

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

April 20, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Elsa A. Bishop, Manager
Air Permitting & Programs
Florida Power & Light Company
Post Office Box 088801
North Palm Beach, Florida 33408-8801

Dear Ms. Bishop:

Re: FPL Martin Power Plant-Unit 4A Compressor Testing
PSD-FL-146B: Permit Amendment

The Department has reviewed Florida Power & Light's (FPL's) letter of April 12, 1995 requesting a temporary amendment to the referenced permit while operational testing is conducted on Combustion turbine (CT) 4A in order to evaluate potential design issues in the compressor section of the unit. The amendment will relax emissions limitation applicable to CT 4A for duration of the of the 30-day test period.

Pursuant to the letter from FPL dated April 12, 1995, and subsequent conversations with the FDEP Southeast District office, FPL is hereby authorized to perform operational testing on combustion turbine 4A (CT 4A) on natural gas fuel in order to evaluate potential design issues in the compressor section of the unit, subject to the following conditions:

1. The Department's Southeast District Air Program Administrator shall be notified either in writing or by facsimile, at least 3 days prior to the commencement of testing of CT 4A.
2. To allow time for evaluation and testing of alterations to the compressor section of CT 4A, except as indicated below, the pound-per-hour emission limitations in Specific Condition 4 of the referenced permit (PSD-FL-146) for NO_x, CO** and VOC** shall not apply to CT 4A on any hour during which testing is being conducted pursuant to this temporary permit amendment. This temporary permit amendment shall remain in effect for 30 calendar days from startup after the current outage or until the testing is complete on combustion turbine 4A, or until June 30, 1995.

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3. During the evaluation and testing of CT 4A, all CT 4A pollutant emissions shall comply with the emission limits specified by the New Source Performance Standards (NSPS) for CTs, 40 CFR 60, Subpart GG.
4. Within 45 days after the completion of the test period, FPL shall furnish the Department with a report summarizing the results of the testing of the compressor and identify any operational problems with the CT units remaining to be resolved.
5. After completion of the testing period, CT 4A must be in compliance with all limitations in the referenced permit.

**Based on previous testing of several GE model MS-7001-FA combustion turbines under worst-case conditions, VOC and CO emissions can be expected to reach levels as high as 446 lbs/hr and 2,800 lbs/hr, respectively. The permittee shall utilize the data derived from the aforementioned previous testing of GE model MS-7001-FA combustion turbines in determining the emissions of VOC and CO for the purposes of determining annual emissions and fees for CT 4A for the test period.

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

The Petition shall contain the following information:

- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

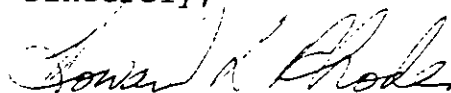
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- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement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

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

A copy of this letter shall be filed with the referenced permit and shall become a condition of that permit.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/aal/t

Enclosure: R. Piper's April 12, 1995 letter

cc: I. Goldman, SED
H. Oven, PPS
J. Harper, EPA
J. Bunyak, NPS

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 4-26-95 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant
to 120.52(11), Florida
Statutes, with the designated
Department Clerk, receipt of
which is hereby acknowledged.

Kim Lober
Clerk

4-26-95
Date

SENDER:
 Complete items 1 and 2 for additional services.
 Complete items 3, and 4a & b.
 Print your name and address on the reverse of this form so that we can return this card to you.
 Attach this form to the front of the mailpiece, or on the back if space does not permit.
 Write "Return Receipt Requested" on the mailpiece below the article number.
 The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services for an extra fee:
 1 Addressee's Address
 2 Restricted Delivery
 Consult postmaster for fee.

3 Article Addressed to
 Elsa A. Bishop, Mrs.
 Air Permittings + Procs.
 Fla. Power + Light Co.
 P.O. Box 088801
 N. Palm Bch. Fl

4a Article Number
 Z 311 902 922

4b Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7 Date of Delivery
 4-28-95

5 Signature (Addressee)
 33498-8801

8 Addressee's Address (Only if requested and fee is paid)

6 Signature (Agent)
 [Signature]

PS Form 3811, December 1991 U.S. GPO: 1993-362-714 **DOMESTIC RETURN RECEIPT**

Is your RETURN ADDRESS completed on the reverse side? Thank you for using Return Receipt Service

Z 311 902 922



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

PS Form 3800, March 1993

Sender	Elsa Bishop
Street and No.	Fla. Power + Lite
P.O., State and ZIP Code	N. Palm Bch, Fl
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	4-26-95
PSD-FI-146B	

Memorandum

Florida Department of
Environmental Protection

TO: Howard L. Rhodes
FROM: Clair Fancy *Clair Fancy for CHF*
DATE: April 18, 1995
SUNJ: Amendment of Permit No. PSD-FL-146B
FPL Martin-Combustion Turbine 4A

Attached for your approval and signature is a letter that will amend the PSD permit for one of the four gas combustion turbines (CT) located at FPL's Martin Power Plant. The amendment will relax (for 30 days) the emission standards for CT 4A while FPL and GE conduct tests to determine the cause of compressor failures and to improve the reliability of CT 4A.

FPL Martin CT 4A will still comply with all requirements of the New Source Performance Standards application to combustion turbines.

I recommend your approval and signature.

CHF/aal/t

attachment