



Department of Environmental Protection

Lawton Chiles
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Virginia B. Wetherell
Secretary

January 17, 1997

Ms. Mary Archer
Environmental Specialist
Florida Power & Light Co.
Post Office Box 088801
North Palm Beach, Florida 33408-8801

OCD-AP-97-15

Brevard County - AP
Cape Canaveral Power Plant
Addition of Fuel Oil Additive
Permits AO05-217321 and AO05-252219

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AIR REGULATION

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Dear Ms. Archer:

This is in response to your January 6 letter and attachments requesting a change in the use of a magnesium based fuel additive in lieu of magnesium hydroxide for the above permits. During my telephone conversation with Richard Piper on Friday, January 17, I informed him that your request was being referred to the Division of Air Resources Management in Tallahassee to be processed. The person to contact regarding this matter is Al Linero.

A copy of your letter was sent to John Brown, Administrator, Title V permitting for power plants. A minor adjustment may be needed in your Title V application to have this incorporated into your Title V permit.

If you have any further questions, please contact me at (407) 893 3333.

Sincerely,

L. T. Kozlov, P. E.
Program Administrator
Air Resources Management

LTK:j
cc: Al Linero
John Brown



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

1/14/97
Dg

Send copies to

AL LINDZD
MIKE HARLEY

AZ
AS
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GK

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JOHN BROWN



1/16
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January 6, 1997

Mr. Leonard Koslov
State of Florida
Department of Environmental Protection
Central Florida District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

**RE: Cape Canaveral Power Plant
Addition of Fuel Oil Additive
Air Operating Permits A005-217321 and A005-252219**

Dear Mr. Koslov:

Pursuant to conversation with Mr. Anatoliy Sobolevskiy on November 8, 1996, this correspondence is to request a revision of the Cape Canaveral Power Plant Air Operating permits to change the fuel additive description from magnesium hydroxide to a magnesium based fuel oil additive. The report prepared by plant personnel is attached describing the test, plus provides data during testing with and without use of the additive.

The current permits addresses the additive on page 7 of 9 condition 5.(b), third paragraph. The following change is recommended:

- Should FPL decide to pursue routine use of ~~magnesium hydroxide (Mg(OH)₂)~~ a magnesium based fuel additive, then all future compliance testing for particulate matter and visible emissions shall include.....

If the \$250 change fee per permit is required, please give me a call so I may expedite it to you. Several of the Districts have returned checks recently indicating since fees for Title V are now being paid the change fee is not required.

If you have questions or require additional information, please give me a call at (561) 625-7637.

Sincerely,

Mary Archer
Environmental Specialist



Cape Canaveral Plant
6000 N. U.S. Hwy. 1
Cocoa, Florida 32927-6002



January 6, 1997

Subject:- Fuel Oil Additive Evaluation at FPL's Cape Canaveral Plant

Objective:- The purpose of this evaluation was to determine the effect of a Magnesium based Fuel oil additive on the products of combustion of heavy number 6 fuel oil when burned in a large utility steam generator. The main focus of this trial was to observe any changes to the ash softening characteristics of the fuel and also determine the effects (if any) on Opacity, SO₂ emissions, and Heat Rate.

Procedure:- At the request of the Technical Department at the Cape Canaveral Power Plant, FPL applied for and received permission from the Florida Department of Environmental Protection to conduct an evaluation of a fuel oil additive manufactured by Bycocin AB. The evaluation began at the Cape Canaveral Plant in early July 1996 and ran for approximately six months finishing at year end 1996. The additive was injected into the fuel oil just upstream of the oil burners and varying dosage rates were tested (i.e. a mix of 1 gallon additive to 2000 gallons oil; through a mix of 1 gallon additive to 5000 gallons oil.)
Online visual observations were made at regular intervals to determine the impact on such things as flame stability, furnace floor ash depth and furnace wall deposit build up. Two off-line inspections were also made to observe areas which could not be seen with the unit operating.
A two day, steady state test series which monitored load, oil flow, heat rate, opacity and SO₂ was conducted in mid October.

Results:- The on-line visual observations were very encouraging: burner flame shape and stability were noticeably improved which indicates that the additive was performing as required to promote complete combustion and total burn out of all the hydrocarbons in the fuel. Furnace floor ash depth, in relation to a similar amount of fuel burned previously, was much less (on the order of 40-50 %) and in addition the furnace wall deposit build up was greatly reduced. These data show that not only is the additive working as planned, but the Magnesium component of the additive was also capturing the Vanadium in the fuel oil and preventing it from converting to Vanadium pentoxide (V₂O₅) which is a very hard and corrosive substance often formed in high temperature combustion zones. (Ash softening characteristics)
The off-line inspections also proved to be encouraging in that areas usually covered with a hard tenacious material were now either bare or covered with a light, friable coating which is easily removed by either sootblowing or waterwashing. Air preheater baskets which are normally susceptible to severe pluggage were found to be in much better condition than anticipated. Ash samples were taken and analyzed by FPL's Central Laboratory. The samples were found to have very small amounts of vanadium or vanadium pentoxide which corresponds to our visual observations.
The two day steady state test was run as a "double blind" test, that is on the first day the unit was tested at steady load with the additive OFF for four hours then, without changing anything, the additive was turned ON and tested for four hours.

The second day the process was reversed with the additive ON and tested for four hours then turned OFF and tested for four hours. This was done to eliminate as many variables as possible in the testing.

The outcome of this testing was most exciting and provided the following information:

1. There was no effect on either the recorded opacity or the visual opacity (no increase or decrease) see attached chart for recorded opacity
2. There was no effect on the recorded SO₂ (additive contains no sulfur)
3. There was no effect on indicated load (net Megawatts).
4. There was a significant improvement in the indicated heat rate (Btu/kWh)

Conclusions:- The Bycocin additive has performed very favorably at the Cape Canaveral Power plant. Not only have the deposits been reduced on the furnace walls and bottom, but what deposits are left have been dry, friable and easily removed. The heat rate improvement should allow the plant to burn a little less oil and still generate the same amount of electricity.

But, far and away the most important results of this evaluation are the data that demonstrate that this additive does not increase the Opacity or the SO₂ when used with the fuel oil which is burned at this Plant.

Request:- The Technical Department at the Cape Canaveral Power Plant therefore requests that the Air Operating Permit for both Units be revised to allow inclusion of this Magnesium based additive as quickly as possible.

Submitted by: Bruce Bennett & Jay McDonald

Unit No. 1 10/17/96				Unit No. 1 10-18-96			
	additive				additive		
SMPL	NOx	Load	SO2	Time	NOx	Load	NOx
9:02:44	0	424.218	0	8:36:07	0.836	421	2.118
9:05:37	0	423.75	0	8:39:00	0.836	423	2.118
9:08:30	0	423.125	0	8:41:53	0.836	424	2.118
9:11:23	0	422.656	0	8:44:46	0.836	423	2.118
9:14:16	0	423.75	0	8:47:39	0.836	422	2.118
9:17:09	0	423.125	0	8:50:32	0.836	422	2.118
9:20:02	0	423.75	0	8:53:25	0	422	0
9:22:55	0	423.125	0	8:56:18	0	423	0
9:25:48	0	423.125	0	8:59:11	0	422	0
9:28:41	0.904	423.75	2.115	9:02:04	0	421	0
9:31:34	0.904	423.75	2.115	9:04:57	0	421	0
9:34:27	0.904	422.656	2.115	9:07:50	0	422	0
9:37:20	0.904	423.75	2.115	9:10:43	0	423	0
9:40:13	0.904	423.75	2.115	9:13:36	0	422	0
9:43:06	0.904	423.125	2.115	9:16:29	0	422	0
9:45:59	0.904	423.75	2.115	9:19:22	0	422	0
9:48:52	0.904	423.75	2.115	9:22:15	0	423	0
9:51:45	0.904	423.75	2.115	9:25:08	0	422	0
9:54:38	0.904	423.125	2.115	9:28:01	0	423	0
9:57:31	0.904	423.125	2.115	9:30:54	0.836	422	2.145
10:00:24	0.904	423.125	2.115	9:33:47	0.836	422	2.145
10:03:17	0.904	423.906	2.115	9:36:40	0.836	422	2.145
10:06:10	0.904	423.125	2.115	9:39:33	0.836	422	2.145
10:09:03	0.904	422.656	2.115	9:42:26	0.836	422	2.145
10:11:56	0.904	423.75	2.115	9:45:19	0.836	422	2.145
10:14:49	0.904	423.125	2.115	9:48:12	0.836	421	2.145
10:17:42	0.904	423.125	2.115	9:51:05	0.836	422	2.145
10:26:21	0.831	423.125	2.098	9:53:58	0.836	422	2.145
10:29:14	0.831	423.125	2.098	9:56:51	0.836	422	2.145
10:32:07	0.831	423.125	2.098	9:59:44	0.836	422	2.145
10:35:00	0.831	423.125	2.098	10:02:37	0.836	422	2.145
10:37:53	0.831	423.125	2.098	10:05:30	0.836	422	2.145
10:40:46	0.831	423.125	2.098	10:08:23	0.836	422	2.145
10:43:39	0.831	423.125	2.098	10:11:16	0.836	422	2.145
10:46:32	0.831	423.125	2.098	10:14:09	0.836	422	2.145
10:49:25	0.831	423.125	2.098	10:17:02	0.836	422	2.145
10:52:18	0.831	423.75	2.098	10:19:55	0.836	422	2.145
10:55:11	0.831	423.75	2.098	10:22:48	0	422	0
10:58:04	0.831	423.125	2.098	10:25:41	0	422	0
11:00:57	0.831	423.125	2.098	10:28:34	0.801	422	2.169
11:03:50	0.831	423.75	2.098	10:31:27	0.801	422	2.169
11:06:43	0.831	424.375	2.098	10:34:20	0.801	422	2.169
11:09:36	0.831	423.75	2.098	10:37:13	0.801	422	2.169
11:12:29	0.831	423.125	2.098	10:40:06	0.801	423	2.169
11:15:22	0.831	423.75	2.098	10:42:59	0.801	423	2.169

11:18:15	0.831	423.125	2.098	10:45:52	0.801	422	2.169
11:26:54	0.846	423.75	2.132	10:48:45	0.801	422	2.169
11:29:47	0.846	423.75	2.132	10:51:38	0.801	422	2.169
11:32:40	0.846	423.75	2.132	10:54:31	0.801	422	2.169
11:35:33	0.846	423.125	2.132	10:57:24	0.801	423	2.169
11:38:26	0.846	423.125	2.132	11:00:17	0.801	423	2.169
11:41:19	0.846	423.125	2.132	11:03:10	0.801	422	2.169
11:44:12	0.846	423.75	2.132	11:06:03	0.801	422	2.169
11:47:05	0.846	423.75	2.132	11:08:56	0.801	422	2.169
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11:52:51	0.846	423.125	2.132	11:14:42	0.801	423	2.169
11:55:44	0.846	423.125	2.132	11:17:35	0.801	422	2.169
11:58:37	0.846	423.75	2.132	11:20:28	0	422	0
12:01:30	0.846	423.125	2.132	11:23:21	0	422	0
12:04:23	0.846	423.125	2.132	11:26:14	0	422	0
12:07:16	0.846	423.125	2.132	11:29:07	0.785	422	2.169
12:10:09	0.846	423.125	2.132	11:32:00	0.785	423	2.169
12:13:02	0.846	423.125	2.132	11:34:53	0.785	423	2.169
12:15:55	0.846	423.125	2.132	11:37:46	0.785	423	2.169
12:18:48	0.846	423.125	2.132	11:40:39	0.785	422	2.169
12:21:41	0	423.125	0	11:43:32	0.785	422	2.169
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12:27:27	0.83	423.125	2.103	11:49:18	0.785	422	2.169
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12:33:13	0.83	423.125	2.103	11:55:04	0.785	422	2.169
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12:38:59	0.83	423.125	2.103	12:00:50	0.785	422	2.169
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12:47:38	0.83	423.125	2.103	12:09:29	0.785	422	2.169
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12:53:24	0.83	423.75	2.103	12:15:15	0.785	422	2.169
12:56:17	0.83	423.125	2.103	12:18:08	0.785	422	2.169
12:59:10	0.83	423.75	2.103	12:21:01	0	422	0
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13:30:53	0.825	423.125	2.109	12:52:44	0.779	423	2.149
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13:39:32	0.825	423.125	2.109	13:01:23	0.779	423	2.149
13:42:25	0.825	423.75	2.109	13:04:16	0.779	423	2.149
13:45:18	0.825	423.125	2.109	13:07:09	0.779	422	2.149
13:48:11	0.825	423.75	2.109	13:10:02	0.779	422	2.149

13:51:04	0.825	423.75	2.109	13:12:55	0.779	422	2.149
13:53:57	0.825	423.125	2.109	13:15:48	0.779	422	2.149
13:56:50	0.825	423.125	2.109	13:18:41	0.779	422	2.149
13:59:43	0.825	423.125	2.109	13:21:34	0	423	0
14:02:36	0.825	423.125	2.109	13:24:27	0	423	0
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14:08:22	0.825	423.125	2.109	13:30:13	0.778	423	2.149
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14:17:01	0.825	423.125	2.109	13:38:52	0.778	422	2.149
14:19:54	0	423.125	0	13:41:45	0.778	423	2.149
14:22:47	0	423.125	0	13:44:38	0.778	422	2.149
14:25:40	0	423.125	0	13:47:31	0.778	423	2.149
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15:06:02	0.827	423.75	2.098	14:27:53	0.772	422	2.163
15:08:55	0.827	423.125	2.098	14:30:46	0.772	423	2.163
15:11:48	0.827	422.812	2.098	14:33:39	0.772	422	2.163
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15:17:34	0.827	423.125	2.098	14:39:25	0.772	422	2.163
15:20:27	0	423.125	0	14:42:18	0.772	422	2.163
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16:00:49	0.819	422.656	2.121	15:22:40	0	422	0
16:03:42	0.819	422.5	2.121	15:25:33	0	422	0
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16:15:14	0.819	422.656	2.121	15:37:05	0.789	422	2.184

16:18:07	0.819	422.656	2.121	15:39:58	0.789	422	2.184
16:21:00	0	423.125	0	15:42:51	0.789	422	2.184
16:23:53	0	422.656	0	15:45:44	0.789	423	2.184
16:26:46	0.821	423.125	2.134	15:48:37	0.789	423	2.184
16:29:39	0.821	423.125	2.134	15:51:30	0.789	422	2.184
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16:38:18	0.821	423.125	2.134	16:00:09	0.789	422	2.184
16:41:11	0.821	422.656	2.134	16:03:02	0.789	423	2.184
16:44:04	0.821	422.5	2.134	16:05:55	0.789	422	2.184
16:46:57	0.821	423.125	2.134	16:08:48	0.789	423	2.184
16:49:50	0.821	422.031	2.134	16:11:41	0.789	422	2.184
16:52:43	0.821	422.656	2.134	16:14:34	0.789	423	2.184
16:55:36	0.821	422.656	2.134	16:17:27	0.789	422	2.184
16:58:29	0.821	423.125	2.134				
17:01:22	0.821	422.5	2.134				
17:04:15	0.821	422.656	2.134				
17:07:08	0.821	422.5	2.134				
17:10:01	0.821	422.656	2.134				
17:12:54	0.821	422.5	2.134				
17:15:47	0.821	422.5	2.134				
17:18:40	0.821	422.656	2.134				
17:21:33	0	422.656	0				
17:24:26	0	422.656	0				
17:27:19	0.829	423.125	2.146				
17:30:12	0.829	422.187	2.146				
17:33:05	0.829	422.656	2.146				
17:35:58	0.829	422.5	2.146				
17:38:51	0.829	422.656	2.146				
17:41:44	0.829	422.656	2.146				
17:44:37	0.829	422.656	2.146				
17:47:30	0.829	422.656	2.146				
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17:53:16	0.829	422.656	2.146				
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18:07:41	0.829	422.656	2.146				
18:10:34	0.829	423.125	2.146				
18:13:27	0.829	422.656	2.146				

Department of Environmental
Routing and Transmittal Slip

To: (Name, Office, Location)

Bureau of Air
MS # 5505
Tallahassee

Remarks:

1/23/97 - cc's: Tom Cascio
File Copy
John Brown

RECEIVED

JAN 22 1997

BUREAU OF
AIR REGULATION

THIS WON'T HURT A BIT

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FROM:

L. J. Kazlov, PE
Air Adm.

DATE

1/21/97

PHONE

5C325-3332

Central District



Department of Environmental Protection

Lawton Chiles
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Virginia B. Wetherell
Secretary

January 17, 1997

Ms. Mary Archer
Environmental Specialist
Florida Power & Light Co.
Post Office.Box 088801
North Palm Beach, Florida 33408- 8801

OCD-AP-97-15

Brevard County - AP
Cape Canaveral Power Plant
Addition of Fuel Oil Additive
Permits AO05-217321 and AO05- 252219

AIR REGULATION
BUREAU OF

JAN 22 1997

RECEIVED

Dear Ms. Archer:

This is in response to your January 6 letter and attachments requesting a change in the use of a magnesium based fuel additive in lieu of magnesium hydroxide for the above permits. During my telephone conversation with Richard Piper on Friday, January 17, I informed him that your request was being referred to the Division of Air Resources Management in Tallahassee to be processed. The person to contact regarding this matter is Al Linero.

A copy of your letter was sent to John Brown, Administrator, Title V permitting for power plants. A minor adjustment may be needed in your Title V application to have this incorporated into your Title V permit.

If you have any further questions, please contact me at (407) 893 3333.

Sincerely,

L. T. Kozlov, P. E.
Program Administrator
Air Resources Management

LTK:j
cc: Al Linero
John Brown

Appendix H-1, Permit History/ID Number Changes

Florida Power & Light Company
Cape Canaveral

[DRAFT/PROPOSED/FINAL] Permit No.: 0090006-001-AV
Facility ID No.: 0090006

Permit History (for tracking purposes):

E.U.

<u>ID No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date^{1,2}</u>	<u>Revised Date(s)</u>
-001	Fossil Fuel Steam Generator #1	AO05-217321	03/10/93	02/25/98		
-002	Fossil Fuel Steam Generator #2	AO05-252219	07/24/94	07/19/99		

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

From: Facility ID No.: 30ORL050006

To: Facility ID No.: 0090006

Notes:

1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.

2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 19, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John Franklin
Plant General Manager
Florida Power & Light Company
11770 U.S. Highway One
North Palm Beach, Florida 33408

Re: Request for Additional Information Regarding Initial Title V Permit Application
File No. 0090006-001-AV
Cape Canaveral Plant, Brevard County

Dear Mr. Franklin:

The initial Title V permit application for the Cape Canaveral Plant was received in a timely manner (June 12, 1996) and has been deemed complete by default. However, in order to continue processing this application, the Department is requesting the additional information outlined below. Should your response to any of the listed items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form. Please note that the items are grouped by the appropriate application section reference.

A. Facility Information.

1. Please provide a copy of document PCCFS_11.txt, Identification of Additional Applicable Requirements. The referenced document appears to be missing from Section E.
2. Attachment PCC-FW, List of Unregulated Trivial or De minimis Activities, contained a consolidated listing of trivial activities, unregulated emissions units and activities that you propose for exemption. Please resubmit as follows:
 - a) Group the unregulated activities into logical groupings of emissions units and indicate any pollutants that have the potential to emit quantities equal to or greater than the threshold levels specified in Rules 62-213.420(3)(c)3. and 4., F.A.C., from each of the unregulated emissions units.
 - b) Identify emissions units that you claim should be exempted and provide adequate information to demonstrate that emissions levels are below the levels established for exemption at Rule 62-213.430(6), F.A.C.
 - c) Do not include trivial activities in the application.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Is your RETURN ADDRESS completed on the reverse side?

SENDER: <ul style="list-style-type: none"> • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece below the article number. • The Return Receipt will show to whom the article was delivered and the date delivered. 		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Mr. John Franklin Plant General Manager Florida Power & Light Company 11770 U.S. Highway One North Palm Beach, Florida 33408		4a. Article Number Z 311 902 879	
5. Signature (Addressee)		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
6. Signature (Agent) 		7. Date of Delivery	
8. Addressee's Address (Only if requested and fee is paid)		8. Addressee's Address (Only if requested and fee is paid)	

Thank you for using Return Receipt Service.

Z 311 902 879

Receipt for Certified Mail
 No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to Mr. John Franklin	
Street and No. 11770 U.S. Highway One	
P.O., State and ZIP Code North Palm Beach, FL 33408	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, March 1993

Mr. John Franklin
Florida Power & Light Company
Additional Information Request
Page 2 of 2

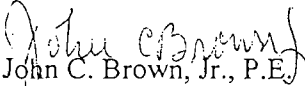
B. Emissions Unit 1: Boiler.

1. "Chemical cleaning waste evaporation" is included in the application as a segment in Section F. However, Specific Condition No. 11 of the current operating permit, AO05-217321, prohibits such an operation. Please explain this apparent contradiction.

2. We note as an informational item that "Previously Submitted" should have been entered in the Acid Rain Application - Phase II form information blank instead of "Not Applicable" in Section L.

A written response to these items is required within ninety days of receipt of this notice, unless additional time is requested pursuant to Rule 62-213.420(1)(b)6, F.A.C. If you should have any questions, please contact Tom Cascio or me at (904) 488-1344.

Sincerely,


John C. Brown, Jr., P.E.
Administrator
Title V Section

JCB/tc

CC: Mr. Kennard F. Kosky, P.E., KBN Engineering and Applied Sciences
Mr. Leonard T. Kozlov, Central District Office

Sule

Memorandum

TO: Len Kozlov, CD

FROM: Bruce Mitchell ^{BM}

DATE: November 7, 1996

SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit
 FP&L, Cape Canaveral Plant: 0090006-001-AV

The Title V operating permit application package for the referenced facility is being processed in Tallahassee. The application was previously forwarded to your office for your files and future reference. Please have someone review the package for completeness and respond in writing by November 15, 1996, if you have any comments. Otherwise, no response is required. If there are any questions, please call the project engineer, Tom Cascio, at 904/488-1344 or SC:278-1344. It is very important to verify the compliance statement regarding the facility. Since we do not have a readily effective means of determining compliance at the time the application was submitted, please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. Also, do not write on the documents.

If there are any questions regarding this request, please call me or Scott Sheplak at the above number(s).

RBM/bm

cc: Alan Zahm, CD

11-7-96

Len/Alan,

I apologize for the shortness of this notice. All future notifications should provide at least 30-days for review time.

Sincerely,
 Bruce



Lawton Chiles
Governor

Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Virginia B. Wetherell
Secretary

Permittee:

Florida Power & Light Co.
11770 U.S. Highway One
North Palm Beach, Florida 33408

Attention: Elsa Bishop, Acting Supervisor
Air Permitting and Programs

Permit Number: A005-217321
Date of Issue:
Expiration Date: February 25, 1998
County: Brevard
Latitude/Longitude:
28°28'10"N/80°45'51"W
UTM: 17-523.1 KmE; 3149.0 KmN
Project: Cape Canaveral Power Plant
Unit No. 1

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) Chapter 17. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

The permittee may operate fossil fuel steam generator unit no. 1 equipped with a 397 foot exhaust stack and multicyclones to control particulate emissions. Unit 1 has a maximum design heat input rate of 4,000 million Btu per hour for oil, and 4180 million Btu/hr for natural gas.

This source is located at the Florida Power and Light Company, Cape Canaveral Power Plant at 6000 North U.S. Highway 1 in Frontenac, Brevard County, Florida.

General Conditions are attached to be distributed to the permittee only.

GENERAL CONDITIONS:

The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. 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.

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, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any 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 of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.

This permit conveys no title to land or water, does not constitute State recognition or acknowledgement 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.

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.

The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and 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.

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 reasonable times, access to the premises where the permitted activity is located or conducted to:

- (a) Have access to and copy any records that must be kept under 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.

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 noncompliance; and
- (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

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.

GENERAL CONDITIONS:

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 Section 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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.

This permit is transferable only upon Department approval in accordance with Rule 17-4.120 and 17-30.300, 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.

This permit or a copy thereof shall be kept at the work site of the permitted activity.

This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)**
- () Determination of Prevention of Significant Deterioration (PSD)**
- () Certification of compliance with state Water Quality Standards (Section 401, PL 92-500)**
- () Compliance with New Source Performance Standards**

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 for 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;**
 - 6. the results of such analyses.**

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 the 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.

PERMITTEE:
Florida Power & Light Co.

Permit Number: A005-217321
Expiration Date: February 25, 1998

Attention: Elsa Bishop, Acting Supervisor
Air Permitting & Programs

SPECIFIC CONDITIONS:

OPERATING CONDITIONS

1. Heat Input Rate:

The maximum permitted heat input rates for this source are 4000 MMBTU/hour for residual or used oil and 4180 MMBTU/hour for natural gas.

2. Permitted Fuels:

This source shall be fired with a variable combination of No. 6 residual fuel oil, natural gas, No. 2 fuel oil, propane gas or on-specification used oil from FPL operations. The quantity of on-specification used oil to be fired shall not exceed 2,413,530 gallons/year.

3. Operating Hours:

This source is permitted to operate continuously.

PERMITTEE:
Florida Power & Light Co.

Permit Number: AO05-217321
Expiration Date: February 25, 1998

Attention: Elsa Bishop, Acting Supervisor
Air Permitting & Programs

SPECIFIC CONDITIONS:
(Continued)

4. Source Emission Limiting Standards and Compliance Testing Requirements:

POLLUTANT	EMISSION (1) LIMITING STDS.	TESTING FREQUENCY (2)			TEST (3) METHOD
		ANNUAL	QUARTERLY	OTHER	
Particulate Matter					
Steady State	0.1 lb/MMBtu	X(4)	X(4)	-	EPA METHOD 5 OR 17 (5)
Sootblowing or Load Changing	0.3 lb/MMBtu (6)	X	-	-	EPA METHOD 5 OR 17 (5)
Sulfur Dioxide	2.75 lb/MMBtu	-	-	X	Monthly Fuel Analysis
Visible Emissions					
Steady State	40% Opacity	X(4)	-	-	DER Method 9
Sootblowing or Load Changing	60% Opacity for up up to 3 hrs in 24 hrs, with up to four 6-minute periods of up to 100% if unit has an operational opacity CEM (6)	X(6)	-	-	DER Method 9

Footnotes:

- (1) FAC 17-210.700(3) and FAC 17-296.405(1)
- (2) FAC 17-297.340
- (3) FAC 17-297.330

PERMITTEE:
Florida Power & Light Co.

Permit Number: A005-217321
Expiration Date: February 25, 1998

Attention: Elsa Bishop, Acting Supervisor
Air Permitting & Programs

SPECIFIC CONDITIONS:
(Continued)

- (4) Florida DEP Order dated January 2, 1986 granted annual particulate matter testing with a 40% opacity limit. Compliance testing shall be conducted on an annual basis on or within 60 days before the date of June 1 of each year. FPL may request an extension of the June 1 deadline on a yearly case-by-case basis. For good cause shown, the Department may extend the deadline for a reasonable time. A timely request to extend the deadline shall automatically extend the time for compliance testing for 30 days or until the request is acted upon by the Department, whichever is earlier. In the event a compliance test cannot be conducted due to an unplanned unit outage, the compliance test shall be conducted within 30 days of the date the unit is returned to service. If the source fails to comply with order conditions, then the source will resume particulate matter (steady-state) testing either annually with a 20% opacity limit or quarterly with a 40% opacity limit. Visible emissions testing will be conducted annually regardless of option selected. If a quarterly schedule is selected, the source shall advise this office in writing of the quarterly test date schedule.
- (5) EPA Method 17 may be used only if the stack gas exit temperature is less than 375°F.
- (6) FAC 17-210.700(3) allows up to 3 hours in a 24-hour period of excess emissions during sootblowing and loading changing operations. Excess emissions are authorized only if best operational practices to minimize emissions are adhered to, and the duration of excess emissions is minimized.

5. Compliance Testing Related Requirements:

(a) Notification - FAC 17-297.340(1)(i)

The Air Resources compliance section of this office shall be notified in writing at least fifteen (15) days in advance of the compliance tests (Rule 17-297.340(1)(i), F.A.C.).

(b) Conditions

Compliance testing shall be conducted while the source is firing No. 6 residual fuel oil at heat input rates from 3600-4000 MMBtu/hr. Particulate and visible emissions tests shall be conducted under both sootblowing and steady-state conditions.

Testing may be conducted while firing No. 6 residual fuel oil at less than 90 percent of the maximum permitted heat input rate, however, if so, subsequent source operation on oil is limited to up to 110% of the average No. 6 residual fuel oil heat input rate during the test. Once the unit is so limited, then operation at a higher No. 6 residual fuel

PERMITTEE:

Florida Power & Light Co.

Permit Number: A005-217321

Expiration Date: February 25, 1998

Attention: Elsa Bishop, Acting Supervisor
Air Permitting & Programs

SPECIFIC CONDITIONS:

(Continued)

oil heat input rate is allowed for a total of no more than fifteen consecutive calendar days to conduct additional compliance testing to regain the higher rates, not to exceed 4,000 MMBtu/hr on No. 6 residual fuel oil with prior notification as specified in condition 5(a) to the Department. The District may give an extension to this 15 days only under unusual circumstances. The required EPA Method 5 or 17 and DER Method 9 compliance tests shall be conducted concurrently. Operating at conditions during testing which do not reflect representative operating conditions may invalidate a test.

Should FPL decide to pursue routine use of magnesium hydroxide (Mg(OH)₂) fuel additive, then all future compliance testing for particulate matter and visible emissions shall include use of the additive at an injection rate consistent with normal operation.

In the event FPL exceeds the tested additive injection rate by 10 percent or more, FPL shall notify the Central District in writing within 14 days of the date that the higher rate was initiated. The notification shall include the date the higher injection rate began, the magnitude of the higher rate, and the approximate date by which the higher rate would cease.

(c) Stack Sampling Facility - FAC 17-297.345

The stack sampling facility must comply with Rule 17-297.345, FAC.

(d) Report Submittal - FAC 17-297.570(2)

A copy of the test results shall be submitted to the Department's Central District Office within 45 days after the last test run is completed. The test report shall provide the actual heat input rate.

6. Annual Operations Report (AOR):

On or before March 1 of each calendar year, a completed DEP Form 17-210.900(4), Annual Operation Report Form for Air Emissions Sources, based on data for the preceding calendar year, shall be submitted to the Department's Central District Office.

7. Excess Emissions

(a) Events - Rule 17-210.700, FAC

Excess emissions resulting from start-up or shut-down are permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions is minimized.

PERMITTEE:
Florida Power & Light Co.

Permit Number: AO05-217321
Expiration Date: February 25, 1998

Attention: Elsa Bishop, Acting Supervisor
Air Permitting & Programs

SPECIFIC CONDITIONS:
(Continued)

Excess emissions resulting from malfunction are permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions is minimized but in no case exceeds two hours in any 24-hour period unless specifically authorized by the Department for longer duration.

Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction are prohibited.

(b) Notification - Rules 17.210.700(6), and 17-4.130, FAC

In the event the permittee is temporarily unable to comply with any of the conditions of the permit, the permittee shall immediately notify the air compliance section of this office. Notification shall be received before 10 a.m. on the following business day, and be in accordance with General Condition (8) of this permit. In case of excess emissions resulting from malfunctions, FPL shall notify the Department. A full written report on the malfunctions shall be submitted in a quarterly report if requested by the Department.

8. Used Oil Combustion:

(a) This source is permitted to burn on-specification used oil originated from Florida Power and Light operations. Florida Power and Light shall not burn off-specification used oil. Used oil which fails to comply with any of the following specification levels is off-specification used oil.

1. Arsenic shall not exceed 5.0 ppm.
2. Cadmium shall not exceed 2.0 ppm.
3. Chromium shall not exceed 10.0 ppm.
4. Lead shall not exceed 100.0 ppm.
5. Total Halogens shall not exceed 4,000.0 ppm.
6. Flash Point shall not be less than 100.0°F. minimum
7. PCB shall be less than 50 ppm.

(b) Each batch of used oil to be burned shall be sampled and analyzed for: arsenic, cadmium, chromium, lead, PCB, total halogens, and flash point using EPA/DEP or ASTM approved methods. Split samples of used oil shall be retained for three (3) months after analysis for further testing if necessary.

(c) Results of used oil sampling and analysis shall be retained by the permittee for at least three (3) years and made available for inspection by the Department upon request.

PERMITTEE:
Florida Power & Light Co.

Permit Number: A005-217321
Expiration Date: February 25, 1998

Attention: Elsa Bishop, Acting Supervisor
Air Permitting & Programs

SPECIFIC CONDITIONS:
(Continued)

(d) Quarterly reports containing monthly summaries of the quantities of used oil burned and the sampling and analysis results shall be submitted to the Department's Central District office. Used oil burned in one month within a calendar quarter triggers the quarterly reporting requirement. Furthermore, the quantities of burned used oil shall be included in the Annual Operation Report (AOR) for Air Emissions Sources.

9. Continuous Emission Monitoring - Rule 17-210.700, FAC

FPL requested authority to occasionally exceed visible emissions of 60 percent opacity as allowed by Rule 17-210.700(3), F.A.C.; therefore, pursuant to rule Rule 17-210.700(3), F.A.C., FPL shall operate, calibrate, and maintain a continuous opacity monitoring system. The continuous opacity monitoring system shall be calibrated, operated, span checked, and maintained according to the manufacturer's recommendation. Calibrations shall consist of electronic zero and span checks and including optical lens check to ensure the monitoring system functions properly.

10. Objectionable Odors - Rule 17-296.320(2), FAC

Objectionable Odor Prohibited - No person shall cause, suffer, allow or permit the discharge air pollutants which cause or contribute to an objectionable odor.

11. Disposal of Spent Boiler Cleaning Chemicals

Florida Power and Light shall not dispose of spent boiler cleaning chemicals by injecting them into this source.

12. Operation Permit Renewal - Rules 17-4.050(2) and 17-4.090(1), FAC

An operation permit renewal must be submitted at least sixty days prior to the expiration date of this permit (Rule 17-4.090, FAC.).

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

cme *July 1994*
A. Alexander, P.E.
District Director
ISSUED 7/18/94



Department of Environmental Protection

Lawton Chiles
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Virginia B. Wetherell
Secretary

May 21, 1996

Mary Archer
Environmental Specialist
Florida Power & Light Company
P.O.Box 088801
North Palm Beach, FL 33408-8801

OCD-AP-96-138

Brevard County - AP
FP&L Cape Canaveral Plant
Boiler #1 - Use of Fuel Oil Additive

Dear Ms. Archer:

During our conversation this morning it was agreed that the Department would extend the time period for testing of the new fuel oil additive Bycosin in Unit #1 boiler, up to 120 days to insure that sufficient test data of burning fuel oil can be collected by the plant staff for ninety (90) successful days.

Please inform this office at the address above of the initial date of testing.

Sincerely,

L.T. Kozlov, P.E.
Acting Program Administrator
Air Resources Management

LTK/^{AS}as/j
cc: Commissioner Scarborough, Jr.
A. Linero
C. Fancy

al



CAPE CANAVERAL PLANT



FPL TELECOPIER COVER SHEET

TELECOPIER NO. ON NET 633-0232 (AUTOMATIC)

Clair

Sent to: BRUCE MITCHELL

Location: DEPT. TALLAHASSEE

Phone Number: _____

From: BRUCE BENNETT FOR MARY ARCHER

Location: CAPE CANAVERAL PLANT

Phone Number: 407-633-0253

Date: 5-9-96

Total Pages: 8 (Including Cover Sheet)

Special Instructions: THIS IS THE INFORMATION
YOU REQUESTED FROM MARY ARCHER FOR
THE ADDITIVE TEST AT THE CAPE CANAVERAL
PLANT UNIT #1.

Telecopy Operator's Name: Bruce Bennett



Lawton Chiles
Governor

Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Virginia B. Wetherell
Secretary

Permittee:
Florida Power & Light Co.
11770 U.S. Highway One
North Palm Beach, Florida 33408

Attention: Elsa Bishop, Acting Supervisor
Air Permitting and Programs

Permit Number: A005-217321
Date of Issue:
Expiration Date: February 25, 1998
County: Brevard
Latitude/Longitude:
28°28'10"N/80°45'51"W
UTM: 17-523.1 KmE; 3149.0 KmN
Project: Cape Canaveral Power Plant
Unit No. 1

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) Chapter 17. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

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This source is located at the Florida Power and Light Company, Cape Canaveral Power Plant at 6000 North U.S. Highway 1 in Frontenac, Brevard County, Florida.

General Conditions are attached to be distributed to the permittee only.

PERMITTEE:

Florida Power & Light Co.

Permit Number: A005-217321

Expiration Date: February 25, 1998

Attention: Elsa Bishop, Acting Supervisor
Air Permitting & Programs**SPECIFIC CONDITIONS:**

(Continued)

oil heat input rate is allowed for a total of no more than fifteen consecutive calendar days to conduct additional compliance testing to regain the higher rates, not to exceed 4,000 MMBtu/hr on No. 6 residual fuel oil with prior notification as specified in condition 5(a) to the Department. The District may give an extension to this 15 days only under unusual circumstances. The required EPA Method 5 or 17 and DER Method 9 compliance tests shall be conducted concurrently. Operating at conditions during testing which do not reflect representative operating conditions may invalidate a test.

Should FPL decide to pursue routine use of magnesium hydroxide (Mg(OH)₂) fuel additive, then all future compliance testing for particulate matter and visible emissions shall include use of the additive at an injection rate consistent with normal operation.

In the event FPL exceeds the tested additive injection rate by 10 percent or more, FPL shall notify the Central District in writing within 14 days of the date that the higher rate was initiated. The notification shall include the date the higher injection rate began, the magnitude of the higher rate, and the approximate date by which the higher rate would cease.

(c) Stack Sampling Facility - FAC 17-297.345

The stack sampling facility must comply with Rule 17-297.345, FAC.

(d) Report Submittal - FAC 17-297.570(2)

A copy of the test results shall be submitted to the Department's Central District Office within 45 days after the last test run is completed. The test report shall provide the actual heat input rate.

6. Annual Operations Report (AOR):

On or before March 1 of each calendar year, a completed DEP Form 17-210.900(4), Annual Operation Report Form for Air Emissions Sources, based on data for the preceding calendar year, shall be submitted to the Department's Central District Office.

7. Excess Emissions

(a) Events - Rule 17-210.700, FAC

Excess emissions resulting from start-up or shut-down are permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions is minimized.

**BYCOSIN DP93 007 FUEL ADDITIVE
MATERIAL SAFETY DATA SHEET**
Contains information required by DOT, EPA, OSHA, and WISHA

PRODUCT NAME: BYCOSIN DP93 007
PRODUCT FUNCTION: ADDITIVE FOR FUEL OIL
FORMULA: (MIXTURE)
DISTRIBUTOR: FERROUS CORPORATION
 P.O. BOX 1764
 BELLEVUE, WA 98009 USA
TELEPHONE: 206-454-6320 OR 1-800-451-6320
FAX: 206-454-6308
HAZARDOUS MATERIAL EMERGENCIES - 1-800-424-9300
INTERNATIONAL HAZARDOUS MATERIAL EMERGENCIES - 202-483-7616

COMPOSITION/INFORMATION ON INGREDIENTS

COMPONENTS

MATERIAL	CAS Number	%
Petroleum distillate, boiling point interval 160-360°C, Aromatic content 25-35 w-%	68334-30-5	5-10
Petroleum distillate, boiling point interval 180-300°C, Aromatic content >96 w-%	68333-88-0	30-100
Organo metallic carboxylate based on Fe	61788-81-6	1-5
Organo metallic carboxylate based on Mg	67701-23-9	10-30

HAZARDS IDENTIFICATION

Inhalation: Vapors may be hazardous when inhaled after repeated exposure.

Skin contact: May cause temporary or lasting harm, i.e. eczema, at repeated or longlasting exposure.

Eye contact: Splashes may cause smarting pain/irritation. High vapor concentrations (vapor phase) may cause irritation.

Ingestion: May cause indisposition, diarrhea and vomiting whereby the product may get into the lungs causing chemical pneumonia.

Environment: Toxic to aquatic organisms. May cause longterm adverse effects in the aquatic environment.

Risk of fire & Explosion: The product may, when heated, give off flammable vapors which can form explosive mixtures with air.

FIRST AID MEASURES

- Inhalation:** Fresh air and rest. Seek medical attention in severe cases.
- Skin contact:** Remove contaminated clothing. Wash skin with soap and water. If irritation persists, obtain medical advice.
- Eye contact:** Flush with water (soft water spray) keeping the eyelids open. If irritation persists, obtain medical advice.
- Ingestion:** Give, if possible, 2-3 spoonfuls of cream or water if the injured person is fully conscious. DO NOT INDUCE VOMITING. Seek medical attention if irritation persists.
- Information to Physician:** Some risk of aspiration causing chemical pneumonia. Be careful with the use of adrenalin, noradrenalin, efedrin or similar - may disturb heart rhythm. The product may increase the sensitivity of the heart to catecholamines.

FIRE-FIGHTING MEASURES

- Fire and explosion hazards:** The product may, when heated, give off flammable vapors which may form explosive mixtures with air.
- Precautions:** Keep away from ignition sources - no smoking. Containers near fire should be moved or cooled with water.
- Extinguishing media:** Powder, foam, CO₂, water spray.
- Extinguishing media NOT TO BE USED:** Direct water jet.

ACCIDENTAL RELEASE MEASURES

- Personal protection:** See Exposure Controls/Personal Protection
- Environmental precautions:** Do not allow to enter drains. Major spills: Notify police, fire department or local pollution authorities. Sources of water supply may be ruined - warn the user.
- Clean up procedure:** Bank up with sand, soil or similar and collect.
- Discharge into water:** The product is almost insoluble in water and heavier than water and sinks therefore to the bottom.

HANDLING AND STORAGE

- Handling:** May cause damage to packings, certain enamelled and painted surfaces, protective and tightening grease coatings and also crude rubber materials. If product has been kept outdoors in cold weather - have it warmed indoors before use. Stir before use.
- Storage:** Keep away from ignition sources - no smoking. Provide good ventilation. Keep container closed. Storage temperature >-15°C.

EXPOSURE CONTROLS/PERSONAL PROTECTION

- Precautions:** Provide good ventilation to keep, if necessary, the concentration below the limit value. Avoid contact with eyes and skin.
- Occupational exposure limits:** 1 mg/m³ (NGV), oil vapor incl. oil smoke
3 mg/m³ (KTV), oil vapor incl. oil smoke
- Personal protection:** In case of insufficient ventilation - use respiratory protection. Use gloves resistant to chemicals and protection goggles if there is a risk of splashes.

PHYSICAL AND CHEMICAL PROPERTIES

Appearance: Dark, reddish-black, clear, relatively low viscosity liquid with a smell of petroleum.

Boiling point (°C):	>160	Density (kg/m ³):	1090-1110
Flash point (°C):	>62 (c.c.)	Vapor press.(kPa/ °C):	0.01 (20°C)*
Solidif./melt. point (°C):	<-15**	Rel. vap.dens. (air=1):	>1
Auto-ignition temp. (°C):	>200	Soluble in organic solvents	See below
Expl. limit (vol-%):	0,5-7,0	Soluble in water (w-%):	No
pH (concentrate):	Not applicable	pH (10%ig):	8-9
Rel. evaporation rate Ether - 1:	>1000	Butylacetate - 100:	Not established
Viscosity (cSt):	<200		

Remark: Organic solvent, petroleum products such as aromatic naphtha, white spirit.
*Petroleum distillate CAS no 68333-88-0
**Starts forming lumps, solidifies at <-20°C

STABILITY AND REACTIVITY

- To be avoided:** See Firefighting Measures and Handling and Storage sections above.
- Materials to be avoided:** No known.
- Dangerous products of degradation:** No known.
- Dangerous products of combustion:** No unusual product - carbon dioxide and water and at insufficient combustion, carbon monoxide (CO), N.B. CO is a toxic gas.

TOXICOLOGICAL INFORMATION

- General:** Acute toxicity is low. The main health hazard arises at longlasting and repeated exposure and if the product comes into the lungs causing chemical pneumonia.
- Inhalation:** The vapors may cause irritation of the respiratory system and have a numbing effect and cause headache, fatigue, and dizziness. High vapor concentrations and repeated exposure may affect the central nervous system, cause loss of appetite and numbness in arms and legs. Liver and kidney troubles may arise.
- Skin contact:** Degrases the skin which may cause red spots and skin chaps and may cause exzema after longlasting or repeated contact.
- Eye contact:** Splashes in the eyes may cause smarting pain/irritation. High vapor concentration may cause irritation.
- Ingestion:** Has an irritating effect on mucuous membranes. May cause indisposition, diarrhea and vomiting whereby the product may get into the lungs causing chemical pheumonia.

.....

ECOLOGICAL INFORMATION

- General:** The product is judged as hazardous to the environment because of petroleum distillate.
 - Mobility:** The petroleum distillates are insoluble in water and their volatility is comparatively low.
 - Degradability:** The petroleum distillates are supposed to be partially biodegradable but not easily degradable.
 - Accumulation:** The two petroleum distillates are, amongst other things because of their very low water solubility, supposed to be potentially bioaccumulating.
 - Toxicity:** Cas No 68333-88-0: EC₁₀ (marine algae, 72 h): 3,29 mg/l
WGK: 2 (self classification)
- The two petroleum distillates are harmful to aquatic organisms. The toxicity increases with the aromatic content.

.....

DISPOSAL CONSIDERATIONS

- Contact an approved waste disposal company and observe local regulations. Smaller quantities may be destructed by burning.
- Hazardous waste:** Spillage is considered as hazardous waste. Inform about the waste quantity, qualities and risks.

TRANSPORT INFORMATION

UN-ar: 1993 Packing Group: III
ADR-S/RID-S: 3 32 (c) Label: No
IMDG: Not classified
DGR: Not classified
Description of the goods: Flammable substance N.O.S. (ADR/RID), warning sign 30/1993 (ADR/RID)
Others: Remark: ADR/ADR-S classification valid before 1 Jan 95.

REGULATORY INFORMATION

Chemical health hazard: Yes Chemical harmful to the environment:
Inflammable product: Yes Class: 3
Explosive product: No
Danger class: Hazardous to health
Code designation: X_n
Indication of danger: Hazardous to health
R-phrase (-s) 20,21,22,18
S-phrase (-s) 38,43 (CO₂ powder or foam)

OTHER INFORMATION

The product is designed for industrial use only.
All the components are included in the EINECS list.

PMT MANATEE PLANT

TEL: 813-776-5219

May 07 '96

11:28 No. 001 P. 01



Post-It™ brand fax transmittal memo 7671		# of pages > <u>2</u>
To <u>Bruce Mitchell</u>	From <u>LT Koslov</u>	
Co. <u>DEP</u>	Co. <u>DEP</u>	
Dept. <u>Air</u>	Phone # <u>5C 325-3332</u>	
Fax <u>904-922-6979</u>	Fax <u>5C 342-5963</u>	

SHOULD ORIGINAL COPIES BE DISCARDED? YES NO

IF NOT, PLEASE ARRANGE FOR PICK-UP BY NEXT BUSINESS DAY

SUBMITTER'S NAME: _____ EXTENSION: _____

SEND TO: Leonard Koslov

TELEPHONE NUMBER: 407-894-7555

COMPANY/DEPARTMENT: DEP - Air

FACSIMILE PHONE NUMBER: 407-897-5963

FROM: Mary Archer

DEPARTMENT: FPL - Env. Services

TELEPHONE NO: 407-625-7637 FAX NUMBER: _____
Beep 1-800-241-4653 #271-0110

DATE: 5-7-96 TIME: _____

TOTAL PAGES (INCLUDING THIS SHEET) 2

SPECIAL INSTRUCTIONS: Mr Koslov - Please give me a beep to discuss the letter included with this fax or leave a message on my voice mail if you cannot. Thank you.

IF YOU DO NOT RECEIVE THIS MESSAGE CLEARLY PLEASE CONTACT US AT Mary Archer
(TELEPHONE NUMBER)



Florida Power & Light Company, P.O. Box 688861, North Palm Beach, FL 33408-8861

April 19, 1996

Mr. Leonard T. Koslov
State of Florida
Department of Environmental Protection
Central Florida District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

RE: Cape Canaveral Power Plant - Unit 1
Use of Fuel Oil Additive

Dear Mr Koslov :

Pursuant to our conversation of April 19, 1996, this correspondence is a notification to provide the Department with details regarding the test of a magnesium fuel oil additive.

Magnesium Fuel Additive in an oil base

Cape Canaveral Plant plans to perform a test with a different magnesium fuel additive, Bycosin, to be performed on Unit 1 starting in mid-May and proceeding until 300,000 barrels of oil have been burned, approximately three months. The injection rate will remain the same as the current additive.

As is the case with the current magnesium additive, no adverse environmental effects will result from the application of oil-based magnesium fuel treatment. The MSDS for this product was faxed to your office April 19, 1996.

Permitting History

According to FPL's records these units are permitted for use of magnesium hydroxide fuel oil additive with notification if the current supply rate changes by 10% or more..

It is my understanding, that since FPL has previously informed the Department about our use of magnesium hydroxide as a fuel additive, proceeding with a test of the new additive should be acceptable. The new magnesium based additive is a chemically similar compound with the exception of a btu added element from the oil used in the additive. If the test is satisfactory addition of the new additive to the current permit will be pursued. Without further correspondence from your office I will concur your approval to continue with the test at Cape Canaveral Plant.

As always, if you have any questions, please do not hesitate to call me at (407) 625-7637.

Sincerely,

A handwritten signature in cursive script that reads "Mary Archer".

Mary Archer
Environmental Specialist

an FPL Group company

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

CENTRAL FLORIDA DISTRICT

3310 MAGUIRE BOULEVARD
SUITE 232
ORLANDO, FLORIDA 32803-3767



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY
ALEX ALEXANDER
DISTRICT MANAGER

Permittee:
Florida Power & Light Co.
P. O. Box 1400
Juno Beach, Fl. 33408

Attention: T. R. Fair, Manager,
Env. Permitting and Programs

I. D. Number:
Permit/Certification
Number: AO05-132054
Date of Issue:
Expiration Date: 10/05/92
County: Brevard
Latitude/Longitude:
28°28'10"N/80°45'51"W
UTM: 17-523.1 KmE
UTM: 3149.0 KmN
Project: Cape Canaveral Power
Plant, Unit No. 1

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

The permittee can operate Fossil Fuel Steam Generator Unit No. 1 equipped with a 397 foot exhaust stack and Multiple Cyclones to control Particulate Matter (PM) emissions. The unit is fired with Residual Oil, Used Oil or Natural Gas with a maximum heat input rate of 4,000 MMBTU/hour. No. 2 Fuel Oil may be used during preheating.

on oil or 4,180 mmbtu/hr. on natural gas. (See attached

This source is located at the Florida Power and Light Company, Cape Canaveral Power Plant at 6000 N U.S. Highway 1 in Frontenac, Brevard County, Florida.

Revised dated 8/23/92

General Conditions are attached to be distributed to the permittee only.

PERMITTEE:

I.D. Number:
 Permit/Certification Number:
 Date of Issue:
 Expiration Date:

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
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, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of 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.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement 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.

This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, 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.

6. The permittee shall at all times 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.
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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of the permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sampling or monitoring any substances or parameters at any location reasonably necessary to secure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

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 notify and provide the department with the following information:
 - a. a description of and cause of non-compliance; and

PERMITTEE:

I.D. Number:
 Permit/Certification Number:
 Date of Issue:
 Expiration Date:

b. the period of noncompliance, including exact 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.

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 revocation of this permit.

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 arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.
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.
11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.
12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.
13. This permit also constitutes:
 - () Determination of Best Available Control Technology (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () Compliance with New Source Performance Standards
14. The permittee shall comply with the following monitoring and record keeping requirements:
 - a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.
 - b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.
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 submitted or corrected promptly.

A005-132054

BEST AVAILABLE COPY

Attention: T. R. Fair, Manager
 Env. Permitting and Programs

Date of Issue:
 Expiration Date: 10/5/92

SPECIFIC CONDITIONS:

(1) Heat Input Rate:

The permitted heat input rate for this source is 4,000 MMBTU/hr on oil or 7,130 mmbtu/hr. on natural gas. (See attached revision dated 3/23/90) *us*

(2) Permitted Fuels:

This source shall be fired with No. 6 Residual Oil, No. 2 Fuel Oil, Used Oil or Natural Gas only.

(3) Source Emission Limiting Standards and Compliance Testing Requirements:

POLLUTANT	EMISSION LIMITING SPEC.	TESTING FREQUENCY			TEST METHOD
		ANNUAL	QUARTERLY	OTHER	
Particulate Matter					
- Steady State	0.1 lb/1000cu	✓ *	-----	-----	EPA Method 5 or 17*
- Combustion	0.3 lb/1000cu; Max. 3 hrs.	✓	-----	-----	EPA Method 5 or 17*
Sulfur Dioxide	2.75 lb/1000cu	-----	-----	✓	Monthly Fuel Analysis
Visible Emissions					
- Steady State	20% Opacity 40% Opacity	✓ *	-----	-----	DER Method 9
- Combustion	60% Opacity; for up to 3 hrs in 24 hrs, with up to 4 0-min. periods of up to 100% if unit has an operational opacity CER	✓	-----	-----	DER Method 9
- Load Changing	60% Opacity; for up to 3 hrs in 24 hrs, with up to 4 0-min. periods of up to 100% if unit has an operational opacity CER	-----	-----	-----	-----
					*EPA Method 17 may be used only if the stack temperature is less than 375° F.

1. - FAC 17-2.600(5) and FAC 17-2.250(3)
2. - FAC 17-2.700(2)
3. - FAC 17-2.700(1)(d)

* DER Order dated 1/2/86 granted annual particulate testing with a 400 opacity limit. If the source fails to comply with Order conditions, then the source will resume particulate (steady-state) testing either annually with a 200 opacity limit or quarterly with a 400 opacity limit. Visible emission testing will be conducted annually regardless of option selected.

Florida Power and Light Company

Permit/Certification Number:

A005-132054

Attention: T. R. Fair, Manager,
Env. Permitting and Programs

Date of Issue:

Expiration Date: 10/5/92

SPECIFIC CONDITIONS:

(4) Compliance Testing Related Requirements:(a) Notification - FAC 17-2.700(2)(a)5

Notification of scheduled test dates shall be given to the Department at least 15 days prior to testing unless otherwise agreed to by the Department.

(b) Conditions

Testing of emissions should be conducted using No. 6 fuel oil and with the source operating within 10% of its rated capacity. Testing may be conducted at less than 90% of rated capacity; however, if so, subsequent source operation is limited to up to 110% of the test load. Once the unit is so limited, then operation at higher capacities is allowed for a cumulative total of no more than fifteen days for purposes of additional compliance testing to regain rated capacity in permit, with prior notification to the Department.

(c) Stack Sampling Facility - FAC 17-2.700(4):

The stack sampling facility must comply with Rule 17-2.700(4), FAC.

(d) Report Submittal - FAC 17-2.700(7)

A copy of the test results shall be submitted to the Department District Office within 45 days after the last test run is completed.

(5) Annual Operations Report - FAC 17-4.14:

On or before March 1 of each calendar year, a completed DER Form 17-1.202(6), Annual Operations Report Form for Air Emissions Sources shall be submitted to the Department.

(6) Excess Emissions - FAC 17-2.250(1),(2) and (3):

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 be minimized.

Excess emissions resulting from malfunction shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) 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.

PERMITTEE:

Florida Power and Light Company

Permit/Certification Number:

A005-132054

Attention: T. R. Fair, Manager
Env. Permitting and Programs

Date of Issue:

Expiration Date: 10/5/92

SPECIFIC CONDITIONS:

(7) Used Oil Handling:

Burning of Non-PCB used oil generated only from FPL operations shall comply with 40 CFR 266 Part E and shall be permitted under the following conditions:

- (a) Each batch of used oil to be burned shall be sampled and analyzed for: Arsenic, Chromium, Cadmium, total Halogens, PCB* and Lead using EPA/DER or ASTM approved methods. Split samples of the used oil shall be retained for three (3) months after analysis for further testing if necessary.
- (b) Results of used oil sampling and analysis performed pursuant to Specific Condition 7 (a) shall be retained by permittee for at least three (3) years and made available for inspection by DER upon request.
- (c) An estimate of the total quantity of used oil burned during the applicable calendar year shall be included in the Annual Operation Report (AOR) for Air Emissions Sources.
- (d) Hazardous waste shall not be burned in this source without prior approval from the Department.

(8) Multiple Cyclones Inspection:

The department should be notified at least once a year to conduct an inspection of the multiple cyclones. The time chosen is to be at the convenience of Florida Power and Light Company.

(9) Local Requirements:

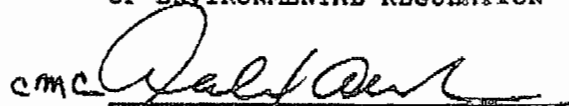
This permit does not preclude compliance with any applicable local permitting requirements and regulations.

(10) Permit Renewal - FAC 17-4.09:

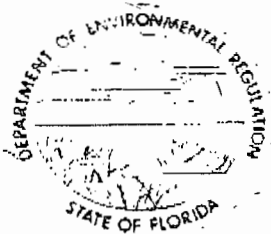
An operation permit renewal application must be submitted at least 60 days prior to the expiration date of this permit.

ISSUED 12-16-92

- * The requirement to analyze for PCB content will be reconsidered by the Department upon written request by the permittee.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


K. Alexander
District Manager
3319 Maguire Boulevard
Suite 232
Orlando, Florida 32803
(305) 894-7555



Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3707 • 407-894-7555

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Alex Alexander, Deputy Assistant Secretary

August 23, 1990

Florida Power and Light Company
Post Office Box 14000
Juno Beach, Florida 33408

Attention: T. R. Fair, Manager
Environmental Permitting and Programs

Brevard County - AP
Cape Canaveral Power Plant, Unit No. 1
Permit A005-132054
Change of Conditions

Dear Mr. Fair:

We are in receipt of your request for a change of the permit conditions. The conditions are changed as follows:

CONDITION

Permit Page No. 4, Specific Condition No. 1, Heat Input Rate:

FROM

The permitted heat input rate for this source is 4,000 MMBTU/hr.

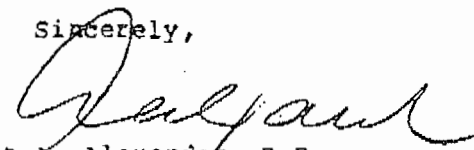
TO

The permitted heat input rate for this source is 4,000 MMBTU/hr on oil or 4,180 MMBTU/hr on natural gas.

All other conditions remain the same.

This letter must be attached to your permit and becomes a part of that permit.

Sincerely,


Alex A. Alexander, P.E.
Deputy Assistant Secretary



Florida Department of Environmental Regulation

Central District • 3519 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767 • 407-894-7555

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

Vex Alexander, Deputy Assistant Secretary

Permittee:
 Florida Power & Light Company
 Post Office Box 078768
 West Palm Beach, Florida 33407-0768

Attention: T. R. Fair, Manager,
 Environmental Permitting and Programs

I. D. Number:
 Permit/Certification
 Number: A005-163421
 Date of Issue:
 Expiration Date: 6/25/94
 County: Brevard
 Latitude/Longitude:
 28°28'10"N/80°45'51"W
 UTM: 17-523.1 KmE; 3149.0 KmN
 Project: Cape Canaveral Power
 Plant, Unit No. 2

This permit is issued under the provisions of Chapter(a) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

The permittee can operate Fossil Fuel Steam Generator Unit No. 2 equipped with a 397 foot exhaust stack and Multiple Cyclones to control Particulate Matter (PM) emissions. The unit is fired with Residual Oil, Used Oil, No. 2 Fuel Oil, Propane, or Natural Gas.

This source is located at the Florida Power and Light Company, Cape Canaveral Power Plant at 6000 North U.S. Highway 1 in Frontenac, Brevard County, Florida.

General Conditions are attached to be distributed to the permittee only.

BEST AVAILABLE COPY

PERMITTEE:

I.D. Number:
 Permit/Certification Number:
 Date of Issue:
 Expiration Date:

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and are such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, and 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
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, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of 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.
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.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal plant or aquatic life or property and penalties therefor caused by the construction or operation of this permit source, 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.
6. The permittee shall at all times 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.
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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of the permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sampling or monitoring 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.
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 notify and provide the department with the following information:
 - a. a description of and cause of non-compliance; and

BEST AVAILABLE COPY

ATTN:

I.D. Number:
 Permit/Certification Number:
 Date of Issue:
 Expiration Date:

b. the period of non-compliance, including exact 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.

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 revocation of this permit.

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 arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.
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.
11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.
12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.
13. This permit also constitutes:
 - () Determination of Best Available Control Technology (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () Compliance with New Source Performance Standards
14. The permittee shall comply with the following monitoring and record keeping requirements:
 - a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.
 - b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rules.
 - c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.
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 submitted or corrected promptly.

PERMITTEE:
 Florida Power & Light Company
 Attention: T. R. Fair, Manager
 Environmental Permitting and Programs

I. D. Number:
 Permit/Certification Number:
 A005-163421
 Date of Issue:
 Expiration Date: 6/25/94

SPECIFIC CONDITIONS:

(1) Heat Input Rate:

The permitted heat input rate for this source is 4,000 MMBtu/hr on oil and 4,180 MMBtu/hr on natural gas.

(2) Permitted Fuels:

This source shall be fired with No. 6 Residual Oil, No. 2 Fuel Oil, Propane Gas or Natural Gas only.

(3) Source Emission Limiting Standards and Compliance Testing Requirements:

Pollutant	Emission 1 Limiting Stds.	Testing Frequency 2			Test 3 Method
		Annual	Quarterly	Other	
Particulate Matter					
- Steady-State	0.1 lb/MMBtu	x	-	-	EPA Method 5 or 17*
- Sootblowing	0.3 lb/MMBtu; Max. 3 hrs.	x	-	-	EPA Method 5 or 17*
Sulfur Dioxide	2.75 lb/MMBtu	-	-	x	Monthly Fuel Analysis
Visible Emissions					
- Steady-State	20% Opacity 40% Opacity	** x**	-	-	DER Method 9
- Sootblowing	60% Opacity for up to 3 hrs in 24 hrs, with up to 4 6-min. periods of up to 100% if unit has an operational opacity CEM	x	-	-	DER Method 9
- Load Changing	60% Opacity for up to 3 hrs in 24 hrs, with up to 4 6-min. periods of up to 100% if unit has an operational opacity CEM	-	-	-	-

* EPA Method 17 may be used only if the stack temperature is less than 375°

PERMITTEE:
 Florida Power & Light Company
 Attention: T. R. Fair, Manager
 Environmental Permitting and Programs

I. D. Number:
 Permit/Certification Number:
 A005-163421
 Date of Issue:
 Expiration Date: 6/25/94

SPECIFIC CONDITIONS:

1. FAC 17-2.600(5) and FAC 17-2.250(3)
2. FAC 17-2.700(2)
3. FAC 17-2.700(1)(d)

** This source may elect to test particulates (steady-state) quarterly and to test visible emissions annually with a 40% opacity limit, or to test particulates (steady-state) and visible emissions annually with a 20% opacity limit. Currently, the source has been authorized to test particulates and visible emissions annually with 40% opacity limit, by Order of the DER Secretary dated 1/02/86. Annual testing shall be conducted at yearly intervals from the date of November 15, 1988.

(4) Compliance Testing Related Requirements:

(a) Notification - FAC 17-2.700(2)(a)5

Notification of scheduled test dates shall be given to the Department at least 15 days prior to testing unless otherwise agreed to by the department.

(b) Conditions

Testing of emissions should be conducted using No. 6 fuel oil and with the source operating within 10% of its rated capacity. Testing may be conducted at less than 90% of rated capacity; however, if so, subsequent source operation is limited to up to 110% of the test load. Once the unit so limited, then operation at higher capacities is allowed for a cumulative total of no more than fifteen days for purposes of additional compliance testing to regain rated capacity in permit, with prior notification to the department.

(c) Stack Sampling Facility - FAC 17-2.700(4):

The stack sampling facility must comply with Rule 17-2.700(4), FAC.

(d) Report Submittal - FAC 17-2.700(7):

A copy of the test results shall be submitted to the Department District Office within 45 days after the last test run is completed.

PERMITTEE:
Florida Power & Light Company

Attention: T. R. Fair, Manager
Environmental Permitting and Programs

I. D. Number:
Permit/Certification Number:
A005-163421
Date of Issue:
Expiration Date: 6/25/94

SPECIFIC CONDITIONS:

(5) Annual Operations Report - FAC 17-4.14:

On or before March 1 of each calendar year, a completed DER Form 17-1.202(6), Annual Operations Report Form for Air Emissions Sources shall be submitted to the Department.

(6) Excess Emissions - FAC 17-2.250(1), (2) and (3):

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 is minimized.

Excess emissions resulting from malfunction shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions is minimized but in no case exceeds two hours in any 24-hour period unless specifically authorized by the Department for longer duration.

(7) Used Oil Handling:

Burning of Non-PCB used oil generated only from FPL operations shall comply with 40 CFR 266 Part E and shall be permitted under the following conditions:

- (a) Each batch of used oil to be burned shall be sampled and analyzed for: Arsenic, Chromium, Cadmium, total Halogens, PCB* and Lead using EPA/DER or ASTM approved methods. Split samples of the used oil shall be retained for three (3) months after analysis for further testing if necessary.
- (b) Results of used oil sampling and analysis performed pursuant to Specific Condition 7(a) shall be retained by permittee for at least three (3) years and made available for inspection by DER upon request.
- (c) An estimate of the total quantity of used oil burned during the applicable calendar year shall be included in the Annual Operation Report (AOR) for Air Emissions Sources.
- (d) Hazardous waste shall not be burned in this source without prior approval from the department.

PERMITTEE:
Florida Power & Light Company

Attention: T. R. Fair, Manager
Environmental Permitting and Programs

I. D. Number:
Permit/Certification Number:
A005-163421
Date of Issue:
Expiration Date: 6/25/94

SPECIFIC CONDITIONS:

(8) Multiple Cyclones Inspection:

The department should be notified at least once a year to conduct an inspection of the multiple cyclones. The time chosen is to be at the convenience of Florida Power and Light Company.

(9) Local Requirements:

This permit does not preclude compliance with any applicable local permitting requirements and regulations.

(10) Permit Renewal - FAC 17-4.09:

An operation permit renewal application must be submitted at least 60 days prior to the expiration date of this permit.

* The requirement to analyze for PCB content will be reconsidered by the department upon written request by the permittee.

ISSUED 7-7-87

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

cmc *Alexander*
A. Alexander
Deputy Assistant Secretary
3319 Maguire Boulevard
Suite 232
Orlando, Florida 32803



April 30, 1997

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

RECEIVED

MAY 08 1997

BUREAU OF
AIR REGULATION

Re: **FPL Canaveral Plant**
Title V Permit

Dear Mr. Cascio,

This correspondence is in response to Mr. John Brown's letter of November 19, 1996. Following are responses to each of the concerns raised in John's letter:

1. Please provide a copy of the document PCCFS_11.txt, Identification of Additional Applicable Requirements. The referenced document appears to be missing from Section E.

Response: The reference to the document was in error. Additional applicable requirements are listed in each of the Emission Unit sections of the application.

2. Attachment PCC-FW, List of Unregulated Trivial or De minimis Activities, contained consolidation of trivial activities, unregulated emission units and activities that you propose for exemption. Please resubmit as follows:

a) Group the unregulated activities into logical groupings of emissions units and indicate any pollutants that have the potential to emit quantities equal to or greater than the threshold levels specified in Rules 62-213.420(3)(c)3. and 4., F.A.C., from each of the unregulated emissions units.

b) Identify emissions units that you claim should be exempted and provide adequate information to demonstrate that emissions levels are below the levels established for exemption at Rule 62-213.430(6), F.A.C.

c) Do not include trivial activities in the application.

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

<u>Item</u>	<u>Rationale</u>
Natural gas metering area relief valves	Safety equipment is exempted by Rule 62-210.300(3)(a)22k F.A.C..
Hydrazine mixing tank & relief valves	This is a 33% aqueous product stored in stainless steel bins. Typically the facility uses less than 300-gallons per year; therefore the emissions of hydrazine are below the 1,000 lb. threshold.
Ammonia Hydroxide mixing tank & relief valves	The facility uses less than 300-gallons per year of a 28% aqueous solution; therefore the emissions of ammonia are below the 1,000 lb. threshold.
Lube Oil tank vents & extraction vents	These items concern lubricating oils which have a low volatility. There is insufficient quantity on hand as the facility to produce a 5-ton release.
Oil Separation Basin (oily waste separator)	VOC's are below the 5-ton threshold. There is insufficient quantity on hand at the facility to produce a 5-ton release.
Miscellaneous mobile vehicle operation (cars, light trucks, heavy-duty trucks, backhoes, tractors, forklifts, cranes, etc.)	Exempted by Rule 62-210.300(3)(a)5.
Diesel Fuel Tank – 2" vent	VOC emissions from both tanks do not exceed the 5-ton threshold.

Unregulated Activities are proposed as follows:

Emission Unit 3

Painting of Plant equipment
Non-halogenated solvent cleaning operations
Parts Washer with #2 Distillate
Use of spray cans & solvents for routine maintenance activities

Combined VOC emissions from all 3 activities combined could exceed 5 tons per year

Emission Unit 4

Miscellaneous mobile equipment operation (compressors, chain saws, small generators, welding machines, etc.)
Internal Combustion engines which drive compressors, generators, water pumps or other auxiliary equipment

Combined NOx emissions could approach 15 tons per year for 10 pieces of equipment each operating 1,000 hrs per year. No other pollutants approach the relevant permitting thresholds.

Unregulated Activities (continued)

Emission Unit 5

Emergency diesel generators

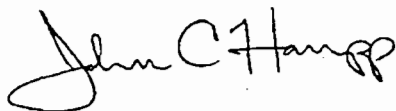
The facility maintains one 500 kW fixed main emergency diesel. The plant also maintains two small diesel generators and two small gasoline generators as plant Hurricane supplies. Maximum emissions are estimated as follows for 8,760 hours of operation per year:

SO ₂	7.4 TPY
NO _x	65.7 TPY
CO	106.2 TPY

No other pollutants approach the relevant permitting thresholds.


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

Sincerely,



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

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Name: John Franklin Title : Plant General Manager		
2. Owner or Responsible Official Mailing Address: Organization/Firm: FPL Environmental Services Department Street Address: 11770 U.S. Highway One City: North Palm Beach State: FL Zip Code: 33408		
3. Owner or Responsible Official Telephone Numbers: Telephone: 4076330221 Fax: 4076330232		
4. Owner or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200 F.A.C., 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 statues 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 <u>4-30-97</u> Date		

* Attach letter of authorization if not currently on file.

4. Professional Engineer 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 a emission 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 emission 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.

William H. Brown

Signature

4/30/97

Date

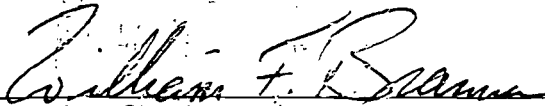
(seal)

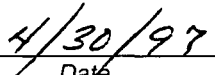
* Attach any exception to certification statement.

Supplement to Professional Engineer Certification Statement

This information supplements the original Title V application for the FPL Canaveral plant of June 1996 which was certified by Ken Kosky of KBN Engineering & Applied Sciences. This certification statement applies only to the following items included in this supplemental package submitted on April 22, 1997:

- List of Unregulated Activities
- List of Exempt Activities
- List of Equipment / Activities Regulated under Title VI


Signature


Date

(seal)



September 30, 1997

Mr. W. Douglas Beason, Esquire
Assistant General Counsel
Office of General Counsel
State of Florida
Department of Environmental Protection
3900 Commonwealth Boulevard Mail Station 34
Tallahassee, FL 32399-3000

VIA: Facsimile & U.S. Mail

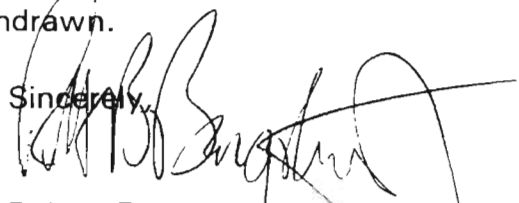
RE: Cape Canaveral Power Plant , Permit No. 0090006-001-AV-DRAFT
FP&L Withdrawal of Petition to Challenge the Draft Title V Permit

Dear Mr. Beason:

This letter is to memorialize Florida Power and Light Company's ("FPL") understanding that the Florida Department of Environmental Protection ("FDEP") amended the DRAFT Cape Canaveral Title V Permit No. 0090006-001-AV, dated June 16, 1997, by striking the existing permit condition language and inserting the language in the attached facsimile from Joe Kahn of FDEP to Rich Piper of FPL dated September 18, 1997. FPL also understands that the revised DRAFT Title V permit for Cape Canaveral will be issued upon receipt of this letter.

The conditions of the June 16, 1997, Draft Title V permit to be revised in the re-issued DRAFT permit are the sulfur dioxide emission limitation and standards, the sulfur dioxide monitoring of operations, and the sulfur dioxide test methods and procedures. FP&L and FDEP negotiated the attached language to be inserted in a revised Draft permit. It is FPL's understanding that all other conditions of the challenged DRAFT permit will remain the same. Based on FPL's understandings as outlined above, FPL requests that its Petition to challenge the Draft Title V permit, dated August 14, 1997, be withdrawn.

Sincerely,


Robert Bergstrom
Authorized House Counsel for
Florida Power and Light Company

RECEIVED

OCT 03 1997

BUREAU OF
AIR REGULATION

attachment
cc:

Mr. Scott Sheplak, P.E., Tallahassee, FDEP
Rich Piper, FPL

10/6/97 *Dom Cascio*

BEST AVAILABLE COPY

Model: Sulfur dioxide compliance demonstration by CEMS

Address: v:\models\boiler\SO2cems.doc

[These are model conditions for an emissions unit classified as a Rule 62-296.405, F.A.C., type source that co-fires only fuel oil and natural gas, and uses CEMS to demonstrate compliance with the SO₂ standard; 9/17/97]

Emission Limitations and Standards

[F].a. **Sulfur Dioxide.** Sulfur dioxide emissions shall not exceed 2.75 pounds per million Btu heat input, as measured by applicable compliance methods. Compliance shall be based on the total heat input from all liquid and gaseous fuels burned. The sulfur dioxide emission limitation shall apply at all times including startup, shutdown, and load change, but shall not apply during malfunction provided best operational practices to minimize emissions are adhered to and the duration of excess emissions are minimized and does not exceed two hours in any 24 hour period.

[Rules 62-213.440 and 62-296.405(1)(c)1. [j], F.A.C.]

Monitoring of Operations

[F].b. **Sulfur Dioxide.** The owner or operator of the emission units shall demonstrate compliance with the sulfur dioxide limit of specific condition [F].a of this permit by the following:

- a. Through the use of a continuous emission monitoring system (CEMS) installed, calibrated, operated and maintained in accordance with the quality assurance requirements of 40 CFR 75, adopted and incorporated by reference in rule 62-204.800, F.A.C. A Relative Accuracy Test Audit of the SO₂ CEMS shall be conducted no less than annually. Compliance shall be demonstrated based on a 3-hour rolling average.
- b. In the event the CEMS becomes temporarily inoperable or interrupted, the fuels and the maximum fuel oil to natural gas firing ratio that shall be used is limited to that which was last used to demonstrate compliance prior to the loss of the CEMS, or the emissions units shall fuel switch and be fired with a fuel oil containing a maximum sulfur content of 2.5%, by weight, or less.
- c. When burning 100% fuel oil, the emissions units shall be fired with a fuel oil containing a maximum sulfur content of 2.5%, by weight, or less.

[Rules 62-213.440, 62-204.800 and 62-296.405(1)(c)3., F.A.C.]

Test Methods and Procedures

[F].c. **Sulfur Dioxide.** The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedences of the sulfur dioxide emissions limiting standard are occurring. The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, as an alternate sampling procedure authorized by permit, the permittee [elected to] OR [shall] demonstrate compliance using CEMS for sulfur dioxide. See specific condition [F].b of this permit. [Rules 62-213.440 and 62-296.405(1)(c)3. and (1)(e)3., F.A.C. IF "ELECTED TO" ABOVE, ADD: Proposed by applicant [date]]

Post-It* Fax Note	7671	Date	9/18/97	# of pages	2
To	Rich Pikel	From	Joe Kahr		
Co./Dept.		Co.	DEP		
Phone #		Phone #			
Fax #	561-691-7070	Fax #	850-488-1364		

Attachment - Revised Draft Title V Permit Language



RECEIVED

SEP 23 1997

BUREAU OF
AIR REGULATION

September 17, 1997

Mr. Scott M. Sheplak, P.E.
State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Draft Permit No. 0090006-001-AV
FPL Cape Canaveral Plant Initial Title V Permit

Dear Mr. Sheplak:

This letter will address once again the issue of particulate testing at the Cape Canaveral facility, as it relates to the percent sulfur in the fuel oil being fired. While FPL appreciates the Department's concurrence on the cofiring issue, we continue to believe that the department's proposed condition regarding particulate testing is unworkable. I will also address 2 other permit related issues which we have discussed previously.

FPL understands that the Department objective is to ensure that particulate emissions remain in compliance, during the firing of all residual oils, both greater than and less than 2.5% sulfur. The Department has proposed permit language that essentially requires FPL to "chase" the sulfur percentage in the fuel oil; that is, to perform particulate tests following any increase in sulfur percentage or upward change in the ratio of fuel oil to natural gas fuel.

While on the surface, this seems logical, it presents logistic problems to the company:

- The Canaveral facility has two fuel oil storage tanks on site, each approximately 268,000 barrels in capacity. Two small metering tanks (approximately 12,000 barrels) are also on the site. New oil arriving at the site is received into one of the large storage tanks. During oil firing, oil is pumped from the storage tanks to the metering tanks, then into the boilers for firing.
- Oil is transported to the plant by barge, from the Port Canaveral terminal, where FPL owns one, 265,000 barrel storage tank. Due to the shallow depth of the waterway between the terminal and the plant, the barges typically can transport only 13,300 barrels per trip. In a typical week, 5 to 10 barges may be delivered and unloaded (a maximum of 133,000 barrels, or about 1/2 the capacity of one of the large on-site storage tanks).
- Because of the tankage sizes and barging limitations described above, in order to increase the percent sulfur in the on-site storage tanks, it requires several weeks of repeated barge shipments of high sulfur oil. Moreover, the suction line at the bottom of the tank, supplying oil to the units is actually a couple of feet off the bottom of the tank (in order to preclude any

settled material from being pumped into the units). This results essentially in a situation wherein a fair amount of dilution occurs each time oil is received. Ultimately, it takes some time to be able to see large differences in percent sulfur in the on-site storage tanks. This presents a problem to FPL in terms of being able to bring in a shipment of high-sulfur oil, just for the purpose of performing a particulate test. Due to dilution, we essentially would need to order several loads of high sulfur oil over several weeks, in order to gradually raise the %sulfur in one of the storage tanks to a high enough level in order to perform a particulate test while minimizing the chances of having to retest.

- We have already presented data to the Department depicting the lack of a significant relationship between particulate matter test results and percent sulfur in the oil. In general, it is FPL's experience that operational parameters such as burner tip condition and boiler cleanliness have much more effect on PM test results than the percent sulfur in the oil.
- Each of the Canaveral units can burn up to 627 barrels of fuel per hour (assuming 0.152 mmbtu / gal., 4,000 mmBtu / hour heat input, and 42 gallons / bbl). Thus, if the units operate at full load on 100% oil, over the course of a week, up to 133,000 bbls of oil could be received, and up to 210,672 bbls of oil could be burned.

In view of the above logistics situation, FPL proposes the following particulate testing regimen:

Proposed Specific Condition [F].d. Operating Conditions During Testing - PM and VE. Compliance testing during sootblowing and steady-state operation for particulate matter and visible emissions shall be conducted at least once annually, if liquid or solid fuel is fired for more than 400 hours. A visible emissions test shall be conducted during one run of each particulate test.

[F].d.1. 100% oil Firing

A particulate test shall be performed on each emission unit while firing fuel oil containing less than or equal to 2.5% sulfur, except that such test will not be required to be performed during any year that testing is performed in accordance with specific condition [F].d.2.

[F].d.2. CoFiring Oil with Natural Gas

If fuel oil containing greater than 2.5% sulfur is cofired with natural gas, a particulate test and visible emissions test shall be conducted as soon as practicable, but in no event more than 60 days, while co-firing such oil with the appropriate proportion of natural gas required to maintain SO₂ emissions at or below 2.75 lb /mmBtu. Following successful completion of such PM and VE testing, further PM and VE testing shall not be required unless fuel oil is fired containing greater than 0.2% above the percentage concentration fired during the most recent cofiring particulate test . If oil is cofired containing sulfur concentration more than 0.2 percent above the concentration of oil cofired during the most recent cofiring particulate test, an additional particulate matter emissions test shall be conducted while cofiring such oil as soon as practicable , but in no event more than 60 days. Following successful completion of such PM and VE testing, further PM and VE testing shall not be required unless fuel oil is fired containing greater than 0.2% above the percentage concentration fired during the most recent cofiring particulate test

[F].e. Fuel Consumption Records. The owner or operator shall create and maintain for each emission unit hourly records of the amount of each fuel fired, the ratio of fuel oil to natural gas if co-fired, and the heating value and sulfur content of each fuel fired. These records must be of sufficient detail to identify testing conditions required by specific condition [F].d. of

this permit, and, when applicable, demonstrate compliance with the requirements of conditions [F].b. paragraphs b and c, of this permit.

I also want to briefly address 2 other issues which we have previously discussed. The first concerns proposed Specific Condition [F].b.a. and the reference to 40 CFR 60 Appendix F. Scott Busa has discussed this issue with Louis Nichols. They agreed that it would be acceptable to strike the reference to Appendix F if we insert the following language: "A Relative Accuracy Test audit of the SO2 CEM shall be conducted annually".

The other issue concerns Specific Condition A.7.. Because the Cape Canaveral plant operates and maintains continuous opacity monitors, DEP Rule 62-210.700(3) applies, and the following language change should be made: "Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change. **Visible emissions above 60 percent opacity shall be allowed for not more than four, six-minute periods, during the 3-hour period of excess emissions allowed by this specific condition.**"

Thank you for your prompt attention to resolve the issues raised in this correspondence. Please do not hesitate to contact me at (561) 691-7058 if I may be of further assistance.

Very truly yours,



Richard Piper
Sr. Environmental Specialist
Florida Power & Light Company

9/23/97 cc - Tom Cascio
Scott Sheplek

Oil Received at Cape Canaveral Plant

As-Fired Analysis Date	As-Fired Data Percent sulfur by weight	Equivalent SO2 Emission Rate lb / mmBtu
1/18/96	1.5	1.6
2/21/96	1.9	2.1
3/20/96	1.9	2.1
4/19/96	2.0	2.2
5/21/96	2.1	2.3
6/21/96	2.0	2.2
7/19/96	2.0	2.2
9/19/96	2.1	2.3
10/18/96	2.1	2.3
11/19/96	2.3	2.5
12/17/96	2.4	2.6
1/20/97	2.3	2.5
2/18/97	2.2	2.4
3/24/97	2.4	2.7
4/21/97	2.5	2.7
5/20/97	2.6	2.9
6/19/97	2.6	2.9
7/20/97	2.1	2.3
7/20/97	2.4	2.7
8/20/97	2.0	2.2
8/20/97	2.2	2.4



August 26, 1997

Mr. Scott M. Sheplak, P.E.
State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED
AUG 28 1997
BUREAU OF
AIR REGULATION

Re: Draft Permit No. 0090006-001-AV
FPL Cape Canaveral Plant Initial Title V Permit

Dear Mr. Sheplak:

Pursuant to our telephone conversation of last week, FPL understands that the Department is willing to allow the cofiring of various fuels at the Cape Canaveral units, as long as the sulfur dioxide emissions are maintained at or below 2.75 pounds of SO₂ per million btu's of heat input (2.75 lb / mmBtu).

The subject draft permit will need to be modified in order to accomplish this. FPL suggests the changes below (language to be stricken is ~~struck through~~; language to be added is **bolded**):

Specific Condition A.10. Sulfur Dioxide. ~~Sulfur dioxide emissions when burning liquid fuel shall not exceed 2.75 pounds per million Btu heat input, as measured by applicable compliance methods. Any calculations used to demonstrate compliance shall be based solely on the Btu value and the percent sulfur of the liquid fuel being burned. The permittee shall limit sulfur dioxide (SO₂) emissions to 2.75 lb of SO₂ per million btu's of heat input (mmBtu) on a 3-hour rolling average basis. The method of compliance for the sulfur dioxide emission limit shall be the Continuous Emission Monitors (CEMs) that were installed on each of the two steam generators pursuant to the requirements of 40 CFR 75 (Acid Rain). There is no limitation on the percent sulfur of the fuel oil fired in the steam generators; however, the 2.75 lb/mmBtu sulfur dioxide emission limit shall apply at all times, including periods of co-firing any of the following fuels in any combination: residual oil, natural gas, used oil, distillate oil, propane.~~

[Rules 62-213.440 and 62-296.405(1)(c)1.j., F.A.C.]

Specific Condition A.15. Sulfur Dioxide. The permittee elected to demonstrate compliance using ~~fuel sampling and analysis. This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions A.21 and A.22.~~ **continuous emission monitors on a 3-hour rolling average basis. The permittee shall perform the required Relative Accuracy Tests (RATA's), Quality Assurance and Quality Control procedures on the Continuous Monitors as specified in the Acid Rain rules (40 CFR 75).**

[Rule 62-296.405(1)(f)1.b., F.A.C.]

The emission unit description on page 5 should also be changed to reflect the megawatt class;

Fossil Fuel Fired Steam Generators #1 and #2 are nominal 402.4 **400 megawatt class** (electric) steam generators designated as Cape Canaveral Units #1 and #2 respectively. Each emissions unit is fired on No. 2, No. 6 residual, or used oil, with a maximum heat input of 4000 MMBtu per hour, or natural gas with a maximum heat input of 4180 MMBtu per hour. Unit #1 commenced commercial operation in April, 1965. Unit #2 commenced commercial operation in May, 1969.

We request that the Department delete Specific Conditions A.21. and A.22. in their entirety, since they refer to fuel sampling and analysis which will no longer be the method of compliance for sulfur dioxide.

Thank you for your prompt attention to the issues raised in this correspondence. Please do not hesitate to contact me at (561) 691-7058 if I may be of further assistance.

Very truly yours,



Rich Piper
Sr. Environmental Specialist
Florida Power & Light Company

8/28/97 cc - *Tom Cassio*
Scott Sheplek



August 12, 1997

Mr. Scott M. Sheplak, P.E.
State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

AUG 19 1997

BUREAU OF
AIR REGULATION

Re: Draft Permit No. 0090006-001-AV
FPL Cape Canaveral Plant Initial Title V Permit

Dear Mr. Sheplak:

FPL proposes to utilize Continuous Emission Monitors (CEM's) for sulfur dioxide as the compliance method for the sulfur dioxide emission limit as allowed by DEP Rule 296.405(1)(e)3. F.A.C.. As you are aware, these monitors were required to be installed on many of FPL's generating units by Title IV of the Clean Air Act Amendments of 1990. By accepting rolling average data from the continuous emission monitors as the compliance method, DEP should have *reasonable assurance* that the Cape Canaveral units are in *continuous compliance* with the sulfur dioxide emission limit.

Enclosed are revised pages to FPL's Title V permit application to address FPL comments on the proposed permit issued June 16, 1997.

1. Revised pages H1 "Basis for Allowable Emission" for sulfur dioxide for the Cape Canaveral steam generators.
2. Revised pages J "Continuous Monitor Information" for the sulfur dioxide monitors for the Cape Canaveral steam generators.
3. A new certification document signed by the Responsible Official for the Cape Canaveral facility.

Each of these permit application revision documents is meant to address the issue of compliance with the sulfur dioxide emission limit. As you are aware, FPL does not agree with the Department's proposal to restrict the fuel that FPL can fire in the Cape Canaveral steam generators to 2.5% sulfur oil or less. Specific Condition A.10. appears to address this:

A10. Sulfur Dioxide. *Sulfur dioxide emissions when burning liquid fuel shall not exceed 2.75 pounds per million Btu heat input, as measured by applicable compliance methods. Any calculations used to demonstrate compliance shall be based solely on the Btu value and the percent sulfur of the liquid fuel being burned. [Rules 62-213.440 and 62-296.405(1)(c)1.j., F.A.C.]*

The above proposed condition that limits calculations used to demonstrate compliance to liquid fuel only, would preempt FPL's ability to purchase lower-cost, higher-sulfur liquid fuels and co-fire them with natural gas fuel. By restricting FPL's ability to undertake this operational methodology, DEP's action would impose higher fuel costs on FPL's ratepayers with absolutely zero environmental benefit.

Moreover, nowhere in DEP's rules is the percentage sulfur in the fuel being fired specified; the rules only address the sulfur dioxide emissions. FPL agrees that the Cape Canaveral units are subject to the 2.75 lb / mmBtu emission limit for sulfur dioxide; we do not agree, however, that the only way to demonstrate compliance with that emission limit is to restrict the fuel sulfur content.

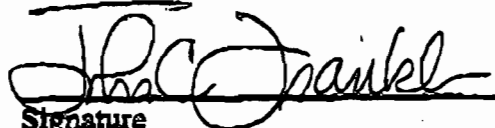
These revisions address the one remaining issue in the draft Title V permit for Cape Canaveral. Thank you for your prompt attention to resolve the issues raised in this correspondence. Please do not hesitate to contact me at (561) 691-7058 if I may be of further assistance.

Very truly yours,

A handwritten signature in black ink, appearing to read "Richard Piper". The signature is written in a cursive, slightly slanted style.

Richard Piper
Sr. Environmental Specialist
Florida Power & Light Company

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Name: John Franklin Title : Plant General Manager
2. Owner or Responsible Official Mailing Address: Organization/Firm: FPL Environmental Services Department Street Address: P.O. Box 14000 City: Juno Beach State: FL Zip Code: 33408
3. Owner or Responsible Official Telephone Numbers: Telephone: 4076330221 Fax: 4076330232
4. Owner or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200 F.A.C., 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 statues 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 <u>8-11-97</u>

* Attach letter of authorization if not currently on file.

Information for Facility_ID: / Emission Unit #: / Pollutant #: / Basis For Allowable Emission #: 1

Allowable Emissions (Pollutant identified on front page)

1. Basis for Allowable Emissions Code: Emissions limit required by rule
2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 2.75 Units : lb/mmBtu
4. Equivalent Allowable Emissions: 11000 lbs/hr 48180 tons/yr
5. Method of Compliance: Continuous Emission Monitor
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): 157 2.75 lb/mmBtu is the current regulatory limit on SO2 emissions [62-296.405(1)(c)1.j. F.A.C.] Equivalent allowable emissions are given for liquid fuel firing.

**Information for Facility_ID: 1 Emission Unit #: 2 Pollutant #: 1
Basis For Allowable Emission #: 1**

Allowable Emissions (Pollutant identified on front page)

1. Basis for Allowable Emissions Code: Emissions limit required by rule
2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 2.75 Units : lb/mmBtu
4. Equivalent Allowable Emissions: 11000 lbs/hr 48180 tons/yr
5. Method of Compliance: Continuous Emission Monitor
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): 157 2.75 lb/mmBtu is the current regulatory limit on SO2 emissions [62-296.405(1)(c)1.j. F.A.C.] Equivalent allowable emissions are given for liquid fuel firing.

**J. CONTINUOUS MONITOR INFORMATION
(Regulated Emissions Units Only)**

Information for Facility-ID : 1 Emission Unit #: 1
Continuous Monitor #: 1

Continuous Monitoring System

1. Parameter Code: Emissions of one or more pollutants
2. Pollutant(s): Sulfur Dioxide
3. CMS Requirement Code(R/O): RULE Rule / Other
4. Monitor Information: Manufacturer: TECO Model Number: 43B Serial Number: 43B-47710-279
5. Installation Date (DD-MON-YYYY): 07/22/94
6. Performance Specification Test Date (DD-MON-YYYY): 08/30/94
7. Continuous Monitor Comment (limit to 200 characters): Required by 40 CFR 75.10(a)(1). To be used for compliance with Sulfur Dioxide emission limit, per Rule 62-296.405(1)(f).

**J. CONTINUOUS MONITOR INFORMATION
(Regulated Emissions Units Only)**

Information for Facility-ID : 1 Emission Unit #: 2

Continuous Monitor #: 1

Continuous Monitoring System

1. Parameter Code: Emissions of one or more pollutants
2. Pollutant(s): Sulfur Dioxide
3. CMS Requirement Code(R/O): RULE Rule / Other
4. Monitor Information: Manufacturer: TECO Model Number: 43B Serial Number: 43B-47734-279
5. Installation Date (DD-MON-YYYY): 07/22/94
6. Performance Specification Test Date (DD-MON-YYYY): 08/31/94
7. Continuous Monitor Comment (limit to 200 characters): Required by 40 CFR 75.10(a)(1). To be used for compliance with Sulfur Dioxide emission limit, per Rule 62-296.405(1)(f).



July 15, 1997

Mr. W. Douglas Beason, Esquire
Assistant General Counsel
Office of General Counsel
State of Florida
Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

RECEIVED
JUL 21 1997
BUREAU OF
AIR REGULATION

**RE: Cape Canaveral Power Plant
Notice of Intent to Issue Proposed
Permit No. 0090006-001-AV - Draft**

Dear Mr. Beason:

On June 16, 1997, Florida Power and Light Company (FPL) received the referenced Notice of Intent to Issue Proposed Permit for its Cape Canaveral Power Plant located in Brevard County, Florida. The Notice of Intent was issued by the Department's Tallahassee Office and was signed by C.H. Fancy, P.E., Chief of Bureau of Air Regulation.

FPL has been working in good faith with the Department to identify and resolve outstanding permit issues regarding the referenced facility. The Department and FPL agree that more time is needed to complete the permitting process for this facility. FPL hereby requests, pursuant to Rule 62-103.070, F.A.C., an extension to and including August 16, 1997, in which to file a petition for administrative proceedings regarding the Notice of Intent to Issue the Proposed Air Construction and Air Operating permits. FPL does not request an extension of the July 16, 1997, in which to public notice the Notice of Intent to Issue the Permits as required under Section 403.815, F.S. and Rule 62-103.150, F.A.C. As good cause for granting the requests for extension of time for filing and public noticing, FPL states the following:

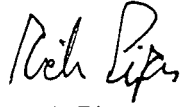
This request is filed simply as a protective measure to avoid waiver of FPL's right to challenge the permit as issued. Granting of this request will not prejudice either party, but will further their mutual interests and likely avoid the need to initiate formal administrative proceedings. FPL is committed to amicably resolving all outstanding issues related to this permit issuance so that the Department's Title V program objectives may be met.

I hereby certify that I have contacted Mr. Clair H. Fancy, P.E., regarding this request, and he has not refused this request for an extension of time.

Page 2

Accordingly, I hereby request that you formally extend the time for filing of a petition for administrative proceedings to and including August 16, 1997.

Sincerely,

A handwritten signature in black ink, appearing to read "Rich Piper". The signature is written in a cursive style with a large initial "R" and "P".

Rich Piper

cc: Mr. Scott Sheplak, P.E., Tallahassee FDEP



July 11, 1997

Mr. Scott M. Sheplak, P.E.
State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Draft Permit No. 0090006-001-AV
FPL Cape Canaveral Plant Initial Title V Permit

Dear Mr. Sheplak:

This correspondence will review the situation regarding SO₂ emissions and the compliance method for SO₂, with respect to the co-firing of oil containing in excess of 2.5% sulfur.

Current Situation: FPL understands that the Department has a concern regarding the demonstration of continuous compliance for SO₂ at the FPL Cape Canaveral facility. Specifically, the Department is concerned that an inadequate mechanism exists to demonstrate continuous compliance with the 2.75 lb / mmBtu emission limit for SO₂ when fuel oil containing in excess of 2.5% sulfur is co-fired with natural gas in the boilers at Cape Canaveral.

FPL wishes to work out an amicable solution to this problem area whereby FPL can continue to co-fire fuel oil containing sulfur in excess of 2.5% sulfur, without undue burden on the company and its ratepayers, while at the same time providing an adequate degree of certainty to the Department that emission limiting standards are not being exceeded..

Regulatory Status: DEP Rule 62-296.405(1)(c)1. addresses existing emission units firing liquid fuel, and establishes an SO₂ emission limiting standard for sources in much of Florida of 2.75 lb / mmBtu.

FPL agrees that this rule is applicable to the Cape Canaveral units. This particular rule does not, however, address the firing of gaseous fuels, nor the co-firing of different types of fuels. The fact that the rule is silent on these issues does not preclude the ability of industry to engage in these activities, however. We agree that our emission limit for SO₂ is 2.75 lb / mmBtu; the question is how to demonstrate continuous compliance to the satisfaction of the Department.

Operational Issues: There are operational advantages to co-firing with natural gas, including lower fuel cost to the customer, lower stack opacity, and ability to reach base load operation of our units. On the cost issue, FPL has conservatively estimated that we have in the recent past saved approximately \$3.5 million dollars per year in fuel costs by co-firing higher sulfur fuels with natural gas. These savings are passed through to our customers in the form of lower utility bills.

Permitting History: Several of FPL's current operating permits address the issue of co-firing oil with natural gas and demonstrating compliance. Enclosed, as an example is an excerpt from the current Air Operating permit for FPL's Port Everglades plant. I would direct your attention to specific condition (4)(b) which discusses compliance testing to be "...conducted with the source firing No. 6 fuel oil or a combination of fuel oil and natural gas not to exceed an equivalent of 2.5% sulfur content..."

While the particular specific condition deals with particulate matter testing (rather than SO₂ compliance), the concept of co-firing with natural gas is nevertheless considered. We have also been "up front" with the Department with regard to co-firing higher-sulfur fuels; attached please find a copy of a letter which was sent in August 1996 to Mr. Leonard Koslov of the Central District Office apprising him of our intentions in this regard. Also enclosed is Mr. Koslov's response.

Future Plans Regarding SO₂ CEMs and Stack Flow Monitors: FPL is exploring the possibility of converting most of its facilities to 40 CFR 75 Appendix D units. [EPA is currently working on a revision to the federal rules regarding oil and gas-fired units]. It is well-documented that most stack flow monitoring equipment tends to bias flow data high, resulting in the over-reporting of SO₂ emissions (and associated allowances for Phase I units now, and Phase II units in the year 2000). In the event that FPL in the future decides to move forward with the conversion to Appendix D, SO₂ mass emissions will be calculated based on fuel sampling & analysis coupled with fuel flow monitoring. With that future scenario in mind, FPL is contemplating alternative means of providing reasonable assurance to the Department that SO₂ emission limits are not exceeded.

Proposal for Continuous Demonstration of Compliance: FPL proposes to undertake the following activities in order to provide assurance to the Department that the 2.75 lb / mmBtu SO₂ emission limit will not be exceeded in the event that fuel oil in excess of 2.5% sulfur is co-fired:

1. Provide, on a quarterly basis, a Certification Document signed by the facility's Responsible Official, attesting to the fact that at any time fuel oil was fired containing in excess of 2.5% sulfur, adequate natural gas was co-fired such that the resulting SO₂ emissions were less than or equal to 2.75 lb / mmBtu.

2. Maintain natural gas and liquid fuel flow monitoring records on site at the facility for a period of 3 years, so that DEP inspection personnel can verify at any time that natural gas and liquid fuel were co-fired in the appropriate proportions. Note that the appropriate proportions are easy to calculate:

Example:

In a 1,000 mmBtu / hour boiler with a 2.75 lb / mmBtu SO₂ limit that fires 3% sulfur oil;

Difference in 3% sulfur and 2.5% sulfur = 0.5% sulfur or 20% higher (0.5 / 2.5)
Therefore at least 20% gas needs to be co-fired with 80% of 3% sulfur oil in order to assure compliance with 2.75 lb / mmBtu emission limit. In other words, at least 200 mmBtu / hour needs to be attributable to natural gas in this example.

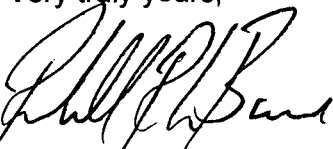
3. Continue to sample fuel oil on a daily basis, while compositing and analyzing the composite samples on a monthly basis for percent sulfur and heat content.

4. Continue to perform required calibrations and maintain calibration records for natural gas and liquid fuel flow monitoring equipment.

By providing the certification document mentioned above, and making fuel flow data available to DEP or local program compliance personnel, FPL asserts that we can adequately address the compliance concerns that the Department has. This procedure has been considered to be acceptable by the Department in the past, at many of FPL's facilities; we have not had a problem with compliance in the past and do not anticipate that future problems will arise with continued use of this compliance methodology. I strongly urge the Department to accept this proposal - it makes sense, it provides the Department with compliance assurance, it's cost effective and it's simple.

Thank you for your prompt attention to this matter. Please do not hesitate to contact me at (561) 691-7001 if I may be of further assistance.

Very truly yours,



Randall R. LaBauve
Director, Environmental Services
Florida Power & Light Company



August 16, 1996

Mr. Leonard Koslov, Manager
FDEP Central District Office
3319 Maguire Blvd., Suite 232
Orlando, FL 32803-3767

**Re: Cofiring of Residual Oil with Natural Gas
at FPL Sanford and Cape Canaveral Plants**

Dear Mr. Koslov:

Pursuant to our telephone conversation of this morning and per your request, this correspondence is to confirm FPL's intention to cofire residual oil containing various percentages of sulfur with natural gas at the two power plants referenced above.

As we discussed, operating units at each facility currently have SO₂ emission limits of 2.75 lb/mmBtu. FPL has historically purchased residual oil for these facilities containing a maximum of 2.5% sulfur in order to meet the SO₂ emission limit. FPL intends in the future to occasionally purchase residual oil containing higher percentages of sulfur for natural gas cofiring purposes at these facilities. Of course, FPL will continue to comply with the relevant heat input and SO₂ emission limits at each facility in accordance with the air operating permits.

In addition, FPL will submit to your office a certification from the Plant General Manager at each facility, attesting to the fact that adequate natural gas was fired along with the residual oil during the previous calendar quarter, in order to comply with the SO₂ emission limit. We propose to include this certification with the regular submittal of the as-fired fuel analyses to your office (example certification letter is attached).

Please note that each facility maintains an SO₂ emission monitor on each stack in accordance with the requirements of 40 CFR 75, and the data are collected and reported regularly as required by that rule. However, the method of compliance for SO₂ emissions at each facility remains the fuel sampling and analysis program which is already specified in each facility's operating permit.

I am confident that the information provided in this correspondence will agree with your recollection of our conversation. If you have any questions regarding this, please do not hesitate to contact me at (561) 625-7661.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Richard Piper", is written over a light-colored background.

Richard Piper
Senior Environmental Specialist
Florida Power & Light Company



Florida Power & Light Company
Martin Combined Cycle Project, P.O. Box 248, Indiantown, FL 34956-0248

TO: Rich Piper

LOCATION: JES/GB

FROM: J. A. Keener


DATE: April 28, 1996

SUBJECT: Quarterly Fuel Letter

The is to certify that at no time during the 1st quarter 1996 sampling period was low sulfur oil burned at any of the Martin Plant Units without sufficient natural gas to ensure that the blend was equivalent to "a mixture of low sulfur fuel oil containing a maximum of 1.0% sulfur (by weight) and natural gas in a ratio that will result in a maximum sulfur dioxide emission rate of 0.8 lbs/MMBtu heat input."

Records of SO₂ data are maintained at the site and are available for review.

Sincerely,


J. A. Keener
Plant General Manager

cc:

T. McCartney
K. Hardy
L. Trotter
R. Adams
Env File

JAK/WW/so₂





Department of Environmental Protection

Lawton Chiles
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Virginia B. Wetherell
Secretary

August 16, 1996

Mr. Richard Piper
Senior Environmental Specialist
Florida Power & Light Company
Post Office Box 088801
North Palm Beach, Florida 33408-8801

OCD-AP-96-235

RECEIVED

AUG 20 1996

Certification Letter
Sanford and Cape Canaveral Plants

ENVIRONMENTAL AFFAIRS

Dear Mr. Piper:

With regard to our telephone conversation today, August 16, the use of a quarterly certification letter for determining the sulfur content used in the blended fuel during the operation of your plants at Sanford and Cape Canaveral, will not be considered as a substitute for all reports required in your permits, and the requirement to maintain records at the plant on an hourly basis of the use of fuel to determine the sulfur emission, or limits established in your permits.

The certification letter you plan to submit represents an additional document which you're providing the Department voluntarily.

If you wish to discuss this matter further, please contact Alan Zahm, Anatoliy Sobolevskiy, or me at 407 893 3333.

Sincerely,

L. T. Kozlov
Program Administrator
Air Resources Management

LTK/j

PERMITTEE:
Ms. Elsa Bishop, Supervisor
Florida Power & Light
North Palm Beach, FL 33408

I.D. NUMBER: 50/BRO/06/0036/01
PERMIT/CERTIFICATION NUMBER: AO 06-223345
DATE OF ISSUE: **APR 21 1993**
EXPIRATION DATE: February 28, 1998

PPE-1

SPECIFIC CONDITIONS:

Footnotes:

1. FAC 17-210.700(3) and FAC 17-296.405(1).
2. FAC 17-297.340.
3. FAC 17-297.330.
4. This source has been authorized by Order of the Department's Secretary to test particulate matter emissions and visible emissions annually with a 40% opacity limit.
5. EPA Method 17 may be used only if the stack gas exit temperature is less than 375°F.
6. SO₂ stack testing is required if equivalent sulfur content exceeds 2.5%. Also, PM stack testing is required within 60 days if a monthly fuel analysis indicating that the equivalent sulfur content of oil burned is increased by 0.5 percentage points or more than that used during the previous PM test.
7. FAC 17-210.700(3) allows up to 3 hours in a 24-hour period of excess emissions during sootblowing and load changing operations.

(4) Compliance Testing Related Requirements:

(a) Notification - FAC 17-297.340(1)(i)

Notification of scheduled compliance test dates shall be given to the Department's Southeast District Office and the Broward County Department of Natural Resource Protection at least 15 days prior to testing unless otherwise agreed to by the Department.

(b) Conditions

Compliance testing of particulate matter emissions should be conducted with the source firing No. 6 fuel oil or a combination of fuel oil and natural gas not to exceed an equivalent of 2.5% sulfur content, and operating within 10% of its rated capacity. Testing may be conducted with the source operating at less than 90% of rated capacity; however, if so, subsequent source operation is limited to up to 110% of the test load. Once the unit is so limited, then operation at higher capacities is allowed for a cumulative total of no more than fifteen days for purposes of additional compliance testing to regain rated capacity in the permit, with prior notification to the Department.

(c) Stack Sampling Facility-FAC 17-297.345

The stack sampling facility must comply with Rule 17-297.345, FAC.

(d) Report Submittal-FAC 17-297.570

A copy of the test results shall be submitted to the Department's Southeast District Office and Broward County Department of Natural Resource Protection within 45 days after the last test run is completed.



RECEIVED

JUL 14 1997

**BUREAU OF
AIR REGULATION**

July 3, 1997

Mr. Scott M. Sheplak, P.E.
State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Draft Permit No. 0090006-001-AV
FPL Cape Canaveral Plant Initial Title V Permit

Dear Mr. Sheplak:

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

Section III. Emission Units and Conditions

Page 2 - Subsection A Facility Description: 402.1 is not the correct megawatt description, it should read something like "Each steam unit falls into a 400MW class (440MW gross generator rating)...".

Page 3 - Section II Facility-wide Conditions: #6 : It is our understanding the Ringelmann chart is obsolete and no longer used in visible emissions evaluations, therefore, we request this reference be removed.

Page 5 - In the Essential Potential to Emit (PTE) Parameters section, the permitted heat inputs for units 1 and 2 for oil and natural gas are switched; the heat input for natural gas should be 4,180 mmBtu / hour, and the heat input for the various liquid fuels should be 4,000 mmBtu / hour. Also please specify the method of heat input calculation as determined by hourly fuel usage and the higher heat value of the oil as determined by the as-fired fuel analysis.

Page 6 - Specific Condition A.3. Methods of Operation. Fuels The use of fuel additives is not addressed in the permit; nor is the evaporation of boiler chemical cleaning waste. Both methods of operation were clearly identified in the permit application. Both activities are normal methods of operation and should be addressed in the body of the permit. Accordingly the following language is requested to be added to Specific Condition A.3.:

d. Additives: Fuel additives are authorized to be added to the boiler units as needed to enhance combustion and facilitate furnace cleaning, in a manner consistent with Best Operational Practices.

e. Evaporation of Boiler Chemical Cleaning solution: Evaporation of spent boiler chemical cleaning solution is authorized to be performed in the boiler units, in a manner consistent with Best Operational Practices.

Page 6 - **Specific Condition A.4. - Disposal of Spent Boiler Cleaning Chemicals** - This condition is requested to be removed in accordance with the May 24, 1996 Department guidance document # DARM-SS/CE-07 - Disposal of Non-Hazardous Boiler Chemical Cleaning Waste by Incineration and Evaporation.

Page 6 - **Specific Condition A.7.- Visible Emissions - SootBlowing & Load Change** - This title would better describe the activities if changed to read "Visible Emissions - Boiler cleaning & Load Change" which better describes the intent of the allowance. Please add other boiler cleaning examples in the parentheses with soot blowing such as air heater wash, dust collector cleaning, hopper cleaning.

Page 10 - **Specific Condition A.20. Particulate Matter** - Orsat analysis is specifically mentioned to determine oxygen measurement, we request that use of an oxygen analyzer also be addressed.

Page 10 - **Specific Condition A.21. - Sulfur Dioxide** - We agree that the test method for sulfur dioxide emissions should be EPA Methods 6, 6A, 6B or 6C or fuel sampling and analysis. Please note that FPL currently uses EPA Method 6C for Relative Accuracy Testing for the continuous monitoring equipment.

Page 10 - **Specific Condition A.22.a. - Fuel Sampling & Analysis** - Please note that FPL uses ASTM method D4294 for fuel sulfur content analysis. Our laboratory uses the most recently-issued ASTM test method (D4294-90 indicates a test method issued in 1990; D4294-93 indicates a test method issued in 1993, and so forth). Therefore we request the test method description be modified to "the most recently issued version for the above-listed ASTM methods" and be inserted into Specific Condition A.22.a.. Also note in A 22.a. analysis of the composite as-fired sample will be completed on a monthly basis instead of following each fuel delivery.

Page 10 - **Specific Condition A.22.b. -** Please change the frequency of recorded information to "Record monthly the amount of each....".

Page 14 - **Specific Condition A.28. - Frequency of Compliance Tests** - The numbering begins with "2" instead of "1", and numbers 6,7 and 8 are omitted. Is this intentional?

Page 14 - **Specific Condition A.28. General Compliance Testing** - A reference to fuel is not included; we suggest "Compliance testing of particulate matter should be performed while firing liquid fuel or a combination of liquid fuel and natural gas in a ratio not to exceed the applicable emission standard".

Page 15 - **Specific Condition A.29.** Compliance testing is required to be completed on or within 60 days of June first of each year. We request a 120 day window prior to and including June first for completion of this annual test. This larger window will allow for changing schedules in overhauls and system demand.

Page 20 - **Appendix E-1. List of Exempt Emission Units and/or Activities** - Item 6 "Welding Machines" should be listed as "miscellaneous mobile vehicle operation".

Page 21 - **Appendix U-1. List of Unregulated Emission Units and/or Activities** - The second item should have the words "and similar equipment" added.

Portable equipment includes link belts, air compressors, and pumps.

Table 2-1, Summary of Compliance Requirements - Testing time for particulate matter is annually please strike quarterly. Also for sulfur dioxide testing time is monthly, please strike daily.

The Department has included as Figure 1 a Summary Report for Gaseous and Opacity Excess Emissions and Monitoring System Performance form. Please note that this is not the form that FPL has utilized historically at the Cape Canaveral facility. Figure 1 appears to have been taken from the NAPS reporting format in 40 CFR 60.7 which is not applicable to the Cape Canaveral facility. FPL proposes to continue using the Excess Emission reporting form we have used previously; it is attached to this letter for your reference.

General Conditions Section

1. The language provided in General Condition 3. Standards for Issuing or Denying Permits essentially eviscerates the language in General Condition 52. Permit Shield. Section 403.082(15) of the Florida Statutes states that "Any permittee that operates in compliance with an air operation permit issued under this section is deemed to be in compliance with applicable permit requirements of the Clean Air Act and all implementing state, local, and federal air pollution control rules and regulations and all provisions of this chapter, relating to air pollution, and rules adopted thereunder." If a permittee is operating in compliance with the air operation permit, the permit shield is intended to provide protection from enforcement as long as all the applicable rules and regulations are cited in the permit application. Therefore we request that General Condition 3. be stricken.

2. General Condition 2, parens 4, 5 and 6 reference fees for construction permits. This section is not applicable to Title V permitting and should be stricken. Permit processing fees for Title V facilities are covered in our annual fee submittal to the Department each February.

3. General Condition 51. Statement of Compliance - Does the Department intend to require the Compliance Certifications on a calendar year basis, fiscal year basis or some other basis?

Thank you for your prompt attention to the issues raised in this correspondence. Please do not hesitate to contact me at (561) 691-7058 if I may be of further assistance.

Very truly yours,



Rich Piper
Sr. Environmental Specialist
Florida Power & Light Company

7/14/97 cc: Scott Sheplak
Tom Cassio

-FL copy-



June 27, 1997

Mr. W. Douglas Beason, Esquire
Assistant General Counsel
Office of General Counsel
State of Florida
Department of Environmental Protection
3900 Commonwealth Boulevard Mail ~~Box~~ # 35
Tallahassee, Florida 32399-3000

**RE: Cape Canaveral Power Plant
Notice of Intent to Issue Proposed
Permit No. 0090006-001-AV - Draft**

Dear Mr. Beason:

On June 16, 1997, Florida Power and Light Company (FPL) received the referenced Notice of Intent to Issue Proposed Permit for its Cape Canaveral Power Plant located in Brevard County, Florida. The Notice of Intent was issued by the Department's Tallahassee Office and was signed by C. H. Fancy, P.E., Chief of Bureau of Air Regulation.

FPL has been working in good faith with the Department to identify and resolve outstanding permit issues regarding the referenced facility. The Department and FPL agree that more time is needed to complete the permitting process for this facility. FPL hereby requests, pursuant to Rule 62-103.070, F.A.C., an extension to and including July 16, 1997, in which to file a petition for administrative proceedings regarding the Notice of Intent to Issue the Proposed Air Construction and Air Operating permits. FPL does not request an extension of the July 16, 1997, in which to public notice the Notice of Intent to Issue the Permits as required under Section 403.815, F.S. and Rule 62-103.150, F.A.C. As good cause for granting the requests for extension of time for filing and public noticing, FPL states the following:

This request is filed simply as a protective measure to avoid waiver of FPL's right to challenge the permit as issued. Granting of this request will not prejudice either party, but will further their mutual interests and likely avoid the need to initiate formal administrative proceedings.

I hereby certify that I have contacted Mr. Scott Sheplak, P.E. regarding this request, and he has no objection to this request for extension of time.

Accordingly, I hereby request that you formally extend the time for filing of a petition for administrative proceedings to and including July 16, 1997.

Sincerely,

Rich Piper
for Rich Piper

cc: Mr. Scott Sheplak, P.E., Tallahassee FDEP

Elx copy



FPL

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

June 27, 1997

Mr. W. Douglas Beason, Esquire
 Assistant General Counsel
 Office of General Counsel
 State of Florida
 Department of Environmental Protection
 3900 Commonwealth Boulevard
 Tallahassee, Florida 32399-3000

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 Permit No. 0090006-001-AV - Draft**

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Accordingly, I hereby request that you formally extend the time for filing of a petition for administrative proceedings to and including July 16, 1997.

Sincerely,

Mary Archer
 for Rich Piper

cc: Mr. Scott Sheplak, P.E., T2
 an FPL Group company

Post-It™ brand fax transmittal memo 7671		# of pages ▶ 1
To <i>Scott Sheplak</i>	From <i>Mary Archer</i>	
Co.	Co. <i>FPL</i>	
Dept. <i>488-1344</i>	Phone # <i>561.641.7057</i>	
Fax # <i>904-922-6979</i>	Fax # <i>7070</i>	



April 30, 1997

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

RECEIVED

MAY 08 1997

**BUREAU OF
AIR REGULATION**

Re: FPL Canaveral Plant
Title V Permit

Dear Mr. Cascio,

This correspondence is in response to Mr. John Brown's letter of November 19, 1996. Following are responses to each of the concerns raised in John's letter:

1. Please provide a copy of the document PCCFS_11.txt, Identification of Additional Applicable Requirements. The referenced document appears to be missing from Section E.

Response: The reference to the document was in error. Additional applicable requirements are listed in each of the Emission Unit sections of the application.

2. Attachment PCC-FW, List of Unregulated Trivial or De minimis Activities, contained consolidation of trivial activities, unregulated emission units and activities that you propose for exemption. Please resubmit as follows:

a) Group the unregulated activities into logical groupings of emissions units and indicate any pollutants that have the potential to emit quantities equal to or greater than the threshold levels specified in Rules 62-213.420(3)(c)3. and 4., F.A.C., from each of the unregulated emissions units.

b) Identify emissions units that you claim should be exempted and provide adequate information to demonstrate that emissions levels are below the levels established for exemption at Rule 62-213.430(6), F.A.C.

c) Do not include trivial activities in the application.

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

<u>Item</u>	<u>Rationale</u>
Natural gas metering area relief valves	Safety equipment is exempted by Rule 62-210.300(3)(a)22k F.A.C..
Hydrazine mixing tank & relief valves	This is a 33% aqueous product stored in stainless steel bins. Typically the facility uses less than 300-gallons per year; therefore the emissions of hydrazine are below the 1,000 lb. threshold.
Ammonia Hydroxide mixing tank & relief valves	The facility uses less than 300-gallons per year of a 28% aqueous solution; therefore the emissions of ammonia are below the 1,000 lb. threshold.
Lube Oil tank vents & extraction vents	These items concern lubricating oils which have a low volatility. There is insufficient quantity on hand as the facility to produce a 5-ton release.
Oil Separation Basin (oily waste separator)	VOC's are below the 5-ton threshold. There is insufficient quantity on hand at the facility to produce a 5-ton release.
Miscellaneous mobile vehicle operation (cars, light trucks, heavy-duty trucks, backhoes, tractors, forklifts, cranes, etc.)	Exempted by Rule 62-210.300(3)(a)5.
Diesel Fuel Tank – 2" vent	VOC emissions from both tanks do not exceed the 5-ton threshold.

Unregulated Activities are proposed as follows:

Emission Unit 3

Painting of Plant equipment
Non-halogenated solvent cleaning operations
Parts Washer with #2 Distillate
Use of spray cans & solvents for routine maintenance activities

Combined VOC emissions from all 3 activities combined could exceed 5 tons per year

Emission Unit 4

Miscellaneous mobile equipment operation (compressors, chain saws, small generators, welding machines, etc.)
Internal Combustion engines which drive compressors, generators, water pumps or other auxiliary equipment

Combined NOx emissions could approach 15 tons per year for 10 pieces of equipment each operating 1,000 hrs per year. No other pollutants approach the relevant permitting thresholds.

Unregulated Activities (continued)

Emission Unit 5

Emergency diesel generators

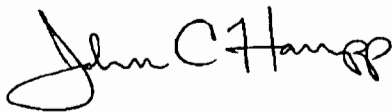
The facility maintains one 500 kW fixed main emergency diesel. The plant also maintains two small diesel generators and two small gasoline generators as plant Hurricane supplies. Maximum emissions are estimated as follows for 8,760 hours of operation per year:

SO ₂	7.4 TPY
NO _x	65.7 TPY
CO	106.2 TPY

No other pollutants approach the relevant permitting thresholds.

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

Sincerely,



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

5/8/97 cc: Tom Cascio
General Corp. File

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:

Name: John Franklin
Title : Plant General Manager

2. Owner or Responsible Official Mailing Address:

Organization/Firm: FPL Environmental Services Department
Street Address: 11770 U.S. Highway One
City: North Palm Beach State: FL Zip Code: 33408

3. Owner or Responsible Official Telephone Numbers:

Telephone: 4076330221 Fax: 4076330232

4. Owner or Responsible Official Statement:

I, the undersigned, am the owner or authorized representative of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200 F.A.C., 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 statues 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.*



Signature

4-30-97

Date

* Attach letter of authorization if not currently on file.

4. Professional Engineer 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 a emission 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 her [] 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 emission 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.

[Signature]
Signature

4/30/97
Date

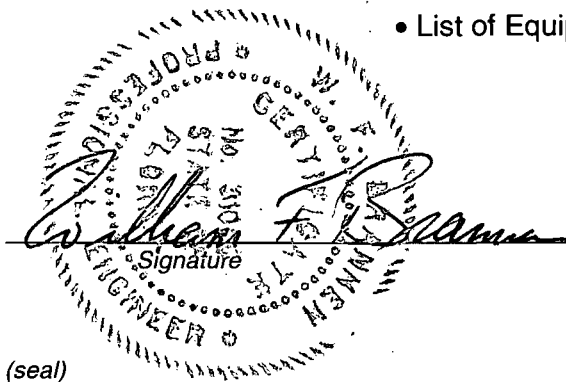
(seal)

* Attach any exception to certification statement.

Supplement to Professional Engineer Certification Statement

This information supplements the original Title V application for the FPL Canaveral plant of June 1996 which was certified by Ken Kosky of KBN Engineering & Applied Sciences. This certification statement applies only to the following items included in this supplemental package submitted on April 22, 1997:

- List of Unregulated Activities
- List of Exempt Activities
- List of Equipment / Activities Regulated under Title VI



(seal)

4/30/97
Date

FLORIDA POWER & LIGHT
700 UNIVERSE BLVD.
P. O. BOX 14000
JUNO BEACH, FL 33408-0420

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FIRST CLASS



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U.S. POSTAGE

Mr. Tom Cascio
FDEP - Div. of Air Resources Mgt.
2600 Blair Stone Road
Tallahassee, FL 32399-2400

FLORIDA's Electronic Notification Cover Memorandum

TO: Gracy R. Danois, U.S. EPA Region 4
THRU: Scott M. Sheplak, P.E., Tallahassee Title V Section
FROM: Thomas Cascio, Permit Engineer
DATE: 06/10/97
RE: U.S. EPA Region 4 Title V Operation Permit Review

Pursuant to the 1996 comprehensive Title V operation permit review strategy contained in the Florida/EPA Implementation Agreement, the following Title V operation permit and associated documents are made available for your review/comment prior to issuance.

<u>Applicant Name</u>	<u>County</u>	<u>Method of Transmittal</u>	<u>Electronic File Name(s)</u>
Florida Power & Light Co. Cape Canaveral Plant 0090006	Brevard	INTERNET	0090006d.zip

This zipped file contains the following electronic files:

0090006i.doc
0090006d.doc
00900061.xls
00900062.xls
0090006h.doc

Updated: 4/23/97 RBM

v:\formats\fednot.doc



RECEIVED
JUN 28 2004
BUREAU OF AIR REGULATION

Colleen Castille, Secretary
Department of Environmental Protection
Executive Office
10th Floor Douglas Building
Commonwealth Boulevard
Tallahassee, FL 32399

Re: Responsible Official Designation Title V Program

Dear Secretary Castille:

This correspondence is to certify the "Responsible Official(s)" for the Title V permits of the affected fossil power plants operated by Florida Power & Light Company. The following person(s) are authorized to act as the "Responsible Official" for that facility, pursuant to State Rule 62-213, F.A.C.

Responsible Official	Title	Title V Facility
Lowell Trotter	Gen. Mgr. Cape Canaveral Plant	Cape Canaveral Plant

The designated "Responsible Official" is hereby authorized to act on behalf of Florida Power & Light on all permit related activities for the facility.

Sincerely,

Adalberto Alfonso
Vice President
Power Generation Division
Florida Power & Light Company

Cc: Al Linero FDEP DARM
FDEP Central Dist.

Additional Responsible Official

1. Name and Position Title of Responsible Official: <u>Angelo Masullo, Production Manager</u>
2. Responsible Official Mailing Address: Organization/Firm: Florida Power and Light Company/Cape Canaveral Plant Street Address: 6000 North US Highway 1 City: Cocoa State: Florida Zip Code: 32927
3. Responsible Official Telephone Numbers: Telephone: (321) 637-2251 Fax: (321) 637-2232
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

Additional Responsible Official

1. Name and Position Title of Responsible Official:
2. Responsible Official Mailing Address: Organization/Firm: Street Address: City: State: Zip Code:
3. Responsible Official Telephone Numbers: Telephone: () - Fax: () -
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.



RECEIVED

JUN 28 2004

BUREAU OF AIR REGULATION

Colleen Castille, Secretary
Department of Environmental Protection
Executive Office
10th Floor Douglas Building
Commonwealth Boulevard
Tallahassee, FL 32399

Re: Responsible Official Designation Title V Program

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Responsible Official	Title	Title V Facility
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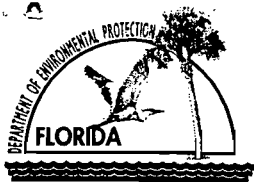
The designated "Responsible Official" is hereby authorized to act on behalf of Florida Power & Light on all permit related activities for the facility.

Sincerely,

Adalberto Alfonso
Vice President
Power Generation Division
Florida Power & Light Company

Cc: Al Linero FDEP DARM
FDEP Central Dist.

RECEIVED
JUN 24 2004
DEP SECRETARY



Department of Environmental Protection

Division of Air Resource Management

RESPONSIBLE OFFICIAL NOTIFICATION FORM

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

Identification of Facility

1. Facility Owner/Company Name: FPL Cape Canaveral Plant	
2. Site Name: Cape Canaveral Plant	3. County: Brevard
4. Title V Air Operation Permit/Project No. <i>(leave blank for initial Title V applications)</i> : 0090006-00 1 AV	

Notification Type *(Check one or more)*

<input type="checkbox"/>	INITIAL:	Notification of responsible officials for an initial Title V application.
<input type="checkbox"/>	RENEWAL:	Notification of responsible officials for a renewal Title V application.
<input checked="" type="checkbox"/>	CHANGE:	Notification of change in responsible official(s).
		Effective date of change in responsible official(s) <u>May 1, 2004</u>

Primary Responsible Official

1.	Name and Position Title of Responsible Official: <u>Lowell Trotter, Plant General Manager</u>
2.	Responsible Official Mailing Address: Organization/Firm: Florida Power and Light Company/Cape Canaveral Plant Street Address: 6000 North US Highway 1 City: Cocoa, State: Florida Zip Code: 32927
3.	Responsible Official Telephone Numbers: Telephone: (321) 637-2221 - Fax: (321) 637-2232
4.	Responsible Official Qualification <i>(Check one or more of the following options, as applicable)</i> : <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
5.	Responsible Official Statement: <i>I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.</i> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%; text-align: center;"> _____ Signature </div> <div style="width: 45%; text-align: center;"> <u>6/21/04</u> _____ Date </div> </div>

Additional Responsible Official

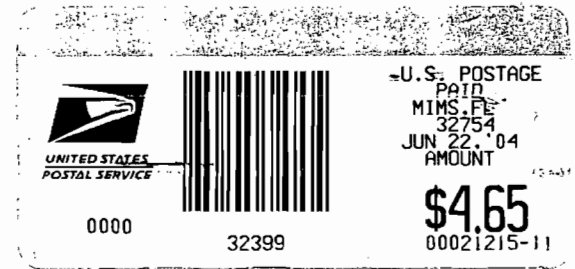
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2. Responsible Official Mailing Address: Organization/Firm: Florida Power and Light Company/Cape Canaveral Plant Street Address: 6000 North US Highway 1 City: Cocoa State: Florida Zip Code: 32927
3. Responsible Official Telephone Numbers: Telephone: (321) 637-2251 Fax: (321) 637-2232
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

Additional Responsible Official

1. Name and Position Title of Responsible Official:
2. Responsible Official Mailing Address: Organization/Firm: Street Address: City: State: Zip Code:
3. Responsible Official Telephone Numbers: Telephone: () - Fax: () -
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.



Florida Power & Light Company, 6000 North US Highway One, Cocoa, FL 32927



Colleen Castille, Secretary
Department of Environmental Protection
Executive Office
10th Floor Douglas Building
Commonwealth Boulevard
Tallahassee, FL 32399

**RETURN RECEIPT
REQUESTED**

CERTIFIED MAIL™



7003 1010 0001 3752 9993

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Office of the Secretary Correspondence Control

Correspond Number	Date Received
-------------------	---------------

EO-11929	08/20/03
----------	----------

Name: Adalberto Alfonso
Organization: Fla. Power & Light
Address: Environmental Services Dept.
P.O. Box 14000
City/State/Zip: Juno Beach, FL 33408
County: Palm Beach
Phone:

Assigned to: Air Resource Management

Instructions: Handle Appropriately

Division/District Director to handle as deemed appropriate. No need to report response to OMB.

Assigned by Joni Scott, Office of Ombudsman 850/245-2118, SC 205-2118, Fax: 850/245-2128,
Email: joni.scott@dep.state.fl.us

If there are any concerns with assignment, due date, etc., the OMB analyst listed above should be contacted immediately.

*Inia -
No response necessary -
fye @*

RECEIVED

AUG 22 2003

DIVISION OF AIR
RESOURCE MANAGEMENT

08/21/03



Mr. David Struhs, Secretary
Department of Environmental Protection
Executive Office
10th Floor Douglas Building
Commonwealth Boulevard
Tallahassee, FL 32399

Re: Responsible Official Designation Title V Program

Dear Mr. Struhs:

This correspondence is to certify the "Responsible Official" for the Title V permit of the affected fossil power plant operated by Florida Power & Light Company. The following person is authorized to act as the "Responsible Official" for that facility, pursuant to State Rule 62-213, F.A.C.

Responsible Official	Title	Title V Facility
Bill Brannen	Gen. Mgr. Cape Canaveral Plant	Cape Canaveral Plant

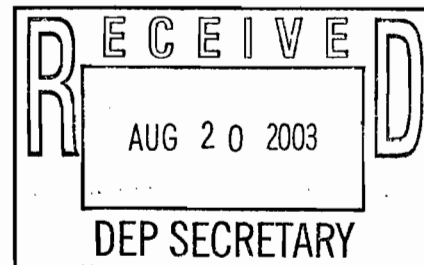
The designated "Responsible Official" is hereby authorized to act on behalf of Florida Power & Light on all permit related activities for the facility.

Sincerely,

Adalberto Alfonso
Vice President
Power Generation Division
Florida Power & Light Company

Cc: Scott Sheplak FDEP DARM
 FDEP Central Dist.
 FDEP NE Dist.

Mary Archer - FPL





Department of Environmental Protection

Division of Air Resource Management RESPONSIBLE OFFICIAL NOTIFICATION FORM

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

Identification of Facility

1. Facility Owner/Company Name: <p style="text-align: center;">Florida Power and Light Company</p>	
2. Site Name: <p style="text-align: center;">Cape Canaveral Plant</p>	3. County: <p style="text-align: center;">Brevard</p>
4. Title V Air Operation Permit/Project No. <i>(leave blank for initial Title V applications)</i> : <p style="text-align: center;">0090006-001-AV</p>	

Notification Type *(Check one or more)*

<input type="checkbox"/> INITIAL:	Notification of responsible officials for an initial Title V application.
<input type="checkbox"/> RENEWAL:	Notification of responsible officials for a renewal Title V application.
<input checked="" type="checkbox"/> CHANGE:	Notification of change in responsible official(s).
	Effective date of change in responsible official(s) <u>August 1, 2003</u>

Primary Responsible Official

1. Name and Position Title of Responsible Official: <p style="text-align: center;">William F. Brannen, Plant General Manager</p>	
2. Responsible Official Mailing Address: Organization/Firm: Florida Power and Light Company/Cape Canaveral Plant Street Address: 6000 North US Highway 1 City: Cocoa State: FL Zip Code: 32927	
3. Responsible Official Telephone Numbers: Telephone: (321) 637-2221 Fax: (321) 637-2232	
4. Responsible Official Qualification <i>(Check one or more of the following options, as applicable)</i> : <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.	
5. Responsible Official Statement: <i>I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.</i> <div style="display: flex; justify-content: space-between;"> <div style="text-align: center;"> _____ Signature </div> <div style="text-align: center;"> <u>8/14/2003</u> _____ Date </div> </div>	

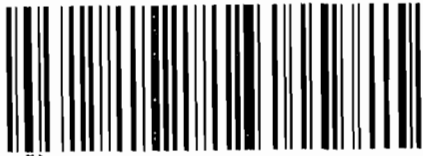


FPL

D-2

Florida Power & Light Company, 6000 North US Highway One, Cocoa, FL

CERTIFIED MAIL



7001 0320 0003 8974 3757

**RETURN RECEIPT
REQUESTED**



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32399

U.S. POSTAGE
PAID
SHAPEES, FL
32959
AUG 18, '03
AMOUNT

\$4.42

00018367-08

Mr. David Struhs, Secretary
Department of Environmental Protection
Executive Office
10th Floor Douglas Building
Commonwealth Boulevard
Tallahassee, FL 32399

AIR



Mr. David Struhs, Secretary
Department of Environmental Protection
Executive Office
10th Floor Douglas Building
Commonwealth Boulevard
Tallahassee, FL 32399

Re: Responsible Official Designation Title V Program

Dear Mr. Struhs:

This correspondence is to certify the "Responsible Official(s)" for the Title V permits of the affected fossil power plants operated by Florida Power & Light Company. The following person(s) are authorized to act as the "Responsible Official" for that facility, pursuant to State Rule 62-213, F.A.C.

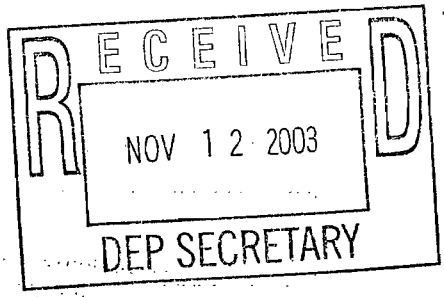
Responsible Official	Title	Title V Facility
Peter G. Holzapfel	Gen. Mgr. Cape Canaveral Plant	Cape Canaveral Plant

The designated "Responsible Official" is hereby authorized to act on behalf of Florida Power & Light on all permit related activities for the facility.

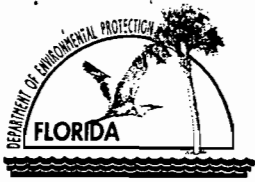
Sincerely,

Adalberto Alfonso
Vice President
Power Generation Division
Florida Power & Light Company

Cc: Scott Sheplak FDEP DARM
FDEP Central Dist.



11-19-03
Done: ARMS.
Bm



Department of Environmental Protection

Division of Air Resource Management RESPONSIBLE OFFICIAL NOTIFICATION FORM

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

Identification of Facility

1. Facility Owner/Company Name: FPL Cape Canaveral Plant	
2. Site Name: Cape Canaveral Plant	3. County: Brevard
4. Title V Air Operation Permit/Project No. (leave blank for initial Title V applications): 0090006-00 1 AV	

Notification Type (Check one or more)

<input type="checkbox"/> INITIAL:	Notification of responsible officials for an initial Title V application.	
<input type="checkbox"/> RENEWAL:	Notification of responsible officials for a renewal Title V application.	
<input checked="" type="checkbox"/> CHANGE:	Notification of change in responsible official(s).	
	Effective date of change in responsible official(s) _____	Nov. 1, 2003

Primary Responsible Official

1. Name and Position Title of Responsible Official: <u>Pete Holzapfel, Plant General Manager</u>
2. Responsible Official Mailing Address: Organization/Firm: Florida Power and Light Company/Cape Canaveral Plant Street Address: 6000 North US Highway 1 City: Cocoa, State: Florida Zip Code: 32927
3. Responsible Official Telephone Numbers: Telephone: (321) 637-2221 Fax: (321) 637-2232
4. Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
5. Responsible Official Statement: <i>I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.</i>
<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;"> _____ Signature </div> <div style="text-align: center;"> <u>11/4/03</u> _____ Date </div> </div>

11-19-03
Done: ARMS.
Bim

Additional Responsible Official

1. Name and Position Title of Responsible Official: <u>Angelo Masullo, Production Manager</u>
2. Responsible Official Mailing Address: Organization/Firm: Florida Power and Light Company/Cape Canaveral Plant Street Address: 6000 North US Highway 1 City: Cocoa State: Florida Zip Code: 32927
3. Responsible Official Telephone Numbers: Telephone: (321) 637-2251 Fax: (321) 637-2232
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

11-19-03
Done: ARMS.
Bm

Additional Responsible Official

1. Name and Position Title of Responsible Official:
2. Responsible Official Mailing Address: Organization/Firm: Street Address: City: State: Zip Code:
3. Responsible Official Telephone Numbers: Telephone: () - Fax: () -
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

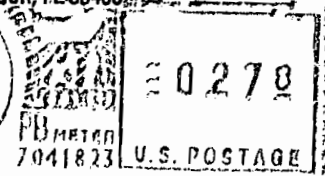
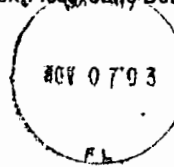


M. Acker JES JB

Florida Power & Light Company, Environmental Services Dept., P. O. Box 34000, Juno Beach, FL 33408

ADDRESS SERVICE
REQUESTED

PRESORTED
FIRST CLASS



Ms. Struks
MB
10

32399/3000





Department of Environmental Protection

Division of Air Resource Management

RESPONSIBLE OFFICIAL NOTIFICATION FORM

RECEIVED

SEP 19 2002

BUREAU OF AIR REGULATION

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

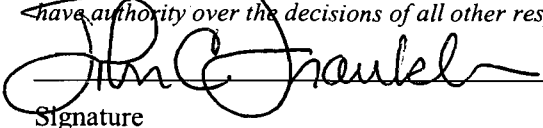
Identification of Facility

1. Facility Owner/Company Name: Florida Power & Light Company	
2. Site Name: Cape Canaveral Plant	3. County: Brevard
4. Title V Air Operation Permit/Project No. (leave blank for initial Title V applications): 0090006-001-AV	

Notification Type (Check one or more)

<input type="checkbox"/> INITIAL:	Notification of responsible officials for an initial Title V application.
<input type="checkbox"/> RENEWAL:	Notification of responsible officials for a renewal Title V application.
<input checked="" type="checkbox"/> CHANGE:	Notification of change in responsible official(s). Effective date of change in responsible official(s) _____

Primary Responsible Official

1. Name and Position Title of Responsible Official: John C. Franklin, Plant General Manager
2. Responsible Official Mailing Address: Organization/Firm: Florida Power & Light Company, Cape Canaveral Plant Street Address: 6000 North US Highway 1 City: Cocoa State: FL Zip Code: 32927
3. Responsible Official Telephone Numbers: Telephone: (321) 637 - 2221 Fax: (321) 637 - 2232
4. Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
5. Responsible Official Statement: <p><i>I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.</i></p> <p> _____</p> <p>Signature 7-21-02 Date</p>

Additional Responsible Official

1. Name and Position Title of Responsible Official: Angelo Masullo, Production Manager
2. Responsible Official Mailing Address: Organization/Firm: Florida Power & Light Company, Cape Canaveral Plant Street Address: 6000 North US Highway 1 City: Cocoa State: FL Zip Code: 32927
3. Responsible Official Telephone Numbers: Telephone: (321) 637 - 2251 Fax: (321) 637 - 2232
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

Additional Responsible Official

1. Name and Position Title of Responsible Official:
2. Responsible Official Mailing Address: Organization/Firm: Street Address: City: State: Zip Code:
3. Responsible Official Telephone Numbers: Telephone: () - Fax: () -
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.



8/26 Scott
need to copy them
on notices of intent.
On any we have already sent
Send them a copy of intent pack
claim - pls handle claim
Dr

August 13, 1997

Howard Rhodes, Bureau Chief
Bureau of Air Resources
Florida Dept. of Env. Protection
2600 Blairstone Rd, MS 5500
Tallahassee, FL 32399

Re: Title V Permits

Dear Mr. Rhodes:

We understand the Bureau is reviewing applications for operating permits pursuant to DEP's authority to administer the Title V program. We are interested in potential permits for Florida's electric utilities, particularly Florida Power & Light, Florida Power Corp., Gulf Power Co., and Tampa Electric Co.

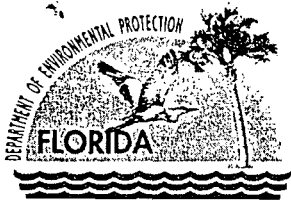
We would like to be added to any list of interested persons to whom notices of intent to issue or deny permits are sent. We would also like to know what opportunities there are for public comment on proposed permits. In addition, if there is a list of pending permits, we would be grateful for a copy. Thank you for your assistance.

Sincerely,

Gail Kamaras

Gail Kamaras, Director
Energy Advocacy Program

RECEIVED
AUG 15 1997
BUREAU OF
AIR REGULATION



CM File

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

March 4, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John Franklin
Plant General Manager
Florida Power & Light Company
11770 U.S. Highway One
North Palm Beach, Florida 33408

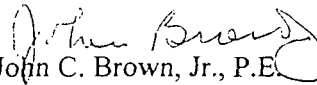
Re: Request for Additional Time to Respond to Information Request
File No. 0090006-001-AV
Cape Canaveral Plant, Brevard County

Dear Mr. Franklin:

The Department has received a facsimile request from Mr. Richard Piper for an additional 60 days to respond to our request for additional information which was received by your office on November 25, 1996. The request was made in accordance with Rule 62-213.420(1)(b)6.a., F.A.C., and requested an additional 60 days to respond. The Department acknowledges this request and grants the additional 60 days to respond in accordance with Rule 62-213.420(b)6.b., F.A.C.

Your response to the request for additional information is now due to the Department on April 24, 1997. Should you require additional time to respond to the request, you will need to "demonstrate good cause" for the additional extension of time in accordance with Rule 62-213.420(b)6.c., F.A.C. If you should have any questions, please call Tom Cascio or me at 904/488-1344.

Sincerely,


John C. Brown, Jr., P.E.
Administrator
Title V Section

JCB/tc

copy to:
Kennard F. Kosky, P.E., Golder Associates, Inc.
Leonard T. Kozlov, P.E., Central District Office
Richard Piper, Florida Power & Light Company

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. John Franklin
Plant General Manager
Florida Power & Light Company
11770 U.S. Highway One
North Palm Beach, Florida 33408

4a. Article Number
Z 392 940 985

4b. Service Type

Registered Insured

Certified COD

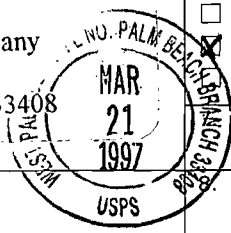
Express Mail Return Receipt for Merchandise

Date of Delivery

5. Signature (Addressee)

6. Signature (Agent)

Addresssee's Address (Only if requested and fee is paid)



Thank you for using Return Receipt Service.

PS Form 3811, December 1991 ☆U.S. GPO: 1992-323-402 DOMESTIC RETURN RECEIPT

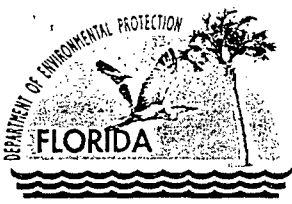
Z 392 940 985



Receipt for Certified Mail
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, March 1993

Sent to	Florida Power & Light Co.
Street and No.	11770 U.S. Hwy. One
P.O., State and ZIP Code	N. Palm Beach, Fl. 33408
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	3-4-97



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
October 6, 1997

Virginia B. Wetherell
Secretary

Mr. John Franklin
Plant General Manager
Florida Power & Light Company
Environmental Services Department
P.O. Box 14000
Juno Beach, FL 33408

Re: DRAFT Title V Permit No.: 0090006-001-AV
Cape Canaveral Plant

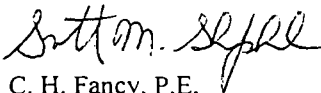
Dear Mr. Franklin:

One copy of a reissued DRAFT Title V Air Operation Permit for the Cape Canaveral Plant located on the West side of the Indian River, approximately eight miles north of Cocoa, Florida on U.S. Highway No. 1, Brevard County is enclosed. The earlier DRAFT Permit was changed based on discussions with Rich Piper of your company. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" is also included. The enclosed DRAFT Permit, dated October 6, 1997, supersedes the earlier DRAFT Permit and all permitting event clocks are reset pursuant to the date clerked.

The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" must be published as soon as possible upon receipt of this letter. This issue is important in order for you to receive your Title IV Acid Rain permit by January 1, 1998, pursuant to the Clean Air Act and Section 403.0872, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Scott M. Sheplak, P.E., at the above letterhead address. If you have any other questions, please contact Tom Cascio at 850/488-1344.

Sincerely,

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

CHF/tc

Enclosures

cc: Ms. Carla E. Pierce, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)
Ms. Yolanda Adams, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

In the Matter of an
Application for Permit by:

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

DRAFT Permit No.: 0090006-001-AV
Cape Canaveral Plant
Brevard County

INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit (copy of DRAFT Permit enclosed) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Florida Power & Light Company, applied on June 12, 1996, to the permitting authority for a Title V air operation permit for the Cape Canaveral Plant located on the West side of the Indian River, approximately eight miles north of Cocoa, Florida on U.S. Highway No. 1, Brevard County.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit is required to commence or continue operations at the described facility.

The permitting authority intends to issue this Title V air operation permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.0872, F.S., and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-1344; Fax: 850/922-6979), within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-103.150(6), F.A.C.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the enclosed Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions 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 permitting 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 Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any other person must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. 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 28-5.207, F.A.C.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. 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.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

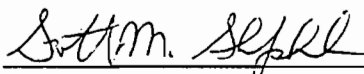
Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator

separately approves any variance or waiver in accordance with the procedures of the federal program.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 401 M. Street, SW, Washington, D.C. 20460.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) and all copies were sent by certified mail before the close of business on 10/7/97 to the person(s) listed:

Mr. John Franklin, Florida Power & Light Company
Mr. William Muly Reichel, Florida Power & Light Company

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) were sent by U.S. mail on the same date to the person(s) listed:

Mr. Kennard F. Kosky, P.E., Golder Associates, Inc.
Mr. Leonard T. Kozlov, Central District Office
Mr. Richard Piper, Florida Power & Light Company
Ms. Gail Kamaras, Legal Environmental Assistance Foundation

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency Clerk, receipt of which is hereby acknowledged.

Barbara J. Boutwell 10/7/97
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Title V DRAFT Permit No.: 0090006-001-AV
Cape Canaveral Plant
Brevard County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to the Florida Power & Light Company for the Cape Canaveral Plant located on the West side of the Indian River, approximately eight miles north of Cocoa, Florida on U.S. Highway No. 1, Brevard County.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions 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 permitting 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 Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. 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 applicable 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 28-5.207 of the Florida Administrative Code.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;

(e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;

(f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. 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.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 401 M. Street, SW, Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:

Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-1344
Fax: 850/922-6979

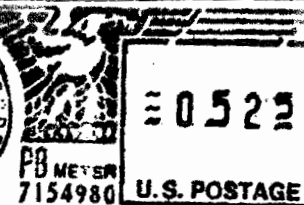
Affected District Program:

Department of Environmental Protection
Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767
Telephone: 407/894-7555
Fax: 407/897-2966

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/488-1344, for additional information.

FLORIDA POWER & LIGHT
700 UNIVERSE BLVD.
P. O. BOX 14000
JUNO BEACH, FL 33408-0420

PRESORTED
FIRST CLASS



Mr. Tom Cascio
FDEP - Div. of Air Resources Mgt.
2600 Blair Stone Road
Tallahassee, FL 32399-2400



Florida Power & Light Company, 6000 North US Highway One, Cocoa, FL 32927



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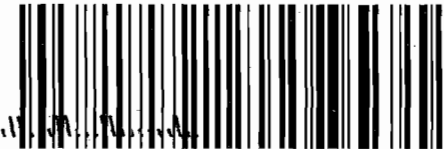
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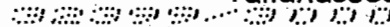
Colleen Castille, Secretary
Department of Environmental Protection
Executive Office
10th Floor Douglas Building
Commonwealth Boulevard
Tallahassee, FL 32399

CERTIFIED MAIL™



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RETURN RECEIPT
REQUESTED



DEPARTMENT OF ENVIRONMENTAL PROTECTION
Office of the Secretary Correspondence Control

Correspond Number	Date Received
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EO-11929	08/20/03
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Name: Adalberto Alfonso
Organization: Fla. Power & Light
Address: Environmental Services Dept.
P.O. Box 14000
City/State/Zip: Juno Beach, FL 33408
County: Palm Beach
Phone:

Assigned to: Air Resource Management

Instructions: Handle Appropriately

Division/District Director to handle as deemed appropriate. No need to report response to OMB.

Assigned by Joni Scott, Office of Ombudsman 850/245-2118, SC 205-2118, Fax: 850/245-2128,
Email: joni.scott@dep.state.fl.us

If there are any concerns with assignment, due date, etc., the OMB analyst listed above should be contacted immediately.

Mia -
No response necessary -
fyi @

RECEIVED

AUG 22 2003

DIVISION OF AIR
RESOURCE MANAGEMENT



FPL

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Florida Power & Light Company, 6000 North US Highway One, Cocoa, FL

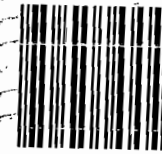
CERTIFIED MAIL



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**RETURN RECEIPT
REQUESTED**

Mr. David Struhs, Secretary
Department of Environmental Protection
Executive Office
10th Floor Douglas Building
Commonwealth Boulevard
Tallahassee, FL 32399



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FPL

M. Arden CES JB

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

ADDRESS SERVICE
REQUESTED

RESORTED
FIRST CLASS



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Ms. Struhs
MB
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