

Department of Environmental Protection

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

David B. Struhs Secretary

June 6, 2001

Richard Piper, Licensing Manager Environmental Services Department Florida Power and Light Company P.O. Box 14000 Juno Beach, FL 33408

Re:

FPL Martin Plant

Air Permit No. PSD-FL-286 Martin Peaking Units 8A and 8B

Dear Mr. Piper:

I received your letter informing the Department that FPL does not intend to perform emissions testing on the Martin peaking units in either power augmentation mode or high temperature peaking mode. The site does not have steam capability to provide steam injection for power augmentation. In addition, operating the units in high temperature peaking mode is predicted to shorten the maintenance interval for the units. As I recall, each unit was restricted to 400 hours per year for power augmentation and 60 hours per year of high temperature peaking mode.

I agree that, without the required testing, FPL is not authorized to operate these units in either power augmentation mode or high temperature peaking mode. During submittal of the Title V permit revision to incorporate Units 8A and 8B, please request removal of the conditions associated with these methods of operation. Otherwise, you will need to include a Compliance Plan that outlines a proposed schedule for testing each unit and demonstrating compliance with the standards.

If you have any questions, please contact me at 850/921-9536.

Sincerely.

Joffang. J. Kree Jeffery F. Koemer

New Source Review Section

cc:

Al Linero Scott Sheplak

Isidore Goldman, SED



May 22, 2001

Mr. Jeff Koerner, P.E.
State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

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BUREAU OF AIR REGULATION.

Re: FPL Martin Plant

PSD Permit #PSD-FL-286

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Dear Mr. Koerner:

Per our discussion, this correspondence is to inform the Department that FPL does not at this time intend to perform emissions testing on the Martin peaking units 8A and 8B in either power augmentation mode or in high temperature peaking mode.

Currently, the site does not have excess steam capability with which to provide power augmentation capability. In addition, the operation of the new units in high temperature peaking mode is predicted to shorten the maintenance interval for the equipment.

FPL recognizes that we will be unable to operate in either of the two referenced operating modes unless and until the emissions testing is performed.

If you should have any questions, please do not hesitate to contact me at (561) 691-7058 or via email at rich_piper@fpl.com.

Very truly yours,

Richard Piper

Licensing Manager

Florida Power & Light Company

CC:

Tom Tittle - DEP Southeast District Office