

# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

August 31, 1990

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Martin A. Smith, Manager Environmental  
Florida Power & Light Company  
P. O. Box 078768  
West Palm Beach, Florida 33407-0768

Dear Mr. Smith:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to construct the existing boiler units 4 and 5, gas turbines 1 through 24, 3 fuel tanks, and all other miscellaneous stationary sources of air pollution at the Lauderdale Plant located on Griffin Road, Dania, Broward County, Florida.

Before final action can be taken on your draft permit, you are required by Florida Administrative Code Rule 17-103.150 to publish the attached Notice of Proposed Agency Action in the legal advertising section of a newspaper of general circulation in Broward County no later than thirty days after receipt of this letter. The Department must be provided with proof of publication within seven days of the date the notice is published. Failure to publish the notice may be grounds for denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Barry Andrews of the Bureau of Air Regulation.

Sincerely,



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

CHF/WK/plm

Attachments

c: Isidore Goldman, SE District  
Al Linero, Broward County  
David Buff, P.E.  
Jewell Harper, EPA

BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of  
Application for Permit by:

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

DER File No. AC 06-179848

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INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Florida Power & Light Company, applied on May 3, 1990, to the Department of Environmental Regulation for a permit to construct the existing Lauderdale Plant in Dania, Broward County, Florida. The permit will restrict VOC emissions to less than 100 TPY.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "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. The applicant shall provide proof of publication to the Department, at the address specified within 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.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

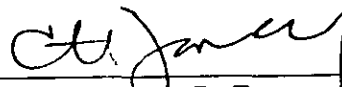
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application(s) have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such

person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION



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

Copies furnished to:

Isidore Goldman, SE District  
Al Linero, Broward County  
David Buff, P.E.  
Jewell Harper, EPA

State of Florida  
Department of Environmental Regulation  
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (AC 06-179848) to construct the existing Lauderdale Plant located on Griffin Road, Dania, Broward County, Florida, to Florida Power & Light Company, P. O. Box 078768, West Palm Beach, Florida 33407-0768. The applicant is proposing to change the type of fuel stored in an existing tank from No. 6 to No. 2 fuel oil. This project will increase volatile organic compounds (VOC) emissions from fuel storage tanks Nos. (2, 3, 4 (removed from service), and 5, by 5.41 TPY. The applicant is also requesting the Department impose federally enforceable permit restrictions on the facility, primarily by limiting the fuels burned in existing gas turbines, which would result in allowable VOC emissions being less than 100 TPY. These emissions will not cause a violation of any ambient air quality standard or interfere with reasonable further progress toward attainment of the ozone ambient air quality standard. A Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER) determination was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

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

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Department of Environmental Regulation  
Southeast District  
1900 S. Congress Avenue, Suite A  
West Palm Beach, Florida 33406

Broward County Environmental Quality Control Board  
500 SW 14th Court  
Ft. Lauderdale Florida 33315

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of buisness on 8-31-90.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
§120.52(9), Florida Statutes, with  
the designated Department Clerk,  
receipt of which is hereby  
acknowledged.

Kyri Sabar 8-31-90  
Clerk Date

Technical Evaluation  
and  
Preliminary Determination

Florida Power and Light Company

Lauderdale Plant  
Broward County, Florida  
File No. AC 06-179848

Department of Environmental Regulation  
Division of Air Resources Management  
Bureau of Air Regulation

August 31, 1990



I. General Information

A. Applicant

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

B. Request

On May 3, 1990, Vice President J. S. Odom of Florida Power and Light Company submitted an application for a permit to construct the existing Lauderdale plant (SIC 4911) and requested permission to switch the type of fuel stored in an existing tank and asked that restrictions be placed on all sources of air pollution at the facility to limit the allowable volatile organic compounds (VOC) emissions to less than 100 TPY. The application was considered complete on June 22, 1990, when additional information (KBN letter dated June 20, 1990) was received by the Department.

C. Project and Location

The applicant is planning to convert an existing storage tank from No. 6 oil to No. 2 oil service at the Lauderdale Plant which is located on Griffin Road, Dania, Broward County, Florida. The UTM coordinates of this site are Zone 17, 580.2 km E and 2,883.3 km N. They also request restrictions be placed on all existing sources of air pollution at this facility to limit allowable VOC emissions to less than 100 TPY. The restrictions would be based on the type and quantity of organic liquids (solvents, lubricants, and fuels) handled or burned at this facility.

D. Emissions

Using Tank No. 3 to handle No. 2 fuel oil instead of No. 6 fuel oil will increase VOC emissions from this tank to 6.33 TPY. The contemporaneous emission change for the storage tanks Nos. 2, 3, 4 (removed from service), and 5 will be 5.41 TPY VOC. The applicant is also requesting the Department restrict the permitted emissions of all the air pollution sources at this facility to less than 100 TPY VOC. There has never been a federally enforceable VOC emission limit for this facility. As the highest actual VOC emissions from the facility was 54.6 TPY, this represents an increase of less than 45.4 TPY VOC.

The following table summarizes the allowable emissions being requested for the facility.

Source	TPY VOC Emissions	Control
Unit Nos. 4 & 5 FFSG and 24 gas turbines	89.1	Limit fuel consumption
Tank No. 2	0.05	Limited 192,642,943 GPY No. 6 oil
Tank No. 3	6.38	Limited 6,830,094 GPY No. 2 oil
Tank No. 4	0	Removed from service
Tank No. 5	3.38	Limited 343,635,079 GPY No. 2 oil
2 gas turbine tanks	0.003	
3 fuel oil metering tanks	0.011	
1 unleaded gasoline tank	0.106	
1 diesel fuel tank	0.001	
Maintenance solvent	0.893	Limited to 250 GPY solvents
All other stationary sources of air pollution	0	No other sources reported for this facility
<b>TOTAL</b>		<b>99.924 TPY</b>

The facility will also emit other products of combustion, including PM, SO<sub>2</sub>, NO<sub>x</sub> and CO. Each of these pollutants is emitted in quantities in excess of 100 TPY. A summary of the emissions for these pollutants reported in the application is shown below.

Pollutant	Maximum Emissions (lbs/hr)			
	SO <sub>2</sub>	NO <sub>x</sub>	PM	CO
Units 4 and 5	3,630	1,892	330	138
Gas Turbines 1-12	4,164	4,032	297	966
Gas Turbines 13-24	4,164	4,032	297	966

Thus, the Lauderdale Plant is a minor facility for VOC and a major facility for SO<sub>2</sub>, NO<sub>x</sub>, PM, and CO.

## II. Rule Applicability

The proposed project, modification to an existing fuel storage tank (changing type of fuel stored) and limiting the emissions from existing sources of air pollution at the Lauderdale Plant, is subject to preconstruction review under the provisions of Chapter 403, F.S., and F.A.C. Chapter 17-2.

The facility is located in an area designated nonattainment for ozone (F.A.C. Rule 17-2.410), and attainment for the other criteria pollutants (F.A.C. Rule 17-2.420).

The proposed permit will restrict VOC emissions to less than 100 TPY which will make the plant a minor facility for VOC by definition (F.A.C. Rule 17-2.100(124)). The emissions for other criteria pollutants (PM, SO<sub>2</sub>, NO<sub>x</sub>, and CO) exceed 100 TPY which makes the plant a major source by definition (F.A.C. Rule 17-2.100 (118)) for these pollutants.

The modification to the fuel storage tanks will increase VOC emissions by less than the significant emission rate listed in F.A.C. Rule, Table 500-2. There are no federally enforceable permit restrictions on the emission of other air pollutants from this facility. Therefore, the project is exempt from review under the prevention of significant deterioration (PSD) regulations (F.A.C. Rule 17-2.500) and new source review for nonattainment areas (F.A.C. Rule 17-2.510). It will be permitted under F.A.C. Rule 17-2.520, Sources not Subject to Prevention of Significant Deterioration or Nonattainment Requirements. Emission standards will be set at the values requested by the applicant. The permit restrictions will be federally enforceable which may subject future modifications of this facility to additional regulations.

### III. Technical Evaluation

The modification to the existing storage tank involves handling No. 2 fuel oil instead of No. 6 fuel oil. Because of the higher vapor pressure of No. 2 fuel oil, VOC emissions from this tank are estimated to increase up to 6.38 TPY. Tank No. 4 will be removed from service. The contemporaneous increase in emissions from storage tanks Nos. 2, 3, 4, and 5 will be 5.41 TPY VOC. These tanks are not equipped with air pollution control systems.

The facility VOC emission restrictions incorporated in the proposal are, at the request of the applicant, to limit VOC emissions to less than 100 TPY. This may affect rule applicability determinations for future modifications to the facility. Any future relaxation of the restrictions in this permit may subject the facility to F.A.C. Rule 17-2.510, new source review for nonattainment areas (40 CFR 52.21(r), Source Obligation).

Boiler units No. 4 and 5 burn natural gas or No. 6 fuel oil. The 24 gas turbines burn natural gas or No. 2 fuel oil. The emissions of the products of combustion are indirectly restricted by the fuel limitations requested by the applicant. These emissions can be estimated from the fuel consumption and emission factors listed in the EPA publication titled AP-42. The Department has chosen to limit fuel consumption to the units instead of limiting the emissions of the products of combustion directly.

Broward County Environmental Quality Board has objected to the Department issuing a permit for the Lauderdale Plant that will result in it becoming a minor VOC source by definition.

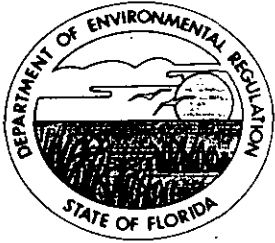
#### IV. Air Quality Analysis

The increase in VOC emissions associated with this project will not cause a violation of any ambient air quality standard or interfere with reasonable further progress toward attainment of the ozone ambient air quality standard.

#### V. Conclusion

Based on the information provided by Florida Power and Light Company, the Department has reasonable assurance that the proposed construction and operation of the modified fuel storage tanks and other existing equipment at the Lauderdale Plant, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.

Attachment: BCFCB letter dated May 10, 1990



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

## PERMITTEE:

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

Permit Number: AC 06-179848  
Expiration Date: June 1, 1991  
County: Broward  
Latitude/Longitude: 26°04'05"N  
80°11'54"W  
Project: Lauderdale Plant

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For modifications to the Lauderdale Plant which contain the following air pollution sources: 80,000 bbl fuel storage tank No. 2 handling No. 6 fuel oil, 150,000 bbl fuel storage tank No. 3 to be converted from No. 6 fuel oil to No. 2 fuel oil service, 55,000 bbl tank No. 4 to be removed from service, 75,000 bbl tank No. 5 handling No. 2 fuel oil, two 1,500 gallon underground gas turbine dump tanks, three 252,000 gallon fuel oil metering tanks, one 4,000 gallon underground unleaded gasoline storage tank, and one 1,000 gallon underground diesel fuel storage tank; fossil fuel steam generating units Nos. 4 and 5, two 161 MW (gross capacity) steam generating units burning a variable combination of natural gas, used oil fuel from FP&L operations, and No. 6 fuel oil with a maximum heat input rate of 1725 MMBtu/hr each, discharging air pollutants through a stack 151 ft. above ground level; 24 gas turbines with 45 ft. high stacks burning natural gas and/or No. 2 fuel oil at a maximum heat input rate of 702 MMBtu/hr for each unit; and, maintenance operations throughout the facility that consume up to 250 GPY solvents.

The UTM coordinates of this facility are Zone 17, 580.2 km E and 2,883.3 km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application
2. DER letter dated May 15, 1990
3. KBN letter dated June 20, 1990
4. KBN letter dated July 1, 1990

PERMITTEE:  
Florida Power & Light Company

Permit Number: AC 06-179848  
Expiration Date: June 1, 1991

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
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. 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 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.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:  
Florida Power & Light Company

Permit Number: AC 06-179848  
Expiration Date: June 1, 1991

**GENERAL CONDITIONS:**

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:

Florida Power & Light Company

Permit Number: AC 06-179848

Expiration Date: June 1, 1991

**GENERAL CONDITIONS:**

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.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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 17-4.120 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.

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

13. 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.



PERMITTEE:  
Florida Power & Light Company

Permit Number: AC 06-179848  
Expiration Date: June 1, 1991

**GENERAL CONDITIONS:**

- 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:
- the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurements;
  - the dates analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SPECIFIC CONDITIONS:**

Tanks

1. The maximum volatile organic compounds (VOC) emissions and volume of organic liquids handled by the tanks shall not exceed the following:

Vessel	Organic Liquid	Annual Throughput (gallons)	Emissions (TPY VOC)
No. 2 Storage Tank	No. 6 fuel oil	192,642,943	0.050
No. 3 Storage Tank	No. 2 fuel oil	688,302,094	6.380
No. 4 Storage Tank	None	0	0

PERMITTEE:  
Florida Power & Light Company

Permit Number: AC 06-179848  
Expiration Date: June 1, 1991

SPECIFIC CONDITIONS:

Vessel	Organic Liquid	Annual Throughput (gallons)	Emissions (TPY VOC)
No. 5 Storage Tank	No. 2 fuel oil	343,635,079	3.380
Gas Turbine Dump Tanks	No. 2 fuel oil	300,000	0.003
Fuel Oil Metering Tanks	No. 6 fuel oil	192,642,943	0.011
Gasoline Storage Tank	Gasoline	10,000	0.106
Diesel Fuel Storage Tank	Diesel fuel	5,000	0.001

2. The permittee shall keep records of the following for at least three years:

- A) The amount of No. 6 fuel oil obtained for the plant.
- B) The sulfur content of the No. 6 fuel oil obtained for the plant.
- C) The amount of No. 2 fuel oil obtained for the plant.
- D) The throughput for fuel storage tank No. 3, fuel storage tank No. 5, gas turbine dump tanks, gasoline storage tank, and diesel fuel storage tank.

3. The VOC emission in TPY from all stationary tanks at this facility shall be calculated annually by the procedure described in AP-42, Emission Factors, Section 4.3, Storage of Organic Liquids. Actual throughput and meteorological data shall be used for these calculations.

Fossil Fuel Steam Generator Units Nos. 4 and 5

4. The maximum heat and fuel inputs to Units Nos. 4 and 5 shall not exceed the following:

Unit	Natural Gas		Oil (No. 6 and FP&L Used Oil)	
	MMCFH	MMBtu/hr	GPH	MMBtu/hr
4	1,643	1,725	10,995	1,650
5	1,643	1,725	10,995	1,650
Total	3,286	3,450	21,991	3,300

When gas and oil are burned together, the allowable heat input and fuel consumption shall be prorated based on the above table.

PERMITTEE:  
Florida Power & Light Company

Permit Number: AC 06-179848  
Expiration Date: June 1, 1991

**SPECIFIC CONDITIONS:**

5. During steady state operations: A) visible emissions shall not exceed 20% opacity, B) particulate matter emissions shall not exceed 0.1 pounds per million Btu heat input.
6. During soot blowing and load changes: A) visible emissions shall not exceed 60% opacity during the 3 hour period of excess emissions allowed for soot blowing and load changes, B) particulate emissions shall not exceed an average of 0.3 pounds per million Btu heat input during the three hour period of excess emissions allowed for soot blowing and load changes.
7. Sulfur dioxide emissions shall not exceed 1.1 pounds per million Btu heat input.
8. Sulfur content of the No. 6 fuel oil shall not exceed 1%.
9. Sulfur content of the No. 2 fuel oil shall not exceed 0.5%.
10. The VOC emissions from each unit shall not exceed 0.0050 lbs/MMBtu when the boiler is burning No. 6 fuel and used oil, and 0.0013 lbs/MMBtu when the boiler is burning natural gas. When both fuels are burned together, the allowable emissions shall be prorated.
11. Total VOC emissions from both units when operating at their permitted capacity shall not exceed 16.32 lbs/hr when they are burning oil and 4.45 lbs/hr when they are burning natural gas.
12. The emissions of other criteria pollutants shall be calculated by using emission factors listed in AP-42, Emission Factors. Tests will not be required for these pollutants unless the Department believes these rates may have been exceeded.
13. The permittee shall keep records for at least three (3) years of the type, quantity, and sulfur content of fuels, GPH of oil, MMCF/hr of natural gas, and percentage of sulfur used by each boiler.
14. Compliance testing shall be conducted for units Nos. 4 and 5 once each federal fiscal year.

PERMITTEE:  
Florida Power & Light Company

Permit Number: AC 06-179848  
Expiration Date: June 1, 1991

**SPECIFIC CONDITIONS:**

15. The compliance test shall be conducted by the following methods:

<u>Source/Emission Point Units Nos. 4 and 5</u>	
<u>Pollutant</u>	<u>Test Method</u>
Particulate (Steady State & Soot Blowing)	EPA Method 17* or EPA Method 5
Visible Emissions (Steady State & Soot Blowing)	DER Method 9
SO <sub>2</sub>	**
Fuel Oil Sulfur Content	ASTM Method D 129

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

\*\* Stack testing for SO<sub>2</sub> is required if the equivalent sulfur content of the fuel exceeds 1.0%. Sulfur content shall be verified by submittal of monthly fuel analysis reports on a quarterly basis. Certified analysis by oil supplier may be substituted for this test.

16. Emissions compliance testing should be conducted with the source firing No. 6 fuel oil and/or natural gas and operating within ten percent (10%) of its permitted capacity; provided, however, that such testing may be conducted with the source operating at less than ninety percent (90%) of its permitted capacity, in which case the source may subsequently be operated at any capacity up to one hundred ten percent (110%) of the average load at which compliance was demonstrated, and at higher capacities for up to fifteen days for purposes of additional compliance testing. A particulate test to show compliance must be conducted within sixty (60) days of the monthly fuel analysis if the equivalent sulfur content of the fuel burned (fuel oil and/or natural gas) is increased by 0.5 percentage points or more from that used during the previous test.

17. Burning of used oil meeting EPA specifications (40 CFR S266.40) and generated from FPL operations shall be permitted under the following conditions:

PERMITTEE:  
Florida Power & Light Company

Permit Number: AC 06-179848  
Expiration Date: June 1, 1991

**SPECIFIC CONDITIONS:**

- (a) Each batch of used oil to be burned shall be sampled and analyzed for: arsenic, chromium, cadmium, total halogens, 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 17(a) shall be retained by the 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 Operations Report (AOR) for Air Emissions Sources. The permittee will submit with the AOR a summary of the range of values for each constituent analyzed pursuant to Specific Condition 17(a).

Gas Turbines

18. VOC emissions from each gas turbine shall not exceed 0.0013 lbs/MMBtu when the turbine is burning No. 2 fuel oil and 0.0034 lbs/MMBtu when the turbine is burning natural gas. When both fuels (oil and gas) are burned together, the allowable VOC emissions shall be prorated.

19. Total VOC emissions from the 24 gas turbines when operating at the permitted capacity shall not exceed 56.66 lbs/hr when the units are burning natural gas and 20.87 lbs/hr when the units are burning oil. When both fuels are burned in the turbines at the same time, the allowable emissions shall be prorated.

20. Visible emissions shall not exceed 20% opacity.

21. The permittee shall keep records of the type and quantity of fuel, GPH of oil and MMCF/hr of natural gas, used by each turbine for at least three (3) years.

22. The VOC emission factor for the gas turbines shall be confirmed by an EPA Method 25A test as described in 40 CFR 60, Appendix A (July 1, 1988) on any one of the gas turbines every 5 years while it is burning 100% natural gas and 100% No. 2 fuel oil.

PERMITTEE:  
Florida Power & Light Company

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**SPECIFIC CONDITIONS:**

23. Visible emissions from each unit shall be determined annually by EPA Method 9 as described in 40 CFR 60, Appendix A (July 1, 1988). Tests shall be conducted while the turbines are operating near their permitted capacity while burning No. 2 fuel oil.

Maintenance Operation

24. Not more than 250 gallons of solvent per year shall be used for maintenance at this facility.

25. The permittee shall keep records of the type and quantity of solvents, in GPY, used during maintenance throughout this plant for a minimum of three (3) years.

Facility

26. The total VOC emissions from all sources at this facility shall not exceed 99.92 TPY.

27. The VOC emissions shall be determined annually by adding the VOC emissions from each source at this facility during the preceding 12 months.

General Administrative Requirements

28. The Department shall be notified of expected test dates at least fifteen (15) days prior to compliance stack testing.

29. 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. This shall include the annual VOC emissions for all air pollution sources at this facility.

30. Copies of all reports, tests, notifications or other submittals required by this permit shall be submitted to both the Department of Environmental Regulation, Southeast District Office and the Broward County Environmental Quality Control Board.

31. In addition to the requirements of General Condition No. 8 of this permit, a written quarterly report shall be submitted to the Department of all opacity exceedances of emission limitations specified in Florida Administrative Code Rules 17-2.250(1) through (4) and 17-2.600(5)(b)1. The report shall state the cause, period

**PERMITTEE:**

Florida Power & Light Company

Permit Number: AC 06-179848

Expiration Date: June 1, 1991

**SPECIFIC CONDITIONS:**

of noncompliance, and steps taken for corrective action and/or prevention of recurrence. If the opacity level cannot be determined for any reason, the report shall state the cause, duration and action taken. All recorded data shall be maintained on file by Florida Power & Light for no less than three (3) years and made available to the Department upon request.

32. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

33. An application for an operation permit must be submitted to the Southeast District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this \_\_\_\_\_ day  
of \_\_\_\_\_, 1990

**STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION**

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STEVE SMALLWOOD, P.E.  
Director  
Division of Air Resources  
Management

P 280 742 414

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 1989-234-555

PS Form 3800, June 1985

Sent to	Martin A. Smith
Street and No.	FIA. Power & Light
P.O., State and ZIP Code	P.O. Box 078768
Postage	WP Bch Fl \$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	AC 06-179845 8-31-90

**SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.**  
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. (Extra charge)      2.  Restricted Delivery (Extra charge)

3. Article Addressed to: Martin A. Smith Mgr. Encl. FIA. Power & Light Co. P.O. Box 078768 West Palm Beach, Fl 33407-0768	4. Article Number P 280 742 414
5. Signature - Addressee X	Type of Service: <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 X [Signature]	Always obtain signature of addressee or agent and DATE DELIVERED.
7. Date of Delivery 9/5/90	8. Addressee's Address (ONLY if requested and fee paid)