



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

August 12, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Wayne C. Ondler  
Environmental Licensing Project Manager  
Florida Power & Light Company  
P. O. Box 088801  
North Palm Beach, FL 33408-8801

Dear Mr. Ondler:

Attached is one copy of the proposed amendment for permit PSD-FL-146 (PSD-FL-146A) for the Martin County Coal Gasification and Combined Cycle project. The purpose of this amendment is to authorize alteration and debugging of the combustors on 4 combustion turbines. Demonstration of compliance with the emission standards during this project will be based on continuous emission monitoring data. This emission data shall be provided to the Department after completion of this project. The mercury compliance test issues shall be addressed as a separate action.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Bruce Mitchell of the Bureau of Air Regulation.

Sincerely,

*for John C. Brown*  
C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/WH/bjb

Attachment

cc: I. Goldman, SED  
J. Harper, EPA  
R. Donelan, Esq., DEP  
H. Oven, PPS  
J. Bunyak, NPS  
D. Roberts, Esq., HBG&S

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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**SENDER:**  
 Complete items 1 and/or 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.

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:  
 Mr. Wayne C. Ondler  
 Environmental Licensing  
 Project Manager  
 Florida Power & Light Company  
 P. O. Box 088801  
 North Palm Beach, FL 33408-8801

4a. Article Number:  
 P 872 563 654

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

7. Date of Delivery: **PAID**

5. Signature (Addressee):

6. Signature (Agent):

8. Addressee's Address Only if requested and fee is paid:

PS Form 3811, December 1991 U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

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P 872 563 654



**Receipt for Certified Mail**

No Insurance Coverage Provided  
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Sent to Mr. Wayne C. Ondler, FP&L	
Street and No. P. O. Box 088801	
P.O., State and ZIP Code N. Palm Beach, FL 33408-8801	
Postage	\$
Certified Fee	
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Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 8-17-94 Permit: PSD-FL-146(a)	

PS Form 3800, JUNE 1991

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an  
Application for Permit Amendment

DEP File No. PSD-FL-146(A)  
Martin County

Florida Power & Light Company  
P. O. Box 088801  
North Palm Beach, FL 33408-8801

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INTENT TO ISSUE

The Department of Environmental Protection (Department) hereby gives notice of its intent to amend a prevention of significant deterioration permit, No. PSD-FL-146 (PSD-FL-146A), issued to Florida Power & Light Company, Post Office Box 088801, North Palm Beach, FL 33408-8801. The Department previously issued this permit for the construction of the Martin County Coal Gasification and Combined Cycle project located on SR 710, 5 miles N.W. of Indiantown, Martin County, Florida. The 880 MW project contains four combustion turbines (CT).

The amended PSD permit will allow for evaluation and testing of redesigned fuel combustors for the CTs. It provides temporary relief from certain short-term emission limits for nitrogen oxides, carbon monoxide, and volatile organic compounds during an initial period of up to 60 days after installation of the final combustor design in the initial CT. Installation of the design would then proceed on the other 3 CTs. The amendment provides a more limited period of 30 days relief per CT from the same emission limits for evaluation and testing of those units. The annual emission limits of these air pollutants and other permit limitations are not changed by this amendment.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 17-212 and 17-4, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that a permit amendment is required for the proposed work.

Pursuant to Section 403.815, F.S., and Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit Amendment. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area

affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit amendment.

The Department will issue the permit amendment with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

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 permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. 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.

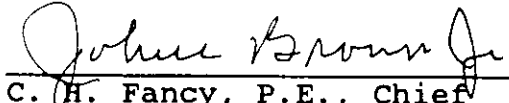
The Petition shall contain the following information;

- (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;
- (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 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 intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the 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 intent 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.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

*for*   
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399  
904-488-1344

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy clerk hereby certifies that this PERMIT AMENDMENT and all copies were mailed by certified mail before the close of business on 8/17/94 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.

  
Clerk 8/17/94  
Date

Copies furnished to:

I. Goldman, SED	H. Oven, PPS
J. Harper, EPA	J. Bunyak, NPS
R. Donelan, Esq., DEP	D. Roberts, Esq., HBG&S

**STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
INTENT TO ISSUE PERMIT AMENDMENT**

**DEP NO. PSD-FL-146(A)**

The Department of Environmental Protection gives notice of its intent to amend a prevention of significant deterioration permit, No. PSD-FL-146 (PSD-FL-146A), issued to Florida Power & Light Company, Post Office Box 088801, North Palm Beach FL 33408-8801. The Department previously issued a PSD permit for the construction and operation of the Martin County Coal Gasification and Combined Cycle project located on SR 710, 5 miles NW of Indiantown, Martin County, Florida. The 880 MW-project consists of 2 combined cycle units with 2 combustion turbines per unit.

The amended PSD permit will allow for evaluation and testing of redesigned fuel combustors for the combustion turbines (CT) by providing temporary relief under the current PSD permit from certain short-term emission limits for nitrogen oxides, carbon monoxide and volatile organic compounds during an initial period of up to 60 days after installation of the final combustor design in the initial CT. Installation of the design would proceed on the other 3 CTs with a need for a more limited period of 30 days relief per CT from the same emission limits for evaluation and testing of those units. The annual emission limits of these air pollutants and other permit limitations are not changed by this amendment.

A person whose substantial interests are affected by the Department's permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes (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, within 14 days of publication of this notice. Petitioner shall mail a copy of any petitions to the applicant, Mr. Wayne C. Ondler, Florida Power & Light Company, Post Office Box 088801, North Palm Beach, FL 33408-8801, 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 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's permit file number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action; (c) A statement of how each petitioner's substantial

interests are affected by the Department's 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; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action; (g) A statement of the relief sought by petitioner, stating precisely the action 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 Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the 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 the publication of this notice 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 pursuant to Rule 28-5.207, Florida Administrative Code.

The application for PSD permit amendment is available for public inspection during normal business hours, 8:00 AM to 5:00 PM, Monday through Friday, except legal holidays at

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, FL 32301

Department of Environmental Protection  
Southeast District  
1900 S. Congress Avenue, Suite A  
West Palm Beach, FL 33406

Any person may send written comments on the proposed action to Mr. John Brown at the Department of Environmental Protection, Bureau of Air Regulation, Mail Station 5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. All comments received within 14 days of publication of this notice will be considered in the Department's final determination.



# Department of Environmental Protection

# DRAFT

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

August XX, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Wayne C. Ondler  
Environmental Licensing Project Manager  
Florida Power & Light Company  
P. O. Box 088801  
North Palm Beach, FL 33408-8801

Dear Mr. Ondler:

Re: FPL Martin CG/CC Project  
PSD-FL-146A: Permit Amendment

The Department has reviewed your attorney's July 28 and August 2, 1994, letters requesting an amendment to the referenced permit and have considered our legal authority to approve the requested permit amendment.

The modifications requested are to relax the concentration and hourly emissions limits on one combustion turbine (CT) for a period of up to 60 days while the first altered dry low NO<sub>x</sub> combustor (DLN II) is being adjusted, relax the same emission limits for up to 30 days on each of the three remaining CTs while their altered DLN II combustors are being adjusted.

Paragraph 403.061(15), Florida Statutes (F.S.), authorizes the Department to consult with any person proposing to construct, install, or otherwise acquire a pollution control device or system concerning the efficacy of such device or system, or the pollution problem which may be related to the source, device, or system. Paragraph 403.061(16), F.S., authorizes the Department to encourage voluntary cooperation by persons in order to achieve the purposes of the state environmental control act. Paragraph 403.061(18), F.S., authorizes the Department to encourage and conduct studies, investigations, and research relating to the causes and control of pollution. Rule 17-210.700(5), Florida Administrative Code (F.A.C.), authorizes the Department to consider variation in industrial equipment and make allowances for excess emissions that provide practical regulatory controls consistent with the public interest. The Department believes it is in the interest of the public to allow the permittee to conduct tests to improve the performance and reliability of CTs

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*Printed on recycled paper.*



# DRAFT

Mr. Wayne C. Ondler  
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equipped with dry low NO<sub>x</sub> combustors. The temporary increase in emissions of the CTs over the limited time authorized by this amendment will not contribute significantly to the air pollution problem within Florida.

In accordance with the provisions of Paragraphs 403.061(15), (16), and (18), F.S., and Rule 17-210.700(5), F.A.C., Florida Power & Light Company is hereby authorized to alter the DLN II combustors for the four CTs subject to the referenced permit, operate the CT receiving the first altered DLN II combustor for a maximum period of 60 days for adjustment; and, operate each of the other three CTs for a maximum period of 30 days, after installation of the altered DLN II combustors, for adjustment provided the following conditions are met:

1. The Department's Southeast District air program administrator shall be notified in writing a minimum of 10 days in advance of initially placing any altered DLN II combustor into service.
2. To allow time for evaluation and testing of alterations to the dry low NO<sub>x</sub> combustor (DLN) design, the emission limitations in Specific Condition 4 of the referenced permit shall not apply during a sixty (60) day period following installation of the final DLN design configuration in the initial CT and shall not apply during a thirty (30) day period per CT following installation of the final DLN design in each of the remaining three CTs. During the evaluation and testing of the altered combustors, the maximum nitrogen oxides (NO<sub>x</sub>) emissions shall comply with the emission limit specified by the new source performance standards for CT, 40 CFR 60, Subpart GG. The annual allowable emissions (TPY) of NO<sub>x</sub> for each CT in permit PSD-FL-146 shall not be exceeded.
2. Except during CT performance testing for extreme conditions, carbon monoxide (CO) emissions shall not exceed 100 ppmvd. The maximum CO emissions during a 12 hour test period to evaluate CT performance during extreme conditions shall not exceed 500 ppmvd, 30 minute average. The annual allowable emissions (TPY) of CO for each CT in permit PSD-FL-146 shall not be exceeded.
3. The volatile organic compound (VOC) emissions shall not exceed 20 ppmvd except during CT performance testing for extreme conditions. During the 12 hour test period to evaluate CT

# DRAFT

Mr. Wayne C. Ondler  
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performance during extreme conditions, VOC emissions shall not exceed 100 ppmvd. The annual allowable emissions (TPY) of VOC from each CT in permit PSD-FL-146 shall not be exceeded.

4. After the adjustment period, each CT must be in compliance with all limitations in the referenced permit.

5. Within 45 days after the completion of the project, the permittee shall furnish the Department with a report summarizing the variation in parameters and emissions of NO<sub>x</sub>, VOC, and CO from the modified DLN II on all of the CTs and any operation problems with the CT units remaining to be resolved.

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;
- (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;

# DRAFT

Mr. Wayne C. Ondler  
PSD-FL-146A  
Permit Amendment  
August XX, 1994  
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(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action;

(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/WH/bjb

Attachment: Douglas Roberts' July 26, 1994, letter.  
Douglas Roberts' August 2, 1994, letter.

cc: I. Goldman, SED  
J. Harper, EPA  
R. Donelan, Esq., DEP  
H. Oven, PPS  
J. Bunyak, NPS  
D. Roberts, Esq., HBG&S