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MAR 17 2003

BUREAU OF AIR REGULATION

Scott Sheplak  
Air Resources Management  
Florida Department of Environmental  
Protection  
2600 Blair Stone Rd  
Tallahassee, Fl. 32399-2400

Reason: FPL Sanford Plant  
Combustion Turbine 5C – Excess Emissions Request for Rotor Blade Change-out  
Current Air Construction Permit No. 1270009-004-AC (PSD-FL-270)

Dear Mr. Sheplak,

Florida Power & Light Company is requesting an authorization of an extended excess emission period for the Sanford Plant Combustion Turbine 5C following the rotor blade changeout during February-March of this year. The turbine manufacturer has identified that this necessitates a Full Speed No Load (FSNL) operation following rotor blade changeout. The extended startup period scheduled to occur during the period of March 7 through April 7 of this year began on March 7. The Department granted a similar request following the replacement of the rotor on Martin Combustion Turbine 4B [letter attached].

Should you have any question, or need any additional information, please contact me at your earliest convenience.

Sincerely,

Mary J. Archer  
Principal Environmental Specialist

Florida Power & Light Company [JES/JB]  
700 Universe Blvd.  
Juno Beach, FL 33408  
Email: mary\_archer@fpl.com  
Phone: 561-691-7057

[3] Attachments: Approval letter for PMR 3A; GE explanation of New Rotor Startup Process

December 18, 2002

CERTIFIED MAIL

Mr. John Lindsay, Plant General Manager  
Florida Power & Light Company - Martin Plant  
P.O. Box 176  
Indiantown, FL 34956

Re: FPL Martin Plant  
Combustion Turbine 4B – Excess Emissions Authorization for Rotor Change-out  
Current Air Permit No. 0850001-007-AV

Dear Mr. Lindsay:

The Department has reviewed your request dated November 22, 2002 (by electronic mail) for excess emissions resulting from Full Speed No Load (FSNL) testing, which is required by the equipment manufacturer following a rotor change-out. The FSNL testing is scheduled for December with an initial testing date of December 18, 2002. Similar requests have previously been granted for Units 3A, 3B, and 4A. In accordance with Rule 62-210.700(1), F.A.C., the Department authorizes excess emissions due to FSNL testing provided:

- The operator adheres to best operational practices to minimize emissions.
- The operator minimizes the duration of excess emissions, which shall not exceed 15 hours for the entire period of FSNL testing.
- The operator notifies the Department's District Office for each day that FSNL testing is performed.
- The owner or operator submits a report summarizing the hourly NOx emissions during the FSNL testing.

This determination is issued pursuant to Chapter 403, Florida Statutes. A person whose substantial interests are affected by the proposed agency action may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code (F.A.C.)

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This determination is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

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Mediation is not available in this proceeding.

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The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

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petition or a request for extension of time, this action will not be effective until further order of the Department.

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, 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 must be filed within thirty (30) days after this order is filed with the clerk of the Department.

If you have any questions regarding this matter, please contact Jeff Koerner at 850/921-9536.

Executed in Tallahassee, Florida.

Trina Vielhauer, Chief  
Bureau of Air Regulation

cc: Mr. John C. Hampp, FPL  
Mr. Tom Tittle, SED  
EPA Region 4



*John D. Wells  
Service Manager*

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4300 West Cypress Street, Suite 700  
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April 20, 2001

Ms. Carine Bullock  
Plant Manager  
FPL Martin Plant  
PO Box 176  
Indiantown, FL 34956

Re: New Rotor Start-up Process  
Martin 3B – Turbine S/N 295851

Dear Carine:

As you are aware, the initial start-ups following installation of a new or reconfigured GE F-Class gas turbine rotor are carefully orchestrated to ensure that the rotor is properly tested and run-in. There is a structured GE procedure that must be followed to prevent damage to the unit during this initial operation. The intent of this procedure is to demonstrate vibration stability and repeatability on two consecutive runs.

Each run involves operation at full-speed, no load (FSNL) for an extended period of time. The first start-up run is done completely off-line, with the unit being operated for at least 5 hours, and possibly longer if problems are encountered. The second run involves a similar extended run at FSNL prior to synchronization and loading of the machine. In the event there is a machine trip on either run, the procedure may require a repeat of the activities on that particular run, depending on the situation.

The details of this procedure will be reviewed with your outage planning team in the next few weeks. In the meantime, if you have any questions, please do not hesitate to contact me.

Very truly yours,

John Wells