

Scott

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

August 8, 1995

Mr. Richard G. Piper
Environmental Specialist
Florida Power and Light Company
Post Office Box 088801
11770 U.S. Highway One
North Palm Beach, Florida 33408

Re: Martin Power Plant, Draft Title V Application
Facility ID No. 50WPB430001

Dear Mr. Piper:


This letter is in reference to the List of Insignificant Activities, "Attachment PMRFS_7.doc," submitted with the subject application.

Your portrayal of the information on the attached listing suggests that the industry listings of insignificant activities exempt certain activities. I understand what you mean, but want to clarify how it really works.

The Title V application should provide a listing of activities for which exemption is requested and justification for the request. For those activities listed at Rule 62-210.300(3), F.A.C., a citation of the rule is the justification. For those activities identified as "presumptive exemption," you may cite those words which means that they have been pre-reviewed by the Department. For any additional activities, you need to show detailed quantitative justification. For all of the above, except those activities listed at Rule 62-210.300(3), F.A.C., the permitting authority makes the final decision of whether they will be exempted, except that any activity not listed at Rule 62-210.300(3), F.A.C., and not listed as "presumptive exemption," needs to be approved by the Tallahassee office (DARM).

If you should have any questions, please contact Scott Sheplak at (904) 488-1344 or write to me at the above address.

Sincerely,


John C. Brown, Jr., P.E.
Administrator
Title V Section

JCB/ss/k

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

UNITS 3 & 4 COMBINED CYCLE POWER BLOCK			
Equipment/System	Size/Source	Type of Emissions	Rationale
Auxiliary Buildings H.V.A.C.	Vent/Exhaust System for Switchgear Rooms Toilet Area Chemical Storage Room Water Chemistry Lab Fume Hoods Auxiliary Boiler Building	air, toilet vapors	Exempted by D.E.P. Assessment Chart Items 17,22,23 & D.E.P. rule 62-213.400 & 62-210.300(3) F.A.C.
Combustion Turbine	Enclosure Venting	Air Turbine Vapors	Exempted by D.E.P. Assessment Chart Item 18
Main Liquid Fuel	¾" Vents to Atmosphere	Fuel oil vapors (VOC)	Exempted by E.P.A. Tanks 2 Program Results
	2" Liquid Fuel Drain Tank Vent (235 gal.)	Fuel oil vapors (VOC)	
	8" Vent w/Filter for Units 3&4 Liquid Fuel Storage Tank (2,000,000 gal.)		
Control Buildings, Potable and Sanitary	Sanitary Vents	Toilet vapors	Exemption by D.E.P. Assessment Chart Item 23
H. R. S. G.	Steam Relief Valves	Steam	Steam only Exempted by D.E.P. Assessment Chart Item 26
	1", 2" Vents to Atmosphere	Steam	
	C.E.M. Gases	NOx, CO2	Exempted by D.E.P. Assessment Chart Item 15
Service Water	¾" Vents to Atmosphere	Water vapor	No regulated pollutants emitted
Fire Protection System	1" Vents to Atmosphere	Water vapors	Exempted by F.D.E.P. Rule 62-210.300(3)(u) F.A.C.
	CO ₂ Control System	CO ₂	Exempted by F.D.E.P. Rule 62-210.300(3)
Emergency Diesel Generator System	Day Tank (500 Gal.) 1½" Vent	Fuel Oil Vapors (VOC)	Exempted by D.E.P. Assessment Chart Item 40

Presumptive exemption

EMISSIONS UNIT	UNIT TYPE	DEPARTMENT RECOMMENDATIONS
15. Testing equipment	CEMS, stack sampling calibration gases, oxygen detector	Presumptive exemption.
16. Internal combustion engines which drive compressors, generators, water pumps, or other auxiliary equipment	Natural gas, propane, gasoline, or diesel fuel combustion products	Exempt by Rule 17-210.300(3)(c) if diesel and operated less than 400 hrs/yr, otherwise presumptively exempt at time of application.
17. HVAC (heating, ventilation, and air conditioning systems)	Cooling/heating	Exempt by rule 17-213.400 and 17-210.300(3).
18. Vent/exhaust systems for: Print room storage cabinets Transformer vaults/ bldg. Maint./welding bldgs. Operating equipment vents Degasifier/dearators/ decarbonators Air blowers/ evacuators/air locks Feedwater heater vents	Steam/condensate	Presumptive exemption. Presumptive exemption. Presumptive exemption. Presumptive exemption. Presumptive exemption. Presumptive exemption.
19. Transformers, switches, and switchgear processing (including cleaning and changing) and venting.	Maintenance activities	Presumptive exemption.
20. Use of nitrogen cap during boiler shut-down	Nitrogen	Exempt, not a criteria or regulated substance.