

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF FINAL AIR CONSTRUCTION PERMIT

In the Matter of an  
Application for Permit by:

Mr. Robert Bergstrom, Plant General Manager  
Florida Power & Light  
392 U.S Highway 17 South  
East Palatka, Florida 32131

DEP File No. 1070014-003-AC  
Inlet Foggers Installation  
Combined Cycle Units 003-006  
Putnam Power Plant

Enclosed is the Final Permit Number 1070014-003 AC for an air construction permit to install foggers at the compressor inlet of four natural gas and No. 2 fuel oil-fired Westinghouse Model 501B5A combined cycle combustion turbine-electrical generators at the Power Plant in Putnam County. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.



C. H. Fancy, P.E., Chief  
Bureau of Air Regulation

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL AIR CONSTRUCTION PERMIT (including the FINAL permit) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 7-20-99 to the person(s) listed:

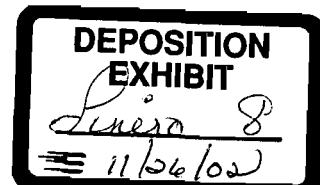
Robert Bergstrom, FP&L\*  
Richard Piper, FPL  
Chris Kirts, DEP NE District  
Gregg Worley, EPA  
Ken Kosky, P.E., Golder Associates

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Keni Jober  
(Clerk)

7-20-99  
(Date)



## FINAL DETERMINATION

Florida Power and Light Company (FP&L)  
Putnam Power Plant, Putnam County  
Inlet Foggers Installation  
DEP File No: 1070014-003-AC

An Intent to Issue an air construction permit, authorizing the installation of inlet foggers on the four 70 MW Westinghouse Model 501B5A combined cycle combustion turbine-electrical generators at the Putnam Power Plant was distributed on June 3, 1999. This facility is located at 392 U.S Highway 17 South, East Palatka, Putnam County, Florida.

The Public Notice of Intent to Issue Air Construction Permit was published in the Palatka Daily News on June 10, 1999. Comments were received from EPA and FP&L.

EPA comments were in response to the Department request on the applicability of the New Source Performance Standard, 40CFR 60, Subpart GG to these turbines. EPA, basically, stated that "if the maximum operating rate of the turbines still occurs under cold weather conditions when the foggers cannot be used to boost the capacity of these units, the installation of the foggers will not constitute a modification". These comments were addressed in a letter dated June 22, 1999 on the same issue for the Ft. Myers Power Plant.

In response to EPA comments, the Department requested and received additional information from FP&L regarding the maximum operating rate of the turbines: The maximum turbine capacity at 20 degrees F is 1220 mmBtu/hr (HHV when firing gas) and 1120 mmBtu/hr (HHV when firing oil). This is compared to the maximum turbine operating capacity of 1000 mmBtu/hr (HHV when firing gas) and 930 mmBtu/hr (HHV when firing oil) at 80 degrees F, which would be the result of lowering the temperature in the 90 degree F range with the use of the foggers.

FP&L comments were related Specific Condition No. 13. FP&L requested to revise this condition tracking degree-hours in the permit, as opposed to simply hours of operation. They stated that this methodology will afford additional operating flexibility without adversely impacting the environment. The Department evaluated FP&L comments and agreed with their request. Specific Condition No. 13 is revised as follows:

Inlet foggers may be installed at the compressor inlet to each of the four combined cycle Westinghouse Model 501B5A combustion turbine-electric generators. The four foggers may operate up to 40,960 degree F-hours per year in aggregate (average 10,240 degree F-hours per unit per year).

The permittee shall monitor both the hours of operation for the inlet foggers and the degrees of cooling afforded by the inlet foggers. Computation of the degree-hour will be performed as follows:

Degree-hours = # hours inlet fogger operating time X degrees F of cooling.

Degrees of Cooling shall be calculated by subtracting the fogged compressor inlet air temperature from the unfogged compressor inlet temperature (upstream of the fogger). The above calculation shall be performed for each hour of fogger operation. Calculation records shall be maintained on the plant site and made available for inspection upon request.

For each hour of oil operation on any combustion turbine during a calendar year, the allowable aggregate total inlet fogger operating degree-hour shall be reduced by 1.27 degree F-hours.

The final action of the Department will be to issue the permit with the changes as noted above.



# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

## PERMITTEE:

Florida Power & Light  
392 US Highway 17 South  
East Palatka, Florida 32131

DEP File No.	1070014-003-AC
Project	Inlet Foggers Project
	ARMS Emissions Units 003-011
SIC No.	4911
Expires:	December 31, 1999

### Authorized Representative:

Robert Bergstrom  
Putnam Plant General Manager

## PROJECT AND LOCATION:

This air construction permit describes the existing facility that was approved through Florida Power Plant Certification No. PA 74-01 and its amendments and which operates under that Certification and Title V permit 1070014-001-AV. Additionally, this permit allows installation of inlet foggers on the four existing Westinghouse Model 501B5A combined cycle combustion turbine-electrical generators designated as ARMS Emissions Units 003-006.


The units are located at the FP&L Putnam Plant, 392 US Highway 17 South, East Palatka, Putnam County. UTM coordinates are: Zone 17; 443.3 km E and 3277.80 km N.

## STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

## ATTACHED APPENDICES MADE A PART OF THIS PERMIT:

Appendix GC	Construction Permit General Conditions
Appendix W	Putnam Plant Heat Input versus Temperature Graphs

  
 Howard L. Rhodes, Director  
 Division of Air Resources  
 Management

# AIR CONSTRUCTION PERMIT 1070014-003-AC

## SECTION I – FACILITY DESCRIPTION

---

### FACILITY DESCRIPTION

Currently, this facility consists of four combustion turbines, each with a supplementally-fired heat recovery steam generator (HRSG), an auxiliary boiler, and “unregulated or insignificant” emissions units. The designation in the Department’s Air Resources Management System (ARMS) are as follows: the four combustion turbines, ARMS Emissions Units 003 to 006; four duct burners within the four HRSGs, ARMS Emissions Units 007 to 010; and the auxiliary boiler, ARMS Emission Unit 011.

Each combustion turbine is a Westinghouse unit Model 501B5A rated at 70 MW generating capacity (at 85 degrees F ambient temperature), with a maximum heat input for natural gas and fuel oil of 968.3 mm Btu/hr and 910.6 mmBtu/hr, respectively. The duct burners for each HRSG are rated at a maximum heat input of 250 mmBtu/hr, and are fired with natural gas and No. 2 fuel oil. The auxiliary boiler is manufactured by VA-Power and has a maximum heat input for natural gas and No. 2 fuel oil of 16.275 mmBtu/hr and 14.28 mmBtu/hr, respectively.

This permitting action, installation of inlet foggers at the four (4) distillate fuel oil-fired combustion turbines equipped with duct burners, amends Power Plant Conditions of Certification PA 74-01 and creates a new construction permit (1070014-003-AC) for these units. No PSD permit exists for this facility since it was built before 1975 and subsequent modifications have not triggered PSD review. On October 16, 1974, FP& L was issued a Site Certification authorizing the construction and operation of the Putnam Plant.

This Project is exempt from the requirements of Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD) as discussed stated in the Technical Evaluation and Preliminary Determination dated June 2, 1999.

### REGULATORY CLASSIFICATION

This facility, FPL Putnam Power Plant, is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM<sub>10</sub>), sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), or volatile organic compounds (VOC) exceeds 100 tons per year (TPY).

This facility is within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 100 TPY for at least one criteria pollutant, the facility is also a Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD).

This facility is a major source of hazardous air pollutants (HAPs) and is also subject to the provisions of Title IV, Acid Rain, Clean Air Act as amended in 1990.

### PERMIT SCHEDULE

- 06/10/99 Notice of Intent published in the Palatka Daily News
- 06/03/99 Distributed Intent to Issue Permit
- 05/07/99 Application deemed complete
- 03/17/99 Received Application

### RELEVANT DOCUMENTS:

The documents listed below are the basis of the permit. They are specifically related to this permitting action, but not all are incorporated into this permit. These documents are on file with the Department.

- Application received on March 29, 1999.
- Department’s Intent to Issue and Public Notice Package dated June 2, 1999.
- FPL’s comments dated April 16, and May 7, 1999.

**AIR CONSTRUCTION PERMIT 1070014-003-AC**  
**SECTION II – ADMINISTRATIVE REQUIREMENTS**

---

1. Unless otherwise indicated in this permit, the construction and operation of the subject emission unit(s) shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-103, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297; and the applicable requirements of the Code of Federal Regulations Section 40, Parts 60, 72, 73, and 75.
2. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [Rule 62-210.300, F.A.C.]
3. Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (DEP), at 2600 Blairstone Road, Tallahassee, Florida 32399-2400 and phone number (850)488-0114. All documents related to reports, tests, and notifications should be submitted to the DEP North District office, 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590 and phone number 904/448-4300.
4. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
5. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
6. Forms and Application Procedures: The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. [Rule 62-210.900, F.A.C.]
7. Modifications: The permittee shall give written notification to the Department when there is any modification to this facility. This notice shall be submitted sufficiently in advance of any critical date involved to allow sufficient time for review, discussion, and revision of plans, if necessary. Such notice shall include, but not be limited to, information describing the precise nature of the change; modifications to any emission control system; production capacity of the facility before and after the change; and the anticipated completion date of the change. [Chapters 62-210 and 62-212]
8. Permit Extension: *This permit expires on December 31, 1999.* The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rule 62-4.080, F.A.C.]
9. Application for a Modification of Title V Permit: An application for a modification of the Title V operating permit, pursuant to Chapter 62-213, F.A.C., must be submitted to the DEP's Bureau of Air Regulation, and a copy sent to the Department's North District office. [Chapter 62-213, F.A.C.]
10. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
11. Annual Reports: Pursuant to Rule 62-210.370(2), F.A.C., Annual Operation Reports, the permittee is required to submit annual reports on the actual operating rates and emissions from this facility. Annual operating reports shall be sent to the DEP's North District office by March 1st of each year.

**AIR CONSTRUCTION PERMIT 1070014-003-AC**  
**SECTION III – SPECIFIC CONDITIONS EUs 003 - 006**

**This section addresses the following emissions units.**

003	Combustion Turbine for Combined Cycle Heat Recovery Steam Generator, HRSG11. This emissions unit consists of a Westinghouse combustion turbine, rated at 70 MW generating capacity (at 85 degrees F ambient temperature). Heat input for this unit may vary at different ambient temperatures in accordance with the curves attached as Appendix W of this permit. (As an example, maximum heat input for natural gas or fuel oil at 85 degrees F ambient temperature is 968.3 mmBtu/hr and 910.6 mmBtu/hr, respectively.)
004	Combustion Turbine for Combined Cycle Heat Recovery Steam Generator, HRSG12. This emissions unit consists of a Westinghouse combustion turbine, rated at 70 MW generating capacity (at 85 degrees F ambient temperature). Heat input for this unit may vary at different ambient temperatures in accordance with the curves attached as Appendix W of this permit. (As an example, maximum heat input for natural gas or fuel oil at 85 degrees F ambient temperature is 968.3 mmBtu/hr and 910.6 mmBtu/hr, respectively.)
005	Combustion Turbine for Combined Cycle Heat Recovery Steam Generator, HRSG21. This emissions unit consists of a Westinghouse combustion turbine, rated at 70 MW generating capacity (at 85 degrees F ambient temperature). Heat input for this unit may vary at different ambient temperatures in accordance with the curves attached as Appendix W of this permit. (As an example, maximum heat input for natural gas or fuel oil at 85 degrees F ambient temperature is 968.3 mmBtu/hr and 910.6 mmBtu/hr, respectively.)
006	Combustion Turbine for Combined Cycle Heat Recovery Steam Generator, HRSG22. This emissions unit consists of a Westinghouse combustion turbine, rated at 70 MW generating capacity (at 85 degrees F ambient temperature). Heat input for this unit may vary at different ambient temperatures in accordance with the curves attached as Appendix W of this permit. (As an example, maximum heat input for natural gas or fuel oil at 85 degrees F ambient temperature is 968.3 mmBtu/hr and 910.6 mmBtu/hr, respectively.)

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required and Power Plant Siting Certification No. PA 74-01 ordered 10/16/74, and the modified conditions of PA 74-01 modified 5/20/80, 3/15/84, 7/16/91 and 5/28/92. Based on information submitted by the applicant in the Title V application, these emissions units are not subject to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines. Each combustion turbine is exhausted through a heat recovery steam generator. Emissions units 003 and 004 began commercial operation in 1978. Emissions units 005 and 006 began commercial operation in 1977. }

**The following specific conditions apply to the emissions units listed above:**

**Essential Potential to Emit (PTE) Parameters**

- Permitted Capacity. The maximum operation heat input rates are as follows:

Unit No.	mmBtu/hr Heat Input	Fuel Type
003, 004, 005, 006	(a)	Natural Gas
	(a)	Fuel Oil

- Heat input is limited at any given ambient temperature in accordance with the curves attached as Appendix W of this permit.

{Note: As an example, maximum heat input for natural gas or fuel oil at 85 degrees F ambient temperature is 968.3 mmBtu/hr and 910.6 mmBtu/hr, respectively. }

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.} [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

**AIR CONSTRUCTION PERMIT 1070014-003-AC**  
**SECTION III – SPECIFIC CONDITIONS EUs 003 - 006**

---

2. Emissions Unit Operating Rate Limitation After Testing. Applicable requirements of Rule 62-297.310 (2) and (2)(b) F.A.C., Operating Rate During Testing.
3. Methods of Operation - Fuels. The combustion turbines shall only be fired with number 2 or number 6 fuel oil or with natural gas. [Rule 62-213.410, F.A.C., PPSC PA 74-01 condition 1.B.(i)]

**Emission Limitations and Standards**

4. Sulfur Dioxide - Sulfur Content. The fuel oil sulfur content shall not exceed 0.7 percent by weight. See specific condition 6. [Rules 62-4.070(3) and 62-213.440, F.A.C., and PPSC PA 74-01 condition 1.B.(i)]
5. Visible Emissions. Visible emissions shall not exceed 20% opacity, except for one 6-minute period per hour during which opacity shall not exceed 27%.  
[Rules 62-4.070(3) and 62-213.440, F.A.C., and PPSC PA 74-01 condition 1.B.(ii)]

**Test Methods and Procedures**

6. Sulfur Dioxide - Sulfur Content. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery. See specific conditions 4. and 7. [Rules 62-213.440 and 62-296.406(3), F.A.C.]
7. Fuel Sampling & Analysis - Sulfur. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90(95), ASTM D1552-95, ASTM D1266-91, or both ASTM D4057-88 and ASTM D129-95 (or latest editions).  
[Rules 62-4.070(3), 62-213.440 and 62-297.440, F.A.C.]
8. Visible Emissions. The permittee shall demonstrate compliance with the visible emissions limit by DEP Method 9. [Rules 62-4.070(3) and 62-213.440, F.A.C.]

**Monitoring of Operations**

9. Annual Tests Required - VE. Except as provided in Rule 62-296.310(7) F.A.C., SIP Approved, emission testing for visible emissions shall be performed annually, no later than September 30th of each year, except for units that are not operating because of scheduled maintenance outages and emergency repairs, which will be tested within thirty days of returning to service. [Rules 62-4.070(3) and 62-213.440, F.A.C.]
10. Wind Restriction and Monitoring. The owner or operator shall burn fuel oil containing no more than 0.50% sulfur (by weight) when sustained winds exceed 20 miles per hour for any continuous period of three hours or longer. The owner or operator shall measure wind velocity and direction, using recognized methods and procedures, at hourly intervals in the plant vicinity, only for those hours during which any combustion turbine at the plant burns fuel oil containing more than 0.50% sulfur (by weight). The owner or operator shall quarterly report wind data, or shall report that no fuel oil containing more than 0.50% sulfur (by weight) was burned, no later than the thirtieth day following the end of each calendar quarter. [PPSC PA 74-01, condition 2]

**Excess Emissions**

11. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.  
[Rule 62-210.700(1), F.A.C.]
12. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.  
[Rule 62-210.700(2), F.A.C.]

**AIR CONSTRUCTION PERMIT 1070014-003-AC**  
**SECTION III – SPECIFIC CONDITIONS EUs 003 - 006**

---

**Inlet Fogger Installation**

13. Inlet foggers may be installed at the compressor inlet to each of the four combined cycle Westinghouse Model 501B5A combustion turbine-electric generators. The four foggers may operate up to 40,960 degree F-hours per year in aggregate (average 10,240 degree F-hours per unit per year).

The permittee shall monitor both the hours of operation for the inlet foggers and the degrees of cooling afforded by the inlet foggers. Computation of the degree-hour will be performed as follows:

Degree-hours = # hours inlet fogger operating time X degrees F of cooling.

Degrees of Cooling shall be calculated by subtracting the fogged compressor inlet air temperature from the unfogged compressor inlet temperature (upstream of the fogger). The above calculation shall be performed for each hour of fogger operation. Calculation records shall be maintained on the plant site and made available for inspection upon request.

For each hour of oil operation on any combustion turbine during a calendar year, the allowable aggregate total inlet fogger operating degree-hour shall be reduced by 1.27 degree F-hours.



**AIR CONSTRUCTION PERMIT 1070014-003-AC**  
**SECTION IV – SPECIFIC CONDITIONS EUs 007 - 010**

This section addresses the following emissions units.

007	Duct burners for Combined Cycle Heat Recovery Steam Generator, HRSG11. This emissions unit consists of duct burners for one heat recovery steam generator. Each HRSG is associated with one combustion turbine. Each HRSG's duct burners have a maximum heat input for natural gas or number 2 fuel oil of 250 mmBtu/hr.
008	Duct burners for Combined Cycle Heat Recovery Steam Generator, HRSG12. This emissions unit consists of duct burners for one heat recovery steam generator. Each HRSG is associated with one combustion turbine. Each HRSG's duct burners have a maximum heat input for natural gas or number 2 fuel oil of 250 mmBtu/hr.
009	Duct burners for Combined Cycle Heat Recovery Steam Generator, HRSG21. This emissions unit consists of duct burners for one heat recovery steam generator. Each HRSG is associated with one combustion turbine. Each HRSG's duct burners have a maximum heat input for natural gas or number 2 fuel oil of 250 mmBtu/hr.
010	Duct burners for Combined Cycle Heat Recovery Steam Generator, HRSG22. This emissions unit consists of duct burners for one heat recovery steam generator. Each HRSG is associated with one combustion turbine. Each HRSG's duct burners have a maximum heat input for natural gas or number 2 fuel oil of 250 mmBtu/hr.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required and Power Plant Siting Certification No. PA 74-01 ordered 10/16/74, and the modified conditions of PA 74-01 modified 5/20/80, 3/15/84, 7/16/91 and 5/28/92. These emissions units are subject to 40 CFR 60, Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. Each heat recovery steam generator has two stacks that exhaust emissions from the associated combustion turbine and the duct burners. Emissions units 007 and 008 began commercial operation in 1978. Emissions units 009 and 010 began commercial operation in 1977.}

The following specific conditions apply to the emissions units listed above:

**Essential Potential to Emit (PTE) Parameters**

1. Permitted Capacity. The maximum operation heat input rates are as follows:

Unit No.	mmBtu/hr Heat Input	Fuel Type
007, 008, 009, 010	250	Natural Gas
	250	Fuel Oil

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

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.}

2. Emissions Unit Operating Rate Limitation After Testing. Applicable Requirements of Rule 62-297.310(2) and (2) (b) F.A.C. Operating Rate During Testing.
3. Methods of Operation - Fuels. The duct burners shall only be fired with number 2 fuel oil or with natural gas.

[Rule 62-213.410, F.A.C., PPSC PA 74-01 condition 1.C.(i)]

**Emission Limitations and Standards**

4. Sulfur Dioxide - Sulfur Content. The fuel oil sulfur content shall not exceed 0.5 percent by weight. See specific condition 7. [Rules 62-4.070(3) and 62-213.440, F.A.C., PPSC PA 74-01 condition 1.C.(i), and 40 CFR 60.42b]

**AIR CONSTRUCTION PERMIT 1070014-003-AC**  
**SECTION IV – SPECIFIC CONDITIONS EUs 007 - 010**

---

5. **Visible Emissions.** Visible emissions shall not exceed 20% opacity (6-minute average), except for one 6-minute period per hour during which opacity shall not exceed 27%. The opacity standards apply at all times, except during periods of startup, shutdown or malfunction. [Rules 62-4.070(3) and 62-213.440, F.A.C., PPSC PA 74-01 condition 1.C.(ii)(a), and 40 CFR 60.43b and 60.46b(a)]
6. **Nitrogen Oxides.** Nitrogen oxide emissions (expressed as NO<sub>2</sub>) shall not exceed 0.20 lb/mmBtu while burning natural gas and distillate oil. The nitrogen oxide standards apply at all times including periods of startup, shutdown, or malfunction. [40 CFR 60.44b and PPSC PA 74-01 (modification of 5/28/92)]

**Test Methods and Procedures**

7. **Sulfur Dioxide - Sulfur Content.** The permittee shall demonstrate compliance with the liquid fuel sulfur limit by maintaining fuel receipts as described in 40 CFR 60.49b(r). See specific conditions 4. and 14. [Rules 62-213.440 and 62-296.406(3), F.A.C., and 40 CFR 60.42b]
8. **VE Test Methods.** To determine compliance with the opacity limits, the owner or operator shall conduct tests using EPA Method 9. [40 CFR 60.46b(d)(7)]
9. **Test Methods For Nitrogen Oxides.** Compliance with the nitrogen oxides emission limit shall be determined through testing using EPA reference methods 7E and 3A, of 40 CFR part 60 appendix A. [40 CFR 60.46b, PPSC PA 74-01 (modification of 5/28/92)] {Note: PPSC PA 74-01 (modification of 5/28/92) allows use of EPA methods 7E and 3A instead of EPA method 20.}

**Monitoring of Operations**

10. **Emission Tests Required - VE and NO<sub>x</sub>.** Except as provided in Rule 62-297.310 (7) F.A.C., SIP Approved, emission testing shall be conducted as follows: Emission testing for visible emissions shall be performed annually. Emission testing for nitrogen oxides shall be performed prior to renewal, except that an annual test for nitrogen oxides shall be performed each year that fuel oil is fired in these units for more than 400 hours. Testing shall be completed no later than September 30th of each year required, except for units that are not operating because of scheduled maintenance outages and emergency repairs, which will be tested within thirty days of returning to service. [Rules 62-4.070(3) and 62-213.440, F.A.C.]
11. **Emission Monitoring For VE.** Prior to burning fuel oil in these emissions units, the owner or operator shall install, calibrate, maintain, and operate a continuous monitoring system for measuring the opacity of emissions discharged to the atmosphere and record the output of the system. This system shall henceforth be operated whenever fuel oil is burned in these emissions units. [40 CFR 60.48b(a)]
12. **CEMS Required by Power Plant Siting.** The owner or operator shall maintain a continuous emission monitoring system (CEMS) for opacity and nitrogen oxides on one of the paired stacks for each combined cycle unit.  
  
{The PPSC requires monitors on one stack each of CT/HRSG 1x and 2x, for a total of two stacks that must be monitored. The owner currently operates opacity monitors to satisfy the PPSC requirement to operate the CEMS for opacity. The NO<sub>x</sub> monitors installed and maintained pursuant to 40 CFR 75 satisfy the PPSC requirement to operate the CEMS for NO<sub>x</sub>.} [Rule 62-213.440, F.A.C., PPSC PA 74-01 condition 4]

**Reporting And Record Keeping Requirements**

13. **Pursuant to 40 CFR 60.49b Reporting And Record Keeping Requirements.**

The owner or operator of an affected facility shall record and maintain records of the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for distillate oil and natural gas for each calendar quarter. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month.

**AIR CONSTRUCTION PERMIT 1070014-003-AC**  
**SECTION IV – SPECIFIC CONDITIONS EUs 007 - 010**

---

The owner or operator shall maintain records of opacity (required by NSPS whenever fuel oil is burned in these emissions units. See condition B.11 of this permit).

The owner or operator shall maintain records of the following information for each steam-generating unit operating day:

- (1) Calendar date.
- (2) The average hourly nitrogen oxides emission rates (expressed as NO<sub>2</sub>) (lb/million Btu heat input) measured or predicted.
- (3) The 30-day average nitrogen oxides emission rates (lb/million Btu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days.
- (4) Identification of the steam generating unit operating days when the calculated 30-day average nitrogen oxides emission rates are in excess of the nitrogen oxides emissions standards under 40 CFR 60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken.
- (5) Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken.
- (6) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data.
- (7) Identification of "F" factor used for calculations, method of determination, and type of fuel combusted.

The owner or operator is required to submit excess emission reports for any calendar quarter during which there are excess emissions from the affected facility. If there are no excess emissions during the calendar quarter, the owner or operator shall submit a report semiannually stating that no excess emissions occurred during the semiannual reporting period. For the purpose of the opacity limitation, excess emissions are defined as all 6-minute periods during which the average opacity exceeds the opacity standards.

[40 CFR 60.49b(d), (f), (g)(1)-(7) and (h)]

14. **Fuel Receipts Required.** The owner or operator of an affected facility who elects to demonstrate that the affected facility combusts only very low sulfur oil shall obtain and maintain at the affected facility fuel receipts from the fuel supplier which certify that the oil meets the definition of distillate oil as defined in 40 CFR 60.41b:

Distillate oil means fuel oils that contain 0.05 weight percent nitrogen or less and comply 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 (incorporated by reference-see 40 CFR 60.17).

Very low sulfur oil means an oil that contains no more than 0.5 weight percent sulfur or that, when combusted without sulfur dioxide emission control, has a sulfur dioxide emission rate equal to or less than 215 ng/J (0.5 lb/million Btu) heat input.

For the purposes of this section, the oil need not meet the fuel nitrogen content specification in the definition of distillate oil. Quarterly reports shall be submitted to the Department certifying that only very low sulfur oil meeting this definition was combusted in the affected facility during the preceding quarter.

[40 CFR 60.45b, 60.47b and 60.49b(r)].

**AIR CONSTRUCTION PERMIT 1070014-003-AC**  
**SECTION V – SPECIFIC CONDITIONS EU 011**

This section addresses the following emissions unit.

011	This emissions unit consists of an auxiliary boiler is manufactured by VA-Power with a maximum heat input for natural gas and number 2 fuel oil of 16.275 mmBtu/hr and 14.28 mmBtu/hr, respectively.
-----	--

{Permitting notes: This emissions unit is regulated under Rule 62-210.300, F.A.C., Permits Required. This emissions unit is subject to 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. Emissions unit 011 began commercial operation in 1993. The unit was previously regulated under Power Plant Siting Certification No. PA 74-01 ordered 10/16/74, and the modified conditions of PA 74-01 modified 5/20/80, 3/15/84, 7/16/91 and 5/28/92. However, the only applicable condition was in conflict with the NSPS and has been superseded by this permit. }

The following specific conditions apply to the emissions unit listed above:

**Essential Potential to Emit (PTE) Parameters**

1. **Permitted Capacity.** The maximum operation heat input rates are as follows:

Unit No.	mmBtu/hr Heat Input	Fuel Type
011	16.275	Natural Gas
	14.28	Number 2 Fuel Oil

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

2. **Emissions Unit Operating Rate Limitation After Testing.** Per Requirements of Rule 62-297.310(2), F.A.C.
3. **Methods of Operation - Fuels.** The auxiliary boiler shall only be fired with number 2 fuel oil or with natural gas. [Rule 62-213.410, F.A.C.]

**Emission Limitations and Standards**

4. **Pursuant to 40 CFR 60.42c Standard For Sulfur Dioxide.**

The owner or operator shall not combust oil in the affected facility that contains greater than 0.5 weight percent sulfur. Compliance with the fuel oil sulfur limit shall be determined based on a certification from the fuel supplier, as described under 40 CFR 60.48c(f)(1) (see specific condition 7.). The fuel oil sulfur limit applies at all times, including periods of startup, shutdown, and malfunction.

[40 CFR 60.42c(d), (h), (i) and (j)]

**Monitoring of Operations**

5. **Emission Monitoring For Sulfur Dioxide.**

As an alternative to operating a CEMS at the outlet of the steam generating unit, the owner or operator shall determine the average SO<sub>2</sub> emission rate by sampling the fuel prior to combustion. Fuel sampling shall be conducted as follows:

As an alternative fuel sampling procedure for affected facilities combusting oil, oil samples may be collected from the fuel tank for each steam generating unit immediately after the fuel tank is filled and before any oil is combusted. The owner or operator of the affected facility shall analyze the oil sample to determine the sulfur content of the oil. If a partially empty fuel tank is refilled, a new sample and analysis of the fuel in the tank would be required upon filling. Results of the fuel analysis taken after each new shipment of oil is received shall be used as the daily value when calculating the 30-day rolling average until the next shipment is received. If the fuel analysis shows that the sulfur content in the fuel tank is greater than 0.5 weight percent sulfur, the owner or operator shall ensure that the sulfur content of subsequent oil shipments is low enough to cause the 30-day rolling average sulfur content to be 0.5 weight percent sulfur or less. [40 CFR 60.46c(d)(2)]

**AIR CONSTRUCTION PERMIT 1070014-003-AC**  
**SECTION V – SPECIFIC CONDITIONS EU 011**

---

**Reporting And Record Keeping Requirements**

6. Pursuant to 40 CFR 60.48c Reporting And Record Keeping Requirements.

For any period in which fuel oil is combusted, the owner or operator shall submit quarterly reports to the Department. Each subsequent quarterly report shall be postmarked by the 30th day following the end of the reporting period.

The owner or operator shall keep records and submit quarterly reports including the following information related to the combustion of fuel oil, as applicable.

- (1) Calendar dates covered in the reporting period.
- (2) Each 30-day average SO<sub>2</sub> emission rate (lb/million Btu), or 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period in the quarter; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.
- (3) Each 30-day average percent of potential SO<sub>2</sub> emission rate calculated during the reporting period, ending with the last 30-day period in the quarter; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.
- (4) Identification of any steam generating unit operating days for which SO<sub>2</sub> or diluent (oxygen or carbon dioxide) data have not been obtained by an approved method for at least 75 percent of the operating hours; justification for not obtaining sufficient data; and a description of corrective actions taken.
- (5) Identification of any times when emissions data have been excluded from the calculation of average emission rates; justification for excluding data; and a description of corrective actions taken if data have been excluded for periods other than those during which oil was not combusted in the steam generating unit.
- (6) Identification of the F factor used in calculations, method of determination, and type of fuel combusted.
- (7) Identification of whether averages have been obtained based on CEMS rather than manual sampling methods.
- (11) If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph (f)(1) of this section, as applicable. In addition to records of fuel supplier certifications, the quarterly report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.

[40 CFR 60.48c(d), (e)(1)-(7) and (e)(11)]

7. Fuel Supplier Certification and Fuel Records. The owner or operator shall maintain records of fuel supplier certification. Fuel supplier certification shall include the following information:

- (i) The name of the oil supplier; and
- (ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil:

Distillate oil means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78, "Standard Specification for Fuel Oils" (incorporated by reference-see 40 CFR 60.17).

The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. [40 CFR 60.48c(f)(1) and (g)]

**APPENDIX GC**  
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

---

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither 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. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- a) Have access to and copy and records that must be kept under the conditions of the permit;
  - b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- a) A description of and cause of non-compliance; and
  - b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

**APPENDIX GC**  
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

---

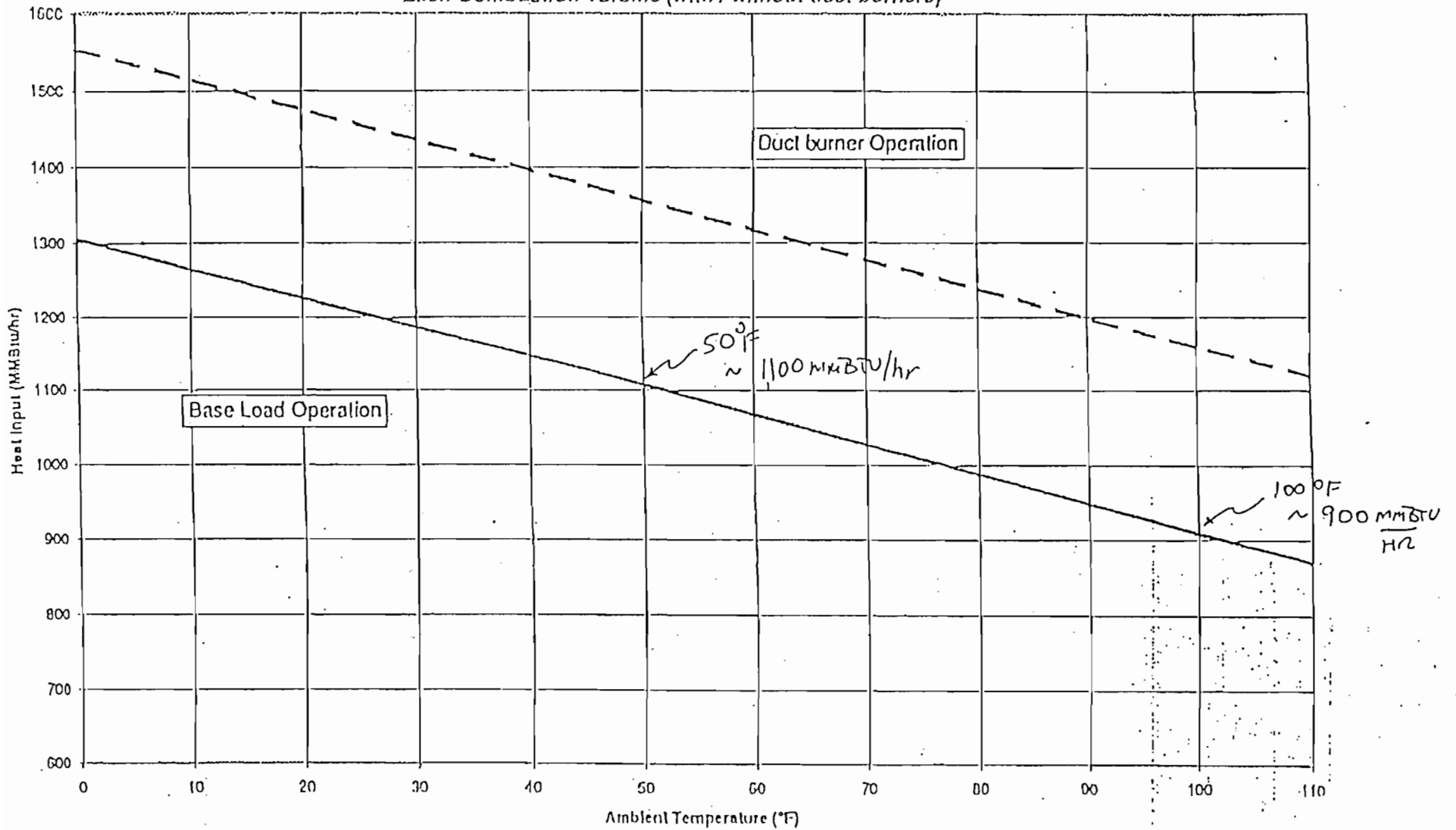
The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- a) Best Available Control Technology ( )
  - b) Prevention of Significant Deterioration ( ); and
  - c) New Source Performance Standards ( ).
- G.14 The permittee shall comply with the following:
- a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c) Records of monitoring information shall include:
    - 1. The date, exact place, and time of sampling or measurements;
    - 2. The person responsible for performing the sampling or measurements;
    - 3. The dates analyses were performed;
    - 4. The person responsible for performing the analyses;
    - 5. The analytical techniques or methods used; and
    - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

## APPENDIX W



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



## FINAL DETERMINATION

Florida Power and Light Company (FP&L)  
Putnam Power Plant, Putnam County  
Inlet Foggers Installation  
DEP File No: 1070014-003-AC

An Intent to Issue an air construction permit, authorizing the installation of inlet foggers on the four 70 MW Westinghouse Model 501B5A combined cycle combustion turbine-electrical generators at the Putnam Power Plant was distributed on June 3, 1999. This facility is located at 392 U.S Highway 17 South, East Palatka, Putnam County, Florida.

The Public Notice of Intent to Issue Air Construction Permit was published in the Palatka Daily News on June 10, 1999. Comments were received from EPA and FP&L.

EPA comments were in response to the Department request on the applicability of the New Source Performance Standard, 40CFR 60, Subpart GG to these turbines. EPA, basically, stated that "if the maximum operating rate of the turbines still occurs under cold weather conditions when the foggers cannot be used to boost the capacity of these units, the installation of the foggers will not constitute a modification". These comments were addressed in a letter dated June 22, 1999 on the same issue for the Ft. Myers Power Plant.

In response to EPA comments, the Department requested and received additional information from FP&L regarding the maximum operating rate of the turbines: The maximum turbine capacity at 20 degrees F is 1220 mmBtu/hr (HHV when firing gas) and 1120 mmBtu/hr (HHV when firing oil). This is compared to the maximum turbine operating capacity of 1000 mmBtu/hr (HHV when firing gas) and 930 mmBtu/hr (HHV when firing oil) at 80 degrees F, which would be the result of lowering the temperature in the 90 degree F range with the use of the foggers.

FP&L comments were related Specific Condition No. 13. FP&L requested to revise this condition tracking degree-hours in the permit, as opposed to simply hours of operation. They stated that this methodology will afford additional operating flexibility without adversely impacting the environment. The Department evaluated FP&L comments and agreed with their request. Specific Condition No. 13 is revised as follows:

Inlet foggers may be installed at the compressor inlet to each of the four combined cycle Westinghouse Model 501B5A combustion turbine-electric generators. The four foggers may operate up to 40,960 degree F-hours per year in aggregate (average 10,240 degree F-hours per unit per year).  
The permittee shall monitor both the hours of operation for the inlet foggers and the degrees of cooling afforded by the inlet foggers. Computation of the degree-hour will be performed as follows:  
Degree-hours = # hours inlet fogger operating time X degrees F of cooling  
Degrees of Cooling shall be calculated by subtracting the fogged compressor inlet air temperature from the unfogged compressor inlet temperature (upstream of the fogger). The above calculation shall be performed for each hour of fogger operation. Calculation records shall be maintained on the plant site and made available for inspection upon request.  
For each hour of oil operation on any combustion turbine during a calendar year, the allowable aggregate total inlet fogger operating degree-hour shall be reduced by 1.27 degree F-hours.

The final action of the Department will be to issue the permit with the changes as noted above.

**PERMITTEE:**

Florida Power & Light  
392 US Highway 17 South  
East Palatka, Florida 32131

*Authorized Representative:*

Robert Bergstrom  
Putnam Plant General Manager

DEP File No.	1070014-003-AC
Project	Inlet Foggers Project ARMS Emissions Units 003-011
SIC No.	4911
Expires:	December 31, 1999

**PROJECT AND LOCATION:**

This air construction permit describes the existing facility that was approved through Florida Power Plant Certification No. PA 74-01 and its amendments and which operates under that Certification and Title V permit 1070014-001-AV. Additionally, this permit allows installation of inlet foggers on the four existing Westinghouse Model 501B5A combined cycle combustion turbine-electrical generators designated as ARMS Emissions Units 003-006.

The units are located at the FP&L Putnam Plant, 392 US Highway 17 South, East Palatka, Putnam County. UTM coordinates are: Zone 17; 443.3 km E and 3277.80 km N.

**STATEMENT OF BASIS:**

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

**ATTACHED APPENDICES MADE A PART OF THIS PERMIT:**

Appendix GC	Construction Permit General Conditions
Appendix W	Putnam Plant Heat Input versus Temperature Graphs

---

Howard L. Rhodes, Director  
Division of Air Resources  
Management

# AIR CONSTRUCTION PERMIT 1070014-003-AC

## SECTION I – FACILITY DESCRIPTION

---

### FACILITY DESCRIPTION

Currently, this facility consists of four combustion turbines, each with a supplementally-fired heat recovery steam generator (HRSG), an auxiliary boiler, and “unregulated or insignificant” emissions units. The designation in the Department’s Air Resources Management System (ARMS) are as follows: the four combustion turbines, ARMS Emissions Units 003 to 006; four duct burners within the four HRSGs, ARMS Emissions Units 007 to 010; and the auxiliary boiler, ARMS Emission Unit 011.

Each combustion turbine is a Westinghouse unit Model 501B5A rated at 70 MW generating capacity (at 85 degrees F ambient temperature), with a maximum heat input for natural gas and fuel oil of 968.3 mm Btu/hr and 910.6 mmBtu/hr, respectively. The duct burners for each HRSG are rated at a maximum heat input of 250 mmBtu/hr, and are fired with natural gas and No. 2 fuel oil. The auxiliary boiler is manufactured by VA-Power and has a maximum heat input for natural gas and No. 2 fuel oil of 16.275 mmBtu/hr and 14.28 mmBtu/hr, respectively.

This permitting action, installation of inlet foggers at the four (4) distillate fuel oil-fired combustion turbines equipped with duct burners, amends Power Plant Conditions of Certification PA 74-01 and creates a new construction permit (1070014-003-AC) for these units. No PSD permit exists for this facility since it was built before 1975 and subsequent modifications have not triggered PSD review. On October 16, 1974, FP& L was issued a Site Certification authorizing the construction and operation of the Putnam Plant.

This Project is exempt from the requirements of Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD) as discussed stated in the Technical Evaluation and Preliminary Determination dated June 2, 1999.

### REGULATORY CLASSIFICATION

This facility, FPL Putnam Power Plant, is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM<sub>10</sub>), sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), or volatile organic compounds (VOC) exceeds 100 tons per year (TPY).

This facility is within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 100 TPY for at least one criteria pollutant, the facility is also a Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD).

This facility is a major source of hazardous air pollutants (HAPs) and is also subject to the provisions of Title IV, Acid Rain, Clean Air Act as amended in 1990.

### PERMIT SCHEDULE

- 06/10/99 Notice of Intent published in the Palatka Daily News
- 06/03/99 Distributed Intent to Issue Permit
- 05/07/99 Application deemed complete
- 03/17/99 Received Application

### RELEVANT DOCUMENTS:

The documents listed below are the basis of the permit. They are specifically related to this permitting action, but not all are incorporated into this permit. These documents are on file with the Department.

- Application received on March 29, 1999.
- Department’s Intent to Issue and Public Notice Package dated June 2, 1999.
- FPL’s comments dated April 16, and May 7, 1999.

**AIR CONSTRUCTION PERMIT 1070014-003-AC**  
**SECTION II – ADMINISTRATIVE REQUIREMENTS**

---

1. Unless otherwise indicated in this permit, the construction and operation of the subject emission unit(s) shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-103, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297; and the applicable requirements of the Code of Federal Regulations Section 40, Parts 60, 72, 73, and 75.
2. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [Rule 62-210.300, F.A.C.]
3. Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (DEP), at 2600 Blairstone Road, Tallahassee, Florida 32399-2400 and phone number (850)488-0114. All documents related to reports, tests, and notifications should be submitted to the DEP North District office, 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590 and phone number 904/448-4300.
4. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
5. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
6. Forms and Application Procedures: The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. [Rule 62-210.900, F.A.C.]
7. Modifications: The permittee shall give written notification to the Department when there is any modification to this facility. This notice shall be submitted sufficiently in advance of any critical date involved to allow sufficient time for review, discussion, and revision of plans, if necessary. Such notice shall include, but not be limited to, information describing the precise nature of the change; modifications to any emission control system; production capacity of the facility before and after the change; and the anticipated completion date of the change. [Chapters 62-210 and 62-212]
8. Permit Extension: *This permit expires on December 31, 1999.* The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rule 62-4.080, F.A.C.]
9. Application for a Modification of Title V Permit: An application for a modification of the Title V operating permit, pursuant to Chapter 62-213, F.A.C., must be submitted to the DEP's Bureau of Air Regulation, and a copy sent to the Department's North District office. [Chapter 62-213, F.A.C.]
10. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
11. Annual Reports: Pursuant to Rule 62-210.370(2), F.A.C., Annual Operation Reports, the permittee is required to submit annual reports on the actual operating rates and emissions from this facility. Annual operating reports shall be sent to the DEP's North District office by March 1st of each year.

**AIR CONSTRUCTION PERMIT 1070014-003-AC**  
**SECTION III – SPECIFIC CONDITIONS EUs 003 - 006**

**This section addresses the following emissions units.**

003	Combustion Turbine for Combined Cycle Heat Recovery Steam Generator, HRSG11. This emissions unit consists of a Westinghouse combustion turbine, rated at 70 MW generating capacity (at 85 degrees F ambient temperature). Heat input for this unit may vary at different ambient temperatures in accordance with the curves attached as Appendix W of this permit. (As an example, maximum heat input for natural gas or fuel oil at 85 degrees F ambient temperature is 968.3 mmBtu/hr and 910.6 mmBtu/hr, respectively.)
004	Combustion Turbine for Combined Cycle Heat Recovery Steam Generator, HRSG12. This emissions unit consists of a Westinghouse combustion turbine, rated at 70 MW generating capacity (at 85 degrees F ambient temperature). Heat input for this unit may vary at different ambient temperatures in accordance with the curves attached as Appendix W of this permit. (As an example, maximum heat input for natural gas or fuel oil at 85 degrees F ambient temperature is 968.3 mmBtu/hr and 910.6 mmBtu/hr, respectively.)
005	Combustion Turbine for Combined Cycle Heat Recovery Steam Generator, HRSG21. This emissions unit consists of a Westinghouse combustion turbine, rated at 70 MW generating capacity (at 85 degrees F ambient temperature). Heat input for this unit may vary at different ambient temperatures in accordance with the curves attached as Appendix W of this permit. (As an example, maximum heat input for natural gas or fuel oil at 85 degrees F ambient temperature is 968.3 mmBtu/hr and 910.6 mmBtu/hr, respectively.)
006	Combustion Turbine for Combined Cycle Heat Recovery Steam Generator, HRSG22. This emissions unit consists of a Westinghouse combustion turbine, rated at 70 MW generating capacity (at 85 degrees F ambient temperature). Heat input for this unit may vary at different ambient temperatures in accordance with the curves attached as Appendix W of this permit. (As an example, maximum heat input for natural gas or fuel oil at 85 degrees F ambient temperature is 968.3 mmBtu/hr and 910.6 mmBtu/hr, respectively.)

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required and Power Plant Siting Certification No. PA 74-01 ordered 10/16/74, and the modified conditions of PA 74-01 modified 5/20/80, 3/15/84, 7/16/91 and 5/28/92. Based on information submitted by the applicant in the Title V application, these emissions units are not subject to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines. Each combustion turbine is exhausted through a heat recovery steam generator. Emissions units 003 and 004 began commercial operation in 1978. Emissions units 005 and 006 began commercial operation in 1977.}

**The following specific conditions apply to the emissions units listed above:**

**Essential Potential to Emit (PTE) Parameters**

- Permitted Capacity. The maximum operation heat input rates are as follows:

Unit No.	mmBtu/hr Heat Input	Fuel Type
003, 004, 005, 006	(a)	Natural Gas
	(a)	Fuel Oil

- Heat input is limited at any given ambient temperature in accordance with the curves attached as Appendix W of this permit.

{Note: As an example, maximum heat input for natural gas or fuel oil at 85 degrees F ambient temperature is 968.3 mmBtu/hr and 910.6 mmBtu/hr, respectively.}

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.} [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

**AIR CONSTRUCTION PERMIT 1070014-003-AC**  
**SECTION III – SPECIFIC CONDITIONS EUs 003 - 006**

---

2. Emissions Unit Operating Rate Limitation After Testing. Applicable requirements of Rule 62-297.310 (2) and (2)(b) F.A.C., Operating Rate During Testing.
3. Methods of Operation - Fuels. The combustion turbines shall only be fired with number 2 or number 6 fuel oil or with natural gas. [Rule 62-213.410, F.A.C., PPSC PA 74-01 condition 1.B.(i)]

**Emission Limitations and Standards**

4. Sulfur Dioxide - Sulfur Content. The fuel oil sulfur content shall not exceed 0.7 percent by weight. See specific condition 6. [Rules 62-4.070(3) and 62-213.440, F.A.C., and PPSC PA 74-01 condition 1.B.(i)]
5. Visible Emissions. Visible emissions shall not exceed 20% opacity, except for one 6-minute period per hour during which opacity shall not exceed 27%. [Rules 62-4.070(3) and 62-213.440, F.A.C., and PPSC PA 74-01 condition 1.B.(ii)]

**Test Methods and Procedures**

6. Sulfur Dioxide - Sulfur Content. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery. See specific conditions 4. and 7. [Rules 62-213.440 and 62-296.406(3), F.A.C.]
7. Fuel Sampling & Analysis - Sulfur. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90(95), ASTM D1552-95, ASTM D1266-91, or both ASTM D4057-88 and ASTM D129-95 (or latest editions). [Rules 62-4.070(3), 62-213.440 and 62-297.440, F.A.C.]
8. Visible Emissions. The permittee shall demonstrate compliance with the visible emissions limit by DEP Method 9. [Rules 62-4.070(3) and 62-213.440, F.A.C.]

**Monitoring of Operations**

9. Annual Tests Required - VE. Except as provided in Rule 62-296.310(7) F.A.C., SIP Approved, emission testing for visible emissions shall be performed annually, no later than September 30th of each year, except for units that are not operating because of scheduled maintenance outages and emergency repairs, which will be tested within thirty days of returning to service. [Rules 62-4.070(3) and 62-213.440, F.A.C.]
10. Wind Restriction and Monitoring. The owner or operator shall burn fuel oil containing no more than 0.50% sulfur (by weight) when sustained winds exceed 20 miles per hour for any continuous period of three hours or longer. The owner or operator shall measure wind velocity and direction, using recognized methods and procedures, at hourly intervals in the plant vicinity, only for those hours during which any combustion turbine at the plant burns fuel oil containing more than 0.50% sulfur (by weight). The owner or operator shall quarterly report wind data, or shall report that no fuel oil containing more than 0.50% sulfur (by weight) was burned, no later than the thirtieth day following the end of each calendar quarter. [PPSC PA 74-01, condition 2]

**Excess Emissions**

11. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
12. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized. [Rule 62-210.700(2), F.A.C.]

**AIR CONSTRUCTION PERMIT 1070014-003-AC**  
**SECTION III – SPECIFIC CONDITIONS EUs 003 - 006**

---

**Inlet Fogger Installation**

13. Inlet foggers may be installed at the compressor inlet to each of the four combined cycle Westinghouse Model 501B5A combustion turbine-electric generators. The four foggers may operate up to 40,960 degree F-hours per year in aggregate (average 10,240 degree F-hours per unit per year).

The permittee shall monitor both the hours of operation for the inlet foggers and the degrees of cooling afforded by the inlet foggers. Computation of the degree-hour will be performed as follows:

Degree-hours = # hours inlet fogger operating time X degrees F of cooling

Degrees of Cooling shall be calculated by subtracting the fogged compressor inlet air temperature from the unfogged compressor inlet temperature (upstream of the fogger). The above calculation shall be performed for each hour of fogger operation. Calculation records shall be maintained on the plant site and made available for inspection upon request.

For each hour of oil operation on any combustion turbine during a calendar year, the allowable aggregate total inlet fogger operating degree-hour shall be reduced by 1.27 degree F-hours.



**AIR CONSTRUCTION PERMIT 1070014-003-AC**  
**SECTION IV – SPECIFIC CONDITIONS EUs 007 - 010**

This section addresses the following emissions units.

007	Ductburners for Combined Cycle Heat Recovery Steam Generator, HRSG11. This emissions unit consists of duct burners for one heat recovery steam generator. Each HRSG is associated with one combustion turbine. Each HRSG's duct burners have a maximum heat input for natural gas or number 2 fuel oil of 250 mmBtu/hr.
008	Duct burners for Combined Cycle Heat Recovery Steam Generator, HRSG12. This emissions unit consists of duct burners for one heat recovery steam generator. Each HRSG is associated with one combustion turbine. Each HRSG's duct burners have a maximum heat input for natural gas or number 2 fuel oil of 250 mmBtu/hr.
009	Duct burners for Combined Cycle Heat Recovery Steam Generator, HRSG21. This emissions unit consists of duct burners for one heat recovery steam generator. Each HRSG is associated with one combustion turbine. Each HRSG's duct burners have a maximum heat input for natural gas or number 2 fuel oil of 250 mmBtu/hr.
010	Duct burners for Combined Cycle Heat Recovery Steam Generator, HRSG22. This emissions unit consists of duct burners for one heat recovery steam generator. Each HRSG is associated with one combustion turbine. Each HRSG's duct burners have a maximum heat input for natural gas or number 2 fuel oil of 250 mmBtu/hr.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required and Power Plant Siting Certification No. PA 74-01 ordered 10/16/74, and the modified conditions of PA 74-01 modified 5/20/80, 3/15/84, 7/16/91 and 5/28/92. These emissions units are subject to 40 CFR 60, Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. Each heat recovery steam generator has two stacks that exhaust emissions from the associated combustion turbine and the duct burners. Emissions units 007 and 008 began commercial operation in 1978. Emissions units 009 and 010 began commercial operation in 1977.}

The following specific conditions apply to the emissions units listed above:

**Essential Potential to Emit (PTE) Parameters**

1. **Permitted Capacity.** The maximum operation heat input rates are as follows:

Unit No.	mmBtu/hr Heat Input	Fuel Type
007, 008, 009, 010	250	Natural Gas
	250	Fuel Oil

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

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.}

2. **Emissions Unit Operating Rate Limitation After Testing.** Applicable Requirements of Rule 62-297.310(2) and (2) (b) F.A.C. Operating Rate During Testing.
3. **Methods of Operation - Fuels.** The duct burners shall only be fired with number 2 fuel oil or with natural gas.  
[Rule 62-213.410, F.A.C., PPSC PA 74-01 condition 1.C.(i)]

**Emission Limitations and Standards**

4. **Sulfur Dioxide - Sulfur Content.** The fuel oil sulfur content shall not exceed 0.5 percent by weight. See specific condition 7. [Rules 62-4.070(3) and 62-213.440, F.A.C., PPSC PA 74-01 condition 1.C.(i), and 40 CFR 60.42b]

**AIR CONSTRUCTION PERMIT 1070014-003-AC**  
**SECTION IV – SPECIFIC CONDITIONS EUs 007 - 010**

---

5. Visible Emissions. Visible emissions shall not exceed 20% opacity (6-minute average), except for one 6-minute period per hour during which opacity shall not exceed 27%. The opacity standards apply at all times, except during periods of startup, shutdown or malfunction. [Rules 62-4.070(3) and 62-213.440, F.A.C., PPSC PA 74-01 condition 1.C.(ii)(a), and 40 CFR 60.43b and 60.46b(a)]
6. Nitrogen Oxides. Nitrogen oxide emissions (expressed as NO<sub>2</sub>) shall not exceed 0.20 lb/mmBtu while burning natural gas and distillate oil. The nitrogen oxide standards apply at all times including periods of startup, shutdown, or malfunction. [40 CFR 60.44b and PPSC PA 74-01 (modification of 5/28/92)]

**Test Methods and Procedures**

7. Sulfur Dioxide - Sulfur Content. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by maintaining fuel receipts as described in 40 CFR 60.49b(r). See specific conditions **4.** and **14.** [Rules 62-213.440 and 62-296.406(3), F.A.C., and 40 CFR 60.42b]
8. VE Test Methods. To determine compliance with the opacity limits, the owner or operator shall conduct tests using EPA Method 9. [40 CFR 60.46b(d)(7)]
9. Test Methods For Nitrogen Oxides. Compliance with the nitrogen oxides emission limit shall be determined through testing using EPA reference methods 7E and 3A, of 40 CFR part 60 appendix A. [40 CFR 60.46b, PPSC PA 74-01 (modification of 5/28/92)] {Note: PPSC PA 74-01 (modification of 5/28/92) allows use of EPA methods 7E and 3A instead of EPA method 20.}

**Monitoring of Operations**

10. Emission Tests Required - VE and NO<sub>x</sub>. Except as provided in Rule 62-297.310 (7) F.A.C., SIP Approved, emission testing shall be conducted as follows: Emission testing for visible emissions shall be performed annually. Emission testing for nitrogen oxides shall be performed prior to renewal, except that an annual test for nitrogen oxides shall be performed each year that fuel oil is fired in these units for more than 400 hours. Testing shall be completed no later than September 30th of each year required, except for units that are not operating because of scheduled maintenance outages and emergency repairs, which will be tested within thirty days of returning to service. [Rules 62-4.070(3) and 62-213.440, F.A.C.]
11. Emission Monitoring For VE. Prior to burning fuel oil in these emissions units, the owner or operator shall install, calibrate, maintain, and operate a continuous monitoring system for measuring the opacity of emissions discharged to the atmosphere and record the output of the system. This system shall thenceforth be operated whenever fuel oil is burned in these emissions units. [40 CFR 60.48b(a)]
12. CEMS Required by Power Plant Siting. The owner or operator shall maintain a continuous emission monitoring system (CEMS) for opacity and nitrogen oxides on one of the paired stacks for each combined cycle unit.  
  
{The PPSC requires monitors on one stack each of CT/HRSG 1x and 2x, for a total of two stacks that must be monitored. The owner currently operates opacity monitors to satisfy the PPSC requirement to operate the CEMS for opacity. The NO<sub>x</sub> monitors installed and maintained pursuant to 40 CFR 75 satisfy the PPSC requirement to operate the CEMS for NO<sub>x</sub>.} [Rule 62-213.440, F.A.C., PPSC PA 74-01 condition 4]

**Reporting And Record Keeping Requirements**

13. Pursuant to 40 CFR 60.49b Reporting And Record Keeping Requirements.

The owner or operator of an affected facility shall record and maintain records of the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for distillate oil and natural gas for each calendar quarter. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month.

**AIR CONSTRUCTION PERMIT 1070014-003-AC**  
**SECTION IV – SPECIFIC CONDITIONS EUs 007 - 010**

---

The owner or operator shall maintain records of opacity (required by NSPS whenever fuel oil is burned in these emissions units. See condition B.11 of this permit).

The owner or operator shall maintain records of the following information for each steam-generating unit operating day:

- (1) Calendar date.
- (2) The average hourly nitrogen oxides emission rates (expressed as NO<sub>2</sub>) (lb/million Btu heat input) measured or predicted.
- (3) The 30-day average nitrogen oxides emission rates (lb/million Btu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days.
- (4) Identification of the steam generating unit operating days when the calculated 30-day average nitrogen oxides emission rates are in excess of the nitrogen oxides emissions standards under 40 CFR 60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken.
- (5) Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken.
- (6) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data.
- (7) Identification of "F" factor used for calculations, method of determination, and type of fuel combusted.

The owner or operator is required to submit excess emission reports for any calendar quarter during which there are excess emissions from the affected facility. If there are no excess emissions during the calendar quarter, the owner or operator shall submit a report semiannually stating that no excess emissions occurred during the semiannual reporting period. For the purpose of the opacity limitation, excess emissions are defined as all 6-minute periods during which the average opacity exceeds the opacity standards.

[40 CFR 60.49b(d), (f), (g)(1)-(7) and (h)]

14. **Fuel Receipts Required.** The owner or operator of an affected facility who elects to demonstrate that the affected facility combusts only very low sulfur oil shall obtain and maintain at the affected facility fuel receipts from the fuel supplier which certify that the oil meets the definition of distillate oil as defined in 40 CFR 60.41b:

Distillate oil means fuel oils that contain 0.05 weight percent nitrogen or less and comply 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 (incorporated by reference-see 40 CFR 60.17).

Very low sulfur oil means an oil that contains no more than 0.5 weight percent sulfur or that, when combusted without sulfur dioxide emission control, has a sulfur dioxide emission rate equal to or less than 215 ng/J (0.5 lb/million Btu) heat input.

For the purposes of this section, the oil need not meet the fuel nitrogen content specification in the definition of distillate oil. Quarterly reports shall be submitted to the Department certifying that only very low sulfur oil meeting this definition was combusted in the affected facility during the preceding quarter.

[40 CFR 60.45b, 60.47b and 60.49b(r)].

# AIR CONSTRUCTION PERMIT 1070014-003-AC

## SECTION V – SPECIFIC CONDITIONS EU 011

This section addresses the following emissions unit.

011	This emissions unit consists of an auxiliary boiler is manufactured by VA-Power with a maximum heat input for natural gas and number 2 fuel oil of 16.275 mmBtu/hr and 14.28 mmBtu/hr, respectively.
-----	--

{Permitting notes: This emissions unit is regulated under Rule 62-210.300, F.A.C., Permits Required. This emissions unit is subject to 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. Emissions unit 011 began commercial operation in 1993. The unit was previously regulated under Power Plant Siting Certification No. PA 74-01 ordered 10/16/74, and the modified conditions of PA 74-01 modified 5/20/80, 3/15/84, 7/16/91 and 5/28/92. However, the only applicable condition was in conflict with the NSPS and has been superseded by this permit.}

The following specific conditions apply to the emissions unit listed above:

**Essential Potential to Emit (PTE) Parameters**

1. Permitted Capacity. The maximum operation heat input rates are as follows:

Unit No.	mmBtu/hr Heat Input	Fuel Type
011	16.275	Natural Gas
	14.28	Number 2 Fuel Oil

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

2. Emissions Unit Operating Rate Limitation After Testing. Per Requirements of Rule 62-297.310(2), F.A.C.
3. Methods of Operation - Fuels. The auxiliary boiler shall only be fired with number 2 fuel oil or with natural gas. [Rule 62-213.410, F.A.C.]

**Emission Limitations and Standards**

4. Pursuant to 40 CFR 60.42c Standard For Sulfur Dioxide.

The owner or operator shall not combust oil in the affected facility that contains greater than 0.5 weight percent sulfur. Compliance with the fuel oil sulfur limit shall be determined based on a certification from the fuel supplier, as described under 40 CFR 60.48c(f)(1) (see specific condition 7.). The fuel oil sulfur limit applies at all times, including periods of startup, shutdown, and malfunction.

[40 CFR 60.42c(d), (h), (i) and (j)]

**Monitoring of Operations**

5. Emission Monitoring For Sulfur Dioxide.

As an alternative to operating a CEMS at the outlet of the steam generating unit, the owner or operator shall determine the average SO<sub>2</sub> emission rate by sampling the fuel prior to combustion. Fuel sampling shall be conducted as follows:

As an alternative fuel sampling procedure for affected facilities combusting oil, oil samples may be collected from the fuel tank for each steam generating unit immediately after the fuel tank is filled and before any oil is combusted. The owner or operator of the affected facility shall analyze the oil sample to determine the sulfur content of the oil. If a partially empty fuel tank is refilled, a new sample and analysis of the fuel in the tank would be required upon filling. Results of the fuel analysis taken after each new shipment of oil is received shall be used as the daily value when calculating the 30-day rolling average until the next shipment is received. If the fuel analysis shows that the sulfur content in the fuel tank is greater than 0.5 weight percent sulfur, the owner or operator shall ensure that the sulfur content of subsequent oil shipments is low enough to cause the 30-day rolling average sulfur content to be 0.5 weight percent sulfur or less. [40 CFR 60.46c(d)(2)]

**AIR CONSTRUCTION PERMIT 1070014-003-AC**  
**SECTION V – SPECIFIC CONDITIONS EU 011**

---

**Reporting And Record Keeping Requirements**

6. Pursuant to 40 CFR 60.48c Reporting And Record Keeping Requirements.

For any period in which fuel oil is combusted, the owner or operator shall submit quarterly reports to the Department. Each subsequent quarterly report shall be postmarked by the 30th day following the end of the reporting period.

The owner or operator shall keep records and submit quarterly reports including the following information related to the combustion of fuel oil, as applicable.

- (1) Calendar dates covered in the reporting period.
- (2) Each 30-day average SO<sub>2</sub> emission rate (lb/million Btu), or 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period in the quarter; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.
- (3) Each 30-day average percent of potential SO<sub>2</sub> emission rate calculated during the reporting period, ending with the last 30-day period in the quarter; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.
- (4) Identification of any steam generating unit operating days for which SO<sub>2</sub> or diluent (oxygen or carbon dioxide) data have not been obtained by an approved method for at least 75 percent of the operating hours; justification for not obtaining sufficient data; and a description of corrective actions taken.
- (5) Identification of any times when emissions data have been excluded from the calculation of average emission rates; justification for excluding data; and a description of corrective actions taken if data have been excluded for periods other than those during which oil was not combusted in the steam generating unit.
- (6) Identification of the F factor used in calculations, method of determination, and type of fuel combusted.
- (7) Identification of whether averages have been obtained based on CEMS rather than manual sampling methods.
- (11) If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph (f)(1) of this section, as applicable. In addition to records of fuel supplier certifications, the quarterly report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.  
[40 CFR 60.48c(d), (e)(1)-(7) and (e)(11)]

7. Fuel Supplier Certification and Fuel Records. The owner or operator shall maintain records of fuel supplier certification. Fuel supplier certification shall include the following information:

- (i) The name of the oil supplier; and
- (ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil:

Distillate oil means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78, "Standard Specification for Fuel Oils" (incorporated by reference-see 40 CFR 60.17).

The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. [40 CFR 60.48c(f)(1) and (g)]

Florida Department of  
Environmental Protection

---

Memorandum

TO: Howard L. Rhodes

THRU: C. H. Fancy  
Al Linero

FROM: Teresa Heron

DATE: July 15, 1999

SUBJECT: FP&L Putnam Spray Fogging Systems  
DEP File No. 1070014-003-AC

Attached is the final permit package for the compressor inlet fogger project at the FP&L Putnam Plant. The application is to install inlet foggers ahead of the compressor inlets of four combined cycle combustion turbines. The foggers will operate on hot days and days of relatively low humidity. The evaporative cooling effected by the foggers will allow the units to operate closer to their rated capacity.

Both short-term and annual emissions will increase because the heat rate through the units will increase when the foggers. However, maximum short-term emissions will still occur during cold days when use of the foggers is not feasible anyway. For this reason, we believe that 40CFR60, Subpart GG will not be triggered. FP&L proposes to limit operation of the coolers to 1,280 hours per unit per year while firing gas and 100 hours per unit per year while firing fuel oil to insure PSD is not triggered by their use. The issue of making a future potential to past actual annual emission increase calculation is extensively addressed in the Technical Evaluation.

We recommend your signature and approval.

AAL/aal

Attachments



RECEIVED

SEP 28 1999

BUREAU OF AIR REGULATION

September 22, 1999

Scott Sheplak, P.E.  
Bureau of Air Regulation  
State of Florida  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**Re: Modification of Title V Permit – 1070014 – 001 - AV**  
**FPL Putnam Plant**

Dear Scott:

Pursuant to our recent conversation, enclosed please find:

- 1) Four copies of the Title V permit forms related to the installation of inlet foggers at the FPL Putnam plant; and
- 2) A copy of the Air Construction permit (#1070014-003) for the Putnam facility, authorizing the installation of inlet air foggers.

Please note that Specific Condition #13, on page 5 of 10 in the Air Construction permit, is the only relevant new permit condition; all the other conditions are already in the Putnam Title V permit.

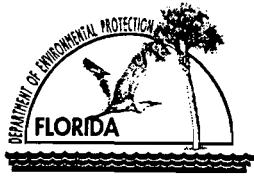
Please modify the Title V permit for the Putnam facility to incorporate this new permit condition.

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

Very truly yours,

A handwritten signature in cursive script that reads "Richard Piper".

Richard Piper  
Repowering Licensing Manager  
Florida Power and Light Company



# Department of Environmental Protection

## Division of Air Resources Management

### APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

#### I. APPLICATION INFORMATION

##### Identification of Facility

1. Facility Owner/Company Name: <b>Florida Power &amp; Light Company</b>	
2. Site Name: <b>Putnam Plant</b>	
3. Facility Identification Number: <b>1070014</b> <span style="float: right;">[ ] Unknown</span>	
4. Facility Location: Street Address or Other Locator: <b>392 US Highway 17 South</b> City: <b>East Palatka</b> County: <b>Putnam</b> Zip Code: <b>32131</b>	
5. Relocatable Facility? [ ] Yes [ <b>X</b> ] No	6. Existing Permitted Facility? [ <b>X</b> ] Yes [ ] No

##### Application Contact

1. Name and Title of Application Contact: <b>Richard G. Piper, Repowering Licensing Mgr.</b>	
2. Application Contact Mailing Address: Organization/Firm: <b>FPL Environmental Services</b> Street Address: <b>700 Universe Boulevard</b> City: <b>Juno Beach</b> State: <b>FL</b> Zip Code: <b>33408</b>	
3. Application Contact Telephone Numbers: Telephone: <b>(561) 691 - 7058</b> Fax: <b>(561) 691 - 7070</b>	

##### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	



**Purpose of Application**

**Air Operation Permit Application**

This Application for Air Permit is submitted to obtain: (Check one)

- Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: \_\_\_\_\_

- Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: 1070014-003-AC

Operation permit number to be revised: 1070014-001-AV

- Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: \_\_\_\_\_

- Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: \_\_\_\_\_

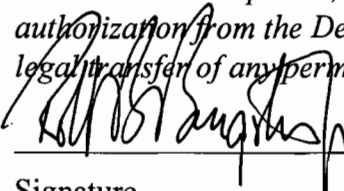

Reason for revision: \_\_\_\_\_

**Air Construction Permit Application**

This Application for Air Permit is submitted to obtain: (Check one)

- Air construction permit to construct or modify one or more emissions units.
- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- Air construction permit for one or more existing, but unpermitted, emissions units.

**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official: <b>Robert Bergstrom, Plant General Manager</b>
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: <b>FPL Putnam Plant</b> Street Address: <b>392 US Hwy 17 South</b> City: <b>East Palatka</b> State: <b>FL</b> Zip Code: <b>32131</b>
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: <b>( 941 ) 325 - 1206</b> Fax: <b>( 941 ) 329 - 4699</b>
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [ X ], if so) or the responsible official (check here [ X ], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  _____ Signature  _____ Date

\* Attach letter of authorization if not currently on file.

**Professional Engineer Certification**

1. Professional Engineer Name: <b>Kennard F. Kosky</b> Registration Number: <b>14996</b>
2. Professional Engineer Mailing Address: Organization/Firm: <b>Golder Associates Inc.</b> Street Address: <b>6241 NW 23<sup>rd</sup> Street, Suite 500</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32653-1500</b>
3. Professional Engineer Telephone Numbers: Telephone: <b>( 352 ) 336 - 5600</b> Fax: <b>( 352 ) 356 - 6603</b>

4. Professional Engineer's Statement:

*I, the undersigned, hereby certify, except as particularly noted herein\*, that:*

*(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and*

*(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.*

*If the purpose of this application is to obtain a Title V source air operation permit (check here [  ] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.*

*If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [  ] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.*

*If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [  ] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.*

*Thomas F. Galy*  
\_\_\_\_\_  
Signature  
(seal)

*9/11/99*  
\_\_\_\_\_  
Date

\* Attach any exception to certification statement.



**Construction/Modification Information**

1. Description of Proposed Project or Alterations:

**Installation of direct water spray inlet fogging systems. Air Construction permit #1070014-003-AC has already been issued by the Department for this installation. This request is to modify the existing Title V permit to incorporate this change.**

2. Projected or Actual Date of Commencement of Construction:

3. Projected Date of Completion of Construction:

**Application Comment**

**The existing four combustion turbines (GT1-1, 1-2, 2-1 and 2-2) have had direct water spray fogging systems installed. These systems reduce the turbine inlet air temperature. The temperature reduction improves the heat rate and increases power due to the cooler / denser inlet air. The limitation of degree-hours (degrees of cooling x hours of operation) serves to ensure that the net emissions change from this project will not result in an increase of any regulated air pollutant greater than the PSD significant emission rates.**

## II. FACILITY INFORMATION

### A. GENERAL FACILITY INFORMATION

#### Facility Location and Type

1. Facility UTM Coordinates: Zone: <b>17</b> East (km): <b>443.3</b> North (km): <b>3277.80</b>			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): <b>29 / 37 / 44</b> Longitude (DD/MM/SS): <b>81 / 35 / 6</b>			
3. Governmental Facility Code: <b>0</b>	4. Facility Status Code: <b>A</b>	5. Facility Major Group SIC Code: <b>49</b>	6. Facility SIC(s): <b>4911</b>
7. Facility Comment (limit to 500 characters): <b>The existing Putnam Plant consists of 2 combined cycle units. Each unit consists of 2 combustion turbines and associated heat recovery steam generators (HRSG's). The HRSG's have duct burners. The primary fuel for the turbines and duct burners is natural gas. Distillate oil is used as back-up in the combustion turbines.</b>			

#### Facility Contact

1. Name and Title of Facility Contact: <b>Pat Wilson, Environmental Specialist</b>			
2. Facility Contact Mailing Address: Organization/Firm: <b>FPL Putnam Plant</b> Street Address: <b>392 US Hwy 17 South</b> City: <b>East Palatka</b> State: <b>FL</b> Zip Code: <b>32131</b>			
3. Facility Contact Telephone Numbers: Telephone: <b>(904) 329 - 4609</b> Fax: <b>(904) 329 - 4699</b>			

**Facility Regulatory Classifications**

**Check all that apply:**

1. <input type="checkbox"/> Small Business Stationary Source?	<input type="checkbox"/> Unknown
2. <input checked="" type="checkbox"/> Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. <input type="checkbox"/> Synthetic Minor Source of Pollutants Other than HAPs?	
4. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input type="checkbox"/> One or More Emissions Units Subject to NSPS?	
7. <input type="checkbox"/> One or More Emission Units Subject to NESHAP?	
8. <input type="checkbox"/> Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters):	

**List of Applicable Regulations**

Facility emissions covered under existing Title V permit; no additional facility or emission unit applicable requirements as a result of this change.	





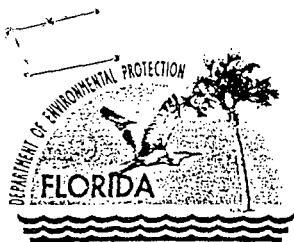
### C. FACILITY SUPPLEMENTAL INFORMATION

#### Supplemental Requirements

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Facility Plot Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Process Flow Diagram(s): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
6. Supplemental Information for Construction Permit Application: <input checked="" type="checkbox"/> Attached, Document ID: <b>Permit 1070014-003-AC__</b> <input type="checkbox"/> Not Applicable
7. Supplemental Requirements Comment:  <b>The enclosed air construction permit includes one new condition that relates to the installation of the inlet air foggers (Specific Condition #13, on page 5 of 10). It is requested that this specific condition be incorporated into the Title V permit.</b>

**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID:_____ <input checked="" type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID:_____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID:_____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID:_____ <input checked="" type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID:_____) or previously submitted to DEP (Date and DEP Office:_____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required:_____) <input checked="" type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID:_____ <input checked="" type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID:_____ <input checked="" type="checkbox"/> Not Applicable



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

## NOTICE OF ADMINISTRATIVE PERMIT CORRECTION

In the Matter of an Application for Administrative Permit Correction:

Mr. Tom Bethea  
Plant General Manager  
Florida Power & Light Company  
P.O. Box 14000  
Juno Beach, FL 33408

FINAL Permit No.: 1070014-001-AV  
Putnam Plant

The Department has determined that two minor corrections to information contained in Final Permit Number 1070014-001-AV are required. These corrections are related to typographical errors, minor omissions, or clarification of permit conditions. These corrections are minor in nature and do not alter, modify or revise any permit requirement. This Administrative Permit Correction was processed as project number 1070014-002-AV, pursuant to Rule 62-210.360, F.A.C. The corrections are:

Specific condition C.2 shall read:

C.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition D.9.  
[Rule 62-297.310(2), F.A.C.]

The row of Table 2-1 of Appendix S for the pollutant NOx for emissions units 007, 008, 009 and 010 shall read:

Pollutant or Parameter	Fuel(s)	Compliance Method	Testing Frequency	Frequency Base Date <sup>1</sup>	Minimum Compliance Test Duration	CMS <sup>2</sup>	See Permit Condition(s)
NOx	Oil or Natural Gas	EPA reference methods 7E and 3A, of 40 CFR part 60 Appendix A	Annual	September 30	3 hours	No	B.9. & B.10.

This permit correction corrects and is a part of Final Permit Number 1070014-001-AV. This permit correction is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit correction) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000, 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 must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

  
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation

Return receipt card, Florida DEP, Tallahassee, FL 32399-3000. If you want delivery restricted to the address, endorse RESTRICTED DELIVERY on the front of the article. If you want delivery restricted to the address, endorse RESTRICTED DELIVERY on the front of the article. If you want delivery restricted to the address, endorse RESTRICTED DELIVERY on the front of the article. If you want delivery restricted to the address, endorse RESTRICTED DELIVERY on the front of the article.

008E

**BEST AVAILABLE COPY**

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT CORRECTION was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 7/27/98 to the person(s) listed:

Mr. Tom Bethea, FPL \*  
Mr. William M. Reichel, FPL \*  
Ms. Mary Archer, FPL  
Mr. Christopher Kirts, P.E., DEP Northeast District, Air Section  
Ms. Carla E. Pierce, USEPA, Region 4 (INTERNET E-mail Memorandum)  
Ms. Yolanda Adams, USEPA, Region 4 (INTERNET E-mail Memorandum)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Barbara J. Bartwell 7/27/98  
(Clerk) (Date)



FPL

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

July 16, 1998

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: Permit No. 1070014-001-AV  
FPL Putnam Plant Final Title V Permit

Dear Mr. Sheplak:

After reviewing the subject Title V permit, FPL has identified the following issues which need to be addressed. Each issue is described as follows:

Page 13 of 29 Specific Condition C.2. Emissions Unit Operating Rate Limitations After Testing. This condition references specific condition D.14. which does not exist.

*Should be D.9*

Appendix S Table 2-1 Please add natural gas as a fuel for the Pollutant/Parameter NOx. Marked up tables are attached.

*OK*

Thank you for your assistance in resolving these issues. If you have any questions, please do not hesitate to contact me at (561) 691-7057.

Sincerely,

Mary Archer  
Sr. Environmental Specialist  
Florida Power & Light Company

Post-It® Fax Note	7671	Date	7-17-98	# of pages	1
To	Scott Sheplak	From	Mary Archer		
Co./Dept		Co.			
Phone #		Phone #	561 691 7057		
Fax #	850 922 6979	Fax #			