



FPL

August 6, 1992

Mr. Preston Lewis, Supervisor
Permitting and Standards Section
State of Florida
Department of Environmental Regulation
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

RECEIVED

AUG 10 1992

Division of Air
Resources Management

**RE: Florida Power & Light Company
Martin Power Plant - Units 1 and 2
Request for Amendment of Construction Permits**

Dear Mr. Lewis:

Florida Power & Light Company (FPL) is planning to co-fire higher sulfur (1.0 percent sulfur) fuel oil and natural gas at the Martin Power Plant Units 1 and 2. The Martin Plant Units 1 and 2 currently burn 0.7 percent sulfur fuel oil and/or natural gas to meet an SO₂ emission limitation of 0.80 pound/MMBtu heat input. The plant uses fuel sampling and analysis to determine compliance with the SO₂ emission limitation.

FPL proposes to burn a variable combination of 1.0 percent sulfur fuel oil and natural gas to meet the SO₂ permit emission limitation specified above for Units 1 and 2. The air operating permit specifies an SO₂ emission limitation of 0.80 pound/MMBtu heat input which allows FPL to burn a variable combination of fuel oil and natural gas. However, the construction permits for Units 1 and 2 describe the use of 0.7 percent sulfur fuel oil or natural gas. It is my understanding based on previous discussions with you and your staff that only the construction permits for Units 1 and 2 would need to be amended to allow FPL to burn a variable combination of 1.0 percent sulfur fuel oil and natural gas to meet the SO₂ permit emission limitation.

FPL has decided to forgo the performance of a feasibility test for Unit 1 for burning 1.0 percent sulfur fuel oil and natural gas as previously discussed with you and your staff at our June 11, 1992 meeting. We hereby request Department approval for an amendment to the Units 1 and 2 construction permits to allow routine co-firing of higher sulfur (1.0 percent) fuel oil and sufficient quantities of natural gas, not to exceed the equivalent of a 0.80 pound SO₂/MMBtu emission limitation. Based on our June 11, 1992 meeting, it is my understanding the information contained in Enclosure 1 should be sufficient for the Department to process the requested construction permit amendments. Enclosed is FPL Check No. 0093 dated August 5, 1992 in the amount of \$250.00 to cover the construction permit amendment processing fee for the two generating units.

Martin Power Plant - Units 1 and 2
Request for Modification of Construction Permits
August 6, 1992
Page 2

If you have any questions regarding this request, please contact me at (407) 697-6924.

Sincerely,

A handwritten signature in cursive script that reads "Daniel R. Adams".

Daniel R. Adams
Environmental Specialist
Florida Power & Light Company

DRA:jm

Enclosures: (2)

cc: Willard Hanks - Florida DER Tallahassee
Tom Tittle - Florida DER Southeast District

Martin Power Plant Units 1 and 2
Co-Firing Higher Sulfur Fuel Oil and Natural Gas
Construction Permit Amendment Request Letter Information

The Florida DER has requested the following information regarding the referenced proposal at a June 11, 1992 meeting with FPL staff.

1. The construction permits and air operating permits for Units 1 and 2. See Attachment 1 for details on the construction permits and Attachment 2 for details on the air operating permits. Note that Units 1 and 2 have identical construction and air operating permits.
2. Description and location of the facility. The Martin Power Plant currently contains two 800 MW class fossil fuel-fired steam generators equipped with low NO_x dual fuel firing burners to control nitrogen oxides and multicyclones to control particulate matter emissions. The units burn low sulfur (0.7 percent) fuel oil and natural gas to control SO₂ emissions. In addition, these units have continuous emission monitoring systems for opacity and NO_x. Each unit's heat input rate is 8650 MMBtu/hr. on oil and 9040 MMBtu/hr. on natural gas. The plant is located in Martin County about six miles northwest of Indiantown, Florida off Highway 710.
3. The objective of the proposal is to allow FPL to operate Units 1 and 2 in a more flexible and cost effective manner. FPL plans to amend the construction permits for Units 1 and 2 to reflect an SO₂ emission limitation of 0.80 pound/MMBtu heat input as currently specified in the air operating permits for those units to allow FPL to co-fire higher sulfur (1.0 percent) fuel oil and natural gas in a variable combination. FPL estimates the cost savings to the customer in going from 0.7 to 1.0 percent sulfur fuel oil at the Martin Plant to be \$1.43 per barrel based on 1991 fuel cost data or about \$5.2 million per year based on the most recent five-year fuel use data for Units 1 and 2.
4. Comparison of fuel oil analyses for 0.7 and 1.0 percent sulfur fuel oils. See Attachment 3 for details. Please note that FPL does not expect an increase in emissions of regulated air pollutants to result from the proposed project. Furthermore, please note that Section 17-2.500(2)(c)(4), F.A.C., provides a new source review exemption for source modifications due to the use of an alternative fuel which the facility was capable of accommodating before January 6, 1975. The Martin Units 1 and 2 construction permits were initially issued by the Department on March 20, 1973 which qualifies for this exemption.
5. Identify and describe plant equipment and operational changes associated with the proposal. See Attachment 4 for details. Please note that the changes are to be made for the convenience in switching between 0.7 and 1.0 percent sulfur fuel oils.

VE
NOX

Enclosure 1

- SO₂
6. Compliance determination method for sulfur dioxide emissions. Based on previous discussions with Department staff, it is FPL's understanding that fuel sampling and analysis will no longer be acceptable for determining compliance with the SO₂ emission limitation. We understand that SO₂ continuous emission monitors will need to be installed and operated on Units 1 and 2 to ensure compliance with the SO₂ emission limitation. The SO₂ continuous emission monitors will be installed and certified in accordance with 40 CFR 60, Appendix B requirements.
 7. Compliance testing provisions. FPL will be performing compliance stack testing for opacity (Method 9), SO₂ (Method 6C), particulate matter (Method 5 or 17), and nitrogen oxides (Method 7 or 7E) for each of the two generating units to demonstrate compliance with all applicable permit emissions limitations. Please note that all applicable compliance testing requirements and compliance test reporting requirements will be complied with by FPL.
 8. Best operational practices as discussed in Attachment 4 will be implemented when co-firing the higher sulfur fuel oil.

ATTACHMENT 1

**Martin Power Plant - Unit 1
Construction Permit**



STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL
2562 EXECUTIVE CENTER CIRCLE, EAST
MONTGOMERY BUILDING, TALLAHASSEE, FLORIDA 32301

Peter P. Baljet
EXECUTIVE DIRECTOR

DAVID H. LEVIN
CHAIRMAN

Date: March 20, 1973

County: Martin County AP

Applicant: Florida Power & Light Company

Florida Power and Light Company
Mr.: Norris R. Kincaid
Director of Environmental Affairs
P. O. Box 3100
Miami, Florida 33101

Dear Mr. Kincaid: *construct,

Pursuant to your recent application, please find enclosed a permit No. AC 73044, dated 3/20/73, to * construct the subject steam generator - Unit #1

This construction permit is issued subject to the attached provisos.

Your continued cooperation will be appreciated.

Sincerely,

K. K. Huffstutler, Chief
Bureau of Permitting

^{2H}
KKH:hmj

cc: Southeast Regional Office
Board of County Commissioners (Martin County)
Project Engineer: W. H. Rogers, Jr.
Fort Pierce Sub-Region

JOHN R. MIDDLEMAS
BOARD MEMBER

GEORGE RUPPEL
BOARD MEMBER

JAMES F. REDFORD, JR.
BOARD MEMBER

A. D. VINCENT
BOARD MEMBER

STATE OF FLORIDA
DEPARTMENT OF AIR AND WATER
POLLUTION CONTROL

CONSTRUCTION PERMIT

FOR Florida Power & Light Company
P. O. Box 3100
Miami, Florida 33101

*Replaced
with
AC 43-4037
6/30/77*

PERMIT NO. AC-73044 DATE 3/20/73

PURSUANT TO THE PROVISION OF SECTION 403.061 (16) OF CHAPTER 403, FLORIDA STATUTES AND CHAPTER 17-4 FLORIDA ADMINISTRATIVE CODE, THIS PERMIT IS ISSUED TO: Norris R. Kincaid, Director of Environmental Affairs

FOR THE CONSTRUCTION OF THE FOLLOWING:
#1 Steam Generator Unit producing 13.38 x 10¹⁰ BTU/Day
burning .7% sulfur Bunker "C" oil.

LOCATED AT: Martin County, Florida
UTM - East 542600 - NORTH 2991500

IN ACCORDANCE WITH THE APPLICATION DATED 12/18/72
AND IN CONFORMITY WITH THE STATEMENTS AND SUPPORTING DATA ENTERED THEREIN,
ALL OF WHICH ARE FILED WITH THE DEPARTMENT AND ARE CONSIDERED A PART OF THIS
PERMIT.

THIS PERMIT SHALL BE EFFECTIVE FROM THE DATE OF ITS ISSUANCE UNTIL 12/30/77
AND SHALL BE SUBJECT TO ALL APPLICABLE LAWS OF THE STATE AND THE RULES AND REGULATIONS OF THE DEPARTMENT.

K.K. Huffstutler
K. K. Huffstutler, Chief
~~XXXXXXXXXXXX~~
BUREAU OF PERMITTING

Peter P. Baljet
Peter P. Baljet
~~XXXXXXXXXXXX~~
EXECUTIVE DIRECTOR

DEPARTMENT OF POLLUTION CONTROL

CONSTRUCTION PERMIT PROVISOS

AIR POLLUTION SOURCES

Permit No. AC-73044

Date: 3/20/73

- 1. Construction of this installation shall be completed by 6/30/77
- 2. This construction permit expires on 12/30/77 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Pollution Control Board.
- 3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction.
- 4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Pollution Control for consideration toward the issuance of an operation permit.
- 5. This _____ shall be tested for _____ within _____ days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted in duplicate to the DPC _____ Florida Regional Office _____

- 6. The operation of this installation shall be observed for visible emissions in accordance with Method 9 - Visible Determination of the Opacity of Emissions from Stationary Sources (Federal Register, December 23, 1971). The observation results are required prior to our issuance of an operation permit, and shall be submitted in duplicate to the DPC Southeast Florida Regional Office, 200 S.E. 6th Street, Suite 500, Fort Lauderdale, Florida 33301
- 7. Stack sampling for total particulate or other contaminant emissions shall be conducted if found by the DPC _____ Florida Regional Office to be necessary as a basis for the issuance of an operation permit.
- 8. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.

The following items are required prior to our issuance of an operation permit in addition to the engineer of record's report of inspection:

- (a) An emission report for total particulates ~~and sulfur oxides~~ based upon actual operations.
- (b) A tabular summary of fuels used & sulfur content (as received basis).
- (c) A tabular summary of actual records of frequencies and durations of soot blowing as well as boiler blowdown characteristics and disposal practices.

These items are required prior to our issuance of an operation permit and shall be submitted in duplicate to the DPC Southeast Florida Regional Office, 200 S.E. 6th Street, Suite 504, Ft. Lauderdale, Florida 33301

- 10. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.
- X) 11. All fugitive dust generated at this site shall be adequately controlled.

STATE OF FLORIDA

JUL 5 1977

DEPARTMENT OF ENVIRONMENTAL REGULATION *Unit 1*
M. Tr. Env'l AffairsSOUTH FLORIDA SUBDISTRICT BRANCH OFFICE
806 SOUTH SIXTH STREET
FORT PIERCE, FLORIDA 33450REUBIN O. ASKEW
GOVERNORJOSEPH W. LANDERS, JR.
SECRETARY

June 30, 1977

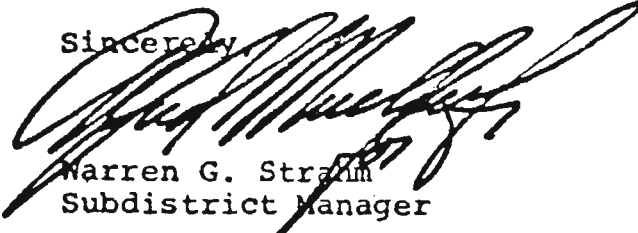
Mr. W. S. Tucker
Manager Environmental Affairs
Florida Power & Light Company
Post Office Box 013100
Miami, Florida 33101

Dear Mr. Tucker:

Pursuant to Section 403.061(16), Florida Statutes, your application, dated June 6, 1977, and plans submitted by your consultants to support this application have been reviewed and found acceptable to the department. We, therefore, are issuing to you the enclosed permit (No. AC56-4037) dated 6-30-77 to construct/~~xxxxxx~~ the subject pollution source.

This permit is not effective unless you accept it. If you do not accept this permit, including any and all of the conditions contained therein, you must file an appropriate petition for an administrative hearing pursuant to the provisions of Section 120.57, Florida Statutes, within fourteen (14) days from receipt of this letter. This petition must comply with the requirements of Section 28-5.15, Florida Administrative Code, and be filed with the Secretary of the Department of Environmental Regulation, 2562 Executive Center Circle East, Montgomery Building, Tallahassee, Florida 32301. If no petition is filed within the above time period, you will be deemed to have accepted this permit and waived your right to request an administrative hearing on this permit issuance, and it will constitute final agency action. Should you file a petition for hearing, it will be subject to dismissal by the Division of Administrative Hearings if it does not comply with the requirements of Section 28-5.15, Florida Administrative Code.

Sincerely,


Warren G. Strahm
Subdistrict Manager

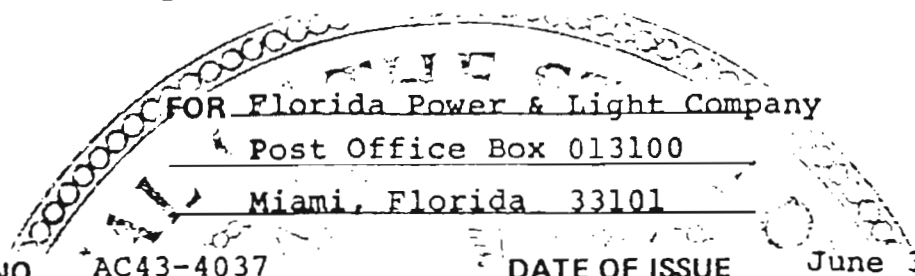
WGS/GH:dlg

Enclosure

Tallahassee File
cc: Mr. Cronfel, P.E.

28.1CA

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION CONSTRUCTION PERMIT



FOR Florida Power & Light Company
Post Office Box 013100
Miami, Florida 33101

PERMIT NO. AC43-4037 DATE OF ISSUE June 30, 1977

PURSUANT TO THE PROVISIONS OF SECTIONS 403.061 (16) AND 403.707 OF CHAPTER 403 FLORIDA STATUTES AND CHAPTERS 17-4 AND 17-7 FLORIDA ADMINISTRATIVE CODE, THIS PERMIT IS ISSUED TO:
W. S. Tucker, Manager Environmental Affairs

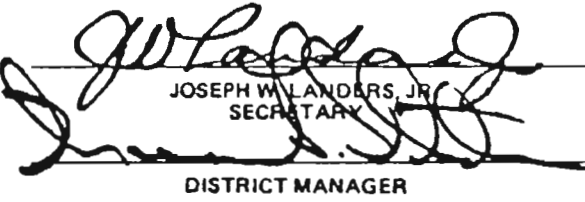
FOR THE CONSTRUCTION OF THE FOLLOWING: Steam Generator Unit #1,
producing 5,579 MBtu/hr., burning max. of 0.7% sulfur
Bunker "C" oil or natural gas subject to attached provisos
of approval, nos. 1, 2, 3, 4, 5, 7, 8, 9, 10, 11 & 13.

LOCATED AT Indiantown, Martin County
UTM Zone 17, East 542,600 M, North 2,991,500 M

IN ACCORDANCE WITH THE APPLICATION DATED June 6, 1977

ANY CONDITIONS OR PROVISOS WHICH ARE ATTACHED HERETO ARE INCORPORATED INTO AND MADE A PART OF THIS PERMIT AS THOUGH FULLY SET FORTH HEREIN. FAILURE TO COMPLY WITH SAID CONDITIONS OR PROVISOS SHALL CONSTITUTE A VIOLATION OF THIS PERMIT AND SHALL SUBJECT THE APPLICANT TO SUCH CIVIL AND CRIMINAL PENALTIES AS PROVIDED BY LAW.
THIS PERMIT SHALL BE EFFECTIVE FROM THE DATE OF ISSUE UNTIL February 1, 1982
OR UNLESS REVOKED OR SURRENDERED AND SHALL BE SUBJECT TO ALL LAWS OF THE STATE AND THE RULES AND REGULATIONS OF THE DEPARTMENT.


BRANCH OFFICE MANAGER


JOSEPH W. LANDERS, JR.
SECRETARY
DISTRICT MANAGER

GH

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

CONSTRUCTION PERMIT PROVISOS

AIR POLLUTION SOURCES

Permit No. AC43-4037

Date 6-30-77

- (X) 1. Construction of this installation shall be completed by December 1, 1981. Application for permit to operate to be submitted by January 1, 1982. *may want to change address so administer*
- (X) 2. This construction permit expires on February 1, 1982 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Environmental Regulation Commission. *also this need to be addend*
- (X) 3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. *N/C*
- (X) 4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Environmental Regulation for consideration toward the issuance of an operation permit. *N/C*
- (X) 5. This STEAM GENERATING UNIT #1 shall be tested for EPA "NEW SOURCE" COMPLIANCE TESTING within 30 days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted to the Department of Environmental Regulation, 806 S. Sixth Street, Fort Pierce, Fla. 33450-(305)464-8525. *THIS SHOULD HAVE BEEN DONE 1/23/81* *MAY NEED AMEND*
- () 6. The operation of this installation shall be observed for visible emissions in accordance with Method 9 - Visible Determination of the Opacity of Emissions from Stationary Sources (Federal Register, December 23, 1971) by a certified reader. A copy of the reader's certification card is to be submitted. The observation results are required prior to our issuance of an operation permit and shall be submitted to the Department of Environmental Regulation,
- (X) 7. Stack sampling for total particulates or other contaminant emissions shall be conducted if found by the Department of Environmental Regulation at the Fort Pierce, Florida District Office to be necessary as a basis for the issuance of an operation permit.

- (X) 8. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.
- (X) 9. The following items are required prior to our issuance of an operation permit in addition to the engineer of record's report of inspection:
 - (X) (a) An emission report for total particulates based upon actual operations.
 - (X) (b) A tabular summary of fuels used & sulfur content (as received basis).
 - (X) (c) A tabular summary of actual records of frequencies and durations of soot blowing as well as boiler blowdown characteristics and disposal practices.

These items are required prior to our issuance of an operation permit and shall be submitted to the Department of Environmental Regulation 806 South Sixth Street, Fort Pierce, Florida 33450, telephone (305) 464-8525.

- (X) 10. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.
- (X) 11. All fugitive dust generated at this site shall be adequately controlled. This includes, but is not limited to, roadway dust.
- () 12. This permit is associated with a Development of Regional Impact (D.R.I.). It does not waive any other permits that may be required from this or any other State, Federal, or local agency.
- (X) 13. Please be advised that the Department does not condone nor authorize the permittee to by-pass waste materials from either air or wastewater facilities at any time that would result in a violation of the rules and regulations of the Department.

In case of breakdown or lack of proper functioning of the facility causing or likely to cause discharge of improperly treated sewage or air emissions, it shall be the duty of the owner of the facility to promptly notify the Department. In addition to notifying this Department, the permittee shall notify the local County Health Officer.

The owner of the impaired facility causing the violation shall be responsible for any and all damages which may result. If violations of State standards occur, enforcement actions may be initiated.

ATTACHMENT 1

**Martin Power Plant - Unit 2
Construction Permit**



STATE OF FLORIDA
 DEPARTMENT OF POLLUTION CONTROL
 2562 EXECUTIVE CENTER CIRCLE, EAST
 MONTGOMERY BUILDING, TALLAHASSEE, FLORIDA 32301

Peter P. Baljet
 EXECUTIVE DIRECTOR

DAVID H. LEVIN
 CHAIRMAN

Date: March 20, 1973

County: Martin County AP

Applicant: Florida Power & Light Company

*Replied
 with
 AC 43-4038
 dated
 6/30/77*

Florida Power & Light Company
 Mr.: Norris R. Kincaid
 Director of Environmental Affairs
 P. O. Box 3100
 Miami, Florida 33101

Dear Mr. Kincaid : *construct

Pursuant to your recent application, please find enclosed a permit No. AC-73045, dated 3/20/73, to *construct the subject steam generator Unit #2

This construction permit is issued subject to the attached provisos.

Your continued cooperation will be appreciated.

Sincerely,
K. K. Muffstutler
 K. K. Muffstutler, Chief
 Bureau of Permitting

411
 KKH:hmj

cc: Southeast Regional Office
 Board of County Commissioners (Martin County)
 Project Engineer: W. H. Rogers, Jr.
 Ft. Pierce Sub-Region

STATE OF FLORIDA
DEPARTMENT OF AIR AND WATER
POLLUTION CONTROL

CONSTRUCTION PERMIT

FOR Florida Power & Light Company
P. O. Box 3100
Miami, Florida 33101

PERMIT NO. AC-73045

DATE 3/20/73

PURSUANT TO THE PROVISION OF SECTION 403.061 (16) OF CHAPTER 403, FLORIDA STATUTES AND CHAPTER 17-4 FLORIDA ADMINISTRATIVE CODE, THIS PERMIT IS ISSUED TO:
Norris R. Kincaid, Director of Environmental Affairs


FOR THE CONSTRUCTION OF THE FOLLOWING:

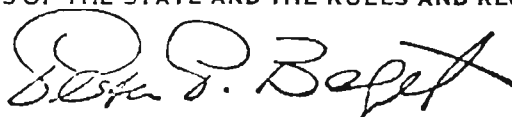
#2 Steam Generator Unit producing 13.38×10^{10} BTU/DAY
buring .7% sulfur Bunker "C" oil.

LOCATED AT: Martin County
UTM North 2991500 - East 542600

IN ACCORDANCE WITH THE APPLICATION DATED 12/18/72
AND IN CONFORMITY WITH THE STATEMENTS AND SUPPORTING DATA ENTERED THEREIN,
ALL OF WHICH ARE FILED WITH THE DEPARTMENT AND ARE CONSIDERED A PART OF THIS
PERMIT.

THIS PERMIT SHALL BE EFFECTIVE FROM THE DATE OF ITS ISSUANCE UNTIL 12/30/77
AND SHALL BE SUBJECT TO ALL APPLICABLE LAWS OF THE STATE AND THE RULES AND REGULATIONS OF THE DEPARTMENT.


K. K. Huffstutler, Chief
XXXXXXXXXXXXXXXXXXXX
BUREAU OF PERMITTING


Peter P. Baljet
XXXXXXXXXXXXXXXXXXXX
EXECUTIVE DIRECTOR

DEPARTMENT OF POLLUTION CONTROLCONSTRUCTION PERMIT PROVISOSAIR POLLUTION SOURCES

Permit No. AC-73045

Date: 3/20/73

- [X] 1. Construction of this installation shall be completed by 6/30/77
- [X] 2. This construction permit expires on 12/30/77 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Pollution Control Board.
- [X] 3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction.
- [X] 4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Pollution Control for consideration toward the issuance of an operation permit.
- [] 5. This _____ shall be tested for _____ within _____ days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted in duplicate to the DPC _____ Florida Regional Office _____
- [X] 6. The operation of this installation shall be observed for visible emissions in accordance with Method 9 - Visible Determination of the Opacity of Emissions from Stationary Sources (Federal Register, December 23, 1971). The observation results are required prior to our issuance of an operation permit, and shall be submitted in duplicate to the DPC Southeast _____ Florida Regional Office, 200 S.E. 6 Street, Fort Lauderdale, Florida 33301
- [] 7. Stack sampling for total particulate or other contaminant emissions shall be conducted if found by the DPC _____ Florida Regional Office to be necessary as a basis for the issuance of an operation permit.
- [X] 8. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.

(TURN OVER)

x) 9. The following items are required prior to our issuance of an operation permit in addition to the engineer of record's report of inspection:

- (a) An emission report for total particulates ~~XXXXXXXXXXXXXXXX~~ based upon actual operations.
- (b) A tabular summary of fuels used & sulfur content (as received basis)
- (c) A tabular summary of actual records of frequencies and durations of soot blowing as well as boiler blowdown characteristics and disposal practices.

These items are required prior to our issuance of an operation permit and shall be submitted in duplicate to the DPC Southeast Florida Regional Office, 200 S.E. 6th Street, Suite 504, Ft. Lauderdale, Florida 33301

- 10. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.
- x) 11. All fugitive dust generated at this site shall be adequately controlled.



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTH FLORIDA SUBDISTRICT BRANCH OFFICE
 806 SOUTH SIXTH STREET
 FORT PIERCE, FLORIDA 33450

RECEIVED

JUN 30 1977

Mgr. Envt. Affairs

REUBIN O.D. ASKEW
 GOVERNOR

JOSEPH W. LANDERS, JR.
 SECRETARY

June 30, 1977

Mr. W. G. Tucker,
 Manager Environmental Affairs
 Florida Power & Light Company
 Post Office Box 013100
 Miami, Florida 33101

Unit #2

Dear Mr. Tucker:

Pursuant to Section 403.061(16), Florida Statutes, your application, dated June 6, 1977, and plans submitted by your consultants to support this application have been reviewed and found acceptable to the department. We, therefore, are issuing to you the enclosed permit (No. AC43-4038) dated 6-30-77 to construct/~~operate~~ the subject pollution source.

This permit is not effective unless you accept it. If you do not accept this permit, including any and all of the conditions contained therein, you must file an appropriate petition for an administrative hearing pursuant to the provisions of Section 120.57, Florida Statutes, within fourteen (14) days from receipt of this letter. This petition must comply with the requirements of Section 28-5.15, Florida Administrative Code, and be filed with the Secretary of the Department of Environmental Regulation, 2562 Executive Center Circle East, Montgomery Building, Tallahassee, Florida 32301. If no petition is filed within the above time period, you will be deemed to have accepted this permit and waived your right to request an administrative hearing on this permit issuance, and it will constitute final agency action. Should you file a petition for hearing, it will be subject to dismissal by the Division of Administrative Hearings if it does not comply with the requirements of Section 28-5.15, Florida Administrative Code.

Sincerely,

Warren G. Strahm
 Subdistrict Manager

WGS/GH:dlg

cc: Mr. Cronfel
 Tallahassee File

Enclosure

28.1CA

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION CONSTRUCTION PERMIT

FOR Florida Power & Light Company

Post Office Box 013100

Miami, Florida 33101

PERMIT NO. AC43-4038

DATE OF ISSUE June 30, 1977

PURSUANT TO THE PROVISIONS OF SECTIONS 403.061 (16) AND 403.707 OF CHAPTER 403 FLORIDA STATUTES AND CHAPTERS 17-4 AND 17-7 FLORIDA ADMINISTRATIVE CODE, THIS PERMIT IS ISSUED TO:
W. S. Tucker, Manager Environmental Affairs

FOR THE CONSTRUCTION OF THE FOLLOWING: Steam generator unit #2,
producing 5,579 MBtu/hr., burning max. of 0.7% sulfur
Bunker "C" oil or natural gas. Subject to attached provisos
of approval no. 1,2,3,4,5,7,8,9,10,11,13.

LOCATED AT Indiantown, Martin County

UTM Zone 17, East 542,600 M, North 2,991,500 M

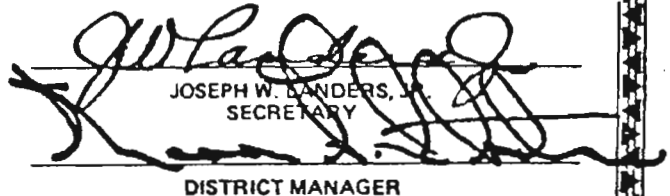
IN ACCORDANCE WITH THE APPLICATION DATED June 6, 1977

ANY CONDITIONS OR PROVISOS WHICH ARE ATTACHED HERETO ARE INCORPORATED INTO AND MADE A PART OF THIS PERMIT AS THOUGH FULLY SET FORTH HEREIN, FAILURE TO COMPLY WITH SAID CONDITIONS OR PROVISOS SHALL CONSTITUTE A VIOLATION OF THIS PERMIT AND SHALL SUBJECT THE APPLICANT TO SUCH CIVIL AND CRIMINAL PENALTIES AS PROVIDED BY LAW.

THIS PERMIT SHALL BE EFFECTIVE FROM THE DATE OF ISSUE UNTIL February 1, 1983

OR UNLESS REVOKED OR SURRENDERED AND SHALL BE SUBJECT TO ALL LAWS OF THE STATE AND THE RULES AND REGULATIONS OF THE DEPARTMENT.


BRANCH OFFICE MANAGER


JOSEPH W. SANDERS, JR.
SECRETARY
DISTRICT MANAGER

GH

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

CONSTRUCTION PERMIT PROVISOS

AIR POLLUTION SOURCES

Permit No. AC43-4038

Date 6-30-77

- (X) 1. Construction of this installation shall be completed by December 1, 1982. Application for permit to operate to be submitted by January 1, 1983.
- (X) 2. This construction permit expires on February 1, 1983 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Environmental Regulation Commission.
- (X) 3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction.
- (X) 4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Environmental Regulation for consideration toward the issuance of an operation permit.
- (X) 5. This steam generating unit #2 shall be tested for EPA "New Source" compliance testing within 30 days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted to the Department of Environmental Regulation, 806 S. Sixth St., Fort Pierce, Fla. 33450--(305) 464-8525.
- () 6. The operation of this installation shall be observed for visible emissions in accordance with Method 9 - Visible Determination of the Opacity of Emissions from Stationary Sources (Federal Register, December 23, 1971) by a certified reader. A copy of the reader's certification card is to be submitted. The observation results are required prior to our issuance of an operation permit and shall be submitted to the Department of Environmental Regulation,
-
- (X) 7. Stack sampling for total particulates or other contaminant emissions shall be conducted if found by the Department of Environmental Regulation at the Fort Pierce, Florida District Office to be necessary as a basis for the issuance of an operation permit.

- (x) 8. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.
- (x) 9. The following items are required prior to our issuance of an operation permit in addition to the engineer of record's report of inspection:
 - (x) (a) An emission report for total particulates based upon actual operations.
 - (x) (b) A tabular summary of fuels used & sulfur content (as received basis).
 - (x) (c) A tabular summary of actual records of frequencies and durations of soot blowing as well as boiler blowdown characteristics and disposal practices.

These items are required prior to our issuance of an operation permit and shall be submitted to the Department of Environmental Regulation 806 South Sixth Street, Fort Pierce, Florida 33450 telephone (305) 464-8525.

- (x) 10. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.
- (x) 11. All fugitive dust generated at this site shall be adequately controlled. This includes, but is not limited to, roadway dust.
- () 12. This permit is associated with a Development of Regional Impact (D.R.I.). It does not waive any other permits that may be required from this or any other State, Federal, or local agency.
- (x) 13. Please be advised that the Department does not condone nor authorize the permittee to by-pass waste materials from either air or wastewater facilities at any time that would result in a violation of the rules and regulations of the Department.

In case of breakdown or lack of proper functioning of the facility causing or likely to cause discharge of improperly treated sewage or air emissions, it shall be the duty of the owner of the facility to promptly notify the Department. In addition to notifying this Department, the permittee shall notify the local County Health Officer.

The owner of the impaired facility causing the violation shall be responsible for any and all damages which may result. If violations of State standards occur, enforcement actions may be initiated.

ATTACHMENT 2

Martin Power Plant - Unit 1
Air Operating Permit



Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406 • 407-964-9668

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary

Scott Benyon, Deputy Assistant Secretary

NOTICE OF PERMIT

Martin County
AP - Florida Power & Light Martin Unit 1
Fossil Fuel Steam Generator

RECEIVED

MAR 01 1990

Mr. M. A. Smith
Manager - Environmental Permitting
and Programs
Florida Power & Light
P. O. Box 078768
West Palm Beach, Florida 33407-0768

MANAGER
ENVIRONMENTAL AFFAIRS

Dear Mr. Smith:

Enclosed is Permit Number AO 43-170568, to operate an air pollution source issued pursuant to Section 403.087, Florida Statutes.

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 17-103 and 28-5.201, FAC, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, FL 32399-2400, within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes. This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, FAC. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, FL 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the Final Order is filed with the Clerk of the Department.

In addition, please be advised that some processes generate hazardous wastes. Please consult 40 C.F.R. Parts 260-271 and Chapter 17-730, F.A.C. for specific rules and regulations applicable to hazardous waste handlers. Attached for your use is a document entitled "Highlights of Hazardous Waste Regulations" which outlines typical compliance items applicable to various hazardous waste generators/facilities.

Executed in West Palm Beach, Florida

STATE OF FLORIDA
DEPARTMENT OF REGULATION

J. Scott Benyon
Deputy Assistant Secretary
1900 South Congress Ave., Suite A
West Palm Beach, FL 33406
407/964-9668

JSB:SBK53

Mr. M. A. Smith
Florida Power & Light
West Palm Beach, Florida
Page 2 of 2

DER Permit Number AO 43-170568

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on FEB 26 1990 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to §120.52(10), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Phyllis J. Kern
Clerk

FEB. 26 1990
Date

trap, allowable $\text{SO}_2 = 0.80 \text{ lbs/mm Btu hr high}$
AP42: $E_{\text{SO}_2} \text{ (lbs/10}^3 \text{ gal)} = 1575$ rounded off
all

$$E_{\text{SO}_2} \text{ (lbs/10}^6 \text{ CF)} = 0.6$$

gas

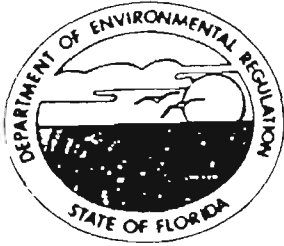
$$E_{\text{SO}_2} = \frac{157(0.7) \text{ lbs}}{10^3 \text{ gal}} \times \frac{\text{gal} \times 10^6}{145,000 \text{ Btu}} = 0.758 \text{ lb/mm Btu}$$

0.7% O₂

$$E_{\text{SO}_2} = \frac{157(1)(10^6)}{(10^3)(145,000)} = 1.08 \text{ lb/mm Btu}$$

1.0% O₂

$$\frac{E_{\text{SO}_2}}{\text{gas}} = \frac{0.6 \text{ FT}^3 \times 10^6}{10^3 \text{ FT}^3 \times 1020 \text{ Btu}} = \frac{0.58 \text{ lbs}}{\text{mm Btu}}$$



Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406 • 407-964-9668

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

Scott Benson, Deputy Assistant Secretary

*APLS
Charles D. Henderson,
Senior Affairs Dept.*

PERMITTEE:
Mr. M. A. Smith
Manager - Environmental Permitting
and Programs
Florida Power & Light
P. O. Box 078768
West Palm Beach, Florida 33407-0768

I.D. NUMBER: 50/WPB/43/0001/01
PERMIT/CERTIFICATION NUMBER: **AO 43-170568 ***
DATE OF ISSUE: **FEB 23 1990**
EXPIRATION DATE: **November 29, 1994**
COUNTY: Martin
LATITUDE/LONGITUDE: 27° 19' 16"N/80° 33' 53"W
UTM: Zone 17; 543.1 Km. E; 3022.0 Km. N
PROJECT: Florida Power & Light Martin Unit 1
Fossil Fuel Steam Generator

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule 17-2, and in conformance with all existing regulations of the Florida Department of Environmental Regulation. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

OPERATE: An air pollution source consisting of a 800 MW Class Fossil Fuel Steam Generator Unit Number 1 (900 megawatt gross capacity) equipped with Low NO_x Dual Fuel Firing Burners to reduce emissions of nitrogen oxides; and multicyclones to control particulate emissions. The unit burns low sulfur fuel oil and natural gas to control sulfur dioxide emissions. In addition, the unit has a continuous emission monitoring system for opacity and NO_x. The unit's heat input rate is 8650 MM BTU/hr. on oil and 9040 mm BTU/hr. on natural gas. *Just*

IN ACCORDANCE WITH: Application for Renewal of Permit to Operate Air Pollution Sources received September 25, 1989; and letter dated February 8, 1990; Permit AO 43-51169 dated November 29, 1984 as modified February 4, 1985; permit AC 43-4037 dated June 30, 1977 as modified January 22, 1981; and Permit AC 73044 dated March 20, 1973. (None are attached).

LOCATED AT: 6 miles NW of Indiantown off Highway 710 in Martin County, Florida.

TO SERVE: A fossil fuel steam generating plant (SIC # 4911).

SUBJECT TO: General Conditions 1-14. and Specific Conditions 1-13.

* This permit is a renewal of AO 43-51169 issued November 29, 1984 and a modification of AO 43-170568 issued December 16, 1989.

up from 5,579 MM BTU/hr!

*8650 MM BTU/hr
x 0.8
6920
lbs/MM BTU
lbs/hr*

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action on any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for as indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

- (a) Have access to and copy any records that must be kept under the conditions of the permit;
- (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in the permit, the permittee shall immediately notify and provide the Department with the following information:

- (a) A description of and cause of noncompliance; and
- (b) The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department, may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Rule 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. The permittee shall comply with the following :
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically, unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit, records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.
14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

PERMITTEE:
Mr. M. A. Smith
Florida Power & Light
West Palm Beach, Florida

I.D. NUMBER: 50/WPB/43/0001/01
PERMIT/CERTIFICATION NUMBER: AO 43-170568
DATE OF ISSUE: ~~Feb 23 1990~~
EXPIRATION DATE: November 29, 1994

SPECIFIC CONDITIONS:

1. Compliance testing shall be conducted for the source covered by this permit once every federal fiscal year in accordance with the methods specified below. Testing of emissions should be conducted with the source operating within 10% of its rated capacity. Testing may be conducted at less than 90% of rated capacity; however, if so, subsequent operation is limited to up to 110% of the test load. Once the unit is so limited, then operation at higher capacities is allowed for a cumulative total of no more than fifteen days for purposes of additional compliance testing to regain rated capacity, with prior notification to the Department.

Notification to the Department is required in writing at least fifteen (15) days prior to testing and will include the testing protocol. The 15-day requirement for rescheduling may be waived at the discretion of the Department.

2. Emission limiting standards are as follows:

In accordance with 40CFR60 Subpart D and Florida Administrative Code Rule 17-2.660:

<u>Pollutant</u>	<u>Emission Limit</u>
Particulate Matter	0.10 lb. per million BTU heat input
Sulfur Dioxide	0.80 lb. per million BTU heat input
Nitrogen Oxides	0.30 lb. per million BTU heat input on oil 0.20 lb. per million BTU heat input on gas
Opacity.	Not greater than 20 percent, except one six-minute period per hour of not more than 27 percent opacity.

3. All compliance tests shall be performed using reference test methods as given in 40CFR60 and as adopted by reference in 17-2. Any deviations from the test methodology in order to facilitate "representative" testing shall be approved by the Department pursuant to F.A.C. Rule 17-2.700(3) prior to conducting the tests.

4. Operation and maintenance of continuous emission monitoring (CEM) systems shall be carried out according to the requirements of 40 CFR60; reports thereof shall be submitted to the Department's Southeast Florida District Office within thirty (30) days following each calendar quarter and will include information required under 40CFR60.7(c). The Department reserves the right to modify the format of the reports. For any periods of excess emissions, as defined in 40CFR60.45(g), the reports shall specify the cause and corrective actions taken as well as the specific operational conditions existing (i.e., steady-state output, load charging rate; sootblowing, liming, or air preheated steam cleaning sequences), during the periods of excess emissions.

5. Until such time when the Environmental Protection Agency (EPA) promulgates final rules regarding fuel sampling and test methods, the Department will accept the current fuel analysis program, provided that daily samples are composited and analyzed for sulfur content every seven (7) operating days, to demonstrate compliance with the 0.80 lb. SO₂ per million BTU based on the monthly composite. Monthly reports shall be submitted to the Department no later than thirty (30) days after the end of the month.

The Permittee shall be allowed 90 days after promulgation of fuel sampling and analysis methods to implement an EPA approved method of monitoring SO₂ emissions either by fuel sampling and analysis or continuous in-stack monitoring or other methods as approved under the provisions of 40CFR60.45.

6. The department may, after reviewing FPL's quarterly excess emission reports, require the Permittee to conduct Method 9 testing. The Department will notify FPL of such request, as well as the objective for such testing, at the request of the Permittee, the Department will take into account any potential instrument error or malfunction before requiring the scheduling of tests. Substantive opacity violations, as verified by Method 9, are subject to appropriate legal action; moreover, repetitive violations shall require the Permittee to revise operating and/or maintenance practices to abate these violations.

PERMITTEE:
Mr. M. A. Smith
Florida Power & Light
West Palm Beach, Florida

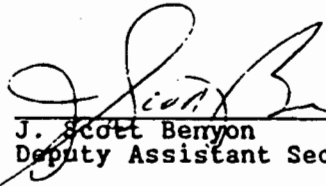
I.D. NUMBER: 50/WPB/43/0001/01
PERMIT/CERTIFICATION NUMBER: AO 43-170568
DATE OF ISSUE: FEB 23 1994
EXPIRATION DATE: November 29, 1994

SPECIFIC CONDITIONS:

7. "Start-up" is defined as referenced in 40CFR60 means the setting in operation of an affected facility for any purpose.
8. On or before March 1 of each calendar year, a completed DER Form 17-1.202(6), Annual Operations Report Form for Air Emissions Sources shall be submitted to the Department.
9. Excess emissions are allowed during startup, shutdown or malfunctions provided:
a) best operational practices are adhered to minimize emissions and b) the duration of the excess emissions is limited to no more than two (2) hours in any 24-hour period.
10. Emission limiting standards or test methods are subject to change should the Department adopt new rules applicable to this source in the future. Compliance with the standards shall be achieved in the time period required by the new rule.
11. All requirements pursuant to 40CFR60, as referenced in F.A.C. Rule 17-2.660, and not specifically addressed in this permit, must be complied with.
12. Burning of used oil meeting EPA specifications (40CFR S266.40) and generated from FPL operations shall be permitted under the following conditions:
 - (a) Each batch of used oil to be burned shall be sampled and analyzed for: Arsenic, Chromium, Cadmium, total Halogens, and Lead using EPA/DER or ASTM approved methods. Split samples of the used oil shall be retained for three (3) months after analysis for further testing if necessary.
 - (b) Results of used oil sampling and analysis performed pursuant to Specific Condition 12(a) shall be retained by permittee for at least three (3) years and made available for inspection by DER upon request.
 - (c) An estimate of the total quantity of used oil burned during the applicable calendar year shall be included in the Annual Operation Report (AOR) for Air Emissions Sources. The permittee will submit with the AOR a summary of the range of values for each constituent analyzed pursuant to Specific Condition 12(a).
13. The permittee shall be aware of and operate under the attached "General Permit Conditions #1 thru 14.". General Permit Conditions are binding upon the permittee and enforceable pursuant to Chapter 403 of the Florida Statutes.

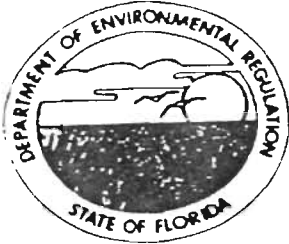
Issued this 23rd day of February, 1990

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION


J. Scott Berryon
Deputy Assistant Secretary

ATTACHMENT 2

**Martin Power Plant - Unit 2
Air Operating Permit**



Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406 • 407-964-9608

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

Scott Benyon, Deputy Assistant Secretary

NOTICE OF PERMIT

FEB. 22 1990

Martin County
AP - Florida Power & Light Martin Unit 2
Fossil Fuel Steam Generator

RECEIVED

FEB 26 1990

Mr. M. A. Smith
Manager - Environmental Permitting
and Programs
Florida Power & Light
P. O. Box 078768
West Palm Beach, Florida 33407-0768

Dear Mr. Smith:

MANAGER
ENVIRONMENTAL AFFAIRS

Enclosed is Permit Number **AO 43-170567**, to operate an air pollution source issued pursuant to Section 403.087, Florida Statutes.

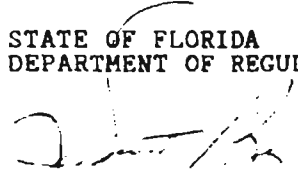
Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 17-103 and 28-5.201, FAC, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, FL 32399-2400, within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes. This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, FAC. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, FL 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the Final Order is filed with the Clerk of the Department.

In addition, please be advised that some processes generate hazardous wastes. Please consult 40 C.F.R. Parts 260-271 and Chapter 17-730, F.A.C. for specific rules and regulations applicable to hazardous waste handlers. Attached for your use is a document entitled "Highlights of Hazardous Waste Regulations" which outlines typical compliance items applicable to various hazardous waste generators/facilities.

Executed in West Palm Beach, Florida

STATE OF FLORIDA
DEPARTMENT OF REGULATION


J. Scott Benyon
Deputy Assistant Secretary
1900 South Congress Ave., Suite A
West Palm Beach, FL 33406
407/964-9668

JSB:SBK53

Mr. M. A. Smith
Florida Power & Light
West Palm Beach, Florida
Page 2 of 2

DER Permit Number AO 43-1/0567

CERTIFICATE OF SERVICE

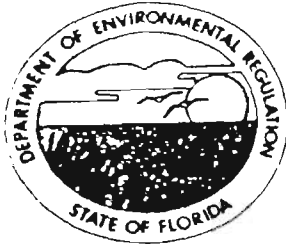
This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on FEB. 22 1990 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to §120.52(10), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Phyllis J. Kern
Clerk

FEB. 22 1990
Date



Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406 • 407-964-9000

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

Scott Benson, Deputy Assistant Secretary

PERMITTEE:

Mr. M. A. Smith
 Manager - Environmental Permitting
 and Programs
 Florida Power & Light
 P. O. Box 078768
 West Palm Beach, Florida 33407-0768

I.D. NUMBER: 50/WPB/43/0001/02
 PERMIT/CERTIFICATION NUMBER: AO 43-170567 *
 DATE OF ISSUE: FEB. 20 1990
 EXPIRATION DATE: November 29, 1994
 COUNTY: Martin
 LATITUDE/LONGITUDE: 27° 19' 16"N/80° 33' 53"W
 UTM: Zone 17; 543.1 Km. E; 3022.0 Km. N
 PROJECT: Florida Power & Light Martin Unit 2
 Fossil Fuel Steam Generator

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule 17-2, and in conformance with all existing regulations of the Florida Department of Environmental Regulation. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

CEM
OPERATE: An air pollution source consisting of a 800 MW Class Fossil Fuel Steam Generator Unit Number 2 (900 megawatt gross capacity) equipped with Low NO_x Dual Fuel Firing Burners to reduce emissions of nitrogen oxides; and multicyclones to control particulate emissions. The unit burns low sulfur fuel oil and natural gas to control sulfur dioxide emissions. In addition, the unit has a continuous emission monitoring system for opacity and NO_x. The unit's heat input rate is 8650 mm BTU/hr. on oil and 9040 mm BTU/hr. on natural gas.

*x. 5 lbs/mm BTU
6920 lbs. SO₂/Rm*
IN ACCORDANCE WITH: Application for Renewal of Permit to Operate Air Pollution Sources received September 25, 1989, and letter dated February 8, 1990; Permit AO 43-64102 dated November 29, 1984 as modified February 4, 1985; Permit AC 43-4038 dated June 30, 1977 as modified January 22, 1981; and Permit AC-73045 dated March 20, 1973. (none are attached).

LOCATED AT: 6 miles NW of Indiantown off Highway 710 in Martin County, Florida.

TO SERVE: A fossil fuel steam generating plant (SIC # 4911).

SUBJECT TO: General Conditions 1-14. and Specific Conditions 1-13.

* This permit is a renewal of AO 43-64102 issued November 29, 1984 and a modification of AO 43-170567 issued December 20, 1989.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action on any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for as indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

- (a) Have access to and copy any records that must be kept under the conditions of the permit;
- (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in the permit, the permittee shall immediately notify and provide the Department with the following information:

- (a) A description of and cause of noncompliance; and
- (b) The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department, may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Rule 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. The permittee shall comply with the following :
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically, unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit, records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.
14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

PERMITTEE:
Mr. M. A. Smith
Florida Power & Light
West Palm Beach, Florida

I.D. NUMBER: 50/WPB/43/0001/02
PERMIT/CERTIFICATION NUMBER: AO 43-170567
DATE OF ISSUE: FEB. 20 1990
EXPIRATION DATE: November 29, 1994

SPECIFIC CONDITIONS:

1. Compliance testing shall be conducted for the source covered by this permit once every federal fiscal year in accordance with the methods specified below. Testing of emissions should be conducted with the source operating within 10% of its rated capacity. Testing may be conducted at less than 90% of rated capacity; however, if so, subsequent operation is limited to up to 110% of the test load. Once the unit is so limited, then operation at higher capacities is allowed for a cumulative total of no more than fifteen days for purposes of additional compliance testing to regain rated capacity, with prior notification to the Department.

Notification to the Department is required in writing at least fifteen (15) days prior to testing. The 15-days requirement for rescheduling may be waived at the discretion of the Department.

2. Emission limiting standards are as follows:

In accordance with 40CFR60 Subpart D and Florida Administrative Code Rule 17-2.660:

<u>Pollutant</u>	<u>Emission Limit</u>
Particulate Matter	0.10 lb. per million BTU heat input
Sulfur Dioxide	0.80 lb. per million BTU heat input
Nitrogen Oxides	0.30 lb. per million BTU heat input on oil 0.20 lb. per million BTU heat input on gas
Opacity.	Not greater than 20 percent, except one six-minute period per hour of not more than 27 percent opacity.

3. All compliance tests shall be performed using reference test methods as given in 40CFR60 and as adopted by reference in 17-2. Any deviations from the test methodology in order to facilitate "representative" testing shall be approved by the Department pursuant to F.A.C. Rule 17-2.700(3) prior to conducting the tests.

4. Operation and maintenance of continuous emission monitoring (CEM) systems shall be carried out according to the requirements of 40CFR60; reports thereof shall be submitted to the Department's Southeast Florida District Office within thirty (30) days following each calendar quarter and will include information required under 40CFR60.7(c). The Department reserves the right to modify the format of the reports. For any periods of excess emissions, as defined in 40CFR60.45(g), the reports shall specify the cause and corrective actions taken as well as the specific operational conditions existing (i.e., steady-state output, load charging rate; sootblowing, liming, or air preheater steam cleaning sequences), during the periods of excess emissions.

5. Until such time when the Environmental Protection Agency (EPA) promulgates final rules regarding fuel sampling and test methods, the Department will accept the current fuel analysis program, provided that daily samples are composited and analyzed for sulfur content every seven (7) operating days, to demonstrate compliance with the 0.80 lb. SO₂ per million BTU based on the monthly composite. Monthly reports shall be submitted to the Department no later than thirty (30) days after the end of the month.

The Permittee shall be allowed 90 days after promulgation of fuel sampling and analysis methods to implement an EPA approved method of monitoring SO₂ emissions either by fuel sampling and analysis or continuous in-stack monitoring or other methods as approved under the provisions of 40CFR60.45.

6. The department may, after reviewing FPL's quarterly excess emission reports, require the Permittee to conduct Method 9 testing. The Department will notify FPL of such request, as well as the objective for such testing. At the request of the Permittee, the Department will take into account any potential instrument error or malfunction before requiring the scheduling of tests. Substantive opacity violations, as verified by Method 9, are subject to appropriate legal action; moreover, repetitive violations shall require the Permittee to revise operating and/or maintenance practices to abate these violations.

PERMITTEE:
Mr. M. A. Smith
Florida Power & Light
West Palm Beach, Florida


I.D. NUMBER: 50/WPB/43/0001/02
PERMIT/CERTIFICATION NUMBER: AO 43-170567
DATE OF ISSUE: FEB. 20 1990
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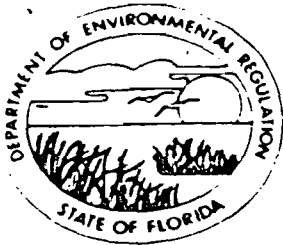
SPECIFIC CONDITIONS:

7. "Start-up" is defined as referenced in 40CFR60 and means the setting in operation of an affected facility for any purpose.
8. On or before March 1 of each calendar year, a completed DER Form 17-1.202(6), Annual Operations Report Form for Air Emissions Sources shall be submitted to the Department.
9. Excess emissions are allowed during startup, shutdown or malfunctions provided:
a) best operational practices are adhered to minimize emissions and b) the duration of the excess emissions is limited to no more than two (2) hours in any 24-hour period.
10. Emission limiting standards or test methods are subject to change should the Department adopt new rules applicable to this source in the future. Compliance with the standards shall be achieved in the time period required by the new rule.
11. All requirements pursuant to 40CFR60, as referenced in F.A.C. Rule 17-2.660, and not specifically addressed in this permit, must be complied with.
12. Burning of used oil meeting EPA specifications (40 CFR S266.40) and generated from FPL operations shall be permitted under the following conditions:
 - (a) Each batch of used oil to be burned shall be sampled and analyzed for: Arsenic, Chromium, Cadmium, total Halogens, and Lead using EPA/DER or ASTM approved methods. Split samples of the used oil shall be retained for three (3) months after analysis for further testing if necessary
 - (b) Results of used oil sampling and analysis performed pursuant to Specific Conditions 12(a) shall be retained by permittee for at least three (3) years and made available for inspection by DER upon request.
 - (c) An estimate of the total quantity of used oil burned during the applicable calendar year shall be included in the Annual Operation Report (AOR) for Air Emissions Sources. The permittee will submit with the AOR a summary of the range of values for each constituent analyzed pursuant to Specific Conditions (a)
13. The permittee shall be aware of and operate under the attached "General Permit Conditions #1 thru 14.". General Permit Conditions are binding upon the permittee and enforceable pursuant to Chapter 403 of the Florida Statutes.

Issued this 20th day of February, 1990

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION


J. Scott Benyon
Deputy Assistant Secretary



BEST AVAILABLE COPY

Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406 • 407-964-9000

Bob Martinez, Governor

Dale Trachtmann, Secretary

John Shearer, Assistant Secretary

Scott Benson, Deputy Assistant Secretary

HIGHLIGHTS OF HAZARDOUS WASTE REGULATIONS (October, 1989)

This write-up is provided to assist hazardous waste (HW) handlers in meeting the regulations. HWs are wastes which are either listed by the U.S. E.P.A., or are ignitable (i.e. flash point $< 140^{\circ}$ F, or an oxidizer), corrosive (e.g. pH < 2 or ≥ 12.5), reactive, or toxic, as defined in 40 CFR Part 261. A HW determination must be made of any waste generated (§262.11). If the waste is hazardous, then it must be recycled, treated, stored or disposed of at a proper HW facility. HW cannot be disposed of on or in the ground, nor at local landfills, septic tanks, or injection wells. Regardless of quantity, the generator of HW is ultimately responsible for the waste from "cradle to grave", and can be held liable for improper management of HW even though it may have been sent to a "proper" HW management facility using a licensed transporter. A copy of the hazardous waste regulations (40 CFR Parts 190-299 (specifically 260-270) can be obtained from a public, college or law library, or EPA Region IV (Atlanta, GA 30365), or the U. S. Government Printing Office (Washington, D.C. 20402) or the U.S. Government Printing Office, P.O. Box 35089, Jacksonville, Florida 32202, telephone 904/791-3801.

I. SMALL QUANTITY GENERATORS (SQG)

A. Conditionally Exempt Small Quantity Generators. (40 CFR 261.5; F.A.C. 17-730)

1. Perform HW determination (§262.11).
2. * Generate < 100 kg/month (< 1 kg month acute HW).
3. Accumulate < 1000 kg at any time.
4. Ensure delivery of HW to a proper recycling or Treatment/Storage/Disposal (TSD) facility.
5. For SQGs generating > 100 kg/month (approx. 25 gal.), use manifest for shipments.
6. Comply with land disposal restrictions (LDR) Part 268, unless exempt.

* Many wastes which are recycled are included in the quantity determination, as well as influent wastewaters prior to treatment, neutralization, etc.

B. SQG 100-1000 kg/month (40 CFR 262.34; F.A.C. 17-730)

1. Obtain a DER/EPA ID number (§262.12).
2. Use manifest system (unless there is a reclamation agreement pursuant to §262.20(e), and ship only to a permitted facility (262, Subpart B).
3. Never exceed the 6000 kg accumulation/180 day storage time limit.

NOTE: DER is more stringent here (i.e., eliminate the 200 mile/270 day exception), and will require SQG to file an exception report for late or missing manifests from the designated facility.

4. Emergency Planning

- a) Have at least one employee with authority as Emergency Coordinator (E.C.) that is on 24 hour call (§262.34(d)(5)).
- b) Next to the telephone, post (i) the E.C. name and phone number, (ii) fire department's number, (iii) location of fire extinguishers, spill control equipment/material, and fire alarm (if any) (§262.34(d)(5)).
- c) Follow emergency procedures in §262.34(d)(4), including taking necessary steps to address spills and fires, and notify National Response Center (24 hr. number: 800/424-8802).
- d) Upon request, the Department will provide a concise, easy-to-follow contingency plan guidance document which describes the contingency plan requirements for full generators, if the facility wishes to develop a more comprehensive emergency plan than required of 100-1000 kg/month generators.

Best Available Copy

Highlights of Hazardous Waste Regulations
Page 2 of 4

5. Training of personnel regarding proper HW handling and emergency response (§262.34)(d)(5)(iii).
6. Keep records (§262.44), including manifests, test results, etc. a minimum of three years.7.
7. If tanks are used for management of HW, meet the tank requirements of 265.201).
8. Meet the following requirements under II, below: items 7 through 21.
9. If a SQG fails to meet applicable requirements, the full generator standards (and possibly TSD standards) may apply.
10. Comply with Land Disposal Restrictions requirements set forth in 40 CFR §268.

NOTE: SQGs must be able to demonstrate proper management of HW, and records should be kept. Effective 9/22/86, the rules require 100-1000 kg/mo. generators to meet the following additional requirements (Federal Register, Vol. 51, No. 56, p. 10178, March 24, 1986).

- II. GENERATORS (40 CFR 262, 265, and 268; F.A.C. 17-630)
 1. Perform HW Determination [262.11].
 2. Obtain a DER/EPA ID number [262.12].
 3. Generate > 1000 kg/mo. or > 1 kg/mo. acute HW, or otherwise do not qualify for (or fails to fulfill certain) SQG requirements.
 4. Accumulate wastes < 90 days [§262.34(b)].
 5. File annual report for all HW shipped off site [F.A.C. 17-730.16].
 6. Meet personnel training requirements, including documentation [§265.16].
 7. Use manifest system, and ship to a permitted facility [262 Subpart B].
 8. File exception report for late or missing manifests from the designated facility [§262.42].
 9. Label containers with the words "hazardous waste" and accumulation start dates, and label tanks "hazardous waste: [§262.34(a)].
 10. Meet satellite accumulation rules [§262.34(c)].
 11. Meet pre-transport requirements re: packaging, labeling, marking and placarding [262 Subpart C].
 12. Keep all records for at least 3 years (e.g., manifests, test data, waste analyses, annual report, etc.) [262 Subpart D].
 13. Special cautions (including "No Smoking" signs) are required for ignitable or reactive wastes (§265.17).
 14. Security (e.g. a locked fence) and bermed containment areas (with roof and impermeable floor) for HW storage areas are strongly recommended.
 15. Maintain and operate the facility in a clean, safe manner [§265.31]. It is the facility's responsibility to comply with OSHA worker safety and protective clothing rules, Fire Codes, Florida's Right to Know Law, local government codes, etc.].
 16. Emergency equipment (§265.32).
 - a) telephone or hand-held two-way radio;
 - b) internal communication or alarm system;
 - c) fire and spill control equipment (e.g., fire extinguishers, hoses, sprinklers, etc.);
 - d) neutralizing agents, spill adsorbants, overpack drums, standby 55-gallon drums, etc.;
 - e) test and maintain the emergency equipment [§265.33];
 17. Maintain adequate aisle space for evacuation, inspecting drums, etc. [§265.35] (e.g., no less than 3 feet).

18. Attempt to make arrangements with local fire and police departments, hospitals, and emergency response contractors/equipment suppliers with regards to HW-related emergencies [§265.37].
19. Containers (e.g., drums, cans, etc.) must be kept closed and in good condition, inspected at least weekly, be compatible with the HW stored, and separated from other incompatible wastes (e.g., keep cyanides away from acids and oxidizers). [265 Subpart I].
20. Tanks must meet the requirements of 265 Subpart J (structural integrity; containment and detection of releases; inspection; response to leaks or spills; operating requirements; closure and post-closure care; special requirements for ignitable, reactive and/or incompatible wastes; waste analysis and trial test).
21. Comply with LDR requirements set forth in §268. Certification (land disposal restricted waste does not exceed treatment standards) or Notification (land restricted waste or exemption) must accompany all manifests of restricted wastes (§268.7), unless exempt.
22. Have a written contingency plan [265 Subpart D]. Upon request, the DER/West Palm Beach HW Section will provide a concise, easy-to-follow contingency plan guidance document.
23. Ignitable or reactive HW must be stored at least 50 feet from the facility's boundary line. [265 Subpart I].

III. TRANSPORTERS [40 CFR 265]

1. Obtain DER/EPA ID # [§263.11].
2. Use manifests [263 Subpart B].
3. Keep records (§263.22).
4. Ability to clean up discharges during transportation-related incidents (§263 Subpart C).
5. Documentation for financial liability [F.A.C. 17-730.170].
6. Transporter picking up HW from SQGs are exempt from manifest and recordkeeping requirements of §263.20.22, provided:
 - (a) the waste transported is pursuant to a reclamation agreement, and
 - (b) the transporter logs certain information and retains the record for 3 years after cessation of the agreement [§262.34(d)].
7. Transporters in Florida, storing HW > 24 hours, and < 10 days are considered a transfer facility and must notify the Department and comply with certain storage facility requirements such as personnel training, contingency plan, preparedness and prevention requirements, records maintenance, closure plan, security, container requirements, certain notification requirements, etc. HW stored in vehicles (or containers) at transfer facilities shall be on a manmade surface which is capable of preventing spills from reaching the ground [F.A.C. 17-730.171(2)].

IV. TREATMENT, STORAGE AND DISPOSAL FACILITIES (TSDF) (40 CFR 264 OR 265 AND 268)

Must notify as a TSDF, obtain a HW permit unless exempt (e.g., wastewater treatment units, elementary neutralization, etc.). Must meet applicable generator standards (II above) plus security, additional recordkeeping, containment system, closure and financial liability standards, waste analysis plan, inspection logs, post-closure and groundwater monitoring for certain operations, ensure that LDR Part 268 Standards are met; meet additional requirements for impoundments, waste piles, incinerators, etc. Facilities receiving HW from off-site (incl. certain recycling facilities) may be subject to TSDF requirements. A TSDF which has been issued a HW operating permit must comply with the provisions of it's HW permit and the applicable provisions of 40 CFR Part 264.

LAND DISPOSAL RESTRICTIONS

On November 8, 1984, the President signed into law the Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA). The Amendments require the EPA to evaluate all listed and characteristic hazardous wastes according to a strict schedule to determine which wastes should be restricted from land disposal. These restrictions are called Land Disposal Restrictions (LDR's). The LDR rule has been gradually applied, with more wastes being added every year. As of May 8, 1990 no hazardous wastes may be disposed of into land disposal units without first being treated to meet federally mandated treatment standards.

The generator of treated hazardous waste must provide signed certification (for each shipment) that his waste meets the treatment standard or, if it does not, the generator must send a signed notification to the TSD facility that the wastes do not meet treatment standards. The generator must also determine:

- a) whether the waste is subject to the LDR rules;
- b) what constituent levels are in the waste;
- c) which treatment standards or prohibition levels apply; and
- d) whether the waste must be treated or already meets the applicable treatment standard or prohibition level upon generation.

For each shipment of waste the generator must also:

- a) provide EPA hazardous waste number(s);
- b) determine the applicable treatment standard(s) for his waste;
- c) provide the manifest number associated with the waste shipment, and
- d) provide waste analysis data (if applicable).

All notifications, certifications, and waste analysis data must be kept on-site for at least five (5) years.

The LDR rule prohibits the dilution of restricted wastes as a substitute for adequate treatment.

The LDR rule provides for a few limited opportunities for delaying the effective date of prohibition, for a treatability variance, or for gaining an exemption from the prohibitions. Contact the EPA for additional details.

This LDR explanation is a very brief synopsis of a complex set of rules and regulations and is not meant to be all inclusive. The generator is responsible for familiarizing himself with the details of the LDR regulations. Contact the EPA or the Florida Department of Environmental Regulation for detailed information.

CAUTION

This hand out, written in plain English, is based on the staff's understanding of HW regulations. It should be read in conjunction with (and not as a substitute for) the Federal or State HW regulations. This write up includes only what the staff believes as the principal components of the HW regulations. The regulatory requirements indicated in this hand-out may change in time because of changes in regulations, new interpretations/guidance from EPA or DER, judicial ruling, and the like.

Ultimately, it is the facility's responsibility to stay current with applicable HW regulations and be in compliance of all applicable environmental regulations. Failure to meet the applicable rules may subject facilities to more stringent standards. For example, SQGs dumping HW illegally not only become subject to disposal facility standards but could also be subject to enforcement actions. Also, please note that the DER has an agreement with the U.S. EPA which mandates the assessment of penalties for violations of Resource Conservation Recovery Act (RCRA) requirements.

If you have questions on this write-up or HW compliance in general, please call the Waste Programs Section, telephone (407) 964-9668.

CO:s/d/245

August 1986
Revised July 1987
" October 1987
" September 1988
" October 1989

ATTACHMENT 3

**Fuel Oil Analyses Comparison
for 0.7 and 1.0 Percent Sulfur Fuel Oils**

**Fuel Oil Analyses Comparison
for 0.7 and 1.0 Percent Sulfur Fuel Oils**

The following is a summary of the as fired fuel oil analyses for the month of June 1992 for 0.7 and 1.0 percent sulfur fuel oils used at FPL's power generation facilities.

Parameter	0.7 Percent Sulfur Oil	1.0 Percent Sulfur Oil
API Gravity	12.6	10.7
Btu/lb.	18,554	18,372
MBtu/Barrel	6,373	6,394
Water (wt.%)	0.1	0.3
Sediment (wt.%)	0.03	0.04
Sulfur (wt.%)	0.68	1.00
Ash (wt%)	0.03	0.05
Vanadium (ppm)	10	20
Viscosity (SSF@122°)	167	165
Asphaltene (wt%)	1.3	3.1

ATTACHMENT 4

**Martin Power Plant
Proposed Fuel Oil handling System Design
and Best Operational Practices Description**



POWER RESOURCES

LOCATION
MARTIN POWER PLANT

PROCEDURE NUMBER
D:\GENOILBURN

TITLE
**BOILER FUEL HANDLING
SYSTEM CONFIGURATION FOR
COFIRING NATURAL GAS WITH
ONE PERCENT SULFUR FUEL OIL**

REV.

ISSUE DATE
07/30/92

Page **1** of **6**

James R. Murphy
Approved by **7-31-92**
Date

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5.2 0.7% SULFUR OIL BURN	6



POWER RESOURCES

LOCATION	MARTIN POWER PLANT	PROCEDURE NUMBER	D:GENOILBURN
TITLE	BOILER FUEL HANDLING SYSTEM CONFIGURATION FOR COFIRING NATURAL GAS WITH ONE PERCENT SULFUR FUEL OIL	REV.	
		ISSUE DATE	07/30/92
		Page	2 of 6

1.0 OBJECTIVE

- 1.1 The objective of this document is to outline the best operating practice necessary to successfully co-fire natural gas with 1.0% sulfur fuel oil while ensuring compliance with all air operating permits, and other environmental regulations.


2.0 DISCUSSION

- 2.1 To comply with FAC 17-762, periodic tank cleaning/inspections are required. To comply with such, piping modifications will be made to maintain unit availability during tank cleaning/inspections. **See attachment #1** on page 4.

Plans have been completed which will allow the cofiring of 1.0% sulfur fuel oil at Martin Plant with sufficient quantities of natural gas to meet applicable SO₂ emission limits. Applicable emission standards have not changed (ie: opacity, particulate matter, SO₂, NO_x). It is imperative that the 1.0% sulfur oil be burned with sufficient quantities of natural gas in order to comply with all applicable air operating permit requirements.

In order to allow a rapid change from 1.0% sulfur oil to 0.7% sulfur oil, the storage and metering tanks for the 1.0% and 0.7% oil will be split. Tank switching will thus accomplish the change from one fuel oil to the other.

Because of the importance of keeping the two types of oil (1.0% and 0.7% sulfur) separated in the metering tanks, changeovers will be performed as shown in **attachments #2 and #3** on pages 5 and 6. It is essential that the 1.0% sulfur oil be purged from the transfer line before filling the metering tank with 0.7% sulfur oil.

 FPL POWER RESOURCES	LOCATION MARTIN POWER PLANT	PROCEDURE NUMBER D:\GENOILBURN
	TITLE BOILER FUEL HANDLING SYSTEM CONFIGURATION FOR COFIRING NATURAL GAS WITH ONE PERCENT SULFUR FUEL OIL	REV.
		ISSUE DATE 07/30/92
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3.0 OPERATIONAL CONSIDERATIONS

The following operational parameters and adjustments must be considered prior to making any change from 0.7% to 1.0% sulfur oil.

- 3.1 Fuel oil temperature must be adjusted to the value required.
- 3.2 Gas must be raised to 40% before changing to 1.0% sulfur oil.
- 3.3 Load changes are generally not feasible when changing tanks (a period of one hour)

4.0 SPECIFIC INSTRUCTIONS

The aforementioned specific instruction(s) shall be strictly adhered to when performing each respective operation.

- 4.1 All metering and storage tank changeovers and transfers will be performed using an approved check sheet.
- 4.2 Anytime that the opacity, or SO₂ limits cannot be met, or percent natural gas of total fuel mixture goes below 30% (and cannot be raised back to 30%), the metering tanks will be immediately lined up to the 0.7% sulfur oil metering tank.



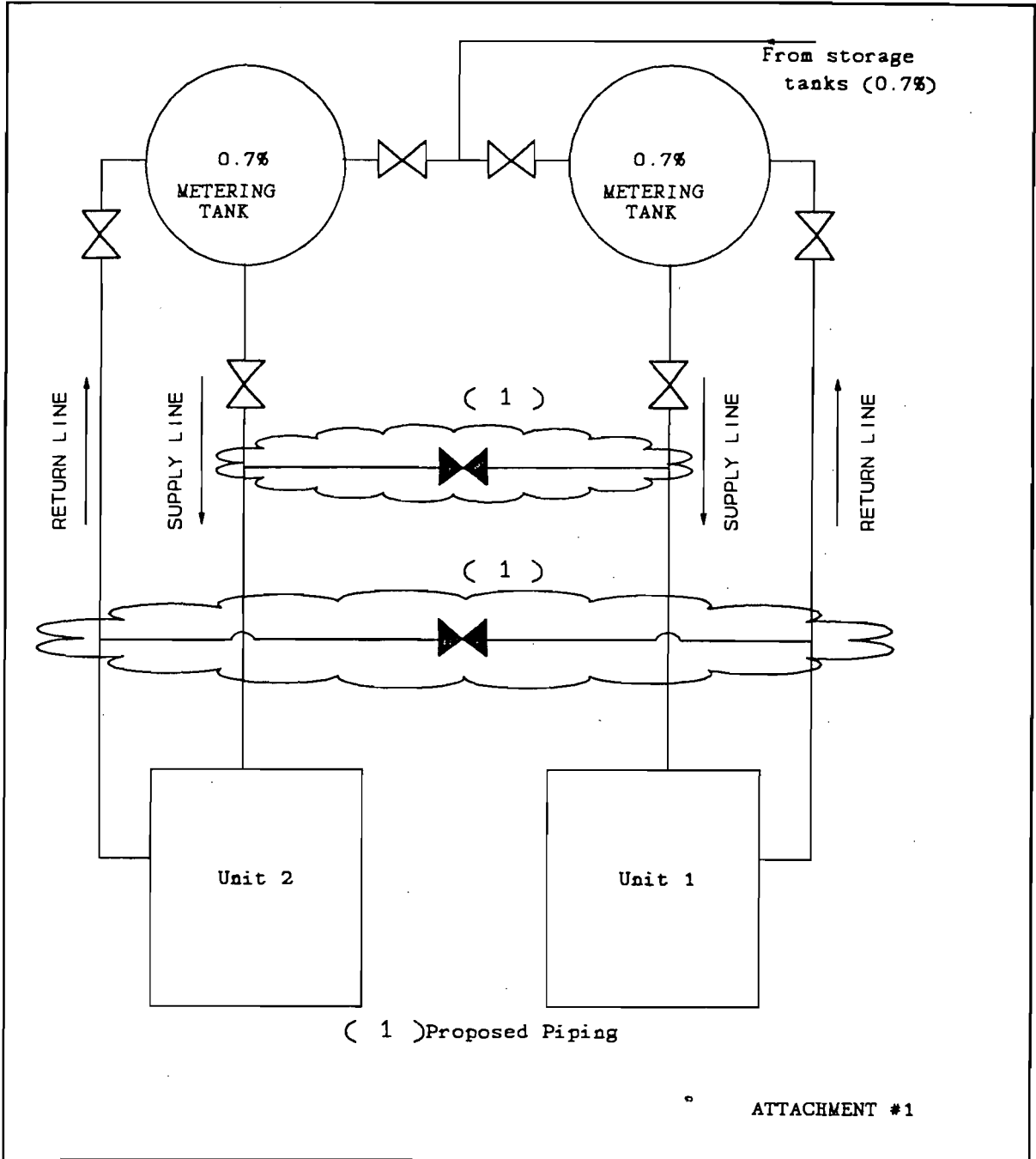
POWER RESOURCES

LOCATION	MARTIN POWER PLANT
TITLE	BOILER FUEL HANDLING SYSTEM CONFIGURATION FOR COFIRING NATURAL GAS WITH ONE PERCENT SULFUR FUEL OIL

PROCEDURE NUMBER	D:GENOILBURN
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5.0 ATTACHMENTS

5.1 NORMAL CONFIGURATION





POWER RESOURCES

LOCATION
MARTIN POWER PLANT

PROCEDURE NUMBER
D:\GEMOILBURN

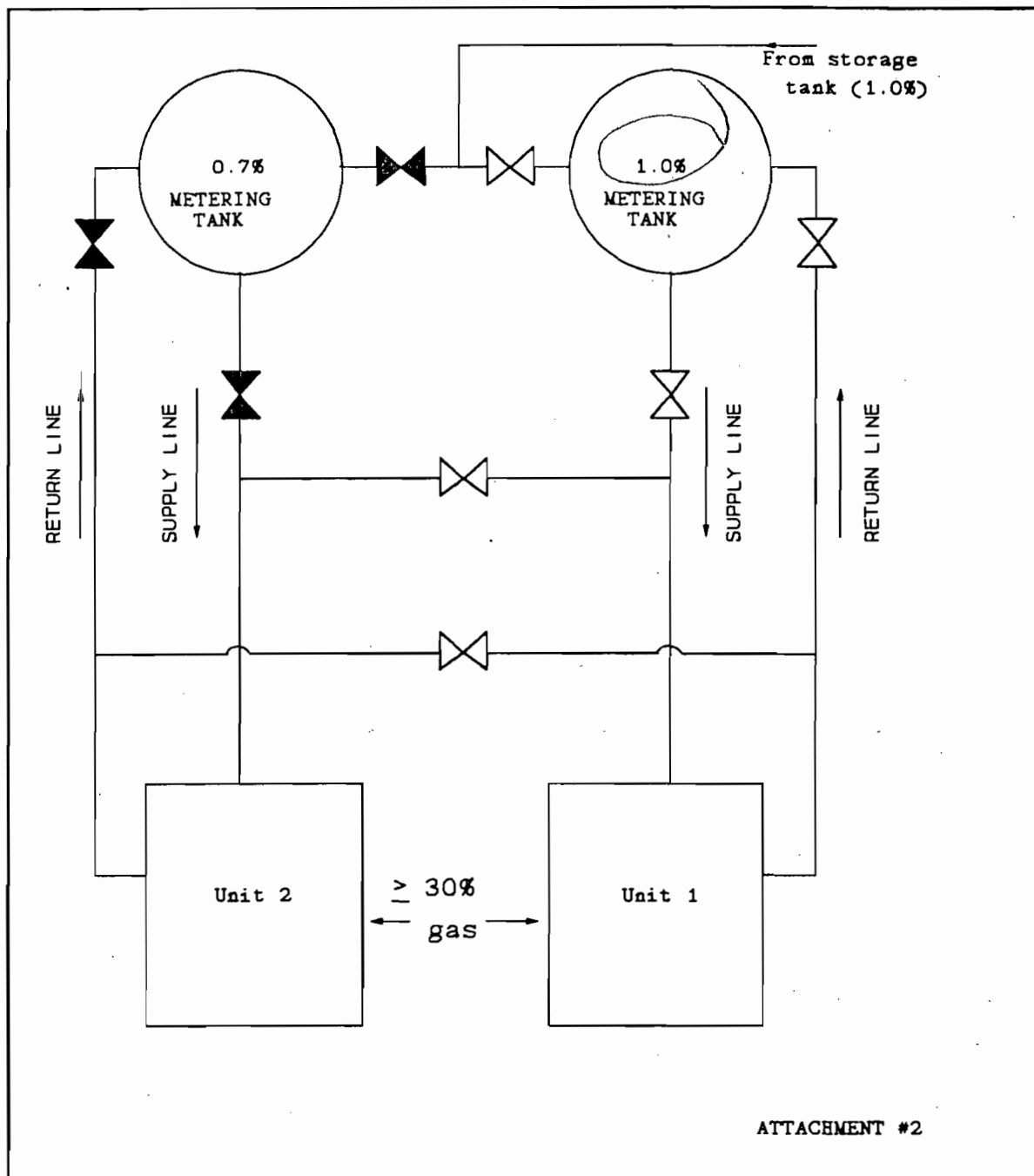
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**BOILER FUEL HANDLING
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COFIRING NATURAL GAS WITH
ONE PERCENT SULFUR FUEL OIL**

REV.

ISSUE DATE
07/30/92

Page **5** of **6**

5.2 1.0% SULFUR FUEL OIL BURN CONFIGURATION



ATTACHMENT #2



POWER RESOURCES

LOCATION
MARTIN POWER PLANT

PROCEDURE NUMBER
D:GENOILBURN

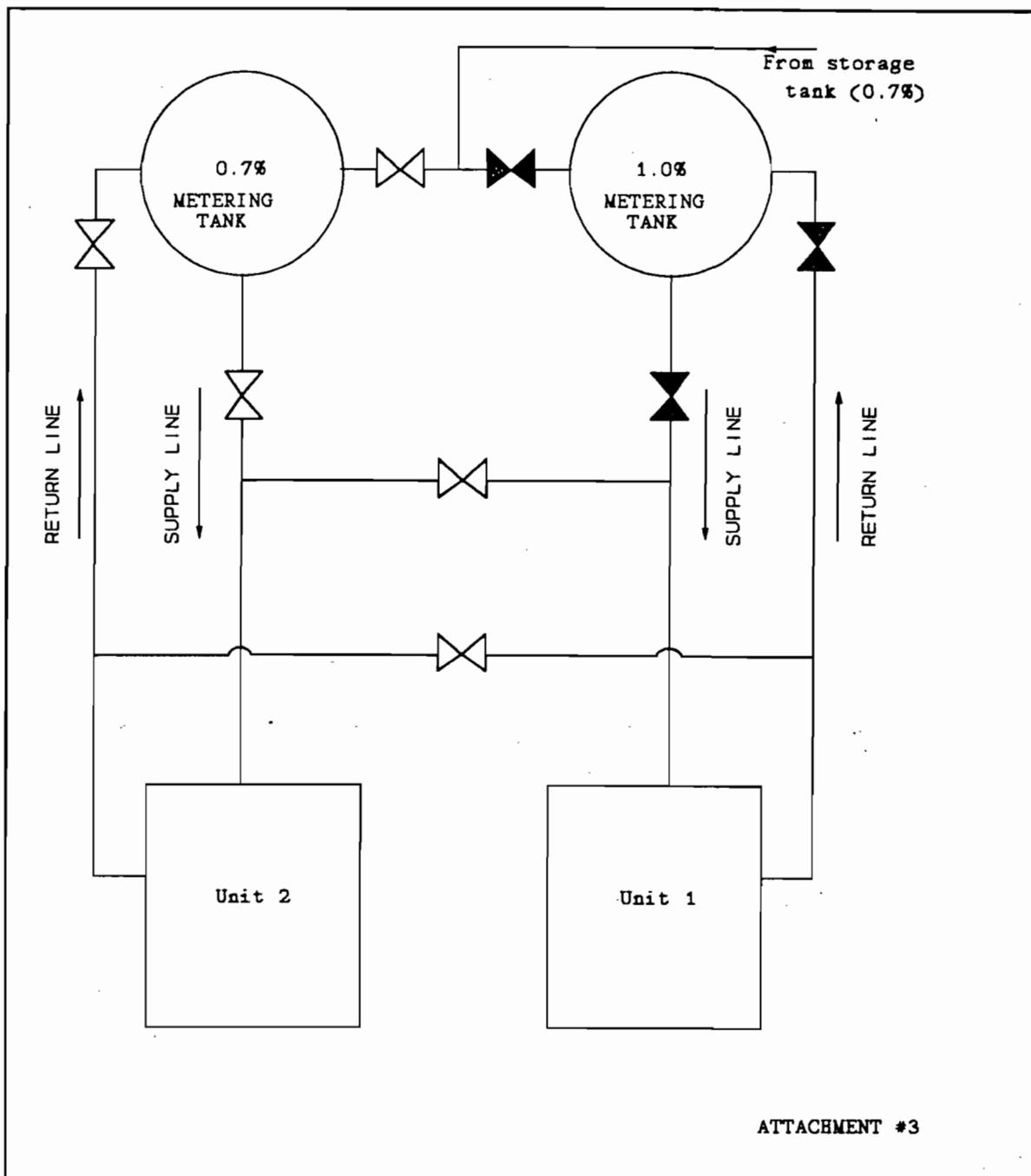
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REV.

ISSUE DATE **07/30/92**

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5.3 0.7% SULFUR FUEL OIL BURN CONFIGURATION



ATTACHMENT #3