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DEC 20 2002

BUREAU OF AIR REGULATION

Thursday, December 19, 2002
Trina Vielhauer, Chief
Bureau of Air Regulation
Division of Air Resources Management Department of
Environmental Protection
2600 Blair Stone Road, MS#5505
Tallahassee, FL 32399-2400

Dear Ms. Vielhauer,

The attached application from Florida Power & Light Company is to request a modification to the Air Construction Permit (0850001-008-AC) for the Martin Plant. The basis for the change to the existing permit is only for the condition limiting excess emissions of the simple cycle peaking gas turbines. The requested change reflects the Martin Plant's experience following several months of actual operation of these units and will assist them in operating them as originally planned.

An application for modification to the existing Title V Permit has been previously submitted and FPL is requesting that this change be included in the Draft of that permit. The proposed conditions limiting excess emissions for the simple cycle combustion turbines in the current Draft will be supplemented with the requested change for the Air Construction Permit. Florida Power & Light Company is also requesting that the Department issue a combined public notice for the Air Construction Permit modification and the Title V Permit modification.

Should you have any questions, or need any additional information, please contact me at your earliest convenience.

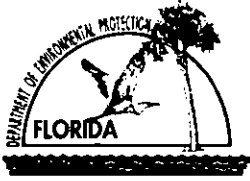
Sincerely,

A handwritten signature in black ink, appearing to read 'John C. Hampp'.

John C. Hampp
Sr. Regulatory Specialist

Florida Power & Light Company
JES-JB
700 Universe Blvd.
Juno Beach, FL 33408
Email: jhampp@email.fpl.com

cc: Mr. Jeff Koerner, FDEP
Mr. Tom Cascio, FDEP



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE I. APPLICATION INFORMATION

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BUREAU OF AIR REGULATION

Identification of Facility

1. Facility Owner/Company Name:	Florida Power & Light Company		
2. Site Name:	Martin Plant		
3. Facility Identification Number:	085001	[]	Unknown
4. Facility Location:	7 miles North of Indiantown on State Road 710		
Street Address or Other Locator:			
City:	Indiantown	County:	Martin
		Zip Code:	34956-0176
5. Relocatable Facility?	6. Existing Permitted Facility?		
[] Yes [X] No	[X] Yes [] No		

Application Contact

1. Name and Title of Application Contact:	John C. Hampp Sr. Environmental Specialist		
2. Application Contact Mailing Address:	Organization/Firm: Florida Power & Light Co. Environmental Services Dept. Street Address: 700 Universe Blvd. City: Juno Beach State: FL Zip Code: 33408		
3. Application Contact Telephone Numbers:	Telephone: (561)- 691-2894 Fax: (561)- 691-7049		

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	12-20-2002
2. Permit Number:	0850001-011-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[] Initial Title V air operation permit for an existing facility which is classified as a Title V source.

[] Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

[] Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: 0850001-008-AC

Operation permit number to be revised: 0850001-007-AV

[X] Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: 0850001-007-AV

[] Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: _____

Reason for revision: _____

Air Construction Permit Application

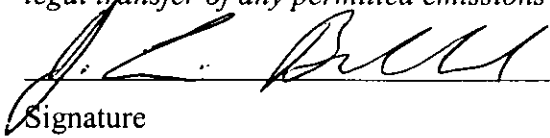
This Application for Air Permit is submitted to obtain: (Check one)

[X] Air construction permit to construct or modify one or more emissions units.

[] Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

[] Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Carine Bullock - Production Manager
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Florida Power & Light Company Martin Plant Street Address: P.O. Box 176 City: Indiantown State: FL Zip Code: 34956-0176
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (772) 597- 7110 Fax: (772) 597- 7416
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  Signature _____ Date <u>12/18/02</u>

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Edward Preast Registration Number: 033225
2. Professional Engineer Mailing Address: Organization/Firm: Florida Power & Light Co. / Environmental Services Dept. Street Address: 700 Universe Blvd. City: Juno Beach State: FL Zip Code: 33408
3. Professional Engineer Telephone Numbers: Telephone: (561) 691 - 7054 Fax: (561) 691 - 7049

4. Professional Engineer Statement:

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

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

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

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

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified 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.

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

Edward Preast

Signature

12/17/02

Date

(seal)

* Attach any exception to certification statement.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

Two new 170 MW nominal General Electric Model PG7241 (FA) simple cycle combustion turbines are being constructed at the Florida Power & Light Martin Plant facility. The combustion turbines will operate on pipeline natural gas as the primary fuel and very low sulfur distillate oil as a backup fuel.

2. ~~Projected~~ or Actual Date of Commencement of Construction: **09/01/00**

3. Projected Date of Completion of Construction:

Application Comment

Excess Emissions Allowed:

18. Excess Emissions Allowed: For each combustion turbine, excess NOx and visible emissions during startup, shutdown, and documented malfunction shall be allowed, providing:

- (a) Operators employ best operational practices to minimize the amount and duration of excess emissions.
- (b) Operation below 50% of base load shall not exceed 120 minutes during any calendar day.
- (c) During startup and shutdown, visible emissions excluding water vapor shall not exceed 20% opacity for up to ten, 6-minute observation periods during any calendar day. Data for each observation period shall be exclusive for the ten periods.
- (d) Excess emissions resulting from startup, shutdown, or documented malfunctions shall not exceed two hours in any 24-hour period except for excess emissions from oil-to-gas fuel switching which shall not exceed 1 hour in any 24-hour period.
- (e) For excess NOx emissions due to malfunction, the permittee shall notify the Compliance Authority within one (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident.
- (f) If the permittee provides at least 5 days advance notice prior to tuning in accordance with the manufacturer's recommendations, up to three 1-hour monitoring averages may be excluded from the continuous NOx compliance demonstration for each gas turbine due to excess NOx emissions resulting from tuning. {Permitting Note: It is expected that no more than two tuning sessions would occur each year.

Facility Regulatory Classifications

Check all that apply:

1. <input type="checkbox"/> Small Business Stationary Source?	<input type="checkbox"/> Unknown
2. <input checked="" type="checkbox"/> Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. <input type="checkbox"/> Synthetic Minor Source of Pollutants Other than HAPs?	
4. <input type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input type="checkbox"/> One or More Emissions Units Subject to NSPS?	
7. <input type="checkbox"/> One or More Emission Units Subject to NESHAP?	
8. <input type="checkbox"/> Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters):	
<p>The existing Title V permitted facility is a major source of hazardous air pollutants (Title III). The new combustion turbines are not a major source of HAP's but are regulated under NSPS Subpart GG.</p>	

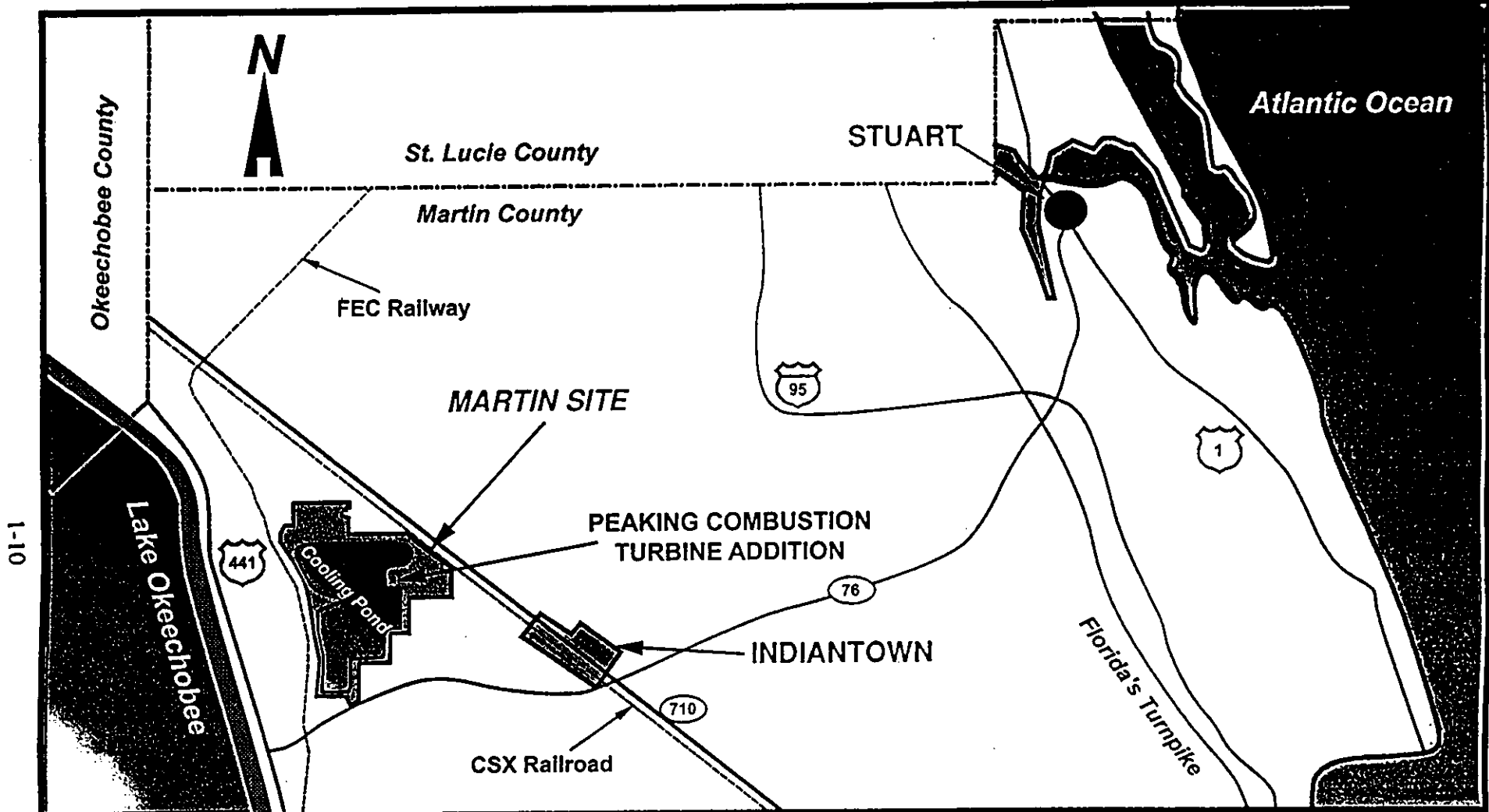
List of Applicable Regulations

All applicable FAC regulations are covered under existing Title V permit and there are no additional requirements.	

B. FACILITY POLLUTANTS

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: _____) or previously submitted to DEP (Date and DEP Office: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input checked="" type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input checked="" type="checkbox"/> Attached, Document ID: <u>PMR8 3.txt</u> <input type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input checked="" type="checkbox"/> Attached, Document ID: <u>PMR8 4.txt</u> <input type="checkbox"/> Not Applicable



1-10

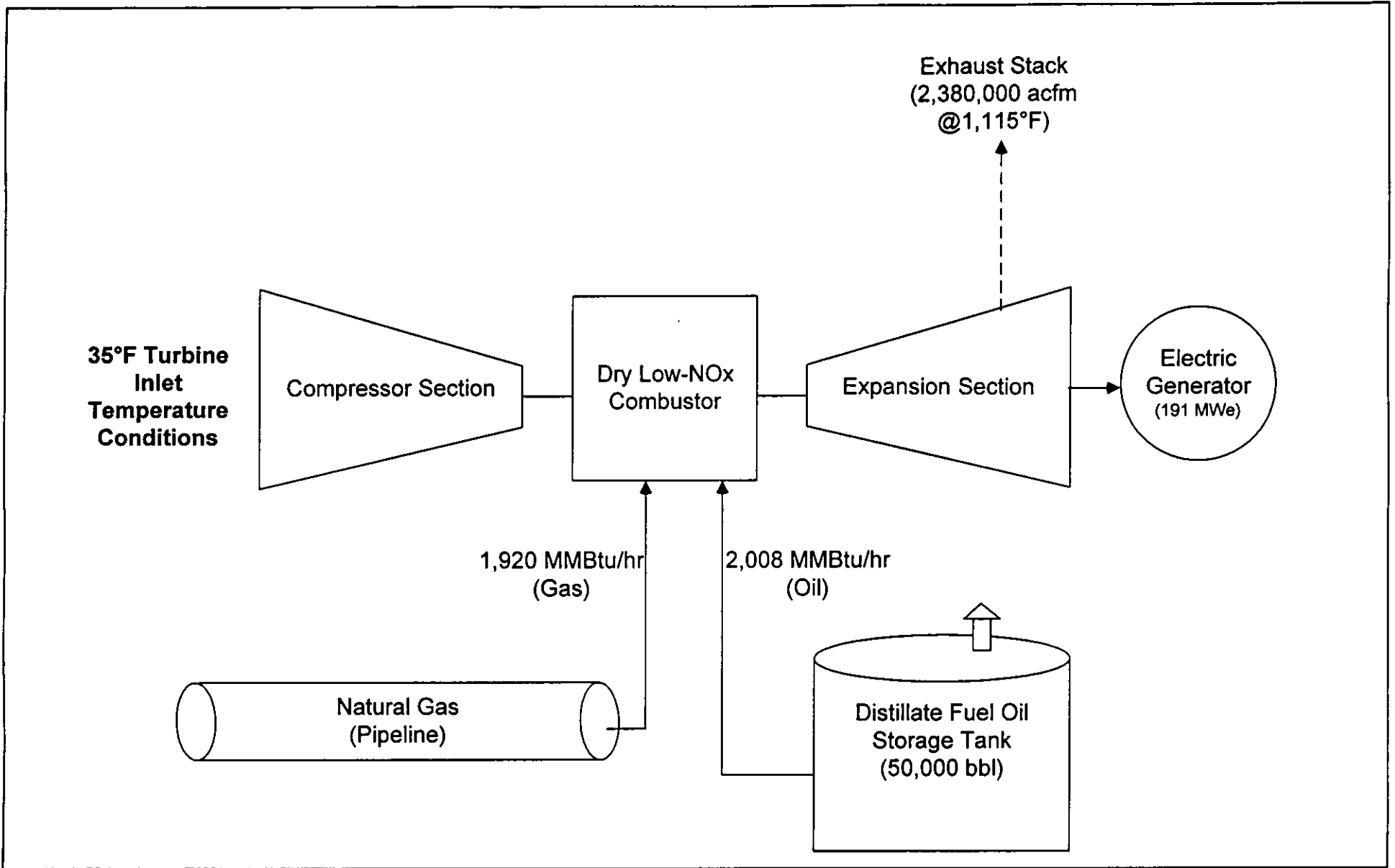
Source: Foster Wheeler Environmental Corp.; 2000

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February 9, 2000

**Figure 1.2-1
SITE LOCATION**



Martin Peaking Units



Martin Peaking Units

**Figure 2-1
Simplified Flow Diagram of GE Frame 7FA
Martin Peaking Units Project**



Attachment PMR8 1.txt

Precautions to Prevent Emissions of Unconfined Particulate Matter

The facility has negligible amounts of unconfined particulate matter as a result of operation of the facility. Potential examples of particulate matter include:

- **Fugitive dust from unpaved roads**
- **Sandblasting abrasive material from plant maintenance activities**
- **Fugitive particulates from the use of bagged chemical products (soda ash, di-, tri- and monosodium phosphate, and other chemicals as needed)**

Several precautions were taken to prevent emissions of particulate matter at the facility including:

- **Paving of roads, parking areas, and equipment yards**
- **Landscaping and planting vegetation**

Operational measures are undertaken at the facility which also minimize particulate emissions, in accordance with 17-296-310 F.A.C.:

- **Use of thick poly flaps over the doorways to prevent any sandblasting material from leaving the sandblast facility. The facility also constructs temporary sandblasting enclosures when necessary, in order to perform sandblasting on fixed plant equipment**
- **Maintenance of paved roads as needed**
- **Regular mowing of grass and care of vegetation**
- **Limiting access to plant property by unnecessary vehicles**
- **Bagged chemical products are stored in weather tight buildings until they are used. Spills of any powdered chemical products are cleaned up as soon as practicable**

Vehicles are restricted to slow speeds on the plant site

Attachment PMR8 2.txt

Fugitive Emission Identification

Criteria and Precursor Air Pollutants

Fugitive particulate emissions are addressed in Attachment PMR8_1.txt. FPL is not aware of fugitive particulate emissions of Sulfure Dioxide, Nitrogen Oxides or Carbon Monoxide that would exceed the reporting thresholds defined in the permit application instructions.

Fugative HAP's Emissions

FPL is not aware of fugitive emissions of HAP pollutants that would exceed the reporting thresholds defined in the permit application instructions.

Attachment PMR8 3.txt

**Martin Plant
Compliance Report and Plan**

This facility and emissions units identified in this application are in compliance with the Applicable Requirements identified in Sections II. B. and III. D. of the application form and attachments referenced in Section III. L. 12 (if included). Compliance is certified as of the date of this application is submitted to the Florida Department of Environmental Protection as required in Rule 62-213.420(1)(a) F.A.C.

Attachment PMR8 4.txt

Compliance Statement

I, the undersigned, am the responsible official as defined in Chapter 62-213, F.A.C., of the Title V source for which this report is being submitted. I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete.


Signature, Responsible Official

12/18/02
Date

Proposed Schedule for submittal of periodic compliance statements to the Department:

FPL will submit an annual compliance statement to the Department's Southeast District Office concurrently with the submittal of the Annual Operating Report for this facility.