

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 16, 2009

Electronic Mail – Received Receipt Requested

Mr. Gary Kowalczyk, Plant General Manager
FPL Sanford Plant
950 S. Highway 17-92
Debary, FL 32713

Re: **Request for Additional Information**
Project No. 1270009-018-AV
Florida Power and Light, Sanford Power Plant
Title V Air Operation Permit Renewal

Dear Mr. Kowalczyk:

On May 20, 2009, the Department received your application for a Title V air operation permit renewal for the above referenced facility. The application is incomplete as submitted. In order to continue processing your application, the Department will need the additional information requested below pursuant to Rule 62-213.420(1)(b)3., Florida Administrative Code (F.A.C.), and Rule 62-4.070(1), F.A.C. Should your response to any of the items below require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. The current Title V permit identifies the "Retired Unit Exemption" form. Please provide this form for the renewal application or explain why this form is no longer necessary.
2. The current Title V permit identifies the "Phase II NO_x Compliance Plan" form. Please provide this form for the renewal application or explain why this form is no longer necessary.
3. The current Title V permit identifies the "Clean Air Interstate Rule (CAIR)" form. Please provide this form for the renewal application.

(Note: Title V renewal application must include all relevant information.)

Section III.B. Emissions Units and Conditions

4. You have requested a change to current permit Condition III.B.13, which specifies allowable periods of excess emissions during startups and shutdowns and CEMS data exclusion during "major tuning sessions". The details of this condition were carefully crafted during initial issuance of the original air construction permit. Changes will likely require a concurrent air construction permit revision. Please provide operational data, including emissions data, during startups, shutdowns and tuning sessions to support each requested change and provide the additional information necessary to justify your request. The proposed change only specifies Condition III.B.13 for Unit 5; however, Unit 4 is mentioned in the request. Should the request include a change in Condition III.C.13 for Unit 4? Please clarify.
5. See attachment PSNCT4A-4D_6 Startup - Shutdown, Controlling Excess Emissions - Operating Procedures: Should the requested change in allowable periods of excess emissions be included in this document? Please clarify.

REQUEST FOR ADDITIONAL INFORMATION

Attachments

6. The attachments submitted for EU 005 through EU 012 for Natural Gas Analysis reads document PSNU3_2. Should the name of the documents be PSNU4_2? Please clarify.
7. Attachment PSNU1-11 Alternative Methods of Operation: This does not appear in the current Title V permit. Is this a new operation? When did the plan begin processing spent boiler cleaning chemicals? What are the primary contaminants of concern?

Other

8. Please identify whether any of the facility's engines are subject to any of the following federal regulations: 40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines; 40 Code of Federal Regulations (CFR) 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines; and 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. If applicable,
 - a. Please provide the following information for each emission unit subject to an applicable subpart: in-service date, cylinder displacement, and rule applicability.
 - b. Please identify the standards, operating limits, and monitoring requirements.

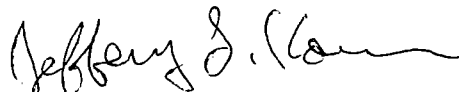
Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Please complete and submit a new R.O. certification statement page from the long application form, DEP Form No. 62-210.900(1), effective March 16, 2008.

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please complete and submit a new P.E. certification statement page from the long application form, DEP Form No. 62-210.900(1), effective March 16, 2008.

The Department must receive a response from you within 90 days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)5., F.A.C.

If you should have any questions, please call Tammy McWade, at 850/488-1906 or Jeff Koerner.

Sincerely,



Jeffery F. Koerner, Administrator
New Source Review Section
850/921-9536

This letter was sent to the following people by electronic mail with received receipt requested.

Mr. Gary Kowalczyk, Plant General Manager (gary.kowalczyk@fpl.com)
Ms. Mary Archer, Project Manager (mary.archer@fpl.com)
Mr. Kennard Kosky, P.E. (kkosky@golder.com)
Mr. Alan Zahm, DEP Central District Office (alan.zahm@dep.state.fl.us)
Mr. Mike Halpin, DEP Siting Office (mike.halpin@dep.state.fl.us)
Ms Ana M. Oquendo, EPA Region 4 (oquendo.ana@epa.gov)
Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
Ms Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

Friday, Barbara

To: Gary_Kowalczyk@fpl.com
Cc: 'Mary.Archer@fpl.com'; 'KKosky@Golder.com'; Zahm, Alan; Halpin, Mike; Oquendo.Ana@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; McWade, Tammy; Holtom, Jonathan
Subject: Request for Additional Information - Florida Power & Light Company-Sanford Power Plant, File No. 1270009-018-AV
Attachments: GaryKowalczyk-FP&L-SanfordPowerPlantRAI, File No. 1270009-018-AV.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <<http://www.adobe.com/products/acrobat/readstep.html>> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

Friday, Barbara

From: Exchange Administrator
Sent: Thursday, July 16, 2009 11:54 AM
To: Friday, Barbara
Subject: Delivery Status Notification (Relay)
Attachments: ATT133727.txt; Request for Additional Information - Florida Power & Light Company-Sanford Power Plant, File No. 1270009-018-AV

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

Gary.Kowalczyk@fpl.com

Mary.Archer@fpl.com

Friday, Barbara

From: Kowalczyk, Gary [Gary.Kowalczyk@fpl.com]
To: Friday, Barbara
Sent: Thursday, July 16, 2009 11:55 AM
Subject: Read: Request for Additional Information - Florida Power & Light Company-Sanford Power Plant, File No. 1270009-018-AV

Your message

To: Gary.Kowalczyk@fpl.com
Subject:

was read on 7/16/2009 11:55 AM.

Friday, Barbara

From: Kowalczyk, Gary [Gary.Kowalczyk@fpl.com]
Sent: Thursday, July 16, 2009 2:26 PM
To: Friday, Barbara
Cc: Archer, Mary; KKosky@Golder.com; Zahm, Alan; Halpin, Mike; Oquendo.Ana@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; McWade, Tammy; Holtom, Jonathan; Hopkins, Randy
Subject: RE: Request for Additional Information - Florida Power & Light Company-Sanford Power Plant, File No. 1270009-018-AV

I have received the document/attachment. Thank you.

Gary Kowalczyk, PE
FPL Power Generation Division
General Manager Sanford Plant
Office: 386-575-5211
Cell: 386-566-8757
Email: gary_kowalczyk@fpl.com

From: Friday, Barbara [<mailto:Barbara.Friday@dep.state.fl.us>]
Sent: Thursday, July 16, 2009 11:54 AM
To: Kowalczyk, Gary
Cc: Archer, Mary; KKosky@Golder.com; Zahm, Alan; Halpin, Mike; Oquendo.Ana@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; McWade, Tammy; Holtom, Jonathan
Subject: Request for Additional Information - Florida Power & Light Company-Sanford Power Plant, File No. 1270009-018-AV

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The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html> > .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

Friday, Barbara

From: Archer, Mary [Mary.Archer@fpl.com]
To: Friday, Barbara
Sent: Thursday, July 16, 2009 12:09 PM
Subject: Read: Request for Additional Information - Florida Power & Light Company-Sanford Power Plant, File No. 1270009-018-AV

Your message

To: Mary.Archer@fpl.com
Subject:

was read on 7/16/2009 12:09 PM.

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mx1.golder.com]
Sent: Thursday, July 16, 2009 11:54 AM
To: Friday, Barbara
Subject: Successful Mail Delivery Report
Attachments: Delivery report; Message Headers

This is the mail system at host mx1.golder.com.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<KKosky@Golder.com>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent
4A5F4D19_9811_4074640_1 515A8718001

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive01.rtp.epa.gov]
Sent: Thursday, July 16, 2009 11:54 AM
To: Friday, Barbara
Subject: Successful Mail Delivery Report
Attachments: Delivery report; Message Headers

This is the mail system at host mseive01.rtp.epa.gov.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<Forney.Kathleen@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent 4A5F4D18_11362_31263_2 73D7C4438D

<Oquendo.Ana@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent 4A5F4D18_11362_31263_2 73D7C4438D

<abrams.heather@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent 4A5F4D18_11362_31263_2 73D7C4438D

Friday, Barbara

From: System Administrator
To: Gibson, Victoria; Zahm, Alan; McWade, Tammy
Sent: Thursday, July 16, 2009 11:54 AM
Subject: Delivered:Request for Additional Information - Florida Power & Light Company-Sanford Power Plant, File No. 1270009-018-AV

Your message

To: [Gary Kowalczyk@fpl.com](mailto:Gary.Kowalczyk@fpl.com)
Cc: 'Mary.Archer@fpl.com'; 'KKosky@Golder.com'; Zahm, Alan; Halpin, Mike; Oquendo.Ana@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; McWade, Tammy; Holtom, Jonathan
Subject: Request for Additional Information - Florida Power & Light Company-Sanford Power Plant, File No. 1270009-018-AV
Sent: 7/16/2009 11:54 AM

was delivered to the following recipient(s):

Gibson, Victoria on 7/16/2009 11:54 AM
Zahm, Alan on 7/16/2009 11:54 AM
McWade, Tammy on 7/16/2009 11:54 AM

Friday, Barbara

From: Gibson, Victoria
To: Friday, Barbara
Sent: Thursday, July 16, 2009 11:55 AM
Subject: Read: Request for Additional Information - Florida Power & Light Company-Sanford Power Plant, File No. 1270009-018-AV

Your message

To: [Gary Kowalczyk@fpl.com](mailto:Gary.Kowalczyk@fpl.com)
Cc: 'Mary.Archer@fpl.com'; 'KKosky@Golder.com'; Zahm, Alan; Halpin, Mike; Oquendo.Ana@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; McWade, Tammy; Holtom, Jonathan
Subject: Request for Additional Information - Florida Power & Light Company-Sanford Power Plant, File No. 1270009-018-AV
Sent: 7/16/2009 11:54 AM

was read on 7/16/2009 11:55 AM.

Friday, Barbara

From: McWade, Tammy
To: Friday, Barbara
Sent: Thursday, July 16, 2009 11:56 AM
Subject: Read: Request for Additional Information - Florida Power & Light Company-Sanford Power Plant, File No. 1270009-018-AV

Your message

To: [Gary Kowalczyk@fpl.com](mailto:Gary.Kowalczyk@fpl.com)
Cc: 'Mary.Archer@fpl.com'; 'KKosky@Golder.com'; Zahm, Alan; Halpin, Mike; Oquendo.Ana@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; McWade, Tammy; Holtom, Jonathan
Subject: Request for Additional Information - Florida Power & Light Company-Sanford Power Plant, File No. 1270009-018-AV
Sent: 7/16/2009 11:54 AM

was read on 7/16/2009 11:55 AM.

Friday, Barbara

From: System Administrator
To: Halpin, Mike; Holtom, Jonathan
Sent: Thursday, July 16, 2009 11:54 AM
Subject: Delivered:Request for Additional Information - Florida Power & Light Company-Sanford Power Plant, File No. 1270009-018-AV

Your message

To: [Gary Kowalczyk@fpl.com](mailto:Gary.Kowalczyk@fpl.com)
Cc: 'Mary.Archer@fpl.com'; 'KKosky@Golder.com'; Zahm, Alan; Halpin, Mike; Oquendo.Ana@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; McWade, Tammy; Holtom, Jonathan
Subject: Request for Additional Information - Florida Power & Light Company-Sanford Power Plant, File No. 1270009-018-AV
Sent: 7/16/2009 11:54 AM

was delivered to the following recipient(s):

Halpin, Mike on 7/16/2009 11:54 AM
Holtom, Jonathan on 7/16/2009 11:54 AM

Friday, Barbara

From: Halpin, Mike
Sent: Thursday, July 16, 2009 12:09 PM
To: Friday, Barbara
Subject: Delivered: Request for Additional Information - Florida Power & Light Company-Sanford Power Plant, File No. 1270009-018-AV
Attachments: ATT133786.txt

Your message was delivered to the recipient.

Friday, Barbara

From: Halpin, Mike
To: Friday, Barbara
Sent: Thursday, July 16, 2009 12:16 PM
Subject: Read: Request for Additional Information - Florida Power & Light Company-Sanford Power Plant, File No. 1270009-018-AV

Your message

To: [Gary Kowalczyk@fpl.com](mailto:Gary.Kowalczyk@fpl.com)
Cc: 'Mary.Archer@fpl.com'; 'KKosky@Golder.com'; Zahm, Alan; Halpin, Mike; Oquendo.Ana@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; McWade, Tammy; Holtom, Jonathan
Subject: Request for Additional Information - Florida Power & Light Company-Sanford Power Plant, File No. 1270009-018-AV
Sent: 7/16/2009 11:54 AM

was read on 7/16/2009 12:16 PM.

Friday, Barbara

From: Holtom, Jonathan
To: Friday, Barbara
Sent: Thursday, July 16, 2009 11:55 AM
Subject: Read: Request for Additional Information - Florida Power & Light Company-Sanford Power Plant, File No. 1270009-018-AV

Your message

To: Gary.Kowalczyk@fpl.com
Cc: 'Mary.Archer@fpl.com'; 'KKosky@Golder.com'; Zahm, Alan; Halpin, Mike; Oquendo.Ana@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; McWade, Tammy; Holtom, Jonathan
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