

Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer, Bureau of Air Regulation
THROUGH: Jon Holtom, Title V Section
FROM: Tom Cascio
DATE: November 12, 2008
SUBJECT: Proposed Title V Air Operation Permit No. 0110037-005-AV
Florida Power and Light Company, Lauderdale Plant
Title V Air Operation Permit Renewal

Attached for your review are the following items:

- Proposed Permit Determination;
- Proposed Title V Air Operation Permit; and,
- Statement of Basis.

The proposed permit renews the Title V air operation permit for the Lauderdale Plant, which is located in Broward County, Florida. The Statement of Basis provides a summary of the project and the rationale for issuance.

The draft Title V air operation permit package was clerked on September 26, 2008. A written response was received from the applicant on October 24, 2008. The Proposed Determination documents changes made to the draft Title V air operation permit based on discussions with the applicant.

I recommend your approval of the attached proposed Title V air operation package.

Attachments

Gibson, Victoria

From: Holtom, Jonathan
Sent: Wednesday, November 12, 2008 10:50 AM
To: Gibson, Victoria
Cc: Cascio, Tom
Subject: FW: FPL Order Granting Extension of Time re: OGC# 08-2512 / DEP Permit # 0110037-005-AV
Attachments: FPL - Ft Lauderdale Title V - closure memo.pdf

Vickie,


Closure memo from Ronni for FPL Ft. Lauderdale. We should be ready to give you the Proposed determination this afternoon.

Jon

From: Moore, Ronni
Sent: Wednesday, November 12, 2008 10:48 AM
To: Holtom, Jonathan; Cascio, Tom
Cc: Vielhauer, Trina
Subject: RE: FPL Order Granting Extension of Time re: OGC# 08-2512 / DEP Permit # 0110037-005-AV

No problem, thanks for the update. Attached is the closure memo.

Ronda L. Moore
Assistant General Counsel

 Please consider the environment before printing this email.

From: Holtom, Jonathan
Sent: Wednesday, November 12, 2008 9:45 AM
To: Cascio, Tom
Cc: Moore, Ronni
Subject: FW: FPL Order Granting Extension of Time re: OGC# 08-2512 / DEP Permit # 0110037-005-AV

Tom,

We are ready to issue the Proposed permit, so it is good that this extension is finished and that they did not file anything further. Please move forward with issuing the Proposed.

Jon

PS Ronni, thanks for following up on the loose ends!

From: Cascio, Tom
Sent: Wednesday, November 12, 2008 9:25 AM

To: Holtom, Jonathan
Subject: FW: FPL Order Granting Extension of Time re: OGC# 08-2512 / DEP Permit # 0110037-005-AV

Jon: Can you reply?

Tom

From: Moore, Ronni
Sent: Monday, November 10, 2008 4:47 PM
To: Cascio, Tom; Vielhauer, Trina
Cc: Swango, Katie; Gibson, Victoria
Subject: FW: FPL Order Granting Extension of Time re: OGC# 08-2512 / DEP Permit # 0110037-005-AV

Afternoon,

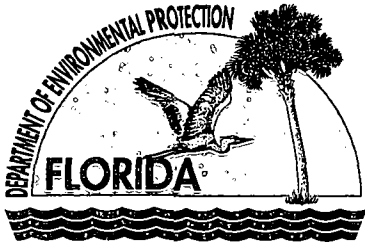
Just checking on some cases here and I see that we issued the attached order granting FPL an extension of time through Nov. 6th on its Title V permit for the Ft. Lauderdale plant. We have not received a further request for extension of time or petition on the matter, so we'll be sending you a closure memo this week. If you have any questions, please let me know.

Thanks,
Ronni

From: Swango, Katie
Sent: Tuesday, October 28, 2008 3:15 PM
To: Vielhauer, Trina; Cascio, Tom
Cc: Moore, Ronni
Subject: FPL Order Granting Extension of Time re: OGC# 08-2512 / DEP Permit # 0110037-005-AV

Please find attached the PDF version of the Order Granting Extension of Time for the above mentioned facility. If you have a problem opening or viewing the above attachment please let me know and I will send you a hard copy as soon as possible. Thanks

Katie Marie Swango
Administrative Assistant for
Rebecca Robinette, Ronni Moore, & Pat Comer
FLORIDA DISCOUNT CARD: More than 3,000 retail pharmacies in Florida are now a part of the Florida Discount Drug Card program. See www.FloridaDiscountDrugCard.com for more info or call toll-free, 1-866-341-8894.



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

November 12, 2008

Electronic Mail – Received Receipt Requested.

Mr. Dwayne Harper, Plant General Manager
Florida Power and Light Company
4300 SW 42 Street
Fort Lauderdale, Florida 33414

Re: Permit No. 0110037-005-AV
Lauderdale Plant
Title V Air Operation Permit Renewal

Dear Mr. Harper:

One copy of the Proposed Determination for the Title V Air Operation Permit Renewal for the Lauderdale Plant, located 2 miles West of Ravenswood Road, Fort Lauderdale, Broward County is enclosed. This letter is only a courtesy to inform you that the Draft Title V Air Operation Permit has now become a Proposed Title V Air Operation Permit. An electronic version of this determination has been posted on the Division of Air Resources Management's web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is: <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>. Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the Proposed Permit is made by the USEPA within 45 days, the Proposed Title V Air Operation Permit will become a Final Title V Air Operation Permit no later than 55 days after the date on which the Proposed Title V Air Operation Permit was mailed (posted) to USEPA. If USEPA has an objection to the Proposed Title V Air Operation Permit, the Final Title V Air Operation Permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you have any questions, please contact the Project Engineer, Tom Cascio, by telephone at 850-921-9526 or by email at tom.cascio@dep.state.fl.us.

Sincerely,

Trina L. Vielhauer
Chief
Bureau of Air Regulation

TLV/jkh/tbc

Enclosure

Copies sent by electronic mail (return receipt requested) to the following:

Mr. Dwayne Harper, Florida Power and Light Company: Dwayne.Harper@fpl.com
Mr. Kennard Kosky, P.E., Golder Associates: kkosky@golder.com
Ms. Sheila M. Wilkinson, Florida Power and Light Company: Sheila_Wilkinson@fpl.com
Ms. Daniela Banu, Broward County: dbanu@co.broward.fl.us
Ms. Katy Forney, U.S. EPA Region 4: forney.kathleen@epamail.epa.gov
Ms. Barbara Friday, DEP BAR: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)
Ms. Victoria Gibson, DEP BAR: victoria.gibson@dep.state.fl.us (for reading file)

PROPOSED PERMIT DETERMINATION

Proposed Permit No. 0110037-005-AV

I. Public Notice.

An Intent To Issue A Title V Air Operation Permit Renewal to Florida Power and Light Company for the Lauderdale Plant, located 2 miles West of Ravenswood Road, Fort Lauderdale, Broward County, was clerked on September 26, 2008. The Public Notice Of Intent To Issue A Title V Air Operation Permit Renewal was published in the Sun-Sentinel on October 3, 2008. The Draft Title V Air Operation Permit was available for public inspection at the permitting authority's office in Tallahassee. Proof of publication of the Public Notice Of Intent To Issue A Title V Air Operation Permit Renewal was received on November 3, 2008.

II. Public Comment(s).

No comments were received from the Public during the 30 (thirty)-day public comment period, however, comments were received from the Permittee. The comments were not considered significant enough to reissue the Draft Title V Air Operation Permit and require another Public Notice, therefore, the Draft Title V Air Operation Permit was changed. Those comments are addressed below. Additions to the permit are indicated by a double underline. Deletions from the permit are indicated by a ~~strike through~~.

Letter from Florida Power and Light Company dated October 24, 2008.

Comment 1.

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.

Response 1.

Because of extensive reformatting and restructuring of the current permit content, it is not feasible to provide this list.

Comment 2.

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.

Response 2.

The Table is an important summary of regulatory information and will be retained.

Comment 3.

Page 4, **FW1.** Appendices. FPL requests that the word "all" be replaced by "the applicable".

Response 3.

The Department disagrees with the comment. All documents shall be complied with (notwithstanding that some sections of some documents may be deemed not applicable).

Comment 4.

Page 5, **FW10.** Clean Air Initiative 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 be held to conditions in an application that are not contained in a valid operating permit.

Response 4.

The Department does not agree with this comment. While it is true that application data is not typically enforceable, the CAIR application is like an Acid Rain part that we simply incorporate into the permit as submitted by the applicant. Complying with the CAIR application will help to assure compliance with the CAIR rule pending any required revisions to the Title V permit.

Comment 5.

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. 0110036-004-AV.

Response 5.

The Department agrees with the comment. The permitting note has been changed as follows:

{Permitting note: The emissions units are regulated under Acid Rain, Phase II; NSPS - 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines, adopted and incorporated by reference in Rule 62-204.800, F.A.C; PSD-FL-145, Prevention of Significant Deterioration (PSD), in Rule 62-212.400, F.A.C.; and Best Available Control Technology (BACT), in Rule 62-212.410, F.A.C.}

Comment 6.

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, 62-210.200(PTE); and Permit No. 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 and 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, 62-210.200(PTE); and Permit No. PSD-FL-145, Specific Condition 1.]

Response 6.

The Department agrees with the comment. Condition No. **A.1.** has been changed as follows:

A.1. Permitted Capacity. The maximum operation heat input rate is as follows (see specific condition **A.323.**):

<u>Unit No.</u>	<u>MMBtu/hr Heat Input (lower heating value) at 75 degrees F</u>	<u>Fuel Type</u>
035	1,775.62	Natural Gas
	1,646.9	Fuel Oil
036	1,775.62	Natural Gas
	1,646.9	Fuel Oil
037	1,775.62	Natural Gas
	1,646.9	Fuel Oil
038	1,775.62	Natural Gas
	1,646.9	Fuel Oil

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 and 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 or as specified in Specific Condition **A.33.**

[Rules 62-4.160(2), 62-204.800, 62-210.200(PTE); and Permit No. PSD-FL-145, Specific Condition 1.]

Comment 7.

In the statement on Page 9, “Rule 62-210.700 (Excess Emissions), F.A.C., cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision”, FPL requests that the word “any” be replaced by “an applicable”.

Response 7.

The Department disagrees with the comment and believes that the statement as written is proper.

Comment 8.

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.

Response 8.

Pursuant to 40 CFR 60.334(b), because these units were built between 1977 and 2004 and use NO_x CEMS for compliance, the water-to-fuel monitoring is not required. The Department agrees with this comment. Condition No. **A.21** has been changed as follows:

A.21. ~~Water To Fuel Monitor. The owner or operator of any stationary gas turbine subject to the provisions of 40 CFR 60, Subpart GG and using water injection to control NO_x emissions shall have installed a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. This system shall be accurate to within ± 5.0 percent and shall be approved by the Administrator. However, the permittee has requested use of the existing NO_x CEMS to demonstrate compliance. [40 CFR 60.334(a)]~~ Monitoring of Operations. Monitoring of operations shall be performed as specified in 40 CFR 60.334, see Appendix NSPS, Subpart GG. [40 CFR 60.334 and Applicant Request]

Comment 9.

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.

Response 9.

The Department disagrees with the comment. We believe that the condition as written is appropriate for the renewed Title V air operation permit.

Comment 10.

Page 10, **A.25.** Test Methods. FPL requests that the table and language be deleted in its entirety and 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".

Response 10.

The Department disagrees with the comment. The condition is an important summary of test methods for the use by compliance personnel and will be retained.

Comment 11.

Page 11, **A.26.** Required Tests. FPL requests that the table be expanded to include O₂ and CO₂ with EPA Reference Method 3A applicable to each fuel as shown below.

Gas	EPA Reference Method	Gas	Oil
O ₂	3A	X	X
CO ₂	3A	X	X

Response 11. The Department agrees with the comment. Condition No. **A.26.** has been changed as follows and Condition **A.25** was changed to include EPA Reference Method 3A:

A.26. Required Tests. Except as specified in this condition for visible emissions testing on fuel oil, annual compliance tests shall be performed on each combustion turbine unit with the fuels used for more than 400 hours in the preceding 12-month period. Tests shall be conducted using EPA reference methods, or equivalent, in accordance with 40 CFR 60 Appendix A.

Pollutant	EPA Reference Method	Gas	Oil
Particulate Matter	5 or 17		X
Visible Emissions	9	X	X
Carbon Monoxide	10	X	X
Nitrogen Oxides	20	X	X
<u>Gas</u>	<u>EPA Reference Method</u>	<u>Gas</u>	<u>Oil</u>
<u>O₂</u>	<u>3A</u>	<u>X</u>	<u>X</u>
<u>CO₂</u>	<u>3A</u>	<u>X</u>	<u>X</u>
Test Method			
Sulfur content	ASTM D 2880-96*		X
	ASTM D 1072-90(94) E-1, ASTM D 3031-81(86), ASTM D 4084-94, or ASTM D 3246-92*	X	

*or the latest edition.

The owner or operator shall conduct testing for visible emissions while firing fuel oil, using EPA Method 9, for each combustion turbine unit upon that turbine's exceeding 400 hours of operation on fuel oil, and every 150 hours of operation on fuel oil thereafter, in any given federal fiscal year (October 1 through September 30). Such tests shall be performed within 15 days of exceeding such operating hours, to allow for prior notification of the tests. [Rule 62-213.440, F.A.C., applicant agreement with EPA on March 3, 1998, PSD-FL-145, Specific Condition 10.; and Administrative Permit Correction dated November 7, 2000.]

Comment 12.

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 “NO_x”. 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.

Response 12.

The Department agrees partially with this request. Testing for NO_x will be added to the condition.

Comment 13.

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 accurately 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.

Response 13.

The Department disagrees with the comment. We believe that the condition as written is appropriate for the renewed Title V air operation permit.

Comment 14.

Page 13. FPL requests that the first permitting note from page 19 of the existing Title V permit 0110037-004-AV which begins, “These emissions units are regulated ... “ be inserted in its entirety before “Essential Potential to Emit (PTE) Parameters” of the draft permit 0110037-005-AV.

Response 14.

The Department agrees with the comment. The following Permitting Note has been added to the draft permit:

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. These emissions units are **not** subject to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines.}

Comment 15.

Page 13. **B.2. Permitted Capacity.** FPL requests that the second permitting note from page 19 of the existing Title V permit 0110037-004-AV which begins, “The heat input limitations ... “ be inserted in its entirety at the end of **B.2.**

Response 15.

The Department disagrees with this comment. However, Specific Condition **B.2.** was changed as follows:

B.2. Permitted Capacity. The total fuel firing rate (lower heating value) for each bank of 12 gas turbines shall not exceed 8,424 MMBtu/hr (3-hour average) during fuel oil firing or natural gas firing. Annual heat input (lower heating value) for each bank of 12 gas turbines shall not exceed $7,379 \times 10^9$ Btu. Compliance with the permitted capacity shall be demonstrated during annual testing and upon request through the use of fuel vendor-supplied heat content data and the fuel usage records required by Condition B.24. [AO06-148762 and Rule 62-213.440(1)(b)1.b., F.A.C.]

Comment 16.

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 the subsequent Specific Conditions **B.15.** through **B.22.**, and that the subsequent specific conditions be renumbered.

Response 16.

The Department disagrees with the comment. The condition is an important summary of test methods for the use by compliance personnel and will be retained.

Comment 17.

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 **B.15.** through **B.22.**, and that the subsequent specific conditions be renumbered.

Response 17.

The Department disagrees with the comment. The condition is an important summary of the annual tests required for the use by compliance personnel and will be retained.

Comment 18.

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 0110037-004-AV. In addition, a requirement to test for NO_x should be added to this specific condition.

Response 18.

The Department agrees with the comment. Condition No. **B.15.** has been changed as follows:

B.15. Compliance Tests Prior To Permit Renewal. The owner or operator shall conduct testing to demonstrate compliance with the emissions standards for VE, NO_x, ~~PM~~, ~~CO~~ and VOC emissions prior to renewal of the facility's Title V Air Operation Permit. See Specific Condition **TR.7.** [Rule 62-297.310(7), F.A.C.]

Comment 19.

Page 17. **Subsection C.** FPL requests that the reference to E.U. No. 032, Unleaded Fuel Storage Tank (4,000 gallon, Gasoline) be deleted as there is no unleaded fuel stored on the facility's grounds.

Response 19.

The Department agrees with the comment. The subsection description has been changed as follows:

The specific conditions in this section apply to the following emissions unit(s):

EU No.	Brief Description
027	Fuel Oil Storage Tank #2 (80,000 bbl, Light Distillate Fuel Oil)
028	Fuel Oil Storage Tank #3 (150,000 bbl, Light Distillate Oil)
029	Fuel Oil Storage Tank #5 (75,000 bbl, Light Distillate Oil)
030	2 Fuel Oil Dump Tanks (2,500 gallon and 110 gallon)
032	Unleaded Fuel Storage Tank (4,000 gallon, Gasoline)

Comment 20.

Page 17. **C.1. Volatile Organic Compounds**. FPL requests that the reference to E.U. No. 030, "No. 2 fuel oil" be revised as follows: "Jet A/No. 2 fuel oil".

Response 20.

The Department agrees with the comment. Specific Condition C.1. has been changed as follows:

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

E.U. ID No.	Organic Liquid	Annual Throughput Limit (Gallons)	VOC Emissions Limit (Tons/Year)
027	Jet A fuel/No. 2 distillate fuel oil*	54,260,842	2.33
028	Jet A fuel	106,079,730	4.46
029	Jet A fuel/No. 2 distillate fuel oil	54,260,842	2.29
030	Jet A/No. 2 fuel oil	300,000	0.003
032	Gasoline	10,000	0.106

* If tank E.U. No. 027 is used to supply Jet A fuel to the two banks of combustion turbines, the total Jet A fuel handled by both tanks E.U. 027 and E.U. 028 shall not exceed 106,079,730 gallons per year, and the sum of the VOC emissions from both tanks E.U. 027 and E.U. 028 shall not exceed 6.79 tons per year. [Rule 62-296.320(1)(a), F.A.C.; AC06-179848; and AO06-230614, Specific Condition 1.]

Comment 21.

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 applies.

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”.

Response 21.

The Department agrees to change the subtitle as follows:

The Following Appendices Are Enforceable ~~Parts Of This Permit~~ As Allowed By Rule Applicability And Are Supporting Documents For The Air Operating Permit:

III. Conclusion.

The enclosed Proposed Title V Air Operation Permit includes the aforementioned changes to the Draft Title V Air Operation Permit.

The permitting authority will issue the Proposed Title V Air Operation Permit Number 0110037-005-AV, with the changes noted above.

STATEMENT OF BASIS

Title V Air Operation Permit Renewal Permit No. 0110037-005-AV

APPLICANT

The applicant for this project is Florida Power and Light Company. The applicant's responsible official and mailing address is: Mr. Juan Nasiff, Plant General Manager, Lauderdale Plant, 4300 SW 42 Street, Fort Lauderdale, Florida 33414.

FACILITY DESCRIPTION

The applicant operates the Lauderdale Plant, which is located 2 miles West of Ravenswood Road, Fort Lauderdale, Broward County, Florida.

This existing facility consists primarily of two combined-cycle generating units (Unit 4 and Unit 5), two banks of twelve simple-cycle gas turbine units, and eight fuel storage tanks. Each combined-cycle unit consists of two combustion turbines (CT) which each exhaust through a separate heat recovery steam generator (HRSG). Each HRSG converts the heat from the CT exhaust into steam. The steam produced from the two HRSG units drives one single-reheat turbine generator. Each combined-cycle unit has a net summer continuous capability of 430 megawatts (MW). Each bank of simple-cycle gas turbines has a net capability of 504 MW.

Also included in this permit is a regulated unit for solvent usage; in addition, there are miscellaneous unregulated/insignificant emissions units (EU) and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received June 27, 2008.

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

CAM: Compliance Assurance Monitoring (CAM) does not apply to the two combined-cycle generating units because the existing nitrogen oxides (NO_x) continuous emissions monitoring systems (CEMS) are used to demonstrate compliance with emissions limits. The other emissions units have no add-on pollution control devices.

PROJECT REVIEW

Some changes were made to the facility's current Title V air operation permit. These included: reformatting, replacement of TV-4 with new Appendix TV, streamlining of EU sections by moving common conditions to the new appendices, and adoption of use of the existing NO_x CEMS to demonstrate compliance with the combined-cycle units' emissions limits. Although the applicant requested a 30-day rolling average for NO_x compliance using the CEMS, we have adopted a 4-hour rolling average to correspond to the 40 CFR 60 Subpart GG requirements. The applicant was verbally apprised of this decision.

STATEMENT OF BASIS

Minor changes were made to the Draft Title V Air Operation Permit based on comments made by the applicant. These changes are noted in the Proposed Determination document.

CONCLUSION

This project renews Title V air operation permit No. 0110037-003-AV, which was issued on January 1, 2004. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C. In accordance with the terms and conditions of this permit, the above named permittee is hereby authorized to operate the facility as shown on the application and approved drawings, plans, and other documents, on file with the permitting authority.

Florida Power and Light Company
Lauderdale Plant
Facility ID No. 0110037
Broward County

Title V Air Operation Permit Renewal

Permit No. 0110037-005-AV
(Renewal of Title V Air Operation Permit No. 0110037-003-AV)

Permitting Authority

State of Florida
Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
Title V Permitting Section

Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-0114
Fax: 850/921-9533

Compliance Authority

State of Florida
Broward County Environmental Protection Department
Air Quality Division

115 S. Andrews Avenue, Room A-240
Fort Lauderdale, Florida 33301

Telephone: 954-519-1220
Fax: 954-519-1495

Title V Air Operation Permit Renewal

Permit No. 0110037-005-AV

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DRAFT PROPOSED PERMIT

PERMITTEE:

Florida Power and Light Company
4300 SW 42 Street
Fort Lauderdale, Florida 33414

Permit No. 0110037-005-AV
Lauderdale Plant
Facility ID No. 0110037
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit for the above referenced facility. The existing Lauderdale Plant is located 2 miles West of Ravenswood Road, Fort Lauderdale, in Broward County. UTM Coordinates are: Zone 17, 580.2 km East and 2883.3 km North. Latitude is: 26° 04' 05" North; and, Longitude is: 80° 11' 54" West.

The Title V air operation permit is issued 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. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawings, plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Effective Date: January 1, 2009
Renewal Application Due Date: May 20, 2013
Expiration Date: December 31, 2013

(Proposed)

Joseph Kahn, Director
Division of Air Resource Management

JK/tlv/jkh/tbc

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

This existing facility consists primarily of two combined-cycle generating units (Unit 4 and Unit 5), two banks of twelve simple-cycle gas turbine units, and eight fuel storage tanks. Each combined-cycle unit consists of two combustion turbines (CT) which each exhaust through a separate heat recovery steam generator (HRSG). Each HRSG converts the heat from the CT exhaust into steam. The steam produced from two HRSG units drives one single-reheat turbine generator. Each combined-cycle unit has a net summer continuous capability of 430 megawatts (MW). Each bank of simple-cycle gas turbines has a net capability of 504 MW.

Also included in this permit is a regulated unit for solvent usage; in addition, there are miscellaneous unregulated/insignificant emissions units and/or activities.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
035	Combined-Cycle Combustion Turbine with Heat Recovery Steam Generator (CT 4A)
036	Combined-Cycle Combustion Turbine with Heat Recovery Steam Generator (CT 4B)
037	Combined-Cycle Combustion Turbine with Heat Recovery Steam Generator (CT 5A)
038	Combined-Cycle Combustion Turbine with Heat Recovery Steam Generator (CT 5B)
003	Bank of 12 Combustion Turbines (Nos. 1 to 12)
015	Bank of 12 Combustion Turbines (Nos. 13 to 24)
027	Fuel Oil Storage Tank #2 (80,000 barrel (bbl), Light Distillate Fuel Oil)
028	Fuel Oil Storage Tank #3 (150,000 bbl, Light Distillate Fuel Oil)
029	Fuel Oil Storage Tank #5 (75,000 bbl, Light Distillate Fuel Oil)
030	2 Fuel Oil Dump Tanks (2,500 gallon and 110 gallon)
032	Unleaded Fuel Storage Tank (4,000 gallon, Gasoline)
039	Site Solvent Usage
<i>Unregulated Emissions Units and Activities</i>	
040	Emergency Diesel Generator
041	Facility-wide Fugitive Emissions for Volatile Organic Compounds (VOC)
042	Auxiliary Boiler used to provide steam to the turbine shaft seals during a cold start of the plant. Maximum heat input rate is 15.5 MMBtu/hr. It is fired with propane and limited to an annual fuel usage of one million gallons pursuant to Rule 62-210.300(3)(a)2., F.A.C. (categorical exemption).
043	Propane Fuel Storage Tank

SECTION I. FACILITY INFORMATION.

Subsection C. Applicable Regulations.

Based on the Title V Air Operation Permit Renewal application received June 27, 2008, this facility is a major source of hazardous air pollutants (HAP). This facility is classified as a Prevention of Significant Deterioration (PSD) major facility. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
40 Code of Federal Regulations (CFR) 60, Subpart A, New Source Performance Standards (NSPS) General Provisions	035, 036, 037, 038
40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines	
40 CFR 75 Acid Rain Monitoring Provisions	
State Rule Citations	
Rule 62-4, Florida Administrative Code (F.A.C.) (Permitting Requirements)	003, 015, 027, 028, 029, 030, 032, 035, 036, 037, 038
Rule 62-204, F.A.C. (Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference)	
Rule 62-210, F.A.C. (Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms)	
Rule 62-212, F.A.C. (Preconstruction Review, PSD Review and Best Available Control Technology (BACT))	
Rule 62-213, F.A.C. (Title V Air Operation Permits for Major Sources of Air Pollution)	
Rule 62-214, F.A.C. (Requirements For Sources Subject To The Federal Acid Rain Program)	035, 036, 037, 038
Rule 62-296, F.A.C. (Emission Limiting Standards)	003, 015, 027, 028, 029, 030, 032, 035, 036, 037, 038
Rule 62-297, F.A.C. (Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures)	

SECTION II. FACILITY-WIDE CONDITIONS.

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section V, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. Nothing is deemed necessary and ordered at this time. [Rule 62-296.320(1)(a), F.A.C.]

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- In order to perform sandblasting on fixed plant equipment in the small sandblast facility, temporary sandblasting enclosures shall be constructed as necessary. Containment devices shall be used to capture and contain sand.
- Maintenance of paved areas shall be performed as needed.
- Mowing of grass and care of vegetation shall be performed on a regular basis.
- Access to plant property by unnecessary vehicles shall be controlled and limited.
- Bagged chemical products shall be stored in weather-tight buildings until they are used. Spills of powdered chemical products shall be cleaned up as soon as practical.

[Rule 62-296.320(4)(c)2., F.A.C.; and proposed by applicant in Title V air operation permit renewal application received June 27, 2008.]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by May 1st, 2009 and by April 1st of each year, thereafter. [Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: <http://www.dep.state.fl.us/Air/permitting/tvfee.htm>. [Rule 62-213.205, F.A.C.]

SECTION II. FACILITY-WIDE CONDITIONS.

- FW8.** Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]
- FW9.** Prevention of Accidental Releases (Section 112(r) of CAA).
- a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 1515, Lanham-Seabrook, MD 20703-1515, Telephone: 301/429-5018.
 - b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]
- FW10.** Clean Air Interstate Rule (CAIR) Applicable Units. This facility contains emissions units that are subject to CAIR. On July 11, 2008, the U.S. Court of Appeals for the District of Columbia recommended vacature of the Clean Air Interstate Rule. Because of this decision, the applicable CAIR requirements that were identified in the renewal application are not being included in the permit at this time. If, and at such time that, CAIR is ultimately upheld, you must begin complying with the CAIR program requirements contained in the renewal application and the Title V permit must be revised accordingly. [Rules 62-213.440 and 62-296.470, F.A.C.]
- FW11.** Volatile Organic Compounds (VOC). The total VOC emissions from all emissions units at this facility (with the exception of the two combined-cycle units, i.e., Unit 4 and Unit 5, that are excluded from this specific condition) shall not exceed 99.92 tons per year.
[AC06-179848; and AO06-230614, Specific Condition 12.]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Units 035, 036, 037, 038

The specific conditions in this section apply to the following emissions unit(s):

EU No.	Brief Description
035	Combined-Cycle Combustion Turbine with Heat Recovery Steam Generator (CT 4A)
036	Combined-Cycle Combustion Turbine with Heat Recovery Steam Generator (CT 4B)
037	Combined-Cycle Combustion Turbine with Heat Recovery Steam Generator (CT 5A)
038	Combined-Cycle Combustion Turbine with Heat Recovery Steam Generator (CT 5B)

The four combined-cycle combustion turbines (CT) are identical in configuration. Each CT is connected to an electrical generator, and each CT generates heat which produces steam in a heat recovery steam generator (HRSG). The steam from two HRSG units is then sent to a steam turbine generator for additional electrical power. The combined CT 4A and CT 4B units are designated Unit 4; in like manner, the combined CT 5A and CT 5B units are designated Unit 5. Unit 4 and Unit 5 each have a net summer continuous capability of 430MW. NO_x emissions are controlled by using steam injection. Duct modules, suitable for later installation of selective catalytic reduction equipment, have been installed. Unit 4 commenced commercial operation in May, 1993; Unit 5 commenced commercial operation in June, 1993. Both Unit 4 and Unit 5 have dual stacks with a height of 150 feet.

The following potential emissions, determined by BACT, are tabulated for PSD and inventory purposes:

Pollutant	Fuel	Maximum Potential Emissions (@40 ° F)	
		lb/hr/CT	4 CTs (TPY)
Sulfuric Acid (H ₂ SO ₄) Mist	Gas	0.042	196 (combined gas and oil total)
	Oil	67	
Mercury	Gas	0.0192	0.3 (combined gas and oil total)
	Oil	0.0049	
Fluoride	Oil	0.0535	0.23
Beryllium	Oil	0.0041	0.02

Sulfuric acid mist emissions assume a maximum of 0.3 percent sulfur in fuel oil for hourly emissions, and an average sulfur content of 0.2 percent for annual emissions.

[PSD-145, Specific Condition 6.]

{Permitting note: The emissions units are regulated under Acid Rain, Phase II; NSPS - 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines, adopted and incorporated by reference in Rule 62-204.800, F.A.C; PSD-FL-145, Prevention of Significant Deterioration (PSD), in Rule 62-212.400, F.A.C.; and Best Available Control Technology (BACT), in Rule 62-212.410, F.A.C.}

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Units 035, 036, 037, 038

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum operation heat input rate is as follows (see specific condition A.323.):

<u>Unit No.</u>	<u>MMBtu/hr Heat Input (lower heating value) at 75 degrees F</u>	<u>Fuel Type</u>
035	1,775.62	Natural Gas
	1,646.9	Fuel Oil
036	1,775.62	Natural Gas
	1,646.9	Fuel Oil
037	1,775.62	Natural Gas
	1,646.9	Fuel Oil
038	1,775.62	Natural Gas
	1,646.9	Fuel Oil

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 and 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 or as specified in Specific Condition A.33.

[Rules 62-4.160(2), 62-204.800, 62-210.200(PTE); and Permit No. PSD-FL-145, Specific Condition 1.]

A.2. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation - Fuels. The fuels that are allowed to be burned in these units are only natural gas or light distillate fuel oil. [Rule 62-213.410, F.A.C.; and Permit No. PSD-FL-145.]

A.4. Hours of Operation. These emissions units are allowed to operate continuously, i.e., 8,760 hours/year, provided that the annual heat input (lower heating value) to the four CT units does not exceed 54,129,421 MMBtu and the annual heat input attributed to light distillate fuel oil firing does not exceed 14,426,844 MMBtu (@ 75 degrees F). [Rule 62-210.200(PTE), F.A.C.; and PSD-FL-145, Specific Condition 2.]

Emission Limitations and Standards

Unless otherwise specified, the averaging time(s) for Specific Condition(s) A.5-A.15 are based on the specified averaging time of the applicable test method.

A.5. Allowable Emissions. The maximum allowable emissions from each CT, in accordance with the BACT determination, shall not exceed the following emissions, at 75 degrees F:

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Units 035, 036, 037, 038

Pollutant	Fuel	Basis	Emission Limitations	
			lb/hr/CT	4 CTs (TPY)*
Nitrogen Oxides (NO _x)	Gas	42 parts per million by volume dry (ppmvd)**	264	4,868 (combined gas and oil total)
	Oil	65 ppmvd**	422	
Volatile Organic Compounds (VOC)	Gas	1 ppmvd	1.3	50 (combined gas and oil total)
	Oil	6 ppmvd	7.8	
Carbon Monoxide (CO)	Gas	30 ppmvd	89	1,489 (combined gas and oil total)
	Oil	33 ppmvd	100	
Particulate Matter (PM/PM ₁₀)	Gas		14.7	424.7 (combined gas and oil total)
	Oil		58	
Sulfur Dioxide (SO ₂)	Gas		4.9	1,582.8 (combined gas and oil total)
	Oil		538	

Notes:

* Refers to the maximum facility emissions (four CTs), with capacity limitations of 25 percent on oil.

**ppm NO_x, dry, corrected to International Organization for Standardization (ISO) standard ambient air conditions and 15 percent oxygen.

[PSD-FL-145, Specific Condition 5.]

- A.6. Visible Emissions (VE).** Visible emissions shall neither exceed 10% opacity while burning natural gas, nor exceed 20% opacity while burning distillate oil. [PSD-FL-145, Specific Condition 7.]
- A.7. Opacity.** The opacity standards set forth in 40 CFR 60 shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. [40 CFR 60.11(c)]
- A.8. Sulfur Dioxide.** The maximum allowable sulfur (total) content of the natural gas burned at this facility shall not exceed 10 grains per 1,000 cubic feet (gr/1000 CF). The permittee shall monitor the sulfur content of the natural gas by the customized fuel monitoring schedule approved by EPA. [PSD-FL-145, Specific Condition No. 5; and Customized Fuel Monitoring Schedule, dated March 12, 1993.]
- A.9. Sulfur Dioxide.** The sulfur content of the light distillate fuel oil shall not exceed a maximum of 0.3 percent, by weight, and shall not exceed an average of 0.2 percent, by weight, during any consecutive 12-month period. The 12-month average sulfur content shall be calculated as a weighted average based upon the sulfur content of the oil and the amount burned on a daily basis. Compliance shall be demonstrated in accordance with the requirements of 40 CFR 60.335 by testing all oil shipments for sulfur content, nitrogen

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Units 035, 036, 037, 038

content, and heating value, using ASTM D 2800-96 or the latest edition. [Rule 62-213.440, F.A.C.; applicant agreement with EPA on March 3, 1998; and PSD-FL-145, Specific Conditions 5. and 11.]

- A.10. Nitrogen Oxides.** The nitrogen oxides emissions from each combustion turbine unit shall be controlled by using steam injection for both natural gas and fuel oil firing modes. [PSD-FL-145, Specific Condition 8.]
- A.11. Nitrogen Oxides.** The nitrogen oxides emissions are limited to 65 parts per million when burning fuel oil and 42 parts per million when burning natural gas. See Specific Condition A.5. [PSD-FL-145, Specific Condition 9.]
- A.12. Volatile Organic Compounds (VOC).** VOC emissions are limited to 1.3 lb/hr/CT when burning natural gas and 7.8 lb/hr/CT when burning fuel oil. VOC emissions are limited to 50 tons per year for the four CT units (total) for all gas and oil burned. [PSD-FL-145, Specific Condition 5.]
- A.13. Carbon Monoxide (CO).** CO emissions are limited to 89 lb/hr/CT when burning natural gas and 100 lb/hr/CT when burning fuel oil. CO emissions are limited to 1489 tons per year for the four CT units (total) for all gas and oil burned. [PSD-FL-145, Specific Condition 5.]
- A.14. Particulate Matter (PM/PM₁₀).** PM/PM₁₀ emissions are limited to 14.7 lb/hr/CT when burning natural gas and 58.0 lb/hr/CT when burning fuel oil. PM/PM₁₀ emissions are limited to 424.7 tons per year for the four CT units (total) for all gas and oil burned. [PSD-FL-145, Specific Condition 5.]
- A.15. Sulfur Dioxide (SO₂).** SO₂ emissions are limited to 4.9 lb/hr/CT when burning natural gas and 538.0 lb/hr/CT when burning fuel oil. SO₂ emissions are limited to 1,582.8 tons per year for the four CT units (total) for all gas and oil burned. [PSD-FL-145, Specific Condition 5.]

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C., cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

- A.16. Excess Emissions Allowed.** Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and 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. [Rule 62-210.700(1), F.A.C.]
- A.17. Excess Emissions From Start up and Shut Down.** 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 shall be minimized. [Rule 62-210.700(2), F.A.C.]
- A.18. Excess Emissions Not Allowed.** 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 shall be prohibited. [Rule 62-210.700(4), F.A.C.]
- A.19. Excess Emissions – NSPS Conditions.** At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [40 CFR 60.11(d)]

Monitoring of Operations

- A.20. Operational Practices.** At all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated pollution control equipment in a manner consistent with good air pollution control practice for minimizing

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Units 035, 036, 037, 038

emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [40 CFR 60.11(d)]

A.21. Water To Fuel Monitor. ~~The owner or operator of any stationary gas turbine subject to the provisions of 40 CFR 60, Subpart GG and using water injection to control NO_x emissions shall have installed a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. This system shall be accurate to within ± 5.0 percent and shall be approved by the Administrator. However, the permittee has requested use of the existing NO_x CEMS to demonstrate compliance. [40 CFR 60.334(a)]~~ Monitoring of Operations. Monitoring of operations shall be performed as specified in 40 CFR 60.334, see Appendix NSPS, Subpart GG. [40 CFR 60.334 and Applicant Request]

A.22. Fuel Monitoring. The owner or operator of any stationary gas turbine subject to the provisions of 40 CFR 60, Subpart GG shall monitor sulfur content and nitrogen content of the fuel being fired in the turbine. The frequency of determination of these values shall be as specified in 40 CFR 60.334. Note that the Lauderdale Plant has an approved Customized Fuel Monitoring Schedule (dated March 12, 1993. See Appendix CFMS, Customized Fuel Monitoring Schedule). [40 CFR 60.334]

Continuous Monitoring Requirements

A.23. NO_x CEMS. The existing NO_x CEMS shall be used to demonstrate compliance with the emissions limits for NO_x, in parts per million, as specified in Specific Condition A.11. A 4-hour rolling average shall be used for demonstrating continuous compliance. Compliance with the pounds per hour NO_x limitations, as specified in Specific Condition A.5, shall be demonstrated by using relative accuracy test audit (RATA) data from the annual CEMS certifications. See Section 60.334 in Appendix NSPS Subpart GG. [Applicant request dated June 27, 2008; and Rule 62-4.070(3), F.A.C.]

A.24. CEMS Requirements. The NO_x CEMS are subject to the monitoring requirements of 40 CFR 60.13. See Appendix NSPS Subpart A, General Provisions.

Test Methods and Procedures

A.25. Test Methods. Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
<u>3A</u>	<u>Determination of Oxygen and Carbon Dioxide Concentrations in Emissions from Stationary Sources</u>
5B	Method for Determining Particulate Matter Emissions (All PM is assumed to be PM ₁₀ .)
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Determination of Carbon Monoxide Emissions from Stationary Sources {Note: The method shall be based on a continuous sampling train.}
18	Measurement of Gaseous Organic Compound Emissions by Gas Chromatography
19	Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxides Emission Rates (Optional F-factor method may be used to determine flow rate and gas analysis to calculate mass emissions in lieu of Methods 1-4.)
20	Determination of Nitrogen Oxides, Sulfur Dioxide and Diluent Emissions from Stationary Gas Turbines

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Units 035, 036, 037, 038

Method	Description of Method and Comments
25A	Method for Determining Gaseous Organic Concentrations (Flame Ionization)

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department.

[Rule 62-213.440, F.A.C., applicant agreement with EPA on March 3, 1998, PSD-FL-145, Specific Condition 10.; and Administrative Permit Correction dated November 7, 2000.]

A.26. Required Tests. Except as specified in this condition for visible emissions testing on fuel oil, annual compliance tests shall be performed on each combustion turbine unit with the fuels used for more than 400 hours in the preceding 12-month period. Tests shall be conducted using EPA reference methods, or equivalent, in accordance with 40 CFR 60 Appendix A.

Pollutant	EPA Reference Method	Gas	Oil
Particulate Matter	5 or 17		X
Visible Emissions	9	X	X
Carbon Monoxide	10	X	X
Nitrogen Oxides	20	X	X
<u>Gas</u>	<u>EPA Reference Method</u>	<u>Gas</u>	<u>Oil</u>
<u>O₂</u>	<u>3A</u>	<u>X</u>	<u>X</u>
<u>CO₂</u>	<u>3A</u>	<u>X</u>	<u>X</u>
	Test Method		
Sulfur content	ASTM D 2880-96*		X
	ASTM D 1072-90(94) E-1, ASTM D 3031-81(86), ASTM D 4084-94, or ASTM D 3246-92*	X	

*or the latest edition.

The owner or operator shall conduct testing for visible emissions while firing fuel oil, using EPA Method 9, for each combustion turbine unit upon that turbine's exceeding 400 hours of operation on fuel oil, and every 150 hours of operation on fuel oil thereafter, in any given federal fiscal year (October 1 through September 30). Such tests shall be performed within 15 days of exceeding such operating hours, to allow for prior notification of the tests. [Rule 62-213.440, F.A.C., applicant agreement with EPA on March 3, 1998, PSD-FL-145, Specific Condition 10.; and Administrative Permit Correction dated November 7, 2000.]

A.27. Opacity. Compliance with standards in 40 CFR 60, other than opacity standards, shall be determined only by performance tests established by 40 CFR 60.8, unless otherwise specified in the applicable standard. [40 CFR 60.11(a)]

A.28. Annual Compliance Tests. During each federal fiscal year (October 1st to September 30th), each EU shall be tested to demonstrate compliance with the emissions standards for VE, PM and CO. Annual compliance tests for these pollutants shall be performed on each unit that burns oil for 400 hours or more during the federal fiscal year. Unless specifically requested by the Compliance Authority pursuant to Rule 62-

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Units 035, 036, 037, 038

297.310(7)(b), F.A.C., periodic opacity tests are not required when firing natural gas. [Rule 62-297.310(7), F.A.C.]

- A.29. Compliance Tests Prior To Permit Renewal. The owner or operator shall conduct testing to demonstrate compliance with the emissions standards for VE, PM, CO, NO_x and VOC emissions prior to renewal of the facility's Title V Air Operation Permit. See Specific Condition **TR.7**. [Rule 62-297.310(7), F.A.C.]
- A.30. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

Recordkeeping and Reporting Requirements

- A.31. NSPS Subpart A Requirements. The permittee shall comply with all reporting requirements of 40 CFR 60.7, contained in Appendix NSPS, Subpart A. [Rule 62-213.440, F.A.C.]
- A.32. Reporting Schedule. The following reports and notifications shall be submitted to the Compliance Authority: Quarterly excess emission reports, in accordance with 40 CFR 60.7 and 60.334, shall be submitted to the Broward County Environmental Protection Department. [PSD-FL-145, Specific Condition 19.]
- A.33. Heat Input Compliance Records. To determine compliance with the oil firing heat input limitation, the permittee shall maintain daily records of fuel oil consumption for each turbine and monthly records of heating value for such fuel. All records shall be maintained for a minimum of five (5) years after the date of each record and shall be made available to representatives of the Department upon request. [PSD-FL-145, Specific Condition 13.]
- A.34. Additional Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.
- A.35. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection B. Emissions Units 003 and 015

The specific conditions in this section apply to the following emissions unit(s):

EU No.	Brief Description
003	Bank of 12 Combustion Turbines (Nos. 1 to 12)
015	Bank of 12 Combustion Turbines (Nos. 13 to 24)

The emissions units are two banks of twelve simple-cycle gas combustion turbine (CT) units. Each bank of CT units has a net capability of 504 MW. The bank of CT units Nos. 1 to 12 commenced commercial operation in August, 1970; the bank of CT units Nos. 13 to 24 commenced commercial operation in August, 1972. Both emissions units have stacks with a height of 45 feet.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. These emissions units are not subject to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines.}

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum operation heat input rate is as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u> (lower heating value)	<u>Fuel Type</u>
003	702	Natural gas or light distillate fuel oil
015	702	Natural gas or light distillate fuel oil

[Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), and Permit No. AO06-230614.]

B.2. Permitted Capacity. The total fuel firing rate (lower heating value) for each bank of 12 gas turbines shall not exceed 8,424 MMBtu/hr (3-hour average) during fuel oil firing or natural gas firing. Annual heat input (lower heating value) for each bank of 12 gas turbines shall not exceed $7,379 \times 10^9$ Btu. Compliance with the permitted capacity shall be demonstrated during annual testing and upon request through the use of fuel vendor-supplied heat content data and the fuel usage records required by Condition B.24. [AO06-148762 and Rule 62-213.440(1)(b)1.b., F.A.C.]

B.3. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

B.4. Methods of Operation - Fuels. The only fuels authorized to be burned in these emissions units are natural gas or light distillate fuel oil. [Rule 62-213.410, F.A.C.; AO06-230614]

B.5. Hours of Operation. These emissions units may operate continuously (8760 hours/year). [Rule 62-210.200(PTE), F.A.C.; and Permit No. AO36-223496, Specific Condition 8]

Emission Limitations and Standards

Unless otherwise specified, the averaging time(s) for Specific Condition(s) **B.6-B.9** are based on the specified averaging time of the applicable test method.

B.6. Visible Emissions. Visible emissions from each turbine shall not be equal to or greater than 20 percent opacity. [Rule 62-296.320(4)(b)1., F.A.C.; and AO06-230614, Specific Condition 6.]

B.7. Volatile Organic Compounds (VOC). VOC emissions from each gas turbine shall not exceed 0.0013 lb/MMBtu when burning No. 2 fuel oil, and 0.0034 lb/MMBtu when burning natural gas. When both fuels are burned at the same time, the allowable emissions shall be prorated. [AO06-230614, Specific Condition 4.]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection B. Emissions Units 003 and 015

- B.8. Volatile Organic Compounds (VOC).** Total VOC emissions from the 24 gas turbines when operating at the permitted capacity shall not exceed 57.3 lbs/hr when the units are burning natural gas, and 21.1 lbs/hr when the units are burning oil. When both fuels are burned at the same time, the allowable emissions shall be prorated. [AO06-230614, Specific Condition 5.]
- B.9. Nitrogen Oxides.** Nitrogen oxides emissions from each gas turbine shall not exceed 0.90 lb/MMBtu and 631 lbs/hr when burning No. 2 fuel oil, and 0.50 lb/MMBtu and 351 lbs/hr when burning natural gas. [Rule 62-296.570(4)(b)5., F.A.C.; and AO06-230614]

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

- B.10. Excess Emissions Allowed.** Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and 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. [Rule 62-210.700(1), F.A.C.]
- B.11. Excess Emissions From Start up and Shut Down.** 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 shall be minimized. [Rule 62-210.700(2), F.A.C.]
- B.12. Excess Emissions Not Allowed.** 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 shall be prohibited. [Rule 62-210.700(4), F.A.C.]

Test Methods and Procedures

- B.13. Test Methods.** Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources
18	Measurement of Gaseous Organic Compound Emissions by Gas Chromatography
20	Determination of Nitrogen Oxides, Sulfur Dioxide and Diluent Emissions from Stationary Gas Turbines
25A	Method for Determining Gaseous Organic Concentrations (Flame Ionization)

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-213.440, 62-296.320, 62-296.570, 62-297.401, F.A.C.; AC06-179848; and AO06-230614.]

- B.14. Annual Compliance Tests.** During each federal fiscal year (October 1st to September 30th), each EU shall be tested to demonstrate compliance with the emissions standards for visible emissions, VOC and nitrogen oxides. Annual compliance tests for these pollutants shall be performed on each unit that burns oil for 400 hours or more during the federal fiscal year. Unless specifically requested by the Compliance Authority pursuant to Rule 62-297.310(7)(b), F.A.C., periodic opacity tests are not required when firing natural gas. [Rule 62-297.310(7), F.A.C. and Permit No. AC06-179848.]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection B. Emissions Units 003 and 015

- B.15. Compliance Tests Prior To Permit Renewal.** The owner or operator shall conduct testing to demonstrate compliance with the emissions standards for VE, NO_x, ~~PM~~, ~~CO~~ and VOC emissions prior to renewal of the facility's Title V Air Operation Permit. See Specific Condition **TR.7**. [Rule 62-297.310(7), F.A.C.]
- B.16. Common Testing Requirements.** Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310(7), F.A.C.]
- B.17. Visible Emissions Testing Required.** The owner or operator shall conduct testing for visible emissions, using EPA Method 9, while the combustion turbine is operating at 90-100 percent of its capacity, according to the following schedule.
- The owner or operator shall conduct testing for visible emissions while firing fuel oil for each simple-cycle turbine unit upon that turbine's exceeding 400 hours of operation on fuel oil, and every 150 hours of operation on fuel oil thereafter, in any given federal fiscal year (October 1 through September 30). Such tests shall be performed within 15 days of exceeding such operating hours, to allow for prior notification of the tests.
- Regardless of the number of hours of operation on fuel oil, at least one compliance test shall be conducted on all twenty-four combustion turbines every five years, coinciding with the term of the operation permit for these turbines. At least one quarter of such tests shall be conducted while burning fuel oil, and at least one quarter of such tests shall be conducted while burning natural gas.
[Rule 62-213.440, F.A.C.; applicant agreement with EPA on March 3, 1998; and AC06-179848, Specific Condition 23.]
- B.18. VE Test Method.** The test method for visible emissions shall be EPA Method 9, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C. [Rules 62-204.800, 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.; and AC06-179848]
- B.19. Nitrogen Oxides Test Methods.** Provided operation is no more than 320 hours/year/turbine on oil, NO_x emissions for the combustion turbines shall be tested every five (5) years by EPA Method 20 or Method 7E tests as described in 40 CFR 60, Appendix A on any representative unit in each bank of the combustion turbines. Tests shall be conducted both while burning 100% natural gas and 100% light distillate oil. [Rule 62-296.570, F.A.C.; and requested by the applicant in letters dated October 1, 1997, and August 27, 2003.]
- B.20. Nitrogen Oxides Test Methods.** The test method for nitrogen oxides shall be EPA Method 20 or Method 7E, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C. [Rules 62-204.800 & 62-297.401, F.A.C.; and AO06-230614.]
- B.21. VOC Test Methods.** The VOC emission factors for the combustion turbines shall be confirmed every five years by EPA Method 25A and/or Method 18 tests as described in 40 CFR 60, Appendix A on any representative unit in each bank of the combustion turbines. Tests shall be conducted both while burning 100% natural gas and 100% No. 2 fuel oil. [AO06-230614, Specific Condition 9.; and Administrative Permit Correction dated November 7, 2000.]
- B.22. Visible Emissions Testing - Annual.** By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:
- only gaseous fuels; or
 - gaseous fuels in combination with any amount of liquid fuels for less than 400 hours per year; or
 - only liquid fuels for less than 400 hours per year.
- [Rules 62-297.310(7)(a)4. and 8., F.A.C.]

Recordkeeping and Reporting Requirements

- B.23. Additional Reporting Requirements.** See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection B. Emissions Units 003 and 015

- B.24. Malfunction Reporting.** In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
- B.25. Fuel Records.** The permittee shall keep records of the type and quantity of fuel, gallons per hour of oil and million cubic feet per hour of natural gas used by each bank of combustion turbines for at least five (5) years. Usage shall be determined on the basis of time of operation versus total fuel consumption for each bank. [AC06-179848, Specific Condition 21.]
- B.26. Quarterly Reports.** A written quarterly report shall be submitted to the Department of all opacity exceedances of emissions limitations specified in Rules 62-210.700 and 62-296.310, F.A.C. The report shall state the cause, period 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 for not less than five (5) years and made available to the Department upon request. [AO06-230614, Specific Condition 17.]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection C. Fuel Storage Tanks: 027, 028, 029, 030, 032

The specific conditions in this section apply to the following emissions unit(s):

EU No.	Brief Description
027	Fuel Oil Storage Tank #2 (80,000 bbl, Light Distillate Fuel Oil)
028	Fuel Oil Storage Tank #3 (150,000 bbl, Light Distillate Oil)
029	Fuel Oil Storage Tank #5 (75,000 bbl, Light Distillate Oil)
030	2 Fuel Oil Dump Tanks (2,500 gallon and 110 gallon)
032	Unleaded Fuel Storage Tank (4,000 gallon, Gasoline)

This Subsection describes a variety of fuel storage tanks at the facility as detailed below.

Emission Limitations and Standards

Unless otherwise specified, the averaging time(s) for Specific Condition C.1 are based on the specified averaging time of the applicable test method.

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

E.U. ID No.	Organic Liquid	Annual Throughput Limit (Gallons)	VOC Emissions Limit (Tons/Year)
027	Jet A fuel/No. 2 distillate fuel oil*	54,260,842	2.33
028	Jet A fuel	106,079,730	4.46
029	Jet A fuel/No. 2 distillate fuel oil	54,260,842	2.29
030	Jet A/No. 2 fuel oil	300,000	0.003
032	Gasoline	10,000	0.106

* If tank E.U. No. 027 is used to supply Jet A fuel to the two banks of combustion turbines, the total Jet A fuel handled by both tanks E.U. 027 and E.U. 028 shall not exceed 106,079,730 gallons per year, and the sum of the VOC emissions from both tanks E.U. 027 and E.U. 028 shall not exceed 6.79 tons per year. [Rule 62-296.320(1)(a), F.A.C.; AC06-179848; and AO06-230614, Specific Condition 1.]

Recordkeeping and Reporting Requirements

C.2. Annual Operating Report. The VOC emissions in tons per year, by specific tank, for all the units identified in Specific Condition C.1., shall be calculated for Annual Operating Report for Air Pollutant Emitting Facility purposes by the procedures described in AP-42, Section 4.3, Storage of Organic Liquids. Actual throughput and representative meteorological data shall be used for these calculations. Also see Specific Condition **FW.11.** in the Facility-wide Conditions Section. [Rule 62-210.370(3), F.A.C.; and AO06-230614, Specific Condition 3.]

C.3. Fuel Oil Records. The permittee shall keep records of the following for at least five (5) years:

- a. The amount of light distillate fuel oil obtained for the facility.
- b. The amount of No. 2 fuel oil obtained for the facility.
- c. The throughput, by specific tank, for all the units identified in Specific Condition C.1. [AO06-230614, Specific Condition 2.]

C.4. Additional Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection D. Emissions Unit 039

Subsection D. The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
039	Site Solvent Usage

Emission Limitations and Standards

Unless otherwise specified, the averaging time for Specific Condition **D.1** is based on the specified averaging time of the applicable test method.

D.1. Volatile Organic Compounds (VOC). Not more than 250 gallons/year, or 0.893 tons/year, VOC loss of solvent during any 12-month period shall be allowed for maintenance of this facility. [AC06-179848, Specific Condition 24.]

Monitoring of Operations

D.2. Solvent Use. The use of solvents for maintenance purposes shall be tracked and controlled during the calendar year. The VOC emissions from solvents shall be calculated by the following method: The solvent volume loss shall be equal to the total solvent purchased/in stock minus the solvent volume reclaimed/disposed of offsite. The solvent volume loss shall then be multiplied by the emission factor (mass VOC/unit of the solvent) to derive a tons per year value. The total solvent tons per year emission value shall be added to all other VOC sources at the facility to ensure compliance with Specific Condition **FW.11.** in Section II., Facility-wide Conditions, of this permit. Specific Condition **FW.11.** limits facility-wide VOC emissions to 99.92 tons per year. Note that the combined-cycle units, Unit 4 and Unit 5, are excluded from Specific Condition **FW.11.** [AO06-230614, Specific Condition 10.]

Recordkeeping and Reporting Requirements

D.3. Records of Solvent Use. The permittee shall keep records of the type and quantity of solvents, in gallons per year, used during maintenance throughout this facility for a minimum of five (5) years. [AO06-230614, Specific Condition 11.]

D.4. Additional Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

SECTION IV. ACID RAIN PART.

Subsection A. Phase II

Operated by: Florida Power and Light Company
ORIS Code: 0613

The emissions units listed below are regulated under Acid Rain, Phase II.

E.U.

ID No. Brief Description

- 035 Combined-Cycle Combustion Turbine with Heat Recovery Steam Generator (CT 4A)
- 036 Combined-Cycle Combustion Turbine with Heat Recovery Steam Generator (CT 4B)
- 037 Combined-Cycle Combustion Turbine with Heat Recovery Steam Generator (CT 5A)
- 038 Combined-Cycle Combustion Turbine with Heat Recovery Steam Generator (CT 5B)

A.1. The Phase II Acid Rain Part application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these Phase II acid rain units must comply with the standard requirements and special provisions set forth in the application listed below:

- a. DEP Form No. 62-210.900(1)(a), dated 04/15/08, received 06/27/08.
[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

A.2. Sulfur dioxide (SO₂) allowance allocations for each Acid Rain unit are as follows:

E.U. ID No.	EPA ID	Year	2009	2010	2011	2012	2013
035	4GT1	SO ₂ allowances, under Table 2 of 40 CFR 73	948*	950*	950*	950*	950*
036	4GT2	SO ₂ allowances, under Table 2 of 40 CFR 73	948*	950*	950*	950*	950*
037	5GT1	SO ₂ allowances, under Table 2 of 40 CFR 73	948*	950*	950*	950*	950*
038	5GT2	SO ₂ allowances, under Table 2 of 40 CFR 73	948*	950*	950*	950*	950*

* The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2 of 40 CFR 73.

A.3. Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.400(3), F.A.C.
- b. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.
- c. Allowances shall be accounted for under the Federal Acid Rain Program.
[Rule 62-213.440(1)(c)1., 2. & 3., F.A.C.]

A.4. Comments, notes, and justifications: None.

SECTION IV. ACID RAIN PART.

Subsection A. Phase II

Acid Rain Part- Page 1

Acid Rain Part Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31 and Chapter 62-214, F.A.C.

This submission is: New Revised

STEP 1
Identify the source by plant name, State, and ORIS code

Plant Name: Lauderdale	State: Florida	ORIS Code: 613
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STEP 2

Enter the unit ID# for every Acid Rain unit at the Acid Rain source in column "a." For new units, enter the requested information in columns "c" and "d."

a Unit ID#	b Unit will hold allowances in accordance with 40 CFR 72.5(c)(1)	c New Units Commence Operation Date	d New Units Monitor Certification Deadline
4GT1	Yes	N/A	N/A
4GT2	Yes	N/A	N/A
5GT1	Yes	N/A	N/A
5GT2	Yes	N/A	N/A
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		

DEP Form No. 62-210 900(1)(a) - Form
Effective: 06/16/03

SECTION IV. ACID RAIN PART.

Subsection A. Phase II

Acid Rain Part - Page 2

Lauderdale

Plant Name (from Step 1)

STEP 3 Read the standard requirements

Acid Rain Part Requirements

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Submit a complete Acid Rain part application (including a compliance plan) under 40 CFR part 72 and Rules 62-214.320 and 330, F.A.C., in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
 - (ii) Submit in a timely manner any supplemental information that the Department determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain part.
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain part application or a superseding Acid Rain part issued by the Department, and
 - (ii) Have an Acid Rain Part.

Monitoring Requirements

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another Acid Rain unit at the same source to the extent provided in 40 CFR 73.35(d)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain part application, the Acid Rain part, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the EPA or the Department:
 - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and

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Effective: 05/16/03

SECTION IV. ACID RAIN PART.

Subsection A. Phase II

Acid Rain Part - Page 3

Lauderdale
Plant Name (from Step 1)

STEP 3, Conf'd.

Recordkeeping and Reporting Requirements (cont)

- (iv) Copies of all documents used to complete an Acid Rain part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an Acid Rain source and each Acid Rain unit of the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability.

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain part application, an Acid Rain part, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.
- (6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II reopening extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 75, 76, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities.

No provision of the Acid Rain Program, an Acid Rain part application, an Acid Rain part, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

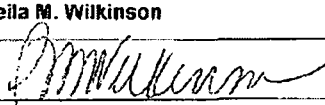
- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a unit can hold, provided, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regarding electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or
- (5) Interfering with or impeding any program for competitive bidding for power supply in a State in which such program is established.

STEP 4

Read the certification statement, sign, and date

Certification

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining this information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name: Sheila M. Wilkinson	
Signature 	Date 4/15/08

DEP Form No. 62-210.900(1)(a) - Form Effective: 06/16/03

SECTION V. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit As Allowed By Rule Applicability And Are Supporting Documents For The Air Operating Permit:

- Appendix A, Glossary.
- Appendix CFMS, Customized Fuel Monitoring Schedule.
- Appendix I, List of Insignificant Emissions Units and/or Activities.
- Appendix NSPS, Subpart A – General Provisions.
- Appendix NSPS, Subpart GG – Standards of Performance for Stationary Gas Turbines.
- Appendix RR, Facility-wide Reporting Requirements.
- Appendix TR, Facility-wide Testing Requirements.
- Appendix TV, Title V General Conditions.
- Appendix U, List of Unregulated Emissions Units and/or Activities.

Friday, Barbara

To: Dwayne.Harper@fpl.com
Cc: 'KKosky@Golder.com'; Sheila_Wilkinson@fpl.com; 'dbanu@co.broward.fl.us';
Forney.Kathleen@epamail.epa.gov; Gibson, Victoria; Cascio, Tom; Holtom, Jonathan
Subject: FT. LAUDERDALE POWER PLANT; 0110037-005-AV
Attachments: ProposedCoverLetter.pdf

Click on the link to the documents displayed below and send a "reply" message verifying receipt of the document(s) provided in this email; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send". We must receive verification that you are able to access the documents. Your reply will preclude subsequent e-mail transmissions to verify receipt of the documents).

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0110037.005.AV.P_pdf.zip

This is the official notification of the Proposed Permit Renewal and its associated documents for the following project:

Attention: Tom Cascio

Owner/Company Name: FLORIDA POWER and LIGHT (PFL)
Facility Name: FT. LAUDERDALE POWER PLANT
Project Number: 0110037-005-AV
Permit Status: PROPOSED
Permit Activity: PERMIT RENEWAL
Facility County: BROWARD

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <<http://www.dep.state.fl.us/air/eproducts/apds/default.asp>> .

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Barbara Friday

Bureau of Air Regulation

Division of Air Resource Management (DARM)

(850)921-9524

11/14/2008

Friday, Barbara

From: Exchange Administrator
Sent: Friday, November 14, 2008 9:30 AM
To: Friday, Barbara
Subject: Delivery Status Notification (Relay)

Attachments: ATT229098.txt; FT. LAUDERDALE POWER PLANT; 0110037-005-AV



ATT229098.txt FT. LAUDERDALE
(372 B) POWER PLANT; 01..

This is an automatically generated Delivery Status Notification.

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

Dwayne.Harper@fpl.com
Sheila_Wilkinson@fpl.com

Friday, Barbara

From: Harper, Dwayne [Dwayne.Harper@fpl.com]
To: Friday, Barbara
Sent: Friday, November 14, 2008 9:32 AM
Subject: Read: FT. LAUDERDALE POWER PLANT; 0110037-005-AV

Your message

To: Dwayne.Harper@fpl.com
Subject:

was read on 11/14/2008 9:32 AM.

Friday, Barbara

From: Harper, Dwayne [Dwayne.Harper@fpl.com]
Sent: Monday, November 17, 2008 10:00 AM
To: Friday, Barbara
Cc: KKosky@Golder.com; Sheila_Wilkinson@fpl.com; dbanu@co.broward.fl.us; Forney.Kathleen@epamail.epa.gov; Gibson, Victoria; Cascio, Tom; Holtom, Jonathan; Stokes, Idayna; Washington, Kevin; Adams, Bill
Subject: RE: FT. LAUDERDALE POWER PLANT; 0110037-005-AV

I have received the documents and I can view them. Thank you.

Dwayne Harper
Plant General Manager
Lauderdale Plant
Office 954-797-1582
Cell 407-402-1126

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Friday, November 14, 2008 9:31 AM
To: Harper, Dwayne
Cc: KKosky@Golder.com; Sheila_Wilkinson@fpl.com; dbanu@co.broward.fl.us; Forney.Kathleen@epamail.epa.gov; Gibson, Victoria; Cascio, Tom; Holtom, Jonathan
Subject: FT. LAUDERDALE POWER PLANT; 0110037-005-AV

Click on the link to the documents displayed below and send a "reply" message verifying receipt of the document(s) provided in this email; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send". We must receive verification that you are able to access the documents. Your reply will preclude subsequent e-mail transmissions to verify receipt of the documents).

Click on the following link to access the permit project documents:
http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0110037.005.AV.P_pdf.zip

This is the official notification of the Proposed Permit Renewal and its associated documents for the following project:

Attention: Tom Cascio

Owner/Company Name: FLORIDA POWER and LIGHT (PFL) Facility Name: FT. LAUDERDALE POWER PLANT Project Number: 0110037-005-AV Permit Status: PROPOSED Permit Activity: PERMIT RENEWAL Facility County: BROWARD

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at
<<http://www.dep.state.fl.us/air/eproducts/apds/default.asp>
<<http://www.dep.state.fl.us/air/eproducts/apds/default.asp>> > .

Permit project documents are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and

verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Barbara Friday

Bureau of Air Regulation

Division of Air Resource Management (DARM)

(850)921-9524

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey <<http://survey.dep.state.fl.us/?refemail=Barbara.Friday@dep.state.fl.us>> . Thank you in advance for completing the survey.

Friday, Barbara

From: Wilkinson, Sheila M [Sheila.M.Wilkinson@fpl.com]
To: Friday, Barbara
Sent: Friday, November 14, 2008 10:28 AM
Subject: Read: FT. LAUDERDALE POWER PLANT; 0110037-005-AV

Your message

To: Sheila.M.Wilkinson@fpl.com
Subject:

was read on 11/14/2008 10:28 AM.

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@sophos.golder.com]
Sent: Friday, November 14, 2008 9:31 AM
To: Friday, Barbara
Subject: Successful Mail Delivery Report

Attachments: Delivery report; Message Headers



Delivery report.txt
(471 B)



Message
Headers.txt (2 KB)

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

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

The mail system

<KKosky@Golder.com>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent
491D8BA2_32333_88_14 C40F3125B6C9

Friday, Barbara

From: Exchange Administrator
Sent: Friday, November 14, 2008 9:30 AM
To: Friday, Barbara
Subject: Delivery Status Notification (Relay)

Attachments: ATT229101.txt; FT. LAUDERDALE POWER PLANT; 0110037-005-AV



ATT229101.txt
(289 B)



FT. LAUDERDALE
POWER PLANT; 01..

This is an automatically generated Delivery Status Notification.

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

dbanu@co.broward.fl.us

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive01.rtp.epa.gov]
Sent: Friday, November 14, 2008 9:31 AM
To: Friday, Barbara
Subject: Successful Mail Delivery Report

Attachments: Delivery report; Message Headers



Delivery report.txt
(499 B)



Message
Headers.txt (2 KB)

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

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

The mail system

<Forney.Kathleen@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250
OK, sent 491D8B9A_11822_4405_4 603A844347

Friday, Barbara

From: System Administrator
To: Gibson, Victoria; Cascio, Tom
Sent: Friday, November 14, 2008 9:31 AM
Subject: Delivered:FT. LAUDERDALE POWER PLANT; 0110037-005-AV

Your message

To: 'Dwayne.Harper@fpl.com'
Cc: 'KKosky@Golder.com'; 'Sheila_Wilkinson@fpl.com'; 'dbanu@co.broward.fl.us'; 'Forney.Kathleen@epamail.epa.gov'; Gibson, Victoria; Cascio, Tom; Holtom, Jonathan
Subject: FT. LAUDERDALE POWER PLANT; 0110037-005-AV
Sent: 11/14/2008 9:31 AM

was delivered to the following recipient(s):

Gibson, Victoria on 11/14/2008 9:30 AM
Cascio, Tom on 11/14/2008 9:30 AM

Friday, Barbara

From: Gibson, Victoria
To: Friday, Barbara
Sent: Tuesday, November 25, 2008 3:39 PM
Subject: Read: FT. LAUDERDALE POWER PLANT; 0110037-005-AV

Your message

To: 'Dwayne.Harper@fpl.com'
Cc: 'KKosky@Golder.com'; 'Sheila_Wilkinson@fpl.com'; 'dbanu@co.broward.fl.us';
'Forney.Kathleen@epamail.epa.gov'; Gibson, Victoria; Cascio, Tom; Holtom,
Jonathan
Subject: FT. LAUDERDALE POWER PLANT; 0110037-005-AV
Sent: 11/14/2008 9:31 AM

was read on 11/25/2008 3:39 PM.

Friday, Barbara

From: Cascio, Tom
To: Friday, Barbara
Sent: Friday, November 14, 2008 9:43 AM
Subject: Read: FT. LAUDERDALE POWER PLANT; 0110037-005-AV

Your message

To: 'Dwayne.Harper@fpl.com'
Cc: 'KKosky@Golder.com'; 'Sheila_Wilkinson@fpl.com'; 'dbanu@co.broward.fl.us'; 'Forney.Kathleen@epamail.epa.gov'; Gibson, Victoria; Cascio, Tom; Holtom, Jonathan
Subject: FT. LAUDERDALE POWER PLANT; 0110037-005-AV
Sent: 11/14/2008 9:31 AM

was read on 11/14/2008 9:43 AM.

Friday, Barbara

From: System Administrator
To: Holtom, Jonathan
Sent: Friday, November 14, 2008 9:31 AM
Subject: Delivered:FT. LAUDERDALE POWER PLANT; 0110037-005-AV

Your message

To: 'Dwayne.Harper@fpl.com'
Cc: 'KKosky@Golder.com'; 'Sheila_Wilkinson@fpl.com'; 'dbanu@co.broward.fl.us'; 'Forney.Kathleen@epamail.epa.gov'; Gibson, Victoria; Cascio, Tom; Holtom, Jonathan
Subject: FT. LAUDERDALE POWER PLANT; 0110037-005-AV
Sent: 11/14/2008 9:31 AM

was delivered to the following recipient(s):

Holtom, Jonathan on 11/14/2008 9:31 AM

Friday, Barbara

From: Holtom, Jonathan
To: Friday, Barbara
Sent: Friday, November 14, 2008 12:57 PM
Subject: Read: FT. LAUDERDALE POWER PLANT; 0110037-005-AV

Your message

To: 'Dwayne.Harper@fpl.com'
Cc: 'KKosky@Golder.com'; 'Sheila_Wilkinson@fpl.com'; 'dbanu@co.broward.fl.us'; 'Forney.Kathleen@epamail.epa.gov'; Gibson, Victoria; Cascio, Tom; Holtom, Jonathan
Subject: FT. LAUDERDALE POWER PLANT; 0110037-005-AV
Sent: 11/14/2008 9:31 AM

was read on 11/14/2008 12:57 PM.