



October 24, 2008

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State of Florida  
Department of Environmental Protection  
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RECEIVED

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BUREAU OF AIR REGULATION

**Re: Comments to Draft Air Operating Permit; Lauderdale Power Plant, Permit No. 0110037-005-AV**

Dear Trina,

As an initial matter, FPL requests that the Department involve major stakeholders in the development of permitting format changes to avoid extended delays in permit review. FPL specifically requests confirmation from FDEP that these formatting changes are not intended to, and in fact do not, result in any changes to the substantive requirements applicable to this facility. Also, the size of the permit for such a simple facility as Lauderdale has grown unwieldy especially in this day of conservation, and moving specific requirements into Appendices makes it much more difficult to determine precisely what requirements are applicable. We are anticipating permits plus attachments to exceed 1000 plus pages for some of our facilities if this trend is continued.

Regarding the Draft Title V Permit referenced above, FPL has the following comments:

- Statement of Basis: Please provide a list of all changes made in the draft permit no. 0110037-005-AV as compared to the current air operating permit no. 0110037-004-AV.
- Page 3,  
Subsection C. Applicable Regulations: FPL requests that the Table indicating Regulation and EU No(s) be removed from the permit. It is cumbersome and may create confusion for the permit users.

- Page 4,

**FW1. Appendices.** FPL requests that the word “all” be replaced by “the applicable”

- Page 5,

**FW10. Clean Air Interstate Rule (CAIR) Applicable Units .....** FPL requests that the last sentence beginning with “*If, and at such time that, .....*” be deleted from this condition. There is no requirement that an applicant to be held to conditions in an application that are not contained in a valid operating permit.

- Page 6,

*{Permitting note: These emissions units are regulated under Acid Rain.....}*.” FPL requests that the citation above be removed and replaced with the Permitting note of the same nature found on Page 7 of the existing title V Permit no. 0110037-004-AV.

- Page 7,

**Specific Condition No.A.1 Permitted Capacity:**

**A.1. Permitted Capacity.** The maximum operation heat input rate is as follows: (see specific condition **A.32.**):.....  
{Table}

[Rules 62-4.160(2), 62-204.800, and 62-210.200(PTE), F.A.C.; and Permit PSD-FL-145, Specific Condition 1.]

*FPL requests the condition be revised to reflect the following.*

**Specific Condition No.A.1 Permitted Capacity:**

**A.1. Permitted Capacity.** The maximum operation heat input rate is as follows: (see specific condition **A.33.**).

{Insert Table}

The maximum operation heat input rate is limited for Emission Units 035, 036, 037, and 038 in accordance with a 3-hour block average that is limited at any given ambient temperature. The ambient temperature for heat input calculation or look up curves is equivalent to the compressor inlet temperature.

The heat input will be demonstrated annually in accordance with the 3-hour run time of the performance test and will be provided as a part of the test submittal.

The CEMs Data Handling & Acquisition System (DAHS) calculated heat input shall not be used for compliance purposes.

*(An estimated “real time” heat input value can be calculated for agency compliance inspectors upon request. The averaging time for the estimated heat input will be a 3-hour block that may utilize*

*fuel flow or tank drop data to determine the fuel usage which will be multiplied by the last available heating value of the fuel. If sampling is needed to determine the current heat input value, the adjusted heat input value will be provided to the inspector after test results are received for the heat value of the fuel and a corrected fuel heat input is calculated.)*

Heat input is not required to be recorded other than the instances as addressed previously in this condition.

[Rules 62-4.160(2), 62-204.800, and 62-210.200(PTE), F.A.C.; and Permit PSD-FL-145, Specific Condition 1.]

- Page 9,  
Rule 62-210.700. FPL requests that the word “any” be replaced by “an applicable”.
  
- Page 9  
**A.21. Water to Fuel Monitor** – FPL requests that this Condition be deleted as the facility will use CEMs for monitoring of operations
  
- Page 10,  
**A.24. CEMS Requirements.** FPL requests that the language be replaced by Specific Condition A.25 from the existing Title V Permit 0110037-004-AV, with the exception that the last sentence beginning with, “*Compliance shall.....*” be omitted. The existing Specific Condition A.25 is more explicit as to the requirements of a Part 75 CEM
  
- Page 10,  
**A.25. Test Methods.** FPL requests that the table and language be deleted in its entirety and be replaced by Specific Condition A.20 from the existing Title V Permit 0110037-004-AV, with the exception that the capacity range be changed from “95-100 percent” to “90-100 percent”.
  
- Page 11,  
**A.25. Test Methods.** FPL requests that the table be expanded to include O<sub>2</sub> and CO<sub>2</sub> with EPA Reference Method 3A applicable to each fuel as shown below.

	<b>EPA Reference Method</b>	<b>Gas</b>	<b>Oil</b>
O <sub>2</sub>	3A	X	X
CO <sub>2</sub>	3A	X	X

- Page 11,

**A.29. Compliance Tests Prior To Permit Renewal.** FPL requests that the language be changed to reflect the current compliance requirements. The reference to PM should be replaced by “NOx”. A requirement to test for PM only applies if a unit was operated on liquid fuel for more than 400 hours. The reference to VOC should be deleted. The requirement to test for VOC was deleted from the Lauderdale permit long ago. Table 2 Summary of Compliance Requirements accurately reflects that VOCs are not tested.

- Page 12,

**A.31. NSPS Subpart A Requirements.** FPL requests that the language be deleted in its entirety and the subsequent Specific Conditions be renumbered. Reporting Requirements are adequately covered by Specific Conditions **A.32.**, **A.33.**, **A.34.**, and **A.35.** Specific Condition **A.31.** is rendered superfluous by the other aforementioned conditions.

- Page 13

FPL requests that the first Permitting note from Page 19 the existing Title V permit 00110037-004-AV which begins, “*These emissions units are regulated.....*” be inserted in its entirety before “**Essential Potential to Emit (PTE) Parameters**” of the Draft permit 0011037-005-AV..

- Page 13

**B.2. Permitted Capacity.** FPL requests that the second Permitting note from Page 19 the existing Title V permit 00110037-004-AV which begins, “*The heat input limitations....*” be inserted in its entirety at the end of **B2.**

- Page 14,

**B.13. Test Methods.** FPL requests that the Specific Condition be deleted in its entirety as the required test methods are specified in subsequent Specific Conditions **B15.** through **B.22.**, and that the subsequent Specific Conditions be renumbered.

- Page 14,

**B.14. Annual Compliance Tests.** FPL requests that the Specific Condition be deleted in its entirety as the required testing is specified in subsequent Specific Conditions **B15.** through **B.22.**, and that the subsequent Specific Conditions be renumbered.

- Page 14,

**B.15. Compliance Tests Prior To Permit Renewal.** FPL requests that the testing requirement to test for PM and CO be deleted which is consistent with the existing Title V permit 00110037-004-AV. In addition, a requirement to test for NOx should be added to this Specific Condition..

- Page 17,  
**Subsection C.** FPL requests that the reference to **EU No. 032, Unleaded Fuel Storage Tank (4,000 gallon, Gasoline)** be deleted as there is no unleaded fuel stored on the facility's grounds.
- Page 17,  
**C.1. Volatile Organic Compounds.** FPL requests that the reference to **EU No. 030, "No. 2 fuel oil"** be revised as follows: "*Jet A/No. 2 fuel oil*".
- Page 23,  
**Section V, Appendices:** FPL requests revision to the statement "**The Following Appendices Are Enforceable Parts of This Permit:**"

*Some of the Appendices listed are an attachment of regulations. All appendices in the list that contain copies of rules should be labeled for "convenience purposes". These regulations do not have a "blanket" applicability as the statement implies..*

FPL suggests modifying the statement to: "**The Following Appendices Are Supporting Documents for the Air Operating Permit and are Enforceable as allowed by rule applicability.**"

Thanks for your consideration in this matter, and, if you should have any questions, please do not hesitate to contact Kevin Washington at (561) 691-2877.

Sincerely,



Dwayne Harper  
Plant General Manager  
Lauderdale Power Plant  
Florida Power and Light Company

Cc: Tom Cascio, FDEP;  
District Office, FDEP