

Memorandum

Florida Department of Environmental Protection

TO: Trina L. Vielhauer
THRU: A. A. Linero, P.E. *aal*
FROM: Scott M. Sheplak, P.E. *sms*
DATE: September 19, 2007
SUBJECT: Florida Power & Light Company
Cutler Plant

Intent to Issue Package

Title V Air Operation Permit Renewal

DRAFT/PROPOSED Permit No.: 0250001-003-AV

Permitting Clock: Today is ARMS Day 24

This application was received electronically via Electronic Permit Submittal and Processing System (EPSAP). I verbally requested the professional engineer (P.E.) signature document on August 23rd. We received the hardcopy P.E. Signature Document on August 27th.

Attached for approval and signature is a permit to renew the Title V air operation permit. The permit renewal is for the operation of the Cutler Plant. The applicant agreed to a parallel review.

The STATEMENT OF BASIS contains an overview of changes made in this permit to the most recently posted Title V permit on the web site. In summary, format changes were made and miscellaneous administrative updates were made. The applicant requested no changes to the current permit, Permit No. 0250001-002-AV, in the renewal application. The newly promulgated federal MACTs *do not apply* to these emissions units since the facility *is not* a major source of HAPs. The provisions of Compliance Assurance Monitoring (CAM), contained in 40 CFR 64 also *do not apply*.

The applicant certified compliance in the permit renewal application. The compliance authority, Miami-Dade County DERM, reported no outstanding compliance or enforcement actions with this facility.

We recommend your approval and signature.

Attachments

AAL/sms



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

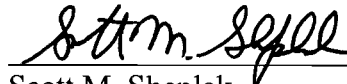
P.E. Certification Statement

Applicant:
Florida Power & Light Company
Cutler Plant

Project No.: 0250001-003-AV

Project Type: Title V Air Operation Permit Renewal

I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).



Scott M. Sheplak
Professional Engineer (P.E.)
License Number 48866



Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/921-9532
Fax: 850/921-9533

SMS/



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

September 19, 2007

Electronically Sent - Received Receipt Requested

Mr. H. O. Nunez
General Manager
Florida Power & Light Company
9700 SW 344th Street
Homestead, FL 33035

Re: Title V Air Operation Permit Renewal
DRAFT/PROPOSED Permit No.: 0250001-003-AV
Cutler Plant

Dear Mr. Nunez:

On July 2, 2007, you submitted an application for a Title V Air Operation Permit Renewal for the Cutler Plant, located at 14925 SW 67 Avenue, Miami, Miami-Dade County. Enclosed are the following documents: "Statement of Basis", "DRAFT/PROPOSED Permit", "Written Notice of Intent to Issue Title V Air Operation Permit", and "Public Notice of Intent to Issue Title V Air Operation Permit".

The "Statement of Basis" summarizes the Permitting Authority's technical review of the application and provides the rationale for making the preliminary determination to issue a DRAFT/PROPOSED Permit. The proposed "DRAFT/PROPOSED Permit" includes specific conditions that regulate the emissions units at this facility. The "Written Notice of Intent to Issue Title V Air Operation Permit" provides important information regarding: the Permitting Authority's intent to issue a Title V air operation permit (DRAFT/PROPOSED Permit); the requirements for publishing a Public Notice of the Permitting Authority's intent to issue the DRAFT/PROPOSED Permit; the procedures for submitting comments on the DRAFT/PROPOSED Permit; the requirements for requesting a public meeting; the requirements for filing a petition for an administrative hearing; and the availability of mediation. The "Public Notice of Intent to Issue Title V Air Operation Permit" is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

Publishing the Public Notice as soon as possible and providing the proof of publication helps ensure the acid rain part (Title IV) and the Title V permit is effective by January 1, 2008.

If you have any questions, please contact Mr. Scott M. Sheplak, P.E. at 850/921-9532.

Sincerely,

Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/aal/sms

Enclosures

*In the Matter of an
Application for Title V Air Operation Permit by:*

Mr. H. O. Nunez
General Manager
Florida Power & Light Company
9700 SW 344th Street
Homestead, FL 33035

DRAFT/PROPOSED Permit No.:
0250001-003-AV
Cutler Plant
Title V Permit Renewal
Miami-Dade County, Florida

Intent to Issue Title V Air Operation Permit Renewal

Facility Location: The applicant requests a Title V air operation permit (Permit) to operate the Cutler Plant, which is located at 14925 SW 67 Avenue, Miami, Miami-Dade County.

Project: On July 2, 2007, the applicant applied to the Permitting Authority for a permit renewal.

This facility consists of two natural gas and fuel oil fired conventional steam electric generating stations, designated as Units #5 and #6 by the Florida Power & Light Company. Unit #5 is comprised of a Combustion Engineering outdoor-type boiler/steam generator and a Westinghouse outdoor reheat condensing steam turbine that drives a hydrogen-cooled generator with a nameplate rating of 75 megawatts. Unit #6 is comprised of a Combustion Engineering outdoor-type boiler/steam generator and a General Electric tandem compound single reheat turbine generator with a generator nameplate rating of 160 megawatts.

Details of the project are provided in the application and the enclosed "Statement of Basis".

Permitting Authority: Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213, and 62-214, Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to operate the facility. The Department of Environmental Protection, Bureau of Air Regulation, is the Permitting Authority responsible for making a permit determination regarding this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114 and facsimile number is 850/921-9533.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the DRAFT/PROPOSED Permit, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the DRAFT/PROPOSED Permit by visiting the following web site: <http://www.dep.state.fl.us/air/eproducts/ards/>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue a permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a FINAL Permit in accordance with the conditions of the DRAFT/PROPOSED Permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice of Intent to Issue Title V Air Operation Permit" (Public Notice). The Public Notice shall be published one time only as

soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within seven (7) days of publication. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form presented in Section 50.051, F.S., to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the DRAFT/PROPOSED Permit for a period of thirty (30) days from the date of publication of the Public Notice. Written comments must be post-marked, and all e-mail or facsimile comments must be received by the close of business (5 pm), on or before the end of this 30-day period by the Permitting Authority at the above address, email or facsimile. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location on the official web site for notices at Florida Administrative Weekly (FAW) at <http://faw.dos.state.fl.us/> and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the DRAFT/PROPOSED Permit, the Permitting Authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Title V Air Operation Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Title V Air Operation Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and

when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Title V Air Operation Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

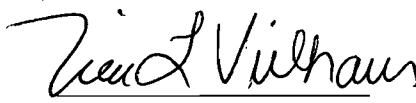
Mediation: Mediation is not available in this proceeding.

EPA Review & Objections: EPA has agreed to treat the DRAFT Title V Permit as a PROPOSED Title V Permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The FINAL Title V Air Operation Permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that results in a different decision or significant change of terms or conditions.

The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following web site address <http://epa.gov/region4/air/permits/Florida.htm>.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within sixty (60) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the thirty (30) day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit the EPA Region 4 web site at: <http://epa.gov/region4/air/permits/Florida.htm>.

Executed in Tallahassee, Florida.


Trina L. Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Title V Air Operation Permit Renewal (including the Public Notice and the DRAFT/PROPOSED permit) and all copies were sent electronically (with Received Receipt) before the close of business on 9/24/07 to the persons listed:

Mr. H. O. Nunez, FP&L: ed_nunez@fpl.com

Mr. R. Bryan Fennell, FP&L: r_b_fennell@fpl.com

Mr. John C. Hampp, FP&L: john_hampp@fpl.com

Mr. Kennard F. Kosky, P.E., Golder Associates, Inc.: KKosky@golder.com

Ms. Barbara Friday, DEP BAR: Barbara.Friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)

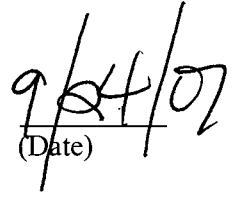
Mr. H. Patrick Wong, Miami-Dade County DERM: wongp@miamidade.gov

Ms. Katy R. Forney, U.S. EPA, Region 4: Forney.Kathleen@epamail.epa.gov

Clerk Stamp

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


(Clerk)


(Date)

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

Department of Environmental Protection
DRAFT/PROPOSED Title V Air Operation Permit No. 0250001-003-AV
Florida Power & Light Company - Cutler Plant
Miami-Dade County

Applicant: The applicant for this project is Florida Power & Light Company, 9700 SW 344th Street, Homestead, FL 33035. The applicant's responsible official is Mr. H. O. Nunez, General Manager.

Facility Location: The applicant operates the Cutler Plant, which is located at 14925 SW 67 Avenue, Miami, Miami-Dade County, Florida.

Project: The applicant submitted an application for a Title V Air Operation Permit Renewal.

The facility consists of two natural gas and fuel oil fired conventional steam electric generating stations, designated as Units #5 and #6 by the Florida Power & Light Company. Unit #5 is comprised of a Combustion Engineering outdoor-type boiler/steam generator and a Westinghouse outdoor reheat condensing steam turbine that drives a hydrogen-cooled generator with a nameplate rating of 75 megawatts. Unit #6 is comprised of a Combustion Engineering outdoor-type boiler/steam generator and a General Electric tandem compound single reheat turbine generator with a generator nameplate rating of 160 megawatts.

Permitting Authority: Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213, and 62-214 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to operate the facility. The Department of Environmental Protection, Bureau of Air Regulation, is the Permitting Authority responsible for making a permit determination regarding this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114 and facsimile number is 850/921-9533.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the DRAFT/PROPOSED Permit, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the DRAFT/PROPOSED Permit by visiting the following web site: <http://www.dep.state.fl.us/air/eproducts/ards/>.

Notice of Intent to Issue A Permit: The Permitting Authority gives notice of its intent to issue a permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a FINAL Permit in accordance with the conditions of the DRAFT/PROPOSED Permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the DRAFT/PROPOSED Permit for a period of thirty (30) days from the date of publication of this Public Notice. Written comments must be post-marked and all e-mail or facsimile comments must be received by the close of business (5 pm) on or before the end of this 30-day period by the Permitting Authority at the above address, email or facsimile. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority

determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location on the official web site for notices at Florida Administrative Weekly (FAW) at <http://faw.dos.state.fl.us/> and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the DRAFT/PROPOSED Permit, the Permitting Authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

Mediation: Mediation is not available for this proceeding.

EPA Review & Objections: EPA has agreed to treat the DRAFT Title V Permit as a PROPOSED Title V Permit and to perform its 45-day review provided by the law and regulations concurrently with the

public comment period. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The FINAL Title V Air Operation Permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that results in a different decision or significant change of terms or conditions.

The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following web site address <http://epa.gov/region4/air/permits/Florida.htm> .

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within sixty (60) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the thirty (30) day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://epa.gov/region4/air/permits/Florida.htm> .



Florida Power & Light Company, 9700 S.W. 344 Street, Homestead, FL 33035

RECEIVED

OCT 22 2007

BUREAU OF AIR REGULATION

October 19, 2007

Mr. Scott Sheplak
Bureau of Air Regulations
Florida Department of Environmental Protection
Bob Martinez Center
Mail Station #5505
2600 Blair Stone Road Tallahassee, FL 32399-2400

RE: Florida Power & Light Company
Cutler Plant
DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV

Dear Mr. Sheplak:

Florida Power & Light Company (FPL) is pleased to submit the notarized copy of the Public Notice of Intent to Issue Title V Air Operation Permit No. 0250001-003-AV that was published in the Miami Herald on October 5, 2007. This is the hard copy version of the electronic submittal you received from our facility on October 16, 2007.

If you have any questions I can be reached at 305 242-3826. Thank you for your time.

Regards,

A handwritten signature in black ink that reads "Gary W. Andersen".

Gary W. Andersen
Florida Power & Light
Senior PGD Leader – Cutler Plant

-file-

Sheplak, Scott

From: Forney.Kathleen@epamail.epa.gov
Sent: Tuesday, October 16, 2007 3:06 PM
To: Sheplak, Scott
Cc: Harvey, Mary
Subject: Re: FW:

Attachments: notification of publication.doc



notification of
publication.do...

Yes. I was out yesterday.

Katy

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30024

Phone: 404-562-9130
Fax: 404-562-9019

"Sheplak, Scott"
<Scott.Sheplak@dep.state.fl.us>

10/16/2007 12:25
PM

To
Kathleen Forney/R4/USEPA/US@EPA
cc
"Harvey, Mary"
<Mary.Harvey@dep.state.fl.us>
Subject
FW:

Please acknowledge receipt.

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. Thank you in advance for completing the survey.

From: Harvey, Mary
Sent: Monday, October 15, 2007 4:04 PM
To: 'Ms. Kathleen Forney, EPA Region 4'
Cc: Sheplak, Scott
Subject:

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:
<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,
DEP, Bureau of Air Regulation

(See attached file: notification of publication.doc)

Electronically Sent - Received Receipt Requested

TO: Ms. Katy R. Forney, U.S. EPA, Region 4: Forney.Kathleen@epamail.epa.gov

FROM: Scott M. Sheplak, Florida DEP: Scott.Sheplak@dep.state.fl.us

Re: Notification of Publication of Public Notice of DRAFT/PROPOSED Title V Permit

Florida Power & Light Company - Cutler Plant
Title V Air Operation Permit Renewal
DRAFT/PROPOSED Permit No.: 0250001-003-AV
Parallel Review

This project is being processed using a parallel review. The purpose of this e-mail is to notify the United States Environmental Protection Agency (USEPA) Region 4 of the beginning and end dates of the public comment period for the subject permit.

The Public Notice for the subject permit was published on October 5, 2007. Proof of publication of the Public Notice was received on October 15. The USEPA Region 4 review period begins on the date of publication (beginning of the public comment period) and ends on the 45th day after publication {Day 45 is **November 19**}.

Provided an objection (veto) is not received from USEPA, the DRAFT/PROPOSED permit will become a FINAL permit by operation of law on the 55th day after the permit posting date {Day 55 is **November 29**}.

copy to: Barbara Friday
File

Sheplak, Scott

From: John_Hampp@fpl.com
Sent: Monday, October 15, 2007 10:09 AM
To: Sheplak, Scott
Subject: RE: DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV - Florida Power & Light Company - Cutler Plant
Attachments: 14090341_225349979.pdf; 0250001-003-AV cover, intent & public notice.doc

Scott,

The notice was published in the Miami Herald on October 5th.

John....

----- Forwarded by John Hampp/GC/FPL on 10/15/2007 10:06 AM -----

<<14090341_225349979.pdf>>

(See attached file: 14090341_225349979.pdf)

<p>"Sheplak, Scott" <Scott.Sheplak@dep.state.fl.us> 10/10/2007 12:57 PM</p>	<p>To: john.hampp@fpl.com cc: Subject: RE: DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV - Florida Power & Light Company - Cutler Plant</p>
---	---

Has this been published yet?

Attached is a word version of the cover letter and intent to issue with public notice if you need it.

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](#). Thank you in advance for completing the survey.

From: Sheplak, Scott
Sent: Monday, September 24, 2007 3:29 PM
To: 'john.hampp@fpl.com'
Subject: FW: DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV - Florida Power & Light Company - Cutler Plant

Let me know when you publish the public notice. (See attached file: 0250001-003-AV cover, intent & public notice.doc)

10/15/2007

STATEMENT OF BASIS

Florida Power and Light Company
Cutler Plant

Facility ID No.: 0250001
Miami-Dade County

Title V Air Operation Permit Renewal
DRAFT/PROPOSED Permit No.: 0250001-003-AV

The 1st renewal Title V Air Operation Permit, No. 0250001-002-AV, was effective on January 1, 2003. This Title V Air Operation Permit Renewal 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 perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

The subject of this permit is for the renewal of Title V Air Operation Permit No. 0250001-002-AV.

This facility consists of two natural gas and fuel oil fired conventional steam electric generating stations, designated as Units #5 and #6 by the Florida Power & Light Company. Both emissions units consist of a boiler/steam generator that drives a single reheat turbine generator, and are equipped with a 150-foot exhaust stack.

Unit #5 is comprised of a Combustion Engineering outdoor-type boiler/steam generator and a Westinghouse outdoor reheat condensing steam turbine that drives a hydrogen-cooled generator with nameplate rating of 75 megawatts. The emission unit is fired on No. 2 or No. 6 fuel oil with a maximum heat input of 170 mmBtu per hour, or natural gas with a maximum heat input of 940 mmBtu per hour. It commenced commercial operation in November 1954.

Unit #6 is comprised of a Combustion Engineering outdoor-type boiler/steam generator and a General Electric tandem compound single reheat turbine generator with generator nameplate rating of 160 megawatts. The emission unit is fired on No. 2 or No. 6 fuel oil with a maximum heat input of 290 mmBtu per hour, or natural gas with a maximum heat input of 1620 mmBtu per hour. It commenced commercial operation in July 1955.

Fuel additives such as, but not limited to, magnesium hydroxide are used to enhance combustion and facilitate furnace cleaning, in a manner consistent with Best Operational Practices.

The emissions units are regulated under Phase II of the Federal Acid Rain Program (the facility holds ORIS code **0610**), and Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the Title V permit renewal application received July 2, 2007, this facility *is not* a major source of hazardous air pollutants (HAPs).

Overview of Changes Made in this Permit, Permit No.: 0250001-003-AV

Below is a brief overview of the changes made in this Title V permit.

I. Department Initiated Administrative Changes

1. Changed "Dade" County to "Miami-Dade" County.
2. The Compliance Authority's address change is updated.

4. Section IV. Acid Rain Part., Subsection A. Acid Rain, Phase II.

Added two conditions:

A.5. Fast-Track Revisions of Acid Rain Parts. Those Acid Rain sources making a change described at Rule 62- 214.370(4), F.A.C., may request such change as provided in Rule 62-213.413, F.A.C., Fast-Track Revisions of Acid Rain Parts. [Rules 62-213.413 and 62-214.370(4), F.A.C.]

A.6. Comments, notes, and justifications:

a. The designated representative (DR) was changed by letter dated 10/14/05, with a revised Certificate of Authorization.

3. The NOx analyzer model number is updated.

From:

The units also have continuous emissions monitoring systems (CEMs) installed for NOx (TECO model 42).

To:

The units also have continuous emissions monitoring systems (CEMs) installed for NOx (TECO 42C).

II. Department Initiated Permitting Format Changes

The last Title V permit renewal was drafted after the receipt date of the application which was July 5, 2002. Miscellaneous permitting format changes have been made since this date. These miscellaneous changes were made in this permit. For convenience, the applicable changes are summarized below.

1. Changed version of Appendix TV:

From: Appendix TV-4, Title V Conditions, version dated February 12, 2002

To: APPENDIX TV-6, TITLE V CONDITIONS version dated 06/23/06.

2. The information related to Section 112(r) in Facility-wide condition 4. is changed as follows:

From:

4. 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 3346
Merrifield, VA 22116-3346
Telephone: 703/816-4434

and,

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]

To:

4. 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, Maryland 20703-1515
Telephone: 301/429-5018

and,

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]

3. Updated Facility-wide condition 8.

From:

8. General Pollutant Emission Limiting Standards. 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 (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1)(a), F.A.C.]

To:

8. General Pollutant Emission Limiting Standards. 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 (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. **Nothing was deemed necessary and ordered at this time.**
[Rule 62-296.320(1)(a), F.A.C.; and, renewal Title V permit application received July 2, 2007]

4. Updated Facility-wide condition 9.

From:

9. Not federally enforceable. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following:

- a. In order to perform sandblasting on fixed plant equipment, sandblasting enclosures shall be constructed and operated as necessary.
- b. Maintenance of paved areas shall be performed as needed.
- c. Mowing of grass and care of vegetation shall be done on a regular basis.
- d. Access to plant property by unnecessary vehicles shall be controlled and limited.
- e. 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.
- f. Vehicles shall be restricted to slow speeds on the plant site.

[Rule 62-296.320(4)(c)2., F.A.C.; and proposed by applicant in the Title V permit renewal application received July 5, 2002.]

To:

9. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements (see Condition 57. of APPENDIX TV-6, TITLE V CONDITIONS):

The following requirements are “not federally enforceable”:

- a. In order to perform sandblasting on fixed plant equipment, sandblasting enclosures shall be constructed and operated as necessary;
 - b. Maintenance of paved areas shall be performed as needed;
 - c. Mowing of grass and care of vegetation shall be done on a regular basis;
 - d. Access to plant property by unnecessary vehicles shall be controlled and limited;
 - e. 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;
- and,

f. Vehicles shall be restricted to slow speeds on the plant site.
[Rule 62-296.320(4)(c)2., F.A.C.; and, proposed by the applicant in the renewal Title V permit application received July 2, 2007.]

III. Applicant Requested Changes

The applicant requested no changes to the current permit, Permit No. 0250001-002-AV, in the renewal application.

IV. NESHAP Requirements, also referred to as MACTs, from 40 CFR 63

This facility has emissions units that were potentially subject to newly promulgated MACTs under 40 CFR 63 specifically, the RICE MACT Subpart ZZZZ for engines and the MACT Subpart DDDDD for industrial boilers & process heaters. Both MACTs *do not apply* to emissions units at the facility since the facility *is not* a major source of HAPs. In addition, the boilers qualify as units not covered by the MACT DDDDD pursuant to 40 CFR 63.7491(c); each boiler is an electric utility steam generating unit with an electrical generating capacity of more than 25 MW.

V. Compliance Assurance Monitoring (CAM) Requirements

The only control devices at the facility are multiple cyclones (i.e., two tubular dust collectors) on each of the two boilers. Because these emissions units operate primarily on natural gas (i.e., fuel oil is allowed only during startup), the provisions of Compliance Assurance Monitoring (CAM), contained in 40 CFR 64 *do not apply*. The units have not fired fuel oil since the effective date of the initial Title V Permit (January 1, 1998).

Florida Power & Light Company
Cutler Plant
Facility ID No.: 0250001
Miami-Dade County

Title V Air Operation Permit Renewal

DRAFT/PROPOSED Permit No.: 0250001-003-AV

Permitting Authority:

State of Florida
Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation

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

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

Compliance Authority:

Miami-Dade County
Department of Environmental Resources Management
Air Quality Management Division
701 NW 1st Court
Suite 400
Miami, Florida 33136

Telephone: 305/372-6925
Fax: 305/372-6954

Title V Air Operation Permit Renewal
DRAFT/PROPOSED Permit No.: 0250001-003-AV

Table of Contents

<u>Section</u>	<u>Page Number</u>
Placard Page	1
I. Facility Information	2
A. Facility Description.	
B. Summary of Emissions Unit ID Nos. and Brief Descriptions.	
C. Relevant Documents.	
II. Facility-wide Conditions	3
III. Emissions Units and Conditions	
A. Fossil Fuel Fired Steam Generators (E.U. ID Nos. -003 and -004).....	6
IV. Acid Rain Part	
A. Acid Rain, Phase II	18
Appendix I-1, List of Insignificant Emissions Units and/or Activities.....	20
Appendix U-1, List of Unregulated Emissions Units and/or Activities.....	21



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

Permittee:

Florida Power & Light Company
P.O. Box 140000
Juno Beach, Florida 33408

DRAFT/PROPOSED Permit No.: 0250001-003-AV

Facility ID No.: 0250001

SIC Nos.: 49, 4911

Project: Title V Air Operation Permit Renewal

Site Name: Cutler Plant

The purpose of this permit is to renew Title V Air Operation Permit No. 0250001-002-AV, previously effective January 1, 2003, for the operation of the Cutler Plant. This facility is located at 14925 SW 67 Avenue, Miami, Miami-Dade County; UTM Coordinates: Zone 17, 570.4 km East and 2834.9 km North; Latitude: 25° 37' 52" North and Longitude: 80° 17' 56" West.

This Title V air operation permit renewal 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 perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix I-1, List of Insignificant Emissions Units and/or Activities

Appendix U-1, List of Unregulated Emissions Units and/or Activities

APPENDIX TV-6, TITLE V CONDITIONS, version dated 06/23/06

APPENDIX SS-1, STACK SAMPLING FACILITIES version dated 10/07/96

Appendix AR-1, Acid Rain: Phase II Acid Rain Part Application received July 2, 2007

Alternate Sampling Procedure: ASP No. 97-B-01

Effective Date: January 1, 2008

Renewal Application Due Date: July 4, 2012

Expiration Date: December 31, 2012

Joseph Kahn, Director
Division of Air Resource Management

JK/tlv/aal/sms

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of two natural gas and fuel oil fired conventional steam electric generating stations, designated as Units #5 and #6 by the Florida Power & Light Company. Unit #5 is comprised of a Combustion Engineering outdoor-type boiler/steam generator and a Westinghouse outdoor reheat condensing steam turbine that drives a hydrogen-cooled generator with a nameplate rating of 75 megawatts. Unit #6 is comprised of a Combustion Engineering outdoor-type boiler/steam generator and a General Electric tandem compound single reheat turbine generator with a generator nameplate rating of 160 megawatts.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the Title V permit renewal application received July 2, 2007, this facility is *not* a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID Nos. and Brief Descriptions.

E.U. ID No.	Brief Description
-003	Fossil Fuel Fired Steam Generator #5
-004	Fossil Fuel Fired Steam Generator #6

Unregulated Emissions Units and/or Activities

-005	Painting and Solvent Cleaning
-006	Mobile Equipment and Engines
-007	Emergency Diesel Generator

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s) on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit, however, are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

- Table 1-1, Summary of Air Pollutant Standards and Terms
- Table 2-1, Summary of Compliance Requirements
- Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
- Appendix H-1, Permit History/ID Number Changes
- Statement of Basis

These documents are on file with the permitting authority:

Application for a Title V Air Operation Permit Renewal received July 2, 2007, electronically via Electronic Permit Submittal and Processing System (EPSAP).

Florida Power & Light Company
Cutler Plant

DRAFT/PROPOSED Permit No.: 0250001-003-AV
Facility ID No.: 0250001

Hardcopy P.E. Signature Document received on August 27, 2007.

DRAFT/PROPOSED Title V Air Operation Permit Renewal clerked on Month, 2007.

Public Notice published on Month , 2007.

Notification to U.S. EPA Region 4 of Publication of Public Notice dated Month , 2007.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-6, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}
2. **Not federally enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited.** The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]
3. **General Particulate Emission Limiting Standards. General Visible Emissions Standard.** Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rule 62-296.320(4)(b)1., & 4., F.A.C.]
4. **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, Maryland 20703-1515
Telephone: 301/429-5018
- and,
- 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]
5. **Unregulated Emissions Units and/or Activities.** Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]
6. **Insignificant Emissions Units and/or Activities.** Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]
7. <intentionally left blank>
8. **General Pollutant Emission Limiting Standards. 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 (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

Nothing was deemed necessary and ordered at this time.

[Rule 62-296.320(1)(a), F.A.C.; and, renewal Title V permit application received July 2, 2007]

9. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements (see Condition 57. of APPENDIX TV-6, TITLE V CONDITIONS):

The following requirements are “not federally enforceable”:

- a. In order to perform sandblasting on fixed plant equipment, sandblasting enclosures shall be constructed and operated as necessary;
- b. Maintenance of paved areas shall be performed as needed;
- c. Mowing of grass and care of vegetation shall be done on a regular basis;
- d. Access to plant property by unnecessary vehicles shall be controlled and limited;
- e. 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; and,
- f. Vehicles shall be restricted to slow speeds on the plant site.

[Rule 62-296.320(4)(c)2., F.A.C.; and, proposed by the applicant in the renewal Title V permit application received July 2, 2007.]

10. Timely Recording, Monitoring and Reporting. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

11. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.

[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-6, TITLE V CONDITIONS).}

12. Compliance Authority. The permittee shall submit all compliance related notifications and reports required of this permit to the Miami-Dade County Department of Environmental Resources Management (DERM) office:

Miami-Dade County
Department of Environmental Resources Management
Air Quality Management Division
701 NW 1st Court
Suite 400
Miami, Florida 33136
Telephone: 305/372-6925
Fax: 305/372-6954

13. EPA Contact Information. Any reports, data, notifications, certifications, and requests required for the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155
Fax: 404/562-9163

- 14.** Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.
[Rule 62-213.420(4), F.A.C.]

Section III. Emissions Units and Conditions.

Subsection A. This section addresses the following emissions units.

E.U. ID No.	Brief Description
-003	Fossil Fuel Fired Steam Generator #5
-004	Fossil Fuel Fired Steam Generator #6

Fossil Fuel Fired Steam Generator #5 is a nominal 75 megawatt (electric) steam generator designated as Cutler Unit #5. The emission unit is fired on No. 2 or No. 6 fuel oil with a maximum heat input of 170 mmBtu per hour, or natural gas with a maximum heat input of 940 mmBtu per hour. It commenced commercial operation in November 1954.

Fossil Fuel Fired Steam Generator #6 is a nominal 160 megawatt (electric) steam generator designated as Cutler Unit #6. The emission unit is fired on No. 2 or No. 6 fuel oil with a maximum heat input of 290 mmBtu per hour, or natural gas with a maximum heat input of 1620 mmBtu per hour. It commenced commercial operation in July 1955.

Fuel additives such as, but not limited to, magnesium hydroxide are used to enhance combustion and facilitate furnace cleaning, in a manner consistent with Best Operational Practices.

Both emissions units consist of a boiler/steam generator that drives a single reheat turbine generator, and are equipped with a 150 foot exhaust stack. The control devices consist of multiple cyclones (i.e., tubular mechanical dust collectors).

The units also have continuous emissions monitoring systems (CEMs) installed for NO_x (TECO 42C).

{Permitting note: the emissions units are regulated under Acid Rain, Phase II, and Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input.}

The following specific conditions apply:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum operation heat input rates are as follows:

Unit No.	mmBtu/hr Heat Input	Fuel Type
5	940	Natural Gas
	170	No. 2 or No. 6 Fuel Oil
6	1620	Natural Gas
	290	No. 2 or No. 6 Fuel Oil

[Rules 62-4.160(2), 62-210.200 (PTE), and 62-296.405, F.A.C.; AO13-173751; AO13-173753]

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.

Regular record keeping is not required for heat input. Instead the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.}

A.2. Emissions Unit Operating Rate Limitation After Testing. See Specific Condition **A.27.**
[Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation. Fuels.

a. Startup: The only fuels allowed to be burned are natural gas, No. 2 fuel oil, or No. 6 fuel oil, both with a 0.5% maximum sulfur content by weight.

b. Normal: The only fuel allowed to be burned is natural gas.

[Rule 62-213.410, F.A.C.; AO13-173751, Specific Condition No. 1; AO13-173753, Specific Condition No. 1]

A.4. Emergency Operation.

No. 2 fuel oil or No. 6 fuel oil may be burned during emergency conditions, as authorized by Metropolitan Miami-Dade County.

[AO13-173751; AO13-173753]

A.5. Hours of Operation. The emissions units may operate continuously, i.e., 8,760 hours/year.

[Rule 62-210.200 (PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

{Permitting note: Unless otherwise specified, the averaging times for Specific Conditions **A.6.** through **A.12.** are based on the specified averaging time of the applicable test method.}

A.6. Visible Emissions. Visible emissions shall not exceed 20 percent opacity, except for one two-minute period per hour during which opacity shall not exceed 40 percent. Emissions units governed by this visible emissions limit shall compliance test for particulate matter emissions annually and as otherwise required by Chapter 62-297, F.A.C.

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

A.7. Visible Emissions - Soot Blowing and Load Change. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

[Rule 62-210.700(3), F.A.C.]

A.8. Particulate Matter. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods.

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

A.9. Particulate Matter - Soot Blowing and Load Change. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

[Rule 62-210.700(3), F.A.C.]

A.10. Not federally enforceable. Sulfur Dioxide. Sulfur dioxide emissions when burning liquid fuel shall not exceed 0.55 lb/mmBtu heat input, and 93.5 pounds per hour for Unit #5, and 159.5 pounds per hour for Unit #6, as measured by applicable compliance methods.

[AO13-173751 and AO13-17353, based on Metropolitan Miami-Dade County Code Sec. 24-17(2)(c)(iii).]

A.11. Sulfur Dioxide.

a. When burning liquid fuel, sulfur dioxide emissions shall not exceed 1.1 pounds per million Btu heat input, as measured by applicable compliance methods.

b. The No. 2 or No. 6 fuel oil sulfur content shall not exceed 0.5 percent, by weight. See Specific Condition **A.25.**

[Rules 62-296.405(1)(c)1.i. and 62-296.405(1)(e)3., F.A.C.; AO13-173751 and AO13-173753]

A.12. Nitrogen Oxides. Nitrogen oxides emissions shall not exceed 0.20 pounds per million Btu heat input, and 188 pounds per hour for Unit #5 and 324 pounds per hour for Unit #6, as measured by applicable compliance methods.

[Rule 62-296.570(4)(b)4., F.A.C.; AO13-173751 and AO13-173753]

Excess Emissions

A.13. 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.14. 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.15. 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.16. A written quarterly report shall be submitted to the Department's Southeast District Office and the Miami-Dade County Department of Environmental Resources Management of all

opacity exceedances of emissions limitations. The report shall state the cause, period of non-compliance, and steps taken for corrective action and/or prevention of recurrence. The Department shall also be notified when there are no exceedances for a quarter. All recorded data shall be maintained on file by the permittee for no less than two (2) years and made available to the Department upon request.

[AO13-173751 and AO13-173753, Specific Condition No. 5]

Monitoring of Operations

A.17. Sulfur Dioxide. The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery. This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See Specific Conditions A.11., A.24., and A.25. [Rule 62-296.405(1)(f)1.b., F.A.C.]

A.18. Determination of Process Variables.

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

A.19. A continuous monitoring system for NO_x shall be calibrated, maintained, operated, and output recorded for determining compliance with the emissions limits.

[AO13-173751 and AO13-173753]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.20. Visible Emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. See Specific Condition A.21.

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

A.21. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.

2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

- a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
- b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value. [Rule 62-297.401, F.A.C.]

A.22. Particulate Matter. Testing of particulate matter emissions shall be conducted if unit operation on oil, exclusive of start-up, exceeds 400 hours per year.
[Rule 62-297.310(7), F.A.C.; AO13-173751, AO13-173753, Specific Condition No. 2.]

A.23. Particulate Matter. The test methods for particulate emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 (Orsat analysis) or 3A shall be used when the oxygen based F-factor is computed according to EPA Method 19 is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17.
[Rules 62-213.440, 62-296.405(1)(e)2., and 62-297.401, F.A.C.]

A.24. Sulfur Dioxide. The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedences of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. **The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, as an alternate sampling procedure authorized by permit, the permittee elected to demonstrate compliance by accepting a liquid sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery.** See Specific Conditions A.11. and A.25.

[Rules 62-213.440, 62-296.405(1)(e)3. and 62-297.401, F.A.C.; and, AO13-173751 and AO13-173753]

A.25. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

A.26. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

A.27. Operating Rate During Testing. Testing of emissions shall be conducted with each emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

A.28. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

A.29. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.
2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter

and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

- c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.
- (b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.
- (c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.
- (d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.

TABLE 297.310-1
CALIBRATION SCHEDULE

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/-0.001" mean of at least three readings Max. deviation between readings .004"

Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually	Spirometer or calibrated wet test or dry gas test meter	2%
	2. One Point: Semiannually		
	3. Check after each test series	Comparison check	5%

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube. [Rule 62-297.310(4), F.A.C.]

A.30. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit. [Rule 62-297.310(6), F.A.C.]

A.31. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid fuel for more than 400 hours other than during startup.
3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
 - a. Did not operate; or
 - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
 - a. Visible emissions, if there is an applicable standard;
 - b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
 - c. Each NESHAP pollutant, if there is an applicable emission standard.

5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; and, SIP approved]

A.32. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rule 62-297.310(7)(a)4., F.A.C.]

A.33. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

Recordkeeping and Reporting Requirements

A.34. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Miami-Dade County Department of Environmental Resources Management (DERM) 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 DERM.

[Rule 62-210.700(6), F.A.C.]

A.35. The permittee shall submit to DERM a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the permittee for a period of five years.
[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

A.36. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with DERM on the results of each such test.
- (b) The required test report shall be filed with DERM as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow DERM to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
1. The type, location, and designation of the emissions unit tested.
 2. The facility at which the emissions unit is located.
 3. The owner or operator of the emissions unit.
 4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
 7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
 8. The date, starting time and duration of each sampling run.
 9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
 10. The number of points sampled and configuration and location of the sampling plane.
 11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
 12. The type, manufacturer and configuration of the sampling equipment used.
 13. Data related to the required calibration of the test equipment.
 14. Data on the identification, processing and weights of all filters used.
 15. Data on the types and amounts of any chemical solutions used.
 16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
 17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
 18. All measured and calculated data required to be determined by each applicable test procedure for each run.

19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
 20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
 21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for DERM, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.
- [Rules 62-213.440 and 62-297.310(8), F.A.C.]

Section IV. This section is the Acid Rain Part.

Operated by: Florida Power & Light Company
ORIS code: 000610

Subsection A. This subsection addresses Acid Rain, Phase II.

The emissions units listed below are regulated under Phase II of the Federal Acid Rain Program.

E.U. ID No.	Description
-003	Fossil Fuel Fired Steam Generator #5
-004	Fossil Fuel Fired Steam Generator #6

A.1. The Phase II permit 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), version dated 06/16/03, signed by the Designated Representative on 06/27/07, and received by the Department on 07/02/07.

[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	2008	2009	2010	2011	2012
-003	PCU5	SO ₂ allowances under Table 2 of 40 CFR 73	0*	0*	4*	4*	4*
-004	PCU6	SO ₂ allowances under Table 2 of 40 CFR 73	0*	0*	9*	9*	9*

*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.

1. 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.
2. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.
3. Allowances shall be accounted for under the Federal Acid Rain Program.

[Rule 62-213.440(1)(c), F.A.C.]

A.4. Where an applicable requirement of the Act is more stringent than applicable regulations promulgated under Title IV of the Act, both provisions shall be incorporated into the permit and shall be enforceable by the Administrator.

[40 CFR 70.6(a)(1)(ii); and, Rule 62-210.200, F.A.C., Definitions – Applicable Requirements.]

A.5. Fast-Track Revisions of Acid Rain Parts. Those Acid Rain sources making a change described at Rule 62- 214.370(4), F.A.C., may request such change as provided in Rule 62-213.413, F.A.C., Fast-Track Revisions of Acid Rain Parts.

[Rules 62-213.413 and 62-214.370(4), F.A.C.]

A.6. Comments, notes, and justifications:

- a. The designated representative (DR) was changed by letter dated 10/14/05, with a revised Certificate of Authorization.

Appendix I-1, List of Insignificant Emissions Units and/or Activities.

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, or that meet the criteria specified in Rule 62-210.300(3)(b)1., F.A.C., Generic Emissions Unit Exemption, are exempt from the permitting requirements of Chapters 62-210, 62-212 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities:

1	Natural Gas Metering Area Relief Valves
2	Hydrazine Mixing Tank
3	Lube Oil Vapor Extraction Vents
4	Lube Oil Dump Tank Vent
5	Oil Separation Basin
6	Hazardous Waste Building
7	Paint/Lube Building
8	Miscellaneous mobile vehicle operation
9	<intentionally left blank>
10	<intentionally left blank>
11	Evaporation of Boiler Chemical Cleaning Waste

Appendix U-1, List of Unregulated Emissions Units and/or Activities.

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘exempt emissions units’.

Emissions Unit	Description
-005	Painting and Solvent Cleaning
-006	Mobile Equipment and Engines
-007	Emergency Diesel Generator

Appendix AR-1, Acid Rain.

Florida Power & Light Company
Cutler Plant

DRAFT/PROPOSED Permit No.: 0250001-003-AV

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

E.U. ID No.	Description
-003	Fossil Fuel Fired Steam Generator #5
-004	Fossil Fuel Fired Steam Generator #6

The Designated Representative of these acid rain units applied for a Phase II permit by submitting to the Department a completed "Revised (Renewal) Acid Rain Part Application" form (DEP Form No. 62-210.900(1)(a), F.A.C., Effective: 06/16/03) signed by the Designated Representative on 06/27/07.

The submitted form was scanned and is attached in this appendix.

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: Cutler Plant	State: Florida	ORIS Code: 000610
---------------------------------	-----------------------	--------------------------

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 9(c)(1)	c New Units Commence Operation Date	d New Units Monitor Certification Deadline
PCU 5	Yes	N/A	N/A
PCU 6	Yes	N/A	N/A
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		

Cutler Plant

Plant Name (from Step 1)

STEP 3
Read the standard requirementsAcid 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(b)(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

Cutler Plant
Plant Name (from Step 1)

STEP 3
Cont'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 at 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 repowering 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 regulating 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 impairing any program for competitive bidding for power supply in a State in which such program is established

STEP 4

Certification

Read the certification statement, sign, and date

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 the 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: R. Bryan Fennell	
Signature 	Date 6-27-07

Acid Rain Program Instructions for Acid Rain Part Application (40 CFR 72.30 - 72.31 and Rule 62-214.320, F.A.C.)

The Acid Rain Program requires the designated representative to submit an Acid Rain part application for each source with an Acid Rain unit. A complete Certificate of Representation must be received by EPA before the part application is submitted to the title V permitting authority. A complete Acid Rain part application, once submitted, is binding on the owners and operators of the Acid Rain source and is enforceable in the absence of an Acid Rain part until the title V permitting authority either issues an Acid Rain part to the source or disapproves the application.

Please type or print. The alternate designated representative may sign in lieu of the designated representative. If assistance is needed, contact the title V permitting authority.

STEP 1 Use the plant name and ORIS Code listed on the Certificate of Representation for the plant. An ORIS code is a 4 digit number assigned by the Energy Information Agency (EIA) at the U.S. Department of Energy to power plants owned by utilities. If the plant is not owned by a utility but has a 5 digit facility code (also assigned by EIA), use the facility code. If no code has been assigned or if there is uncertainty regarding what the code number is, contact EIA at (202) 287-1730 (for ORIS codes), or (202) 287-1927 (for facility codes).

STEP 2 For column "a," identify each Acid Rain unit at the Acid Rain source by providing the appropriate unit identification numbers, consistent with the unit identification numbers entered on the Certificate of Representation and with unit identification numbers used in reporting to DOE and/or EIA. For new units without identification numbers, owners and operators may assign such numbers consistent with EIA and DOE requirements.

For columns "c" and "d," enter the commence operation date(s) and monitor certification deadline(s) for new units in accordance with 40 CFR 72.2 and 75.4, respectively.

Submission Deadlines

For new units, an initial Acid Rain part application must be submitted to the title V permitting authority 24 months before the date the unit commences operation. Acid rain part renewal applications must be submitted at least 6 months in advance of the expiration of the acid rain portion of a title V permit, or such longer time as provided for under the title V permitting authority's operating permits regulation.

Submission Instructions

Submit this form to the appropriate title V permitting authority. If you have questions regarding this form, contact your local, State, or EPA Regional acid rain contact, or call EPA's Acid Rain Hotline at (202) 564-9620.

Table 1-1, Summary of Air Pollutant Standards and Terms.

Florida Power & Light Company
Cutler Plant

DRAFT/PROPOSED Permit No.: 0250001-003-AV
Facility ID No.: 0250001

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID Nos.		Brief Description				Allowable Emissions		Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
-003		Fossil Fuel Fired Steam Generator #5				lbs./hour	TPY	lbs./hour	TPY		
Pollutant Name	Fuel(s)	Hours/Year	Standard(s)	lbs./hour	TPY	lbs./hour	TPY	Regulatory Citation(s)	See permit condition(s)		
Visible Emissions											
Steady State	gas	8760	20% Opacity					Rule 62-296.405(1)(a), F.A.C.	A.6.		
Soot Blowing or Load Changing	gas		60% Opacity					Rule 62-210.700(3), F.A.C.	A.7.		
Particulate Matter											
Steady State	gas	8760	0.1 lb/MMBtu			94.0	120.85	Rule 62-296.405(1)(b), F.A.C.	A.8.		
Soot Blowing or Load Changing	gas		0.3 lb/MMBtu			282.0		Rule 62-210.700(3), F.A.C.	A.9.		
Sulfur Dioxide											
	oil	startup	1.1 lb/MMBtu			187		Rules 62-213.440 and 62-296.405(1)(c)1.i., F.A.C.	A.11.		
	oil	startup	0.55 lb/MMBtu***	93.5					A.10.		
Nitrogen Oxides	gas	8760	0.2 lb/MMBtu	188			823.44	Rule 62-296.570(4)(b)4., F.A.C.	A.12.		

E.U. ID Nos.		Brief Description				Allowable Emissions		Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
-004		Fossil Fuel Fired Steam Generator #6				lbs./hour	TPY	lbs./hour	TPY		
Pollutant Name	Fuel(s)	Hours/Year	Standard(s)	lbs./hour	TPY	lbs./hour	TPY	Regulatory Citation(s)	See permit condition(s)		
Visible Emissions											
Steady State	gas	8760	20% Opacity					Rule 62-296.405(1)(a), F.A.C.	A.6.		
Soot Blowing or Load Changing	gas		60% Opacity					Rule 62-210.700(3), F.A.C.	A.7.		
Particulate Matter											
Steady State	gas	8760	0.1 lb/MMBtu			162.0	208.29	Rule 62-296.405(1)(b), F.A.C.	A.8.		
Soot Blowing or Load Changing	gas		0.3 lb/MMBtu			486.0		Rule 62-210.700(3), F.A.C.	A.9.		
Sulfur Dioxide											
	oil	startup	1.1 lb/MMBtu			319.0		Rules 62-213.440 and 62-296.405(1)(c)1.i., F.A.C.	A.11.		
	oil	startup	0.55 lb/MMBtu***	159.5					A.10.		
Nitrogen Oxides	gas	8760	0.2 lb/MMBtu	324			1,419.12	Rule 62-296.570(4)(b)4., F.A.C.	A.12.		

Notes:

* The "Equivalent Emissions" listed are for informational purposes only.

** Values computed using the ratio of 3/21 for soot blowing/steady state per 24 hour day.

***Limit based on Metropolitan Miami-Dade County Code.

Table 2-1, Summary of Compliance Requirements.

Florida Power and Light Company
Cutler Plant

DRAFT/PROPOSED Permit No.: 0250001-003-AV
Facility ID No.: 0250001

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.		Brief Description					
-003		Fossil Fuel Fired Steam Generator #5					
-004		Fossil Fuel Fired Steam Generator #6					
Pollutant Name or Parameter	Fuels	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
Steady State	gas	DEP Method 9	Annual	1-Oct	1 hour		A.20., A.21.
Soot Blowing or Load Changing	gas	DEP Method 9	Annual	1-Oct	1 hour		A.20., A.21.
Particulate Matter							
Steady State	gas	EPA Method 5 or 17	Annual	1-Oct	3 hour		A.22., A.23.
Soot Blowing or Load Changing	gas	EPA Method 5 or 17 ***	Annual	1-Oct			A.22., A.23.
Sulfur Dioxide	oil	Sulfur limit with vendor fuel analysis	Daily				A.11.,A.17., A.24., A.25.
Nitrogen Oxides	gas	CMS	Continuous			Yes	A.19.
Notes:							
*Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.							
**CMS [=] continuous monitoring system							
***EPA Method 17 may be used only if the stack gas exit temperature is less than 375 degrees F.							

Appendix H-1, Permit History/ID Number Changes

Florida Power & Light Company
Cutler Plant

DRAFT/PROPOSED Permit No.: 0250001-003-AV

Permit History (for tracking purposes):

<u>E.U. ID No(s).</u>	<u>Project Description</u>	<u>Permit No.</u>	<u>Effective Date</u>	<u>Expiration Date</u>
All	Initial Title V Permit	0250001-001-AV	01/01/98	12/31/02
All	Title V Permit Renewal	0250001-002-AV ¹	01/01/03	12/31/07 ³
All	Title V Permit Renewal	0250001-003-AV	01/01/08 pending ²	12/31/12 pending

¹ The most recently posted Title V permit on the web site.

² Future effective date for acid rain purposes.

³ Extension(s) of existing permit(s). Rule 62-213.420(1)(b)2., F.A.C. requires applicants having made a timely application for permit renewal to continue to operate the source under the authority and provisions of any existing valid permit or Florida Electrical Power Plant Siting Certification, and in accordance with applicable requirements of the Acid Rain Program, until the conclusion of proceedings associated with its permit application or until the new permit becomes effective, whichever is later.

Subsequent Permits Issued & Projects:

Compilation of permits and projects issued after the most recently posted Title V permit on the web site.

Air Permit Documents Search page of world wide web site (<http://www.dep.state.fl.us/air/eproducts/apds/default.asp>) accessed on 08/24/2007.

ARMS - Permitting Application – Projects, accessed on 08/24/2007.

<u>E.U. ID No(s). & Section(s) of permit¹ affected</u>	<u>Project Description</u>	<u>Permit No.</u>	<u>Effective Date</u>	<u>Expiration Date</u>
	None	None		

Friday, Barbara

To: ed_nunez@fpl.com; r_b_fennell@fpl.com; 'john.hampp@fpl.com'; 'KKosky@Golder.com'; wongp@co.miami-dade.fl.us; Forney.Kathleen@epamail.epa.gov

Cc: Sheplak, Scott

Subject: DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV - Florida Power & Light Company - Cutler Plant

Attachments: 0250001-003-AV Table 2-1.pdf; 0250001-003-AV Appendix AR-1.pdf; 0250001-003-AV Appendix H-1.pdf; 0250001-003-AV Permit.pdf; 0250001-003-AV statement of basis.pdf; 0250001-003-AV Table 1-1.pdf; 0250001-003CoverLetter.pdf; 0250001-003-AVIntent&PublicNotice.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

9/24/2007

Friday, Barbara

From: System Administrator
To: Sheplak, Scott
Sent: Monday, September 24, 2007 3:23 PM
Subject: Delivered:DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV - Florida Power & Light Company - Cutler Plant

Your message

To: 'ed_nunez@fpl.com'; 'r_b_fennell@fpl.com'; 'john.hampp@fpl.com'; 'KKosky@Golder.com'; 'wongp@co.miami-dade.fl.us'; 'Forney.Kathleen@epamail.epa.gov'
Cc: Sheplak, Scott
Subject: DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV - Florida Power & Light Company - Cutler Plant
Sent: 9/24/2007 3:22 PM

was delivered to the following recipient(s):

Sheplak, Scott on 9/24/2007 3:23 PM

Friday, Barbara

From: Exchange Administrator
Sent: Monday, September 24, 2007 3:23 PM
To: Friday, Barbara
Subject: Delivery Status Notification (Relay)

Attachments: ATT343293.txt; DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV - Florida Power & Light Company - Cutler Plant



ATT343293.txt (440 B) DRAFT/PROPOSED Title V Permit ...

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.

ed_nunez@fpl.com
r_b_fennell@fpl.com
john.hampp@fpl.com

Friday, Barbara

From: Sheplak, Scott
To: Friday, Barbara
Sent: Monday, September 24, 2007 3:23 PM
Subject: Read: New Posting #0250001

Your message

To: Gracy Danois; Kathleen Forney; Walker, Elizabeth (AIR)
Cc: Sheplak, Scott
Subject: New Posting #0250001
Sent: 9/24/2007 3:21 PM

was read on 9/24/2007 3:23 PM.

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@sophos.golder.com]
Sent: Monday, September 24, 2007 3:21 PM
To: Friday, Barbara
Subject: Successful Mail Delivery Report

Attachments: Delivery report; Message Headers



Delivery report.txt
(454 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
46F80E2A_2536_9_1

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive01.rtp.epa.gov]
Sent: Monday, September 24, 2007 3:21 PM
To: Friday, Barbara
Subject: Successful Mail Delivery Report

Attachments: Delivery report; Message Headers



Delivery report.txt
(488 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 46F80E27_5731_941_56

Friday, Barbara

From: R_Bryan_Fennell@fpl.com

Sent: Monday, September 24, 2007 3:22 PM

To: Friday, Barbara

Subject: DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV - Florida Power & Light Company - Cutler Plant

Return Receipt

Your DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV - Florida Power & Light Company
document: - Cutler Plant
was R B Fennell/PGBU/FPL
received by:
at: 09/24/2007 03:22:19 PM

Friday, Barbara

From: Sheplak, Scott
Sent: Monday, September 24, 2007 3:27 PM
To: 'Gracy Danois'; 'Kathleen Forney'
Cc: Friday, Barbara
Subject: RE: New Posting #0250001

Gracy & Katy,

I will let you know when they publish as this one is a parallel review (DRAFT/PROPOSED) Title V permit.

Scott

From: Friday, Barbara
Sent: Monday, September 24, 2007 3:21 PM
To: Gracy Danois; Kathleen Forney; Walker, Elizabeth (AIR)
Cc: Sheplak, Scott
Subject: New Posting #0250001

There is a new posting on Florida's website.

0250001003AV
FLORIDA POWER & LIGHT COMPANY
CUTLER PLANT

Draft/Proposed Permit Renewal

If you have any questions, feel free to contact me.

Thanks,
Barbara

9/24/2007

Friday, Barbara

From: R_Bryan_Fennell@fpl.com
Sent: Monday, September 24, 2007 3:23 PM
To: Friday, Barbara
Cc: ed_nunez@fpl.com; Forney.Kathleen@epamail.epa.gov; john.hampp@fpl.com; KKosky@Golder.com; r_b_fennell@fpl.com; Sheplak, Scott; wongp@co.miami-dade.fl.us
Subject: Re: DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV - Florida Power & Light Company - Cutler Plant
Attachments: 0250001-003-AV Table 2-1.pdf; 0250001-003-AV Appendix AR-1.pdf; 0250001-003-AV Appendix H-1.pdf; 0250001-003-AV Permit.pdf; 0250001-003-AV statement of basis.pdf; 0250001-003-AV Table 1-1.pdf; 0250001-003CoverLetter.pdf; 0250001-003-AVIntent&PublicNotice.pdf

Ms. Friday,

Please let this serve as notice that I have received the attached documents.

Thank you

R. Bryan Fennell
 General Manager II - Environmental, Water, Lab
 Office: 561-691-2781
 Cell: 561-762-5266

CONFIDENTIAL COMMUNICATION

The information contained in this transmission may be proprietary, privileged, and/or confidential. It is intended only for the use of the person(s) named above. If you are not the intended recipient, you are notified that any review, dissemination, distribution, or duplication of this communication is strictly prohibited. If you are not the intended recipient, please immediately contact the sender by reply email and destroy all copies of the original message. Thank you.

"Friday, Barbara" <Barbara.Friday@dep.state.fl.us>



"Friday, Barbara"

<Barbara.Friday@dep.state.fl.us>

09/24/2007 03:22 PM

To: ed_nunez@fpl.com,
 r_b_fennell@fpl.com, john.hampp@fpl.com,
 KKosky@Golder.com, wongp@co.miami-
 dade.fl.us,
 Forney.Kathleen@epamail.epa.gov
 cc: "Sheplak, Scott"
 <Scott.Sheplak@dep.state.fl.us>
 Subject: DRAFT/PROPOSED Title V Permit
 Renewal No.: 0250001-003-AV - Florida
 Power & Light Company - Cutler Plant

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:

<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you, <?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />
DEP, Bureau of Air Regulation

(See attached file: 0250001-003-AV Table 2-1.pdf)(See attached file: 0250001-003-AV Appendix AR-1.pdf)(See attached file: 0250001-003-AV Appendix H-1.pdf)(See attached file: 0250001-003-AV Permit.pdf)(See attached file: 0250001-003-AV statement of basis.pdf)(See attached file: 0250001-003-AV Table 1-1.pdf)(See attached file: 0250001-003CoverLetter.pdf)(See attached file: 0250001-003-AVIntent&PublicNotice.pdf)

Friday, Barbara

From: Ed_Nunez@fpl.com
Sent: Monday, September 24, 2007 3:55 PM
To: Friday, Barbara
Subject: DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV - Florida Power & Light Company - Cutler Plant

Return Receipt

Your DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV - Florida Power & Light Company
document: - Cutler Plant
was Ed Nunez/PGD/FPL
received by:
at: 09/24/2007 03:55:10 PM

9/25/2007

Friday, Barbara

From: R_Bryan_Fennell@fpl.com

Sent: Monday, September 24, 2007 3:57 PM

To: Friday, Barbara

Subject: RE: DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV - Florida Power & Light Company - Cutler Plant

Return Receipt

Your RE: DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV - Florida Power & Light
document: Company - Cutler Plant
was R B Fennell/PGBU/FPL
received by:
at: 09/24/2007 03:57:18 PM

Friday, Barbara

From: Ed_Nunez@fpl.com
Sent: Monday, September 24, 2007 3:57 PM
To: Friday, Barbara
Subject: Re: DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV - Florida Power & Light Company - Cutler Plant

Ms. Friday,
I received the subject email.
Regards,

Heriberto (Ed) Nuñez, P.E.

Power Generation Division-FPL
Turkey Point and Cutler Power Plants
Office: (305) 242-3822
Cell: (305) 775-0294
email: ed_nunez@fpl.com

9/25/2007

Friday, Barbara

From: John_Hampp@fpl.com
Sent: Monday, September 24, 2007 9:56 PM
To: Friday, Barbara
Subject: DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV - Florida Power & Light Company - Cutler Plant

Return Receipt

Your DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV - Florida Power & Light Company
document: - Cutler Plant
was John Hampp/GC/FPL
received by:
at: 09/24/2007 09:56:09 PM

9/25/2007

Friday, Barbara

From: Exchange Administrator
Sent: Tuesday, September 25, 2007 3:29 AM
To: Friday, Barbara
Subject: Delivery Status Notification (Delay)

Attachments: ATT345850.txt; DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV - Florida Power & Light Company - Cutler Plant



ATT345850.txt (343 B) DRAFT/PROPOSED Title V Permit ...

This is an automatically generated Delivery Status Notification.

THIS IS A WARNING MESSAGE ONLY.

YOU DO NOT NEED TO RESEND YOUR MESSAGE.

Delivery to the following recipients has been delayed.

wongp@co.miami-dade.fl.us

Friday, Barbara

From: Forney.Kathleen@epamail.epa.gov
Sent: Wednesday, September 26, 2007 11:58 AM
To: Friday, Barbara
Subject: Re: DRAFT/PROPOSED Title V Permit Renewal No.: 0250001-003-AV - Florida Power & Light Company - Cutler Plant

Thanks.
Katy

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30024

Phone: 404-562-9130
Fax: 404-562-9019

"Friday,
Barbara"
<Barbara.Friday@
dep.state.fl.us>

09/24/2007 03:22
PM

To
<ed_nunez@fpl.com>,
<r_b_fennell@fpl.com>,
<john.hampp@fpl.com>,
<KKosky@Golder.com>,
<wongp@co.miami-dade.fl.us>,
Kathleen Forney/R4/USEPA/US@EPA

cc

"Sheplak, Scott"
<Scott.Sheplak@dep.state.fl.us>
Subject
DRAFT/PROPOSED Title V Permit
Renewal No.: 0250001-003-AV -
Florida Power & Light Company -
Cutler Plant

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:

<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

[attachment "0250001-003-AV Table 2-1.pdf" deleted by Kathleen Forney/R4/USEPA/US]

[attachment "0250001-003-AV Appendix AR-1.pdf"

deleted by Kathleen Forney/R4/USEPA/US] [attachment "0250001-003-AV Appendix H-1.pdf"

deleted by Kathleen Forney/R4/USEPA/US] [attachment "0250001-003-AV Permit.pdf" deleted by

Kathleen Forney/R4/USEPA/US] [attachment "0250001-003-AV statement of basis.pdf" deleted

by Kathleen Forney/R4/USEPA/US] [attachment "0250001-003-AV Table 1-1.pdf" deleted by

Kathleen Forney/R4/USEPA/US] [attachment "0250001-003CoverLetter.pdf"

deleted by Kathleen Forney/R4/USEPA/US] [attachment "0250001-003-

AVIntent&PublicNotice.pdf" deleted by Kathleen Forney/R4/USEPA/US]

Sheplak, Scott

-file-

From: John_Hampp@fpl.com
Sent: Monday, September 10, 2007 8:52 AM
To: Sheplak, Scott
Subject: Re: Parallel Review of Title V Permit

Scott,

Thanks for the update. I would agree that the Cutler Title V renewal should fit well within the description of "non-controversial" and would be a good candidate for the parallel review.

I believe it is appropriate to follow this route for the Cutler permit renewal.

John

9/10/2007

Sheplak, Scott~~file~~

From: Sheplak, Scott
Sent: Friday, September 07, 2007 4:54 PM
To: 'john_hampp@fpl.com'
Subject: Parallel Review of Title V Permit
Attachments: Guidance Memorandum DARM-PER-41.pdf

Re: Cutler Plant, Title V Air Operation Permit Renewal

We now have an opportunity to expedite Title V permits by doing what is called a "parallel review" in Florida. We have a guidance memorandum on this (see attached Guidance Memorandum DARM-PER-41 dated 11/20/2006).

Based on my review of the subject Title V permit renewal application, this one is a candidate for "parallel review." This process works well where there will be no significant comments. This permit application in my opinion is not controversial and is routine.

Essentially, this new process would save about 1 month of time to issue the FINAL permit. The EPA review period would be performed with the public comment period. The actual permit being publicly noticed would be a "DRAFT/PROPOSED" permit. The PROPOSED permit stage is combined with the DRAFT permit stage hence the reference to a "parallel review." Like before a FINAL permit would be issued after the end of the EPA review period. This renewed permit has a planned future effective date of January 1, 2008. By using the parallel review process, you can receive the FINAL permit well before December 31, 2007.

Please consider this new option and let me know if you are interested in a parallel review for this project.

Sincerely,

Scott M. Sheplak, P.E.
Title V Program Coordinator

Air Permitting South Section
Bureau of Air Regulation
Division of Air Resource Management
State of Florida, Department of Environmental Protection

9/7/2007

Sheplak, Scott

file

From: Sheplak, Scott
Sent: Monday, August 27, 2007 12:43 PM
To: 'KKosky@golder.com'
Cc: Adams, Patty; Linero, Alvaro
Subject: Signature Document for Professional Engineer (P.E.) certification

Re: Project Number 0250001-003-AV, Title V Air Operation Permit Renewal
Cutler Plant

Dear Mr. Kosky:

We received the hardcopy Signature Document for the professional engineer (P.E.) certification of the subject application today.

Thank you.

Sincerely,

Scott M. Sheplak
State of Florida, Department of Environmental Protection
Mail Station #5505
2600 Blair Stone Road
Tallahassee, FL 32399

850/921-9532
Scott.Sheplak@dep.state.fl.us

8/27/2007

Electronic Permit Submittal and Processing System (EPSAP) Professional Engineer Signature Document

"This document is signed and sealed to secure the data in this permit application and any attached files that were submitted electronically as described in Florida Department of Business and Professional Regulation, Board of Professional Engineers, Procedures for Signing and Sealing Electronically Transmitted Plan, Specifications, Reports or other Documents, Rule 61G15-23.003., F.A.C.."

EPSAP Application Number: 1606-1
Facility Identification Number: 0250001
Facility Owner/Company Name: FLORIDA POWER & LIGHT (PCU)

RECEIVED

AUG 27 2007

Purpose of Application:
 Title V air operation permit renewal.

BUREAU OF AIR REGULATION

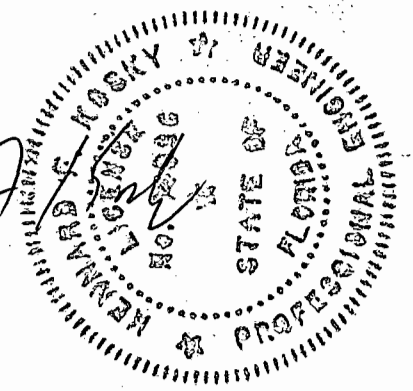
Signature File Created: 6/29/2007 4:08:21 PM

File Description	Authentication Code
Submitted Application Data	3215DF1A3676F2A8BEE5A8E90AA8F558004056C3
Uploaded Facility Documents:	
PCU_Facility_plot.pdf	956A6CE22E7408A0575FCC93E0A91E09BE8C42F6
PCU_Compliance_Plan.pdf	85561FDCE52666948835A8F98D0C36C6AD89B8B6
pcu_exempt_units.pdf	874B41FC3E4B7F36B7519E2BEE554B9B19B03B1C
pcu_exempt_units.pdf	874B41FC3E4B7F36B7519E2BEE554B9B19B03B1C
PCU_requirements.pdf	12832172F6793FF0E029C3C9D44148F132AE60B4
cutler_eastview_feb02.jpg	EA9AB39426A1AD1AB6748EB08A3941F22C5AA82D
0000186F.pdf	123E6607B3EAE83FE8B8A3E6EC3DA44003DE651B
Cutler 2006 Ann Complete.pdf	FC43D247ECE7980CD8E2AF89DD6C9CD854AEAC3F
PCU_process_flow.pdf	9CF3A80F0F7BB1E7F67307EF82FB35AE8420A1DD
Uploaded Emissions Unit Documents:	
PCU_process_flow.pdf	9CF3A80F0F7BB1E7F67307EF82FB35AE8420A1DD
PCU_process_flow.pdf	9CF3A80F0F7BB1E7F67307EF82FB35AE8420A1DD
CEMS RATA_PCU_5_2Q06.pdf	AB8061BE12837E3CB182BBCA76372B86B67D8CD4
pcu_titleV.pdf	E7D68D55B35DC94FB318E4DF02AB5F8FA6C62B74
Cert. of Representation - Cutler.pdf	6C9830044EDA7DFC103EF49565881B228F644E70
Cutler CEMS Monitoring Plan.pdf	9F299CE4DEB2BDD0E75906A5340D3812A0C20B86
CEMS RATA_PCU_6_2Q06.pdf	C4C5E4C0F111B0B268F32333EF2BCA989C812C62
CEMS RATA_PCU_6_2Q06.pdf	C4C5E4C0F111B0B268F32333EF2BCA989C812C62
pcu_titleV.pdf	E7D68D55B35DC94FB318E4DF02AB5F8FA6C62B74
Cert. of Representation - Cutler.pdf	6C9830044EDA7DFC103EF49565881B228F644E70
Cutler CEMS Monitoring Plan.pdf	9F299CE4DEB2BDD0E75906A5340D3812A0C20B86
PCUU2_4.PCX	F48E6FEF937FBA3DFB9CFA770BF31960D1C7D7B3
PCUUU1_1.jpg	16173C4DDB74C8CDC8D08DCDE20991B21B619D99
Final Signature File	7078CE943177F71182E02C253691466B9D599313

Professional Engineer (PE): KENNARD KOSKY License No: 14996

(sign and affix PE seal below)

Kenneth F. Kosky



Kenneth F. Kosky
PE Signature

7/3/07
Date

255

Sheplak, Scott

-file-

From: Gordon, Ray (DERM) [GordoR@miamidade.gov]
Sent: Tuesday, July 24, 2007 4:26 PM
To: Sheplak, Scott
Cc: Muthiah, Mallika (DERM); Jordahl, Claire (DERM)
Subject: Compliance Review of Title V Air Operation Permit Renewal Application

The following information is from a review of DERM's records on the FPL Cutler Plant, facility ID 0250001:

- o The power plant has 2 steam generators.
- o Current operating permit 0250001-002-AV, effective 1/1/2003, expires 12/31/2007, renewal due 7/5/2007 (Tallahassee Office received 7/2/2007).
- o EU-003 (generator #5) operated 578 hours & EU-004 (generator #6) operated a total of 1791 hours in 2006.
- o Both generators used only natural gas during 2006.
- o No testing was conducted in 2006 (according to the TV permit VE & PM testing is required if fuel oil is used for more than 400 hours during the year).
- o The facility has CEMS for NOx. Quarterly NOx reports indicate the highest level recorded was 0.06 lb/MMBtu (limit of 0.20 lb/MMBtu heat input).
- o The last inspection was conducted on 3/23/2006.

Based on review of the last inspection report, quarterly NOx reports & the 2006 AOR, records at this time reflect no excess emissions or instances of non-compliance for the FPL Cutler Plant.

An inspection of this Facility is scheduled for the first week in August

Original Message-----

From: Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]
Sent: Friday, July 06, 2007 2:15 PM
To: Muthiah, Mallika (DERM)
Cc: Linero, Alvaro
Subject: Compliance Review of Title V Air Operation Permit Renewal Application
Re: Compliance Review of Title V Air Operation Permit Renewal Application
Application Number 1606-1
Florida Power & Light Company-Cutler Plant
Facility ID No.: 0250001
On July 2, 2007, our office received the subject application via Electronic Permit Submittal Processing System (EPSAP). You should be able to access the application through the EPSAP system.

Each applicant for a Title V permit is required to sign a certification of compliance. Each applicant is also required to report the compliance status of each emissions unit. Any non-compliance at the time of application and/or during the processing of the application requires a compliance plan to be submitted. The applicant certified compliance in the application.

Please review this facility's status with your compliance and enforcement staff. Please notify me via email or hard-copy either:

a. there are no outstanding compliance or enforcement actions with this facility or

8/17/2007

b. the following outstanding compliance and enforcement issues exist (please list).

Please review the compliance status of this facility and send us your written comments within 30 days (no later than August 2th). Thank you for your cooperation.

Ray A. Gordon

Air Compliance Project Manager

Office:305-372-6925

gordor@miamidade.gov

"Delivering Excellence Every Day"

From: Sheplak, Scott
Sent: Monday, July 02, 2007 4:54 PM
To: Koerner, Jeff; Adams, Patty
Cc: Linero, Alvaro
Subject: RE: A new application was submitted in EPSAP on FDEP

That is correct.

Patty, When the hard copy P.E. page comes in please pass it on. Thanks!

-----Original Message-----

From: Koerner, Jeff
Sent: Monday, July 02, 2007 4:38 PM
To: Adams, Patty; Linero, Alvaro; Sheplak, Scott
Subject: FW: A new application was submitted in EPSAP on FDEP

This looks like the Cutler Plant Title V renewal for Scott ...

Jeff

-----Original Message-----

From: Oracle Account [mailto:oracle@epic30.dep.state.fl.us]
Sent: Monday, July 02, 2007 4:30 PM
To: undisclosed-recipients
Subject: A new application was submitted in EPSAP on FDEP

A new application was submitted in EPSAP for the following facility:

Application Number: 1606-1
Facility ID: 0250001
Facility Name: FLORIDA POWER & LIGHT (PCU)

At your earliest convenience, please log-in to the EPSAP application located at http://appprod.dep.state.fl.us/epsap_eng/default.asp to begin the application review process.

Please note the following uploaded files included with this application:

9 Facility File(s):

- COMPLIANCE REPORT AND PLAN (PCU_Compliance_Plan.pdf)
- FACILITY PLOT PLAN (PCU_Facility_plot.pdf)
- IDENTIFICATION OF APPLICABLE REQUIREMENTS (PCU_requirements.pdf)
- LIST OF EXEMPT EMISSIONS UNITS (RULE 62-210.300(3), F.A.C.) (pcu_exempt_units.pdf)
- LIST OF INSIGNIFICANT ACTIVITIES (pcu_exempt_units.pdf)
- OTHER FACILITY INFORMATION (0000186F.pdf)
- OTHER FACILITY INFORMATION (Cutler 2006 Ann Complete.pdf)
- OTHER FACILITY INFORMATION (cutler_eastview_feb02.jpg)
- PROCESS FLOW DIAGRAM(s) (PCU_process_flow.pdf)

13 Emission Unit File(s):

- EU 3: ACID RAIN PART (FORM NO. 62-210.900(1)(a)) (pcu_titleIV.pdf)
- EU 3: CERTIFICATE OF REPRESENTATION (EPA FORM NO. 7610-1) (Cert. of Representation - Cutler.pdf)
- EU 3: COMPLIANCE DEMONSTRATION REPORTS/RECORDS (CEMS RATA_PCU_5_2006.pdf)
- EU 3: DESCRIPTION OF STACK SAMPLING FACILITIES (PCUUU1_1.jpg)
- EU 3: OTHER EMISSIONS UNIT INFORMATION (Cutler CEMS Monitoring Plan.pdf)
- EU 3: PROCESS FLOW DIAGRAM (PCU_process_flow.pdf)
- EU 4: ACID RAIN PART (FORM NO. 62-210.900(1)(a)) (pcu_titleIV.pdf)
- EU 4: CERTIFICATE OF REPRESENTATION (EPA FORM NO. 7610-1) (Cert. of Representation -

Cutler.pdf)

EU 4: COMPLIANCE DEMONSTRATION REPORTS/RECORDS (CEMS RATA_PCU_6_2Q06.pdf)

EU 4: COMPLIANCE DEMONSTRATION REPORTS/RECORDS (CEMS RATA_PCU_6_2Q06.pdf)

EU 4: DESCRIPTION OF STACK SAMPLING FACILITIES (PCUU2_4.PCX)

EU 4: OTHER EMISSIONS UNIT INFORMATION (Cutler CEMS Monitoring Plan.pdf)

EU 4: PROCESS FLOW DIAGRAM (PCU_process_flow.pdf)

PROFESSIONAL ENGINEER CERTIFICATION:

I hereby certify, except as particularly noted herein*, that:

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

* Explain any exception to the certification statement.

Professional Engineer Name: KENNARD KOSKY
Professional Engineer Registration Number: 14996
Date Professional Engineer Submitted: 6/29/2007

RESPONSIBLE OFFICIAL CERTIFICATION:

By entering my PIN below, I certify that I am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

Responsible Official Name: HERIBERTO NUNEZ
Date Responsible Official Submitted: 7/2/2007