From:

Harvey, Mary

Sent:

Thursday, January 25, 2007 2:36 PM

To:

Adams, Patty

Subject:

FW: Florida Power & Light Company - Sanford Plant - Project #1270009-014-AC

From: Kozlov, Leonard

Sent: Thursday, January 25, 2007 1:35 PM

To: Harvey, Mary

Subject: Read: Florida Power & Light Company - Sanford Plant - Project #1270009-014-AC

#### Your message

To:

 $"roxane\_kennedy@fpl.com"; "mary\_archer@fpl.com"; "randy\_hopkins@fpl.com"; Kozlov, Leonard$ 

Cc:

Mulkey, Cindy; Adams, Patty; Gibson, Victoria

Subject:

Florida Power & Light Company - Sanford Plant - Project #1270009-014-AC

Sent:

1/24/2007 10:36 AM

was read on 1/25/2007 1:35 PM.

From:

Harvey, Mary

Sent:

Wednesday, January 24, 2007 10:36 AM

To:

'roxane\_kennedy@fpl.com'; 'mary\_archer@fpl.com'; 'randy\_hopkins@fpl.com'; Kozlov, Leonard

Cc:

Mulkey, Cindy; Adams, Patty; Gibson, Victoria

Subject:

Florida Power & Light Company - Sanford Plant - Project #1270009-014-AC

Attachments: Document - Project #1270009-014-AC.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,

DEP, Bureau of Air Regulation

From:

Harvey, Mary

Sent:

Wednesday, January 24, 2007 11:09 AM

To:

Adams, Patty; Mulkey, Cindy

Subject:

FW: Florida Power & Light Company - Sanford Plant - Project #1270009-014-AC

----Original Message----

From: Randy\_Hopkins@fpl.com [mailto:Randy\_Hopkins@fpl.com] Sent: Wednesday, January 24, 2007 11:04 AM

To: Harvey, Mary Cc: Mulkey, Cindy; Kozlov, Leonard; mary\_archer@fpl.com; Adams, Patty;

roxane kennedy@fpl.com; Gibson, Victoria

Subject: Re: Florida Power & Light Company - Sanford Plant - Project #1270009-014-AC

I am in receipt of the document. Thank you.

Randy Hopkins Sr. Plant Leader FPL Sanford Plant W: 386-575-5385



# Florida Department of Environmental Protection

Bob Martinez Center 2600 Blairstone Road Tallahassee, Florida 32399-2400 Charlie Crist Governor Jeff Kottkamp Lt. Governor Michael W. Sole Secretary

January 23, 2007

Electronically sent - Received Receipt requested.

Roxane R. Kennedy, Plant General Manager Florida Power & Light Company – Sanford Plant 950 South Highway 17-92 DeBary, Florida 32713

Re: FPL Sanford Plant Combustion Turbine 5C
Project No. 1270009-014-AC
Combined Cycle Combustion Turbine – Excess Emissions
Authorization Following Rotor/Blade Change-out

# Dear Ms. Kennedy:

The Department has reviewed the request dated January 18, 2007 for excess emissions resulting from Full Speed No Load (FSNL) testing, which is recommended by the equipment manufacturer following a rotor/blade change-out. The FSNL testing is scheduled to occur between January 24 and February 8, 2007. Similar requests have previously been granted for other units at both the FPL Martin and Sanford Plants. The Department authorizes excess emissions due to FSNL testing provided:

- The operator adheres to best operational practices to minimize emissions;
- The operator minimizes the duration of excess emissions, which shall not exceed 15 hours for the entire period of FSNL testing;
- The operator notifies the Department's Central District Office for each day that FSNL testing is performed; and,
- The owner or operator submits a report summarizing the hourly NOx emissions during the FSNL testing.

Nothing in this action waves any federal requirements of the applicable New Source Performance Standards (NSPS) for this unit.

The Department will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14

Ms. Roxane Kennedy January 23, 2007 Page 2 of 3

(fourteen) days of receipt of this notice. Petitions filed by any other person must be filed within 14 (fourteen) days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by the filing of a Notice of Appeal, under Rule 9.110 of the Florida Rules of Appellate Procedure, with the Clerk of the Department 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 of Appeal must be filed within thirty days from the date this notice is filed with the Clerk of the permitting authority.

Executed in Tallahassee, Florida.

Trina L. Vielhauer, Chief Bureau of Air Regulation

Vilham & Vilham

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TLV/al/cem

Ms. Roxane Kennedy January 23, 2007 Page 3 of 3

# **CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this authorization and all copies were sent electronically (with Received Receipt) before the close of business on 1/24/67 to the persons listed:

Roxane Kennedy, FPL: roxane\_kennedy@fpl.com

Mary Archer, FPL: <u>mary\_archer@fpl.com</u> Randy Hopkins, FPL: <u>randy\_hopkins@fpl.com</u>

Len Kozlov, P.E., CD: leonard.kozlov@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,

on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

(Date



January 18, 2007

Trina Vielhauer, Chief Bureau of Air Regulation FDEP Division of Air Resources 2600 Blair Stone Road, MS #5505 Tallahassee, Florida 32399-2400

RE: FPL Sanford Power Plant - Title V Air Operating Permit 1270009-011-AV
Combustion Turbine 5C
Excess Emissions Request for Manufacturer Requested FSNL Testing

Dear Ms. Vielhauer:

Florida Power & Light is requesting an excess emissions period for the Sanford Plant Unit 5C combustion turbine. The turbine manufacturer (General Electric) has requested that a period of Full Speed No Load (FSNL) operation is necessary for the following twofold purposes:

- 1) GE Energy desires to investigate and develop ways to reduce the severity and clearing speed of the rotating stall in the GE 7FA Gas Turbine. This will have the effect of reducing the stresses in the R-0 blades and thus reduce the likelihood of crack initiation/growth occurring during start up.
- 2) GE Energy desires to gather R-0 blade vibratory response data to validate Computational Fluid Dynamics (CFD) models of the gas turbine inlet. This information will be used to assist in potential changes to the 7FA inlet plenum with the intent to reduce/eliminate the current flow field distortion that is vibrating the R-0 blades.

The FSNL test is expected to last for no more than 10 hours and will only be scheduled upon agreement with the Department. The Department has granted similar requests for FSNL testing following the replacement of rotor/blade change outs at our facility. (authorization letter attached for reference.)

If you have any questions or require additional information, please contact me at (386) 575-5211 or Randy Hopkins at (386) 575-5385.

Sincerely,

Roxane R. Kerinedy
Plant General Manager
FPL Sanford Plant

# Attachment

Cc:

Mr. Lenonard T. Kozlov, Manager (via email) FDEP Central Florida District 3313 Maguire Blvd., Suite 232 Orlando, Florida 32803-3767

Ms. Mary Archer - FPL/JES (via email)

FPL Sanford Plant File

From:

Harvey, Mary

Sent:

Tuesday, January 30, 2007 1:51 PM

To:

Mulkey, Cindy; Adams, Patty

Subject:

FW: Letter - Roxane Kennedy - Florida Power & Light Company - Sanford Plant - Project #

1270009-015-AC

----Original Message----

From: Randy\_Hopkins@fpl.com [mailto:Randy\_Hopkins@fpl.com] Sent: Tuesday, January 30, 2007 1:11 PM

To: Harvey, Mary

Cc: Mulkey, Cindy; Kozlov, Leonard; mary\_archer@fpl.com; Adams, Patty;

roxane\_kennedy@fpl.com; Gibson, Victoria

Subject: Re: Letter - Roxane Kennedy - Florida Power & Light Company - Sanford Plant -

Project #1270009-015-AC

I am in receipt of the document. Thank you.

Randy Hopkins Sr. Plant Leader FPL Sanford Plant

From:

Harvey, Mary

Sent:

Tuesday, January 30, 2007 12:21 PM

To:

roxane\_kennedy@fpl.com; mary\_archer@fpl.com; randy\_hopkins@fpl.com; Kozlov, Leonard

Cc:

Adams, Patty; Mulkey, Cindy; Gibson, Victoria

Subject:

Letter - Roxane Kennedy - Florida Power & Light Company - Sanford Plant - Project #1270009-015-AC

Attachments: Letter-Roxane R. Kennedy - Project #1270009-015-AC.pdf

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Thank you,

DEP, Bureau of Air Regulation