting period. Wind velocity and direction measurements required by this made in accordance with recognized methods and procedures.~~

3. Sampling Platform

The permittee shall install a sampling platform on one stack or shall provide sampling ports access facilities as may be prescribed by the Department in performing stack sampling.

4. Continuous Monitoring Devices

The permittee shall install and operate continuous monitoring devices on one of the paired the following: Opacity, Nitrogen Oxides. Records of such monitoring shall be available for inspec

5. Ambient Air Samplers

The permittee shall install and operate continuously for a 24-hour period every six days, tw West-Gaeke, monitoring devices for sulfur dioxide and two suspended air particulate sampling de these ambient air samples will be determined by consultation with the Chief, Bureau Air Monitorin the Department. The data collected will be reported to the Chief, Bureau of Air Monitoring and As by the 45th day following the end of the reporting period, utilizing the SAROAD or other mutually and DEP ~~DER~~ shall examine the ambient monitoring program and decide by 1/10/92 to upgrade t delete it.

6. Water Effluents

Water effluents shall conform to the limitations of Chapter 62-302, F.A.C., including but not

contained in Paragraph 7 below. Iron, chlorine, nickel and zinc shall meet the water quality stand Administrative Code Rule 62-302, at the boundary of a mixing zone defined to be an area that is 8 and 90 meters in width, taking into account the particular shoreline configuration, as shown on Fi

7. Monitoring

Monitoring shall be conducted at the frequencies listed below on the following waste strea applicable: Cooling Tower Blowdown, West EP Pond, North Fuel Oil Tank Farm, waste streams St. Johns River. Cooling Tower Blowdown and Physical Chemical Treatment System discharge simultaneously or separately through the same pipe. Monitoring reports shall be submitted quart Department's Director of the Northeast District:

Effluent Characteristics	Limitation	Monitoring
* Flow	To existing plant discharge area. Cooling tower blowdown shall be minimized to the degree allowed by best engineering practice; furthermore, the combined flow to the St. Johns River from the cooling tower and the chemical waste treatment system shall not exceed 2,200 gpm.	Continuous recorders or pump logs
* Temperature	Not to exceed 98°F. at the P.O.D. and not to exceed 92°F. or 5° F. above ambient at the boundary of a 3-dimensional zone of mixing described by a cylinder if 50 meters radius running horizontally from the P.O.D. and which extends vertically to the river surface and river bottom.	Continuous (recorder or pump logs) at any point between the blowdown discharge at the cooling tower and the P.O.D. of cooling water into the river.
* Phosphate to Blowdown tank	50 ppm	Weekly
* Dissolved solids	6000 ppm	Daily
* pH	6.0-8.5	Daily

* Floating solids and visible foam	None visible	None

8. Change in Discharge

All discharges or emissions authorized herein shall be consistent with the terms and condit certification. The discharge of any pollutant identified in this certification more frequently than or excess of that authorized shall constitute a violation of the certification. Any solids, sludges, filter pollutants removed in the course of treatment or control of wastewaters shall be disposed of in a prevent any pollutants from such materials from entering waters of the state.

9. Noncompliance Notification:

If, for any reason, the permittee does not comply with or will be unable to comply with any li in this certification, the permittee shall provide prompt notification to the Director of the Northeast telecommunication sent no late than 3:00 p.m. of the next normal work day following the occurren noncompliance, and shall submit the following information in writing, within ninety-six (96) hours o aware of such condition:

A. A description of the discharge and cause of noncompliance; and

B. The period of noncompliance, including exact dates and times; or, if not corrected, the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent r noncomplying discharge.

10. Facilities Operation

The permittee shall at all times maintain in good working order and operate as efficiently a treatment or control facilities or systems installed or used by the permittee to achieve compliance conditions of this certification.

11. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact resulting fro any limitation specified in this certification, including such accelerated or additional monitoring as the nature and impact of the noncomplying discharge.

12. Bypassing

Any diversion or bypass of facilities necessary to maintain compliance with the terms and c certification is prohibited, except (i) where unavoidable to prevent loss of life or severe property d excessive storm drainage or runoff would damage any facilities necessary for compliance with the permittee shall promptly notify the Director of the Northeast District of the Department of each suc bypass in accordance with the procedure contained in condition 9 of this certification.

13. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or c wastewaters shall be disposed of in a manner such as to prevent any pollutant from such material waters of the state.

14. Right of Entry

The permittee shall allow the Secretary of the Florida Department of Environmental Protect representatives, upon the presentation of credentials:

A. ~~a.~~ To enter upon the permittee's premises where an effluent source is located or in whi required to be kept under terms and conditions of this certification; and

B. ~~b.~~ To have access to and copy any records required to be kept under the conditions of and

C. ~~c.~~ To inspect any monitoring equipment or monitoring method required in this certificati any discharge of pollutants.

15. Revocation or Suspension

After notice and opportunity for a hearing, this certification may be suspended, or revoked during its term for cause including, but not limited to, the provisions of s. 403.512, Chapter 403, Fl failure to comply with the terms and conditions of the certification.

16. New Pollutant Standards

If an effluent or emission standard or prohibition (including any schedule of compliance sp effluent or emission standard or prohibition) is established for a pollutant which is present in this c such standard or prohibition is more stringent than any limitation for such pollutant in this certifica shall be revised in accordance with the new effluent or emission standard or prohibition and the p

17. Civil and Criminal Liability

Nothing in this certification shall be construed to relieve the permittee from civil or criminal non-compliance with any condition of this certification, applicable rules or regulation of the Depart 403, Florida Statutes.

18. Legal Action

Nothing in this certification shall be construed to preclude the institution of any legal action permittee from the responsibilities, requirement, liabilities, or penalties established pursuant of an Statutes, or Regulation, including Department rules and regulations promulgated by the Departme 403, F.S.

19. Property Rights

The issuance of this certification does not convey any property rights in either real or perso exclusive privileges, nor does it authorize any injury to public or private property or any invasion o any infringement of Federal, State or local laws or regulations

20. Severability

The provisions of this certification are severable, and if any provision of this certification on any provision of this certification to any circumstances is held invalid, the application of such prov circumstances, and the remainder of this certification shall not be affected thereby.

21. Debris Discharge

No debris shall be discharged to waters of the State from the intake screens with the excep Additionally, the Permittee shall, beginning no later than July 1, 1978, undertake a study to evalu viable nekton collected on the intake screens to ambient temperature waters and shall submit a re no later than November 1, 1979.

22. Free Available Chlorine

After December 31, 1976 or six months after commencement of boiler operations, whichev available chlorine shall not exceed an average concentration of 0.2 mg/1 and a maximum concent a maximum of one two-hour period a day. Chlorine concentration monitoring shall be conducted t during the period of maximum expected residual, at any point between the exit from the cooling to cooling water in the river. The results of such a monitoring shall be reported, quarterly to the Nort Additionally, a study shall be instituted to evaluate all practicable methods to reduce total chlorine levels, including, but not necessarily limited to, (i) ~~(1)~~ minimization of chlorine addition commensu requirements, (ii) ~~(2)~~ reduction of flow during chlorination, and (iii) ~~(3)~~ discontinuation of blowdow chlorination and subsequent periods of high concentration. Results of this study, including faciliti methods propose to reduce total chlorine residuals shall be submitted within twenty-four months o plant operation. Subsequently, chlorination procedures to reduce total chlorine residual shall be i extent practicable.

23. Biocide Discharge

Any biocide discharge from any point source shall comply with the requirements of the Fed Fungicide, and Rodenticide Act, as amended (U.S.C. 136 et. seq.) and the use of such pesticide consistent with the labeling.

24. Polychlorinated Biphenyl Compounds

There shall be no release from containment devices structures of polychlorinated biphenyl environment.

25. Turbid Waters

There shall be no surface discharge of turbid waters to waters of the State from the spoil di system. Any spoil excavated during construction or maintenance dredging shall be deposited on berm or other control device shall be constructed around the spoil disposal area to insure against of excavated material which may cause turbidity in excess of 29 Nephelometric ~~50 Jackson~~ Turbi background in waters of the State.

26. Barge Slip

The Barge Slip shall be of a sheet pile type construction with a poured concrete cap. Ripra the river bank adjacent to the barge slip to prevent erosion due to removal of natural vegetation. removed from the barge slip prior to the departure of any barge. Such oil shall be disposed of by treatment system.

27. Utilities Tunnel

Construction of the utilities tunnel under U.S. 17 shall be expedited to occur in a minimal a construction shall be performed in accordance with the standards of the Florida Department of Tr close coordination with:

~~Mr. C. A. Benedict~~
District Engineer Fifth Division
Florida Department of Transportation
Post Office Box 47
Deland, Florida 32720

and with:

~~Mr. J.A. Crookshank, Jr.~~
Maintenance Engineer, Putnam County
Post Office Drawer "X"
St. Augustine, Florida 32084

28. Stormwater Runoff

During construction and plant operation necessary measures shall be employed to settle, fi silt-containing pollutant-loaded stormwater runoff to prevent contamination of water of the State. may include sediment traps, barriers and use of berms or vegetation. Exposed or disturbed soils s as possible to minimize silt and sediment run runoff into waters of the State.

29. Turbidity Control

Turbidity control shall be installed prior to any construction or maintenance dredging to ins State waters is not increased more than 29 Nephelometric ~~50 Jackson~~ Turbidity units.

30. Groundwater Monitoring Plan

The Groundwater Monitoring Plan for the Putnam Power Plant, approved on February 25, the Department, is incorporated by reference.

Copies of any subsequent revisions to the Groundwater Monitoring Plan which are approv Department's Northeast District Office shall be filed with the Department's Siting Coordination Offi to the parties hereto by certified mail, and, in the absence of a request for a hearing thereon withi such revision, the revisions shall become part of this certification without the need for further filing filing fees.

31. Review of Site Certification

This certification shall be final unless revoked or suspended pursuant to law. Five years fr issuance of any National Pollutant Discharge Elimination System Permit issued pursuant to the F Pollution Control Act Amendments of 1972, for the Combined Cycle Units, the Department shall r monitoring data that have been submitted to it during the preceding five year period, for the purpo the extent of the permittee's compliance with the conditions of this certification and the environme facility. The Department shall submit the results of its review and recommendations to the Permitt of record in this certification proceeding.

32. Monitoring Program Review

The results of the air and water monitoring programs will be reviewed by the Department a Light Company at the end of each year of operation to determine the necessity and/or extent of co methods and procedures utilized in the monitoring program shall be approved by the Department annually by the Department sand Florida Power & Light Company, and may be modified by agree record in this certification proceeding.

33. Modification of Conditions

The conditions of this certification may be modified in the following manner:

A. The Board, pursuant to 403.516(1), F.S., hereby delegates to the Secretary the authorit notice and opportunity for hearing, any conditions pertaining to air and water monitoring and sam exceptions to water quality standards.

B. Conformance With Federally Delegated Permits

This certification shall be modified to conform to any subsequent amendments, modificatio by DEP under a federally delegated or approved program to any separately issued Prevention of (PSD) permit, Title V Air Permit, or National Pollutant Discharge Elimination System (NPDES) per facility. FPL shall send each party to the certification proceeding (at the parties last known addre the record of such proceedings) copies of notice requests submitted by FPL for modifications or r above-listed permits if the request involves a relief mechanism (e.g., mixing zone, variance, etc.) f standards, a relaxation of conditions included in the permit due to state permitting requirements, o less restrictive air emission limitations in the air permits. DEP shall notify all parties to the certific intent to modify conditions under this section prior to taking final agency action.

C. All other modifications shall be made in accordance with Section 403.516, Florida Statu

---------- History Notes ----------

Certification issued 10/16/74 by Pollution Control Board
Modified 5/18/76, Governor Graham
Modified 9/26/78, Secretary Landers/parties/stipulation
Modified 8/20/80
Modified 3/15/84, Governor Graham
May have been modified in 1985 -- researching Archives
Modified 4/15/86, _____?; -- researching Archives
Modified 7/16/91, Secretary Browner
Modified 12/14/95, Secretary Wetherell

State of Florida Department of Environmental Regulation

Florida Power & Light Company, ~~Palatka~~ Putnam Power Plant Station

Case No. PPS-74-01

CONDITIONS OF CERTIFICATION

The permittee shall comply with the following conditions of certification:

1. Fuel consumed should not contain more than 0.7% sulfur nor should stack emissions exceed those specified in Florida Administrative Code Rule 17-2.600(6).

2. Stack Height: Minimum stack heights shall be 71 feet above grade. Stacks with a height of at least 150 feet shall be constructed if monitoring data per Condition 5 indicate ambient air standards would be violated.

Wind Restriction: The permittee will burn fuel oil containing no more than 0.50% sulfur when sustained winds exceed 20 miles per hour for any continuous period of three hours or longer.

Wind Monitoring: The permittee shall measure wind velocity and wind direction at hourly intervals in the plant vicinity only for those hours during which either unit of the plant operates on oil. Wind data for the hours during which oil was burned during each month, or, if applicable, a statement that no oil was burned during that month, shall be reported to the Northeast District Manager of the Department by the last day of each month following the reporting period. Wind velocity

and direction measurements required by this paragraph shall be made in accordance with recognized methods and procedures.

3. The permittee shall install a sampling platform on one stack or shall provide sampling ports and such temporary access facilities as may be prescribed by the Department in performing stack sampling.

4. The permittee shall install and operate continuous monitoring devices on one of the paired exhaust stacks for the following: Opacity, Nitrogen Oxides. Records of such monitoring shall be available for inspection.

5. The permittee shall install and operate continuously for a 24-hour period every six days two ambient air, West-Gaeke, monitoring devices for sulfur dioxide and two suspended particulate sampling devices. The location of these ambient air samplers shall be determined by consultation with the Northeast District Manager of the Department. The data collected will be reported to the Northeast District Manager quarterly by the last day of each month following the reporting period, utilizing SAROAD or other mutually acceptable format.

6. Water effluents shall conform to the limitations of Chapter 17-3, F.A.C., including but not limited to those contained in Paragraph 7 below.

7. The following parameters shall be reported monthly to the Northeast District Manager:

Effluent Characteristics	Limitations	Monitoring
* Flow	To existing plant discharge area. Cooling tower blowdown shall be minimized to the degree allowed by best engineering practice; furthermore, the combined flow to the St. Johns River from the cooling tower and the chemical waste treatment system shall not exceed 2,200 gpm.	Continuous recorders or pump logs
* Temperature	Not to exceed 98°F. at the P.O.D. and not to exceed 92°F. or 5° F. above ambient at the boundary of a 3-dimensional zone of mixing described by a cylinder of 50 meters radius running horizontally from the P.O.D. and which extends vertically to the river surface and river bottom.	Continuous (recorder or logs) at any point between the blowdown discharge at the cooling tower and the P.O.D. of cooling water into the river.
* Phosphate to Blowdown tank	50 ppm	Weekly
* Dissolved solids	6000 ppm	Daily
* pH	6.0 - 8.5	Daily
* Floating solids and visible foam	None visible	None

8. Change in Discharge

All discharges or emissions authorized herein shall be consistent with the terms and conditions of this certification. The discharge of any pollutant identified in this certification more frequently than or at a level in excess of that authorized shall constitute a violation of the certification. Any antici-

pated facility expansions, production increases, or process modifications which will result in new, different, or increased discharges of pollutants or expansion in steam generating capacity must be reported by submission of a new application.

9. Noncompliance Notification:

If, for any reason, the permittee does not comply with or will be unable to comply with any limitation specified in this certification, the permittee shall provide prompt notification to the Northeast District Manager of the Department by telecommunication sent no later than 3:00 p.m. of the next normal work day following the occurrence of such noncompliance, and shall submit the following information in writing, within ninety-six (96) hours of becoming aware of such conditions:

A. A description of the discharge 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 noncomplying discharge.

10. Facilities Operation:

The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this certification.

11. Adverse Impact:

The permittee shall take all reasonable steps to minimize any adverse impact resulting from noncompliance with any limitation specified in this certification, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

12. Bypassing:

Any diversion or bypass of facilities necessary to maintain compliance with the terms and conditions of this certification is prohibited, except (i) where unavoidable to prevent loss of life or severe property damage, or (ii) where excessive storm drainage or runoff would damage any facilities necessary for compliance with the conditions of this certification. The permittee shall promptly notify the Northeast District Manager of the Department of each such diversion or bypass in accordance with the procedure contained in condition #9 of this certification.

13. Removed Substances:

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering waters of the state.

14. Right of Entry:

The permittee shall allow the Secretary of the Florida Department of Environmental Regulation and/or authorized representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises where an effluent source is located or in which any records are required to be kept under terms and conditions of this permit; and

b. To have access to and copy any records required to be kept under the conditions of this certification; and

c. To inspect any monitoring equipment or monitoring method required in this certification and to sample any discharge of pollutants.

15. Revocation or Suspension:

After notice and opportunity for a hearing, this certification may be suspended, or revoked in whole or in part during its term for cause including, but not limited to, the provisions of § 403.512, Chapter 403, Florida Statutes, or for failure to comply with the terms and conditions of the certification.

16. New Pollutant Standards:

If an effluent or emission standard or prohibition (including any schedule of compliance specified in such effluent or emission standard or prohibition) is established for a pollutant which is present in this certification and such standard or prohibition is more stringent than any limitation for such pollutant in this certification, this certification shall be revised in accordance with the new effluent or emission standard or prohibition and the permittee is so notified.

17. Civil and Criminal Liability:

Nothing in this certification shall be construed to relieve the permittee from civil or criminal penalties for non-compliance with any condition of this certification, applicable rules or regulations of the Department, or Chapter 403, Florida Statutes.

18. Nothing in this certification shall be construed to preclude the institution of any legal action or relieve the permittee from the responsibilities, requirements, liabilities, or penalties established pursuant to any applicable State Statutes, or Regulation, including Department rules and regulations promulgated by the Department pursuant to Chapter 403, F.S.

19. Property Rights:

The issuance of this certification does not convey any property rights in either real or personal property, or any exclusive privileges, nor 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.

20. Severability:

The provisions of this certification are severable, and if any provision of this certification or the application or any provision of this certification to any circumstances is held invalid, the application of such provision to other circumstances, and the remainder of this certification shall not be affected thereby.

21. No debris shall be discharged to waters of the State from the intake screens with the exception of viable nekton. Additionally, the Permittee shall, beginning no later than July 1, 1978, undertake a study to evaluate methods of returning viable nekton collected on the intake screens to ambient temperature waters and shall submit a report presenting results no later than November 1, 1979.

22. After December 31, 1976 or six months after commencement of boiler operations, whichever occurs later, free available chlorine shall not exceed an average concentration of 0.2 mg/l and a maximum concentration of 0.5 mg/l during a maximum of one two-hour period a day. Chlorine concentration monitoring shall be conducted two times per week, during the period of maximum expected residual, at any point between the exit from the cooling tower and the P.O.D. of cooling water in the river. The results of such a monitoring shall be reported quarterly to the Northeast District Manager. Additionally, a study shall be instituted to evaluate all practicable methods to reduce total chlorine (free and combined) levels, including, but not necessarily limited to, (1) minimization of chlorine addition commensurate with control requirements, (2) reduction of flow during chlorination, and (3) discontinuation of blowdown during chlorination and subsequent periods of high concentration. Results of this study, including facilities and/or methods proposed to reduce total chlorine resi-

duals, shall be submitted within twenty-four months of commencement of plant operation. Subsequently, chlorination procedures to reduce total chlorine residuals shall be implemented to the extent practicable.

23. Any biocide discharge from any point source shall comply with the requirements of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended (7 U.S.C. 136 et. seq.) and the use of such pesticide shall be in a manner consistent with the labeling.

24. There shall be no release from containment devices or structures of polychlorinated biphenyl compounds to the environment.

25. There shall be no surface discharge of turbid waters to waters of the State from the spoil disposal/borrow pit system. Any spoil excavated during construction or maintenance dredging shall be deposited on an upland area. A berm or other control device shall be constructed around the spoil disposal area to insure against spillage or discharge of excavated material which may cause turbidity in excess of 50 Jackson Turbidity Units above background in waters of the State.

26. The Barge Slip shall be of a sheet pile type construction with a poured concrete cap. Riprap shall be placed on the river bank adjacent to the barge slip to prevent erosion due to removal of natural vegetation. Spilled oil shall be removed from the barge slip prior to the departure of any barge. Such oil shall be disposed of by the plant's oil treatment system.

27. Construction of the utilities tunnel under U.S. 17 shall be expedited to occur in a minimal amount of time. Such construction shall be performed in accordance with the standards of the Florida Department of Transportation and in close coordination with:

Mr. C. A. Benedict
District Engineer, Fifth Division
Florida Department of Transportation
Post Office Box 47
DeLand, Florida 32720

and with:

Mr. J. A. Crookshank, Jr.
Maintenance Engineer, Putnam County
Post Office Drawer "X"
St. Augustine, Florida 32084

28. During construction and plant operation necessary measures shall be employed to settle, filter or absorb silt-containing or pollutant-loaded stormwater runoff to prevent contamination of waters of the State. Such measures may include sediment traps, barriers and use of berms or vegetation. Exposed or disturbed soils shall be sodded as soon as possible to minimize silt and sediment runoff into waters of the State.

29. Turbidity control shall be installed prior to any construction or maintenance dredging to insure that turbidity of State waters is not increased more than 50 Jackson Turbidity Units.

30. Review of Site Certification:

This certification shall be final unless revoked or suspended pursuant to law. Five years from the date of issuance of any National Pollutant Discharge Elimination System Permit issued

pursuant to the Federal Water Pollution Control Act Amendments of 1972, for the Combined Cycle Units, the Department shall review all monitoring data that have been submitted to it during the preceding five year period, for the purpose of determining the extent of the permittee's compliance with the conditions of this certification and the environmental impact of this facility. The Department shall submit the results of its review and recommendations to the Permittee and all parties of record in this certification proceeding.

31. Monitoring Program Review:

The results of the air and water monitoring programs will be reviewed by the Department and Florida Power & Light Company at the end of each year of operation to determine the necessity and/or extent of continuation. The methods and procedures utilized in the monitoring program shall be approved by the Department and also be reviewed annually by the Department and Florida Power & Light Company, and may be modified by agreement of all parties of record in this certification proceeding.

32. Modification of Conditions:

The conditions of this certification may be modified in the following manner:

A. The Board, pursuant to 403.516(1), F.S., hereby delegates to the Secretary the authority to modify, after notice and opportunity for hearing, any conditions pertaining to air and water monitoring and sampling, variances, or exceptions to water quality standards.

B. All other modifications shall be made in accordance with Section 403.516, Florida Statutes.

FLORIDA POWER & LIGHT COMPANY
PUTNAM PLANT
CONDITIONS OF CERTIFICATION
Includes Modifications in Effect 5/28/92

[Dates in left margin indicate language was modified subsequent to 10/16/74]

The permittee shall comply with the following conditions of certification:

5/20/80
3/15/84
7/16/91
5/28/92

1. A. Auxiliary Boilers:

Fuel consumed shall not contain more than 0.7% sulfur nor shall stack emissions exceed those specified in Chapter 17-2.600(6).

B. Combustion Turbines:

(i) Only fuel oil with not more than 0.7 percent sulfur content or natural gas may be fired.

(ii) Visible emissions shall not exceed 20 percent opacity except for one 6-minute period per hour during which opacity shall not exceed 27 percent.

C. Heat Recovery Steam Generators:

(i) Only the following fuels may be fired: (a) natural gas or (b) fuel oil with not more than 0.5 percent sulfur content by weight.

(ii) Emissions shall not exceed the following limitations:

(a) Visible emissions shall not exceed 20 percent (6-minute average), except for one 6-minute period per hour of not more than 27 percent.

(b) Excess opacity resulting from malfunctions is permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess opacity shall be minimized, but in no case exceed two hours in any 24-hour period unless specifically authorized by the Department for longer duration.

(c) Excess opacity resulting from startup or shutdown is permitted, provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.

(d) Nitrogen oxides emissions shall not exceed 0.2 lb/mmBtu heat input when natural gas or distillate oil is combusted or 0.4 lb/mmBtu heat input when residual oil is combusted. The nitrogen oxides standard applies at all times, including periods of startup, shutdown, or malfunction.

(e) Within 90 days after this modification becomes effective, FPL shall submit to the DER Siting Coordination Office for review and approval a report outlining best operational practices to be implemented at the Putnam Plant to minimize excess opacity emissions as referenced in conditions ii (a) and (b).

(iii) To determine compliance with the emissions limit for sulfur dioxide, receipts from the fuel supplier shall be maintained for each shipment which certify that the oil complies with the specifications for fuel oil numbers 1 and 2, as defined by the American Society of Testing and Materials in ASTM D396-78, Standard Specifications for Fuel Oils. Quarterly reports based on such receipts shall be submitted to the Northeast District Office certifying that only oil containing no more than 0.5 weight percent sulfur or oil that has a sulfur dioxide emission rate equal to or less than 0.5 lb/mmBtu heat input and which meets the ASTM specifications was combusted in the duct burners during the preceding quarter. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter.

(iv) To determine compliance with the opacity limits, Method 9 shall be used as required under 40 CFR § 60.8 (July 1, 1990 Edition). The initial performance test shall be performed within 60 days after achieving

the maximum production rate for the HRSGs, but not later than 180 days after initial startup. Annual compliance tests shall be performed at least once during each federal fiscal year (October 1 - September 30). Thirty (30) days prior to the initial compliance test and fifteen (15) days prior to each annual compliance test, notice shall be provided to the Northeast District Office. The results of each test shall be submitted to the Northeast District Office within 45 days of test completion. Other Department approved methods may be used for compliance testing after prior Department approval.

(v) To determine compliance with the nitrogen oxides emissions limit, FPL shall conduct a performance test using EPA Reference Methods 7E and 3A, (as codified in 40 CFR Part 60, Appendix A). The initial compliance test shall be performed within 60 days after achieving the maximum production rate for the HRSGs, but not later than 180 days after initial startup. Annual compliance test shall be performed at least once during each federal fiscal year (October 1 - September 30). Thirty (30) days prior to the initial compliance test and fifteen (15) days prior to each annual compliance test, notice shall be provided to the Northeast District Office. The results of each test shall be submitted to the Northeast District Office within 45 days of test completion.

(vi) FPL shall maintain records of opacity and must submit excess emissions reports for any calendar quarter during which there are excess emissions from the HRSGs. If there are no excess emissions during the calendar quarter, FPL shall submit a report stating that no excess emissions occurred during the quarterly reporting period. The quarterly reports shall be submitted to the Department's Northeast District Office.

(vii) FPL shall satisfy any applicable nitrogen oxides emissions records maintenance requirements set forth in 40 CFR § 60.49b(g) (July 1, 1990 Edition).

(viii) All records required under this condition shall be maintained by FPL for a period of two years following the date of such record.

5/18/76 _____2. Stack Height: Minimum stack heights for the
5/20/80 paired combined cycle unit exhaust stacks
7/16/91 shall be 71 feet above grade. Stacks with a height of at least 150 feet shall be constructed if monitoring data per Condition 5 indicates ambient air standards have been violated.

5/18/76 _____ Wind Restriction: The permittee will burn
5/20/80 fuel oil containing no more than 0.50% sulfur when sustained winds exceed 20 miles per hour for any continuous period of three hours or longer.

5/18/76 _____ Wind Monitoring: The permittee shall measure
5/20/80 wind velocity and wind direction at hourly
3/15/84 intervals in the plant vicinity, only for
7/16/91 those hours during which combustion turbines at either of the combined cycle units of the plant operates on oil with greater than 0.5 percent sulfur content. Wind data for the hours during which oil with greater than 0.5 percent sulfur content was burned each month, or, if applicable, a statement that no oil with greater than 0.5 percent sulfur content was burned during that month, shall be reported to the Northeast District Director of the Department by the last day of the month following each reporting period. Wind velocity and direction measurements required by this paragraph shall be made in accordance with recognized methods and procedures.

[FPL and DER shall examine the provisions of this condition and determine necessary revisions by 1/10/92, to conform to any decision made pursuant to Condition No. 5, below.]

3. The permittee shall install a sampling platform on one stack or shall provide sampling ports and such temporary access facilities as may be prescribed by the Department in performing stack sampling.

5/18/76 _____4. The permittee shall install and operate
3/15/84 continuous monitoring devices on one of the

7/16/91 paired combined cycle unit exhaust stacks for each unit for the following: Opacity, Nitrogen Oxides. Records of such monitoring shall be available for inspection.

5/18/76 _____5. With the exception of cooling tower blowdown, water effluents shall conform to the limitations of Chapter 17-3, F.A.C., including, but not limited to those contained in Condition 7 below. For cooling tower blowdown, in addition to those limitations contained in Chapter 17-3, F.A.C., and Condition 7 below, a mixing zone is hereby established for the parameters of iron, chlorine, copper, nickel and zinc with the dimensions of 800 meters in length and 90 meters in width, except that the southernmost section of the mixing zone shall be 150 meters in width as shown on Figure 5 of Attachment "A" hereto so as to take into account a particular shoreline configuration.

5/15/86 renumbered 5/28/92

5/18/76 _____6. Monitoring shall be conducted at the frequencies listed below on the following waste streams, where applicable: Cooling Tower Blowdown, West EP Pond, North Fuel Oil Tank Farm, and the Physical Chemical Treatment System. Each of these waste streams discharge to the St. Johns River. Cooling Tower Blowdown and the Physical Chemical Treatment System discharge may discharge simultaneously or separately through the same pipe. Monitoring reports shall be submitted quarterly to the Department's Northeast District Director:

5/15/86 7/17/91 renumbered 5/28/92

Parameter	Monitoring Limitations	Frequency	Waste Streams
a. Flow	Cooling tower blowdown shall be minimized to the degree allowed by best engineering practices	Continuous recorders, pump logs or calculation	Cooling Tower Blowdown, West EP Pond, North Fuel Oil Tank Farm Area, Physical Chemical Treatment System

b. Temperature	Not to exceed 98°F. at the P.O.D. and not to exceed 92°F. 5°F. above ambient at the boundary of a three-dimensional zone of mixing described by a cylinder of 50 meters radius running horizontally from the P.O.D. and which extends vertically to the river surface and river bottom	Continuous (recorder or logs) at any point between the blowdown discharge at the cooling tower and the P.O.D. or cooling water water into the river	Cooling Tower Blowdown
c. Phosphate	50 ppm Weekly	Physical Chemical Treatment System during periods of discharge from the neutralization basin	
d. Dissolved Solids	6000 ppm	Daily Physical Chemical Treatment System	Cooling Tower Blowdown,
e. pH	6.0 - 8.5	Daily West EP Pond, North Fuel Oil Tank Farm Area, Physical Chemical Treatment System	Cooling Tower Blowdown,
f. Floating Solids and and Visible Foam	None visible	None West EP Pond, North Fuel Oil Tank Farm Area, Physical Chemical Treatment System	Cooling Tower Blowdown,

renumbered 5/18/76 renumbered 5/28/92 7. Change in Discharge: All discharges or emissions authorized herein shall be consistent with the terms and conditions of this certification. The discharge of any pollutant identified in this certification more frequently than or at a level in excess of that authorized shall constitute a violation of the certification. Any anticipated facility expansions, production increases, or process modifications which will result in new, different, or increased discharges of pollutants or expansion in steam generating capacity must be reported by submission of a new application.

5/18/76 7/16/91 renumbered 8. Noncompliance Notification: If, for any reason the permittee does not comply with or will be unable to comply with any

5/28/92

limitation specified in this certification, the permittee shall provide prompt notification to the Director of the Northeast District of the Department by telecommunication sent by 3:00 p.m. of the next normal work day following the occurrence of such noncompliance, and shall submit the following information in writing, within ninety-six (96) hours of becoming aware of such conditions:

A. A description of the discharge 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 noncomplying discharge.

renumbered 5/18/76 _____9. renumbered 5/28/92

Facilities Operation: The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this certification.

renumbered 5/18/76 _____10. renumbered 5/28/92

Adverse Impact: The permittee shall take all reasonable steps to minimize any adverse impact resulting from noncompliance with any limitation specified in this certification, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

5/18/76 _____11. 7/16/91 renumbered 5/28/92

Bypassing: Any diversion or bypass of facilities necessary to maintain compliance with the terms, and conditions of this certification is prohibited, except (i) where unavoidable to prevent loss of life or severe property damage or (ii) where excessive storm drainage or runoff would damage any facilities necessary for compliance with the conditions of this certification. The permittee shall promptly notify the Director of the Department of each such diversion or bypass in accordance with the procedure

contained in Condition 9 of this certification.

renumbered 5/18/76 _____12. renumbered 5/28/92

Removed Substances: Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering waters of the state.

5/18/76 _____13. renumbered 5/28/92

Right of Entry: The permittee shall allow the Secretary of the Florida Department of Environmental Regulation and/or authorized representatives, upon the presentation of credentials:

(a) To enter upon the permittee's premises where an effluent source is located or in which any records are required to be kept under terms and conditions of this permit; and

(b) To have access to and copy any records required to be kept under the conditions of this certification; and

(c) To inspect any monitoring equipment or monitoring method required in this certification and to sample any discharge of pollutants.

5/18/76 _____14. renumbered 5/28/92

Revocation or Suspension: After notice and opportunity for a hearing, this certification may be suspended, or revoked in whole or in part during its terms for cause including, but not limited to, the provisions of § 403.512, Chapter 403, Florida Statutes, or for failure to comply with the terms and conditions of the certification.

renumbered 5/18/76 _____15. renumbered 5/28/92

New Pollutant Standards: If an effluent or emission standard or prohibition (including any schedule of compliance specified in such effluent or emission standard or prohibition) is established for a pollutant which is present in this certification and such standard or prohibition is more stringent than any limitation for such pollutant in this certification, this certification shall be revised in accordance with the new

effluent or emission standard or prohibition and the permittee so notified.

renumbered 5/18/76 _____16. renumbered 5/28/92

Civil and Criminal Liability: Nothing in this certification shall be construed to relieve the permittee from civil or criminal penalties for noncompliance with any condition of this certification, applicable rules or regulations of the Department, or Chapter 403, Florida Statutes.

5/18/76 _____17. renumbered 5/28/92

Nothing in this certification shall be construed to preclude the institution of any legal action or relieve the permittee from the responsibilities, requirements, liabilities, or penalties established pursuant to any applicable state statutes or regulations, including Departmental rules and regulations promulgated by the Department pursuant to Chapter 403, Florida Statutes.

renumbered 5/18/76 _____18. renumbered 5/28/92

Property Rights: The issuance of this certification does not convey any property rights in either real or personal property, or any exclusive privileges, nor 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.

renumbered 5/18/76 _____19. renumbered 5/28/92

Severability: The provisions of this certifition are severable, and if any provision of this certification or the application or any provision of this certification to any circumstances is held invalid, the application of such provision to other circumstances and the remainder of this certification shall not be affected thereby.

5/18/76 _____20. 9/26/78 5/15/86 renumbered 5/28/92

No debris shall be discharged to waters of the state from the intake screens with the exception of viable nekton.

5/18/86 _____21. 5/15/86 renumbered

Discharge of cooling tower blowdown shall not begin until total residual chlorine concentrations are below 0.14 mg/l. Free

5/28/92 available chlorine shall not exceed a daily average concentration of 0.2 mg/l and a maximum concentration of 0.5 mg/l during a maximum of one 2-hour period a day at the point of discharge. Chlorine concentration monitoring shall be conducted two times per week using multiple grab sampling. The results of such a monitoring shall be reported to the District Manager on the same frequency as reported to the U. S. Environmental Protection Agency.

renumbered
5/18/76 _____22. Any biocide discharge from any point source
renumbered shall comply with the requirements of the
5/28/92 Federal Insecticide, Fungicide, and Rodenticide Act, as amended (7 U.S.C. 136 et seq.) and the use of such pesticide shall be in a manner consistent with the labeling.

5/18/76 _____23. There shall be no release from containment
renumbered devices or structures of polychlorinated
5/28/92 biphenyl compounds to the environment.

renumbered
5/18/76 _____24. There shall be no surface discharge of turbid
renumbered waters to waters of the state from the spoil
5/28/92 disposal/borrow pit system. Any spoil excavated during construction of maintenance dredging shall be deposited on an upland area. A berm or other control device shall be constructed around the spoil disposal area to ensure against spillage or discharge of excavated material which may cause turbidity in excess of 50 Jackson Turbidity Units above background in waters of the State.

renumbered
5/18/76 _____25. The barge slip shall be of a sheet-pile type
renumbered construction with a poured concrete cap.
5/28/92 Riprap shall be placed on the river bank adjacent to the barge slip to prevent erosion due to removal of natural vegetation. Spilled oil shall be removed from the barge slip prior to the departure of any barge. Such oil shall be disposed of by the plant's oil treatment system.

renumbered
5/18/76 _____26. Construction of the utilities tunnel under
renumbered U.S. 17 shall be expedited to occur in a

5/28/92

minimal amount of time. Such construction shall be performed in accordance with the standards of the Florida Department of Transportation and in close coordination with:

Mr. C. A. Benedict
District Engineer, Fifth Division
Florida Department of Transportation
Post Office Box 47
Deland, Florida 32720

and with

Mr. J. A. Crookshank, Jr.
Maintenance Engineer, Putnam County
Post Office Drawer X
St. Augustine, Florida 32084

renumbered
5/18/76 _____27. renumbered
5/28/92

During construction and plant operation, necessary measures shall be employed to settle, filter or absorb silt-containing or pollutant-loaded stormwater runoff to prevent contamination of waters of the state. Such measures may include sediment traps, barriers, and use of berms or vegetation. Exposed or disturbed soil shall be sodded as soon as possible to minimize silt and sediment runoff into waters of the State.

renumbered
5/18/76 _____28. renumbered
5/28/92

Turbidity control shall be installed prior to any construction or maintenance dredging to ensure that turbidity of state waters is not increased more than 50 Jackson Turbidity Units.

new
7/16/91 _____29. renumbered
5/28/92

The Groundwater Monitoring Plan for the Putnam Power Plant, approved on February 25, 1985, and on file with the Department, is incorporated by reference.

Copies of any subsequent revisions to the Groundwater Monitoring Plan which are approved by the Department's Northeast District Office shall be filed with the Department's Siting Coordination Office and provided to the parties hereto by certified mail, and, in the absence of a request for a hearing thereon within 15 days of receipt of

such revision, the revisions shall become part of this certification without the need for further filing or the submission of filing fees.

5/18/76 30. renumbered 7/16/91 renumbered 5/28/92

Review of Site Certification: This certification shall be final unless revoked or suspended pursuant to law. Five years from the date of issuance of any National Pollution Discharge Elimination System Permit issued pursuant to the Federal Water Pollution Control Act Amendments of 1972, for the Combined Cycle Units, the Department shall review all monitoring data that have been submitted to it during the preceding five-year period for the purpose of determining the extent of the permittee's compliance with the conditions of this certification and the environmental impact of this facility. The Department shall submit the results of its review and recommendations to the permittee and all parties of record in this certification proceeding.

5/18/76 31. renumbered 7/16/91 renumbered 5/28/92

Monitoring Program Review: The results of the air, water, and groundwater monitoring programs will be reviewed by the Department and Florida Power & Light Company at the end of each year of operation to determine the necessity and/or extent of continuation. The methods and procedures utilized in the monitoring program shall be approved by the Department and shall also be reviewed annually by the Department and Florida Power & Light Company, and may be modified by agreement of all parties of record in this certification proceeding.

3/15/84 32. renumbered 7/16/91 renumbered 5/28/92

Modification of Conditions: The conditions of this certification may be modified in the following manner:

A. The Board, pursuant to § 403.516(1), Florida Statutes, hereby delegates to the Secretary the authority to modify, after notice and opportunity for hearing, any conditions pertaining to air and water monitoring and sampling, variances, or exceptions to water quality standards.

B. All other modifications shall be made in accordance with § 403.516, Florida Statutes.

BEFORE THE GOVERNOR AND CABINET
OF THE STATE OF FLORIDA

In RE:
FLORIDA POWER & LIGHT COMPANY)
PUTNAM POWER PLANT)
MODIFICATION OF CERTIFICATION)
PA 74-01F)
PUTNAM COUNTY, FLORIDA)
)

FINAL ORDER MODIFYING CONDITIONS
OF CERTIFICATION

On July 16, 1991, the Secretary of the Florida Department of Environmental Regulation (DER) issued a Final Order modifying Certification No. PA 74-01F for the Florida Power & Light Company (FPL) Putnam Power Plant. Those modifications were necessary to incorporate new source performance standards applicable to the heat recovery steam generators as a result of proposed refurbishments and to allow the construction activities which were necessary for those refurbishments to occur. Included within the July, 1991, modification was a requirement that FPL and DER examine the ambient monitoring program and decide whether "to upgrade the program, modify or delete it." On March 18, 1992, DER issued notice that it intended to issue a modification of the conditions of certification to allow termination of the intermittent ambient air quality monitoring program at the Putnam Power Plant.

On March 27, 1992, a notice of Intent to Issue Proposed Modification of Power Plant Certification regarding elimination of the ambient air quality monitoring program was published in the Florida Administrative Weekly and served on all parties. The notice specified that a hearing would be held if requested on or before 45 days from receipt by the parties. No hearing was requested. No person has objected to the the proposed modification.

Subsequently, on April 2, 1992, FPL submitted to DER a request to modify the conditions of certification for the Putnam Power Plant concerning the nitrogen oxides compliance test method and clarification of the nitrogen oxides emission compliance requirement for the duct burners. The modification of conditions would allow FPL to use Method 7E rather than Method 20 for the nitrogen oxides emissions compliance testing and clarify that compliance is to be determined through initial

and annual compliance testing rather than on a 30-day rolling average basis. The requested modification was submitted pursuant to Section 403.516(1)(b), F.S., and Condition 33 (formerly Condition 32) of the conditions of certification, which delegated authority to modify certain conditions of certification to the Department.

On April 2, 1992, a copy of FPL's letter to DER requesting modification of the conditions of certification regarding the nitrogen oxides emissions test method and nitrogen oxides emissions compliance requirements was served on all parties. On April 17, 1992, an Amended Notice of Intent to Issue Proposed Modification of Power Plant Certification was published in the Florida Administrative Weekly. The notice specified that a hearing would be held if requested on or before 45 days from receipt of the request for modification by the parties. No hearing was requested. No person has objected to the proposed modification.

Accordingly, in the absence of any dispute,

IT IS ORDERED:

The Department hereby modifies the conditions of certification for Putnam Power Plant as follows:

Condition No. 1 is modified to read as follows:

1.C. Heat Recovery Steam Generators:

...

(ii)(d) Nitrogen oxides emission shall not exceed 0.2 lb/mmBtu heat input when natural gas or distillate oil is combusted or 0.4 lb/mmBtu heat input when residual oil is combusted. ~~Compliance is determined on a 30-day rolling average basis.~~ The nitrogen oxides standard applies at all times, including periods of startup, shutdown, or malfunction.

...

(v) To determine compliance with the nitrogen oxides emissions limit, FPL shall conduct a performance test using EPA Reference Methods 7E and 3, (as codified in 40 CFR Part 60, Appendix A). ~~the performance test described in 40 CFR § 60.49b(f) (July 1, 1990 Edition) and required under 40 CFR § 60.8 (July 1, 1990 Edition) using the nitrogen oxides and oxygen measurement procedures in 40 CFR Part 60 Appendix A, Method 20 (July 1, 1990 Edition).~~ The initial compliance test shall be performed within 60 days after achieving the maximum production rate for the HRSGs, but not later that 180 days after initial startup. An annual compliance test shall be performed at least once during each federal fiscal year (October 1 - September 30).

Thirty (30) days prior to the initial compliance test and fifteen (15) days prior to each annual compliance test, notice shall be provided to the Northeast District Office. The results of each test shall be submitted to the Northeast District Office within 45 days of test completion.

Conditions No. 5 is deleted and subsequent conditions are renumbered.

Any party to this 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 of Environmental Regulation in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 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 date that the Final Order is filed with the clerk of the Department of Environmental Regulation.

DONE AND ENTERED THIS 28 day of May, 1992, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Carol M. Browner

CAROL M. BROWNER
Secretary

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400
Telephone: (904) 488-9730

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing Final Order Modifying Conditions of Certification for Florida Power & Light Company's Putnam Power Plant were furnished to the following by United States Mail, postage prepaid, this 14th day of May, 1992:

Steven Pfeiffer, General Counsel
Department of Community Affairs
The Rhyne Building, Room 138
2740 Centerview Drive
Tallahassee, FL 32399-2100

Susan F. Clark, General Counsel
Florida Public Service Commission
Fletcher Building
101 E. Gaines Street
Tallahassee, FL 32399-0850

John Thompson, Chairman
Putnam County Board of
County Commissioners
Post Office Box 758
Palatka, FL 32178

William H. Green
Angela R. Morrison
Hopping, Boyd Green
and Sams
123 S. Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314

R T Donelan, J.

Richard T. Donelan
Assistant General Counsel
State of Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

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: Hamilton S. Oven, Administrator
Siting Coordination Section

FROM: Larry George, Chief
Bureau of Air Monitoring and Assessment

DATE: February 28, 1992

SUBJ: Putnam Power Plant Ambient Monitoring

The Putnam Power Plant Conditions of Certification, specifically, Condition No. 5, requires that the Department "shall examine the ambient monitoring program and decide by 1/10/92 to upgrade the program, modify or delete it." In a letter to you dated January 28, 1992, Florida Power and Light Company inquired as to the Department's position on this condition. After review of the data and the scope of the ambient monitoring program, the bureau recommends that the requirement to continue ambient air monitoring for the Putnam Power Plant be deleted.

If you have any questions or comments, contact me at 488-1344.

TO: Buck Oven

FROM: Mike Harley

DATE: May 27, 1992

SUBJ: Compliance Test Procedures
FP&L Putnam PPSC PA-74-01

We have no objection to the approval of the above referenced request.

Florida Power & Light Company's April 2, 1992 request for approval to use alternate sampling procedures for the measurement of NO_X emissions from the Putnam Plant has been reviewed. FP&L has requested approval to:

- Measure NO_X emissions using EPA Methods 7E and 3A in lieu of EPA Method 20.
- Determine the NO_X emitted from the duct burner by measuring NOx emissions at the duct burner outlet under two different operating conditions. The NO_X emissions will be measured with only the turbine operating and then with both the turbine and the duct burner operating.
- Calculate the gas flow rates using the measured fuel consumption rates and the F-factors given in EPA Method 19 in lieu of measuring the gas flow rates with EPA Method 2.

The company's proposal is acceptable pursuant to the caveats of the May 22, 1992 letter from the Region IV Office of EPA.

Based on a May 26, 1992 conversation with David McNeal of EPA, the reference to 40 CFR 60.49b(h) in EPA's May 22, 1992 letter should be 40 CFR 60.48b(h).

Please send us a copy of your final action.

cc: Jim Pennington
Barry Andrews
Patty Adams
Andy Kutyna

EPA Putnam

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

SOURCE EVALUATION UNIT
AIR ENFORCEMENT BRANCH
FACSIMILE TRANSMISSION SHEET
Fax Number: FTS 257-5207 or 404/347-5207

DATE: 5-22-92 NUMBER OF PAGES (Including this sheet) 5

TO: Hamilton Oven PHONE: 904 488-1344

ADDRESS: FDER FAX NUMBER: 904 487-4938

FROM: Dave McNeal PHONE: (404) 347-5014

If the following pages are received poorly, please call Angela at FTS 257-5014 or 404/347-5014.

SPECIAL INSTRUCTIONS FOR RECEIVER: _____

NOTICE OF INTENT TO ISSUE PROPOSED MODIFICATION OF

POWER PLANT CERTIFICATION

The Department proposes a modification of a Power Plant Certification issued pursuant to the Florida Electrical Power Plant Siting Act, Section 403.501 et seq., Florida Statutes, concerning:

Florida Power and Light Company

Putnam Power Plant

Power Plant Siting Application No. PA 74-01

The Department has reviewed a requested modification of the conditions of certification which would allow termination of an ambient air quality monitoring program. A copy of the proposed modification is available from Hamilton S. Oven, P.E., Administrator, Siting Coordination Office, Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, (904) 487-0472.

Pursuant to Section 403.516, Florida Statutes, and Rule 17-17.211(4), F.A.C., all parties to the certification proceeding have 45 days from the date of receipt of this notice in which to respond to the request. Failure to file a response constitutes a waiver of objection to the requested modification.

POINT OF ENTRY

Any person who is not already a party to the certification proceeding and whose substantial interest is affected by the requested modification may petition for an administrative

determination (hearing) on the proposed modification within thirty days from the date of publication of this notice. 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 must be filed within 30 days of publication of the public notice or within 30 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the certificate holder, Florida Power and Light Company, P.O. Box 078768, West Palm Beach, Florida 33407-0768, at the time of filing.

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(s) 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 30 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to file a petition within the allotted 30 day period shall constit such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes, concerning the modification.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

MAY 22 1992

4APT-AEB

Mr. Hamilton Oven, P.E., Administrator
Site Certification Section
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Review of Alternative Procedures Proposed for Duct Burner Testing at the Florida Power and Light Company (FPL) Putnam Plant

Dear Mr. Oven:

This letter summarizes our review of the referenced alternative testing protocol that was submitted to your agency by the law firm of Hopping Boyd Green and Sams on April 2. The proposed testing procedures which were submitted to you on behalf of FPL by Hopping Boyd Green and Sams include the following provisions which are deviations from the duct burner testing procedures promulgated at 40 C.F.R. §60.46b(f):

1. The company proposes to use EPA Methods 7E and 3A rather than EPA Method 20 to measure NO_x and diluent concentrations during the testing. Both the standard procedures and the proposed alternatives involve the use of instrumental analyzers to measure effluent concentrations. The primary difference between the methods is that Method 20 requires sampling at a large number of traverse points while single-point sampling is acceptable if the proposed alternatives are used.

2. The company proposes to sample only at the duct burner outlet. This constitutes an alternative to the procedures in 40 C.F.R. §60.46b(f) which require sampling at two locations - at the the gas turbine outlet and at the duct burner outlet. According to the procedures in 40 C.F.R. §60.46b(f), the emission rate for the duct burner is calculated as the difference between the emission rates at the two sampling sites. FPL proposes to determine the duct burner emission rate by measuring emission rates at

the duct burner outlet under two different operating conditions - one with only the turbine operating and one with both the turbine and the duct burner operating. The justification provided for the proposed alternative is that it would be difficult to find and obtain access to an acceptable sampling location at the gas turbine outlet.

3. In lieu of using EPA Method 2 to measure gas flow rates at the proposed sampling site, the company proposes to calculate gas flow rates from measured fuel consumption rates and F-factors specified in EPA Method 19.

Based upon our review of the proposed alternatives from FPL, we have determined that using Methods 7E and 3A as alternatives to EPA Method 20 is acceptable. The basis for this determination is that since NO_x is a gas, pollutant stratification should not be a significant factor at the proposed sampling site. Therefore, it should be possible to obtain a representative concentration measurement at the duct burner outlet using single-point sampling.

Calculating gas flow rates using fuel consumption data and F-factors from EPA Method 19 would be acceptable if fuel consumption can be measured as accurately as gas flow rates can be measured using EPA Method 2 (i.e. ± 5 %). The basis for this determination is that, if Method 2 were used to measure flow rates directly, F-factors would be used to determine the heat input during the testing. Since heat input is a surrogate for fuel consumption, using F-factors to calculate gas flow rates from fuel consumption data would utilize the same equations routinely used to calculate heat input from Method 2 data. Therefore, if the equipment used to measure fuel consumption is accurate to within approximately 5 percent, gas flow rates calculated using the proposed alternative procedures would be as accurate as those obtained using EPA Method 2.

Although a final decision regarding the need for simultaneous testing at the gas turbine outlet and duct burner outlet should be made based upon your knowledge of the source, we have determined that sampling only at the duct burner outlet would be acceptable if site-specific factors (i.e. duct work configuration) make it extremely difficult or impossible to install sampling ports and a sampling platform at the gas turbine outlet. Conducting all tests at the duct burner outlet may not be as accurate as conducting simultaneous testing at the gas turbine outlet and at the duct burner outlet. However, the accuracy of the proposed alternative should be acceptable if the turbine and duct burner are operated at a constant rate within 10 percent of full capacity during the testing.

Under the provisions of 40 C.F.R. §60.8(e) FPL could be forced to install sampling ports and an adequate sampling platform at the outlet of the gas turbine. However, there are two reasons why the expense associated with the installation of sampling ports and a platform may not be justified for the source in question. The first reason that requiring the installation of additional sampling ports may not be justified is that the duct burner is part of a peaking unit that operates during only a small portion of the total plant operating time. Due to the limited operating time for the unit, the additional accuracy that could be obtained by having sampling ports at the turbine outlet may not be enough to justify the cost of having the ports and a sampling platform installed.

Another reason that requiring the installation of additional sampling ports may not be justified is that the unit in question is an existing one that became subject to 40 C.F.R. Part 60, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units) because it was reconstructed. Providing adequate sampling access is less of a burden for new facilities than it is for existing facilities because provisions for sampling access can be made during the design of a new facility. Since the duct burner at FPL was not subject to Subpart Db when it was originally constructed, sampling access was not an issue considered during the design of the facility. According to FPL, it would be extremely difficult to retrofit sampling ports and a sampling platform at the gas turbine outlet. Depending upon the actual difficulty associated with installing sampling ports and a platform, the additional accuracy that could be obtained by having additional sampling access may not be enough to justify the cost of the retrofit.

One thing that the FPL proposal did not specify clearly was how the data obtained utilizing the alternative procedures would be used to calculate a duct burner emission rate in $lb/10^6$ BTU. However, if the testing is conducted as proposed, the company will have the information necessary to calculate emission rates with the proper units. In order to calculate the duct burner NO_x emission rate in $lb/10^6$ BTU, the gas turbine emission rate in lb/hr (page 5 of Appendix A to the FPL submittal) would be subtracted from the combined gas turbine/duct burner emission rate in lb/hr (page 6 of Appendix A to the FPL submittal) and the result would be divided by the heat input to the duct burner in 10^6 BTU/hr.

One additional issue that was addressed in the letter from Hopping Boyd Green and Sams involves the averaging time for the duct burner emission standard. Hopping Boyd Green and Sams is correct in their determination that a 30-day rolling average emission standard would not be appropriate for the facility.

The basis for this conclusion is that, according to 40 C.F.R. §60.46b(f), NO_x compliance for duct burners is to be determined through the use of manual emission tests. In addition, 40 C.F.R. §60.49b(h) clearly states that owners or operators of duct burners are not required to install continuous NO_x emission monitors. If the facility were subject to a 30-day rolling average emission standard, the only practical way to demonstrate compliance would be through installation and operation of a continuous NO_x emission monitoring system.

If you have any questions about the determinations provided in this letter, please contact Mr. David McNeal of my staff at 404/347-5014.

Sincerely yours,

Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides and Toxics
Management Division

cc: Mr. James K. Pennington, P.E., Administrator
Compliance and Enforcement Section
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Mr. Mike Harley
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

MAY 22 1992

4APT-AEB

Mr. Hamilton Oven, P.E., Administrator
Site Certification Section
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Review of Alternative Procedures Proposed for Duct Burner Testing at the Florida Power and Light Company (FPL) Putnam Plant

Dear Mr. Oven:

This letter summarizes our review of the referenced alternative testing protocol that was submitted to your agency by the law firm of Hopping Boyd Green and Sams on April 2. The proposed testing procedures which were submitted to you on behalf of FPL by Hopping Boyd Green and Sams include the following provisions which are deviations from the duct burner testing procedures promulgated at 40 C.F.R. §60.46b(f):

1. The company proposes to use EPA Methods 7E and 3A rather than EPA Method 20 to measure NO_x and diluent concentrations during the testing. Both the standard procedures and the proposed alternatives involve the use of instrumental analyzers to measure effluent concentrations. The primary difference between the methods is that Method 20 requires sampling at a large number of traverse points while single-point sampling is acceptable if the proposed alternatives are used.

2. The company proposes to sample only at the duct burner outlet. This constitutes an alternative to the procedures in 40 C.F.R. §60.46b(f) which require sampling at two locations - at the the gas turbine outlet and at the duct burner outlet. According to the procedures in 40 C.F.R. §60.46b(f), the emission rate for the duct burner is calculated as the difference between the emission rates at the two sampling sites. FPL proposes to determine the duct burner emission rate by measuring emission rates at

the duct burner outlet under two different operating conditions - one with only the turbine operating and one with both the turbine and the duct burner operating. The justification provided for the proposed alternative is that it would be difficult to find and obtain access to an acceptable sampling location at the gas turbine outlet.

3. In lieu of using EPA Method 2 to measure gas flow rates at the proposed sampling site, the company proposes to calculate gas flow rates from measured fuel consumption rates and F-factors specified in EPA Method 19.

Based upon our review of the proposed alternatives from FPL, we have determined that using Methods 7E and 3A as alternatives to EPA Method 20 is acceptable. The basis for this determination is that since NO_x is a gas, pollutant stratification should not be a significant factor at the proposed sampling site. Therefore, it should be possible to obtain a representative concentration measurement at the duct burner outlet using single-point sampling.

Calculating gas flow rates using fuel consumption data and F-factors from EPA Method 19 would be acceptable if fuel consumption can be measured as accurately as gas flow rates can be measured using EPA Method 2 (i.e. ± 5 %). The basis for this determination is that, if Method 2 were used to measure flow rates directly, F-factors would be used to determine the heat input during the testing. Since heat input is a surrogate for fuel consumption, using F-factors to calculate gas flow rates from fuel consumption data would utilize the same equations routinely used to calculate heat input from Method 2 data. Therefore, if the equipment used to measure fuel consumption is accurate to within approximately 5 percent, gas flow rates calculated using the proposed alternative procedures would be as accurate as those obtained using EPA Method 2.

Although a final decision regarding the need for simultaneous testing at the gas turbine outlet and duct burner outlet should be made based upon your knowledge of the source, we have determined that sampling only at the duct burner outlet would be acceptable if site-specific factors (i.e. duct work configuration) make it extremely difficult or impossible to install sampling ports and a sampling platform at the gas turbine outlet. Conducting all tests at the duct burner outlet may not be as accurate as conducting simultaneous testing at the gas turbine outlet and at the duct burner outlet. However, the accuracy of the proposed alternative should be acceptable if the turbine and duct burner are operated at a constant rate within 10 percent of full capacity during the testing.

Under the provisions of 40 C.F.R. §60.8(e) FPL could be forced to install sampling ports and an adequate sampling platform at the outlet of the gas turbine. However, there are two reasons why the expense associated with the installation of sampling ports and a platform may not be justified for the source in question. The first reason that requiring the installation of additional sampling ports may not be justified is that the duct burner is part of a peaking unit that operates during only a small portion of the total plant operating time. Due to the limited operating time for the unit, the additional accuracy that could be obtained by having sampling ports at the turbine outlet may not be enough to justify the cost of having the ports and a sampling platform installed.

Another reason that requiring the installation of additional sampling ports may not be justified is that the unit in question is an existing one that became subject to 40 C.F.R. Part 60, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units) because it was reconstructed. Providing adequate sampling access is less of a burden for new facilities than it is for existing facilities because provisions for sampling access can be made during the design of a new facility. Since the duct burner at FPL was not subject to Subpart Db when it was originally constructed, sampling access was not an issue considered during the design of the facility. According to FPL, it would be extremely difficult to retrofit sampling ports and a sampling platform at the gas turbine outlet. Depending upon the actual difficulty associated with installing sampling ports and a platform, the additional accuracy that could be obtained by having additional sampling access may not be enough to justify the cost of the retrofit.

One thing that the FPL proposal did not specify clearly was how the data obtained utilizing the alternative procedures would be used to calculate a duct burner emission rate in $lb/10^6$ BTU. However, if the testing is conducted as proposed, the company will have the information necessary to calculate emission rates with the proper units. In order to calculate the duct burner NO_x emission rate in $lb/10^6$ BTU, the gas turbine emission rate in lb/hr (page 5 of Appendix A to the FPL submittal) would be subtracted from the combined gas turbine/duct burner emission rate in lb/hr (page 6 of Appendix A to the FPL submittal) and the result would be divided by the heat input to the duct burner in 10^6 BTU/hr.

One additional issue that was addressed in the letter from Hopping Boyd Green and Sams involves the averaging time for the duct burner emission standard. Hopping Boyd Green and Sams is correct in their determination that a 30-day rolling average emission standard would not be appropriate for the facility.

The basis for this conclusion is that, according to 40 C.F.R. §60.46b(f), NO_x compliance for duct burners is to be determined through the use of manual emission tests. In addition, 40 C.F.R. §60.49b(h) clearly states that owners or operators of duct burners are not required to install continuous NO_x emission monitors. If the facility were subject to a 30-day rolling average emission standard, the only practical way to demonstrate compliance would be through installation and operation of a continuous NO_x emission monitoring system.

If you have any questions about the determinations provided in this letter, please contact Mr. David McNeal of my staff at 404/347-5014.

Sincerely yours,

Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides and Toxics
Management Division

cc: Mr. James K. Pennington, P.E., Administrator
Compliance and Enforcement Section
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
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Florida Department of Environmental Regulation
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400
Lawton Chiles, Governor
Carol M. Browner, Secretary

February 5, 1992

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

RE: Modification to Putnam Groundwater Monitoring Plan, PA 74-01

Dear Mr. McLean:

The Department hereby approves the modifications to the Putnam Plant Groundwater Monitoring Plan as proposed by your letter of August 19, 1992.

Sincerely,

Hamilton S. Oven

Hamilton S. Oven, P.E.
Administrator, Siting
Coordination Office

cc: Bob Leetch, DER
Robert Martin, DER
Richard Donelan, DER
Steven Pfeiffer, DCA
Michael Palecki, PSC
John Thompson, Putnam County
William H. Green, HBG&S

CERTIFICATE OF SERVICE

Pursuant to Condition of Certification 30 for the Florida Power & Light Company Putnam Power Plant, the Department of Environmental Regulation hereby files notice of an approval of a modification to the Groundwater Monitoring Plan for the power plant site. I hereby certify that copies of the approval letter were filed by U.S. Mail on February 5, 1992.

Hamilton S. Oven

Hamilton S. Oven, P.E.
Administrator, Siting
Coordination Office
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

FPL

P.O. Box 078768, West Palm Beach, FL 33407-0768
5500 Village Blvd.

August 19, 1991

Sally Heuer
Florida Department of Environmental Regulation
3426 Bills Road
Jacksonville, Florida 32207

RE: **Modification to Putnam Plant**
Groundwater Monitoring Plan
Site Number PPS-74-01

Dear Ms. Heuer:

Florida Power and Light Company (FPL) respectfully requests modifications to the Putnam Plant Groundwater Monitoring Plan (GMP) which was approved by the Florida Department of Environmental Regulation (DER) on February 25, 1985. The modifications are related to the following two items:

Item 1) Storage of a lime/alum/clay mixture and spent sand blasting material in and around one of the two approved sludge drying basins.

Item 2) Removal of methylene chloride from the list of parameters to be monitored in wells OB-2R and PU-MW-1.

Item 1)

The Putnam Plant currently has approximately 933 cubic yards on site of a lime/alum/clay mixture which is blowdown from the plant's industrial water treatment coagulator. Attachment 1 is a summary of four EP-Tox analyses of this material which is currently stored in the existing sludge drying basins (see Figure 1 for location). FPL requests permission to store this material until further notice in the red cross-hatched area on Figure 1. This area, with the exception of approximately 1500 square feet located south of the south sludge drying basin, is addressed in the current GMP. There is one monitoring well upstream and three downstream of this area (See Figure 1). These wells are monitored quarterly for the following parameters:

1) pH
2) Arsenic
3) Chromium
4) Silver
5) Copper
6) Iron
7) Manganese

8) Nickel
9) Oil and Grease
10) Sulfate
11) Total Dissolved Solids
12) Zinc
13) Methylene Chloride

Storage of this material would result in no significant change to the current situation. Approximately 150 cubic yards of this mixture are generated each year. Cost of disposal of this material at the Putnam County Landfill would be approximately $30,000 plus transportation costs.

In addition to this lime/alum/clay mixture FPL requests modification to the GMP to allow storage of spent sandblasting material in this same area. Attachment 2 is an EP-Tox analysis of this material. FPL currently has 180 cubic yards of this material on site and generates approximately 90 cubic yards per year. Cost of disposal of this material at the Putnam County Landfill would be approximately $7,000 plus transportation costs.

Item 2)

The letter of approval for the Putnam Plant GMP (See Attachment 3) states as follows:

1) Due to the high levels of methylene chloride (0.50 mg/l and 0.37 mg/l) found in the wastewater from the Oily Waste Basin and the West Evaporation/Percolation Basin, the Department of Environmental Regulation requires that monitor wells OB-2 and PU-MW-1 be monitored quarterly for methylene chloride in addition to those parameters proposed in the submitted plan. This monitoring must be done for one year (four samples) to assess the presence of methylene chloride in the ground water. At the end of the sampling year, both DER and FPL shall discuss further need to monitor for methylene chloride based on the data submitted.

Attachments 4 & 5 are tables presenting data for 1986- present for methylene chloride. Since no methylene chloride has been detected, FPL feels this parameter should be deleted as provided in the above-referenced approval letter.

If you have any questions in these matters, please contact Ron Hix at (407) 640-2073.

Sincerely,

Mark L. McLean

Mark L. McLean
Environmental Specialist
Florida Power & Light Company

cc:
Mr. Hamilton Oven - DER/Tallahassee

Attachment 1

ENVIRONMENTAL SCIENCE & ENGINEERING 06/29/87 STATUS: FINAL-REV.2 PAG

PROJECT NUMBER 87413 0307 PROJECT NAME FPL-BASINS-PUTNAM
FIELD GROUP FPLNB6 LAB COORDINATOR J.D. SHAMIS

PARAMETERS	UNITS	STORET # METHOD	SAMPLE ID/# PBACOMP FPLNB6 7	PBACOMP FPLNB6 8	PBBCOMP FPLNB6 9	PBBCOMP FPLNB6 10
DATE			05/05/87	05/05/87	05/05/87	05/05/87
TIME			00:00	00:00	00:00	00:00
EP-TOX, DATE OF EXTRACTION		97078 M	5/12/87	5/8/87	5/8/87	5/8/87
ARSENIC, DISS	UG/L	1000 GFAA	<2.1	<2.1	<2.1	<2.1
BARIUM, DISS	UG/L	1005 ICAP	448	475	364	356
CADMIUM, DISS	UG/L	1025 ICAP	<6.0	<6.0	<6.0	<6.0
CHROMIUM, DISS	UG/L	1030 ICAP	<8.1	<8.1	9.0	<8.1
LEAD, DISS	UG/L	1049 ICAP	<62.4	<62.4	<62.4	<62.4
MERCURY, DISS.	UG/L	71890 CVAA	0.3	<0.2	0.3	<0.2
SELENIUM, DISS	UG/L	1145 GFAA	<1.6	<1.6	<1.6	<3.1
SILVER, DISS	UG/L	1075 ICAP	<8.7	<8.7	<8.7	<8.7
CORROSIVITY, SW846	MM/YR	98724 I	<6.35	<6.35	<6.35	<6.35
PH, SOIL	STD UNITS	99218 I	9.9	10.2	10.7	10.7
REACTIVITY		99342 I	NEG	NEG	NEG	NEG
FLASH POINT	DEG-C	74030 I	>110	>110	>110	>110

Weight 56 lb/cu ft

Volume 922 cu yds

EDWARD E. CLARK ENGINEERS-SCIENTISTS, INC.

RESULTS OF LABORATORY ANALYSES

REPORT DATE: June 11, 1987
Project No. 8612U
SAMPLE LOCATION: FP&L PUTNAM PLANT
SAMPLE COLLECTED BY: P. WILSON - FP&L
SAMPLE DATE: April 28, 1987
DATE & TIME RECEIVED IN LABORATORY: May 5, 1987 @ 1230
ANALYSIS DATE(S): May 13 - June 11, 1987
SAMPLE TYPE: Sand Blasting Sand
FLORIDA ENVIRONMENTAL LABORATORY CERTIFICATION #:T86036
DHRS LABORATORY CERTIFICATION #: 86196

EP TOXICITY EXTRACTABLE METALS

PARAMETER	Arsenic	Selenium	Mercury	Lead	Chromium	Cadmium
	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
STATION						
Sand Blasting Sand	<.05	<.01	<.002	<.5	<.05	0.05

RECEIVED
JUN 22 1987
Putnam Plant

Bruce K. Krepley
Laboratory Director

EDWARD E. CLARK ENGINEERS-SCIENTISTS, INC.

RESULTS OF LABORATORY ANALYSES

Project No. 8612U

REPORT DATE: June 11, 1987
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FLORIDA ENVIRONMENTAL LABORATORY CERTIFICATION #:T66036
DHRS LABORATORY CERTIFICATION #: 86196

EP TOXICITY EXTRACTABLE METALS

PARAMETER	Barium	Silver	Flash Point
	mg/l	mg/l	°F
STATION			
Sand Blasting Sand	0.78	<.05	>290

Putnam Plant

ATTACHMENT 5

FLORIDA POWER AND LIGHT COMPANY
PUTNAM PLANT
GROUNDWATER MONITORING
METHYLENE CHLORIDE VALUES
WELL C8-2 (DOWNGRADIENT)

SAMPLE DATE	VALUE
2/11/86	< 1.0 ug/L
5/19/86	< 1.0 ug/L
8/11/86	< 1.0 ug/L
11/19/86	< 1.0 ug/L
1/26/87	< 1.0 ug/L
4/20/87	< 1.0 ug/L
7/23/87	< 1.0 ug/L
10/1/87	< 1.0 ug/L
2/3/88	< 1.0 ug/L
4/21/88	< 1.0 ug/L
7/14/88	< 1.0 ug/L
10/6/88	< 1.0 ug/L
1/18/89	< 1.0 ug/L
4/5/89	< 1.0 ug/L
7/13/89	< 1.0 ug/L
10/9/89	< 1.0 ug/L
1/17/90	< 2.0 ug/L

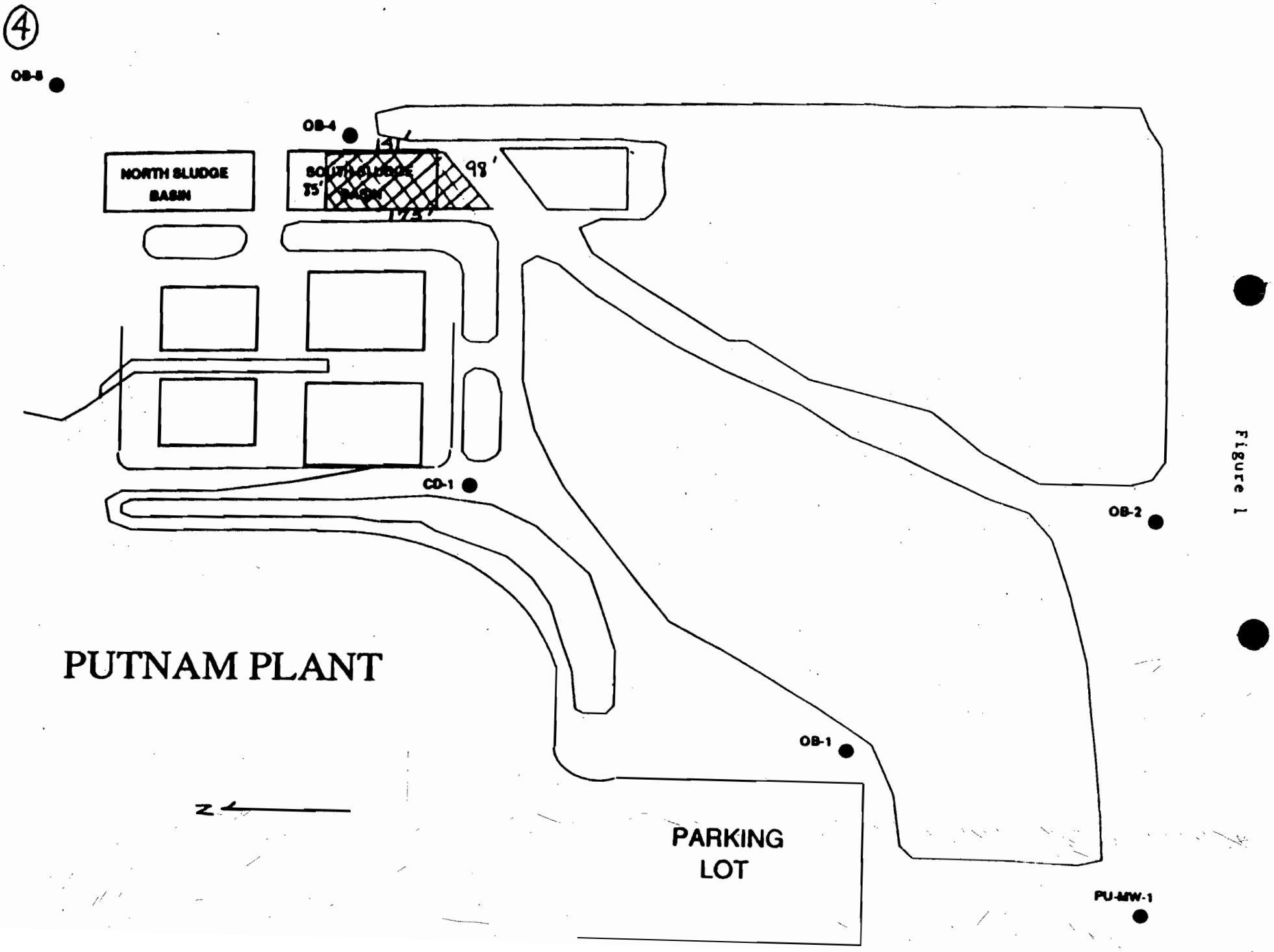
OB-5
OB-4
NORTH SLUDGE BASIN
SOUTH SLUDGE BASIN
85'
98'
175'
CD-1
OB-2
PUTNAM PLANT
OB-1
N
PARKING LOT
PU-MW-1

Figure 1

HOPPING BOYD GREEN & SAMS
ATTORNEYS AND COUNSELORS
123 SOUTH CALHOUN STREET
POST OFFICE BOX 6526
TALLAHASSEE, FLORIDA 32314
(904) 222-7500
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DOUGLAS S. ROBERTS
JULIE B. ROME
KRISTIN C. RUBIN
CECELIA C. SMITH

OF COUNSEL
W. ROBERT FOKES

September 1, 1993

RECEIVED
SEP 07 1993
ENV. PERMITTING

Judy M. McGrady
Florida Power & Light Co.
Environmental Affairs
Post Office Box 088801
North Palm Beach, FL 33408-8801

Re: FPL Putnam Plant; Authorized Heat Input Rates

Dear Judy:

At your request, I have attempted to identify the heat input rates for the FPL Putnam units which have been established under the permits for that plant. FPL needs to identify these rates as part of its efforts to obtain and install CEMs on the units. FPL's latest regulatory submittal which identified the units' heat input rates was the March, 1991 request for modification of site certification under the Power Plant Siting Act for the Putnam units. Section III.E. (page 5 of 12) of the completed Application to Operate/Construct Air Pollution Sources, submitted as part of the PPSA modification request, (enclosed) indicated the maximum heat input rates to the units as follows:

	Heat Input Rate
No. 2 Fuel Oil - CT	910.6 MMBtu/hr.
No. 2 Fuel Oil - HRSG (duct burners)	250 MMBtu/hr.
Natural Gas - CT	968.3 MMBtu/hr.
Natural Gas - HRSG (duct burners)	250 MMBtu/hr.

These are based on CT operation at base load and 85°F. Tables 2-1, 2-2 and 2-3 (enclosed), which were attached to that application, identified the parameters, such as megawattage, fuel flow and heat rate, at which these heat input rates were defined.

These heat input rates slightly exceed the heat input rates identified during the original permitting for the units in 1974. (See attached memo from Elsa Bishop, dated January 29, 1990.) However, since these values have been implicitly accepted by the Department of Environmental Protection during the recent

modification process and appear to be based on actual operating data, as opposed to initial engineering estimates, the above heat input rates can be treated as authorized rates for the combined cycle units.

I trust this responds to your request. Should you have any further questions, please give me a call.

Sincerely,

Douglas S. Roberts

DSR/gs
Encls.