



November 10, 2004

Trina Vielhauer, Chief  
Air Permitting  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Rd. Tallahassee, Florida 32399-2400

RECEIVED  
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BUREAU OF AIR REGULATION

Re: **Draft Title V Permit No. 1270009-011-AV**  
**FPL Sanford Plant Comments Concerning Heat Input**

Dear Ms. Vielhauer:

This will serve to memorialize a conversation I had with Al Linero of your Department on November 3, 2004, in which I was informed that consistent with the revised Statement of Basis, the heat input references in the above permit were not intended to be specific permit limits.

Accordingly, we have been informed that the Department regards heat input as a design value and that the Department understands that the available Acid Rain CEMs does not record the heat input information to compare to the design heat input value. Rather, the Acid Rain CEMs heat input is correlated with fuel flow, and relates with that parameter within the specified accuracy. Initial design heat input was calculated during initial testing and will be calculated annually during required emission testing.

Previously submitted comments are also attached for your information.

I would like to thank the Department for taking the time to discuss this matter with FPL. Please do not hesitate to contact me at (386) 575-5211 regarding these issues.

Sincerely,

A handwritten signature in black ink, appearing to read 'Roxane Kennedy'.

Roxane Kennedy  
Plant General Manager  
Sanford Power Plant  
Florida Power & Light Company

Cc: Leonard Kozlov - FDEP Central District  
PSN File - Title V renewal comments



Copy

October 18, 2004

Mr. Tom Cascio  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Rd. Tallahassee, Florida 32399-2400

Re: Draft Title V Permit No. 1270009-011-AV FPL Sanford Plant Comments

Dear Mr. Cascio:

Pursuant to our conversation of October 18, 2004, comments on the above listed draft Title V air operating permit are listed below with the exception of the heat input basis and specific conditions. As we agreed the heat input concerns will be addressed in a separate communication from the Sanford General Plant Manager Roxane Kennedy. It is our opinion that the following items are administrative corrections.

Statement of Basis – Page 1 – Paragraph 4

ARMS Emissions Units listed are incorrect. Please change from "Unit 4 as 009-012 and Unit 5 as 005-008" to "Unit 4 as 005-008 and Unit 5 as 009-012".

Statement of Basis – Page 1 – Paragraph 7

NO 60-foot bypass stacks were installed at Sanford Plant. The facility CTs cannot run in simple cycle mode. All exhaust gases must go through the HRSG before being exhausted through the stack.

Page 2 – Subsection A Facility Description: Paragraph 3

ARMS Emissions Units listed are incorrect. The permit lists the ARMS as "Unit 4 as 009-012 and Unit 5 as 005-008". Please change to "Unit 4 ARMS number to 005-008 and Unit 5 ARMS number to 009-012".

Page 2 – Subsection A Facility Description : Paragraph 5

Clarification – an evaporative equipment cooler was built for each powerblock. The existing language reads as though only one was built for the site. Please change to " One evaporative equipment cooler for each unit was built instead of the proposed mechanical draft-cooling tower".

Page 2 – Subsection A Facility Description : Paragraph 7

Storage tanks range from 2,000 gallons to 268,000. The 275 gallon tank no longer exists.

Page 9 – Specific Condition A.6.(c)

This is a text change from the old permit. It now references "The distributed control system (DCS)....." Unit 3 does not currently have a DCS. Please change to original text, which states "The permittee shall record.....".

Page 55 – Specific Condition C.58.

Please remove this condition. The Compliance Plan addresses testing. The testing has been completed as required.

Page 55 - Specific Condition C.58.

Please renumber to Specific Condition C.58.

**Page 58 – Subsection B**

The old Unit 4 boiler (permanently retired) is incorrectly listed as Emissions Unit ID No. 004. EU004 is the unregulated emissions units listed in our permit. Please correct the ID of the old boiler to EU 002.

**Page 60 – Subsection C**

The old Unit 5 boiler (permanently retired) is incorrectly listed as Emissions Unit ID No. 005. EU005 in the permit is Unit 4A CT. Please correct the old boiler to EU 003.

**Appendix U-1 – Brief Description of Emissions Units and/or Activity**

Remove #5 – Tank LO no longer exists

Remove #6 – 275 gallon tank no longer exists

The words “Not Federally enforceable” is inserted between Item 10 and Item 11. We believe this to be an error.

**Appendix I-1 – List of Insignificant Emissions Units and/or Activities**

The words “Not Federally enforceable” is inserted between Item 19 and Item 20. We believe this to be an error as the Items 16-19 are identical to Items 20-23 on Unit 4 without this insert.

**Table 2-1 Summary of Compliance Requirements – Page 2 of 3**

Please remove Note 6 as CP-3 HAS been completed and the Unit tested.

**Attachment HP Drum Temperature and Pressure During Cold Startup**

Please Re-title this attachment from "Fort Myers Repowering Project " to “Sanford Repowering Project”.

Thank you for your attention to the issues raised in this correspondence. Please do not hesitate to contact me at (561) 691-7057 regarding these issues.

Sincerely,



Mary J. Archer  
Environmental Services  
Florida Power & Light Company

Cc: Leonard Kozlov – FDEP Central District  
Trina Vielhauer - FDEP Tallahassee



November 10, 2004

Ms. Kathy Carter, FDEP Agency Clerk  
Office of General Counsel of the Department of Environmental Protection  
3900 Commonwealth Boulevard  
Mail Station #35  
Tallahassee, Florida 32399-3000

Re: **Draft Title V Permit No. 1270009-011-AV**  
**FPL Sanford Plant WITHDRAWAL Extension for Petition Period Request**

Dear Ms. Carter:

The Sanford Power Plant referenced permit was received on October 5, 2004 and FPL requested an extension of time to file for petition on October 13, 2004. With this correspondence FPL requests a withdrawal of the extension to file for a petition for the addressed permit.

Thank you for your prompt review of this request. Please do not hesitate to contact Mary Archer at (561) 691-7057 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Roxane Kennedy'.

Roxane Kennedy  
General Plant Manager  
Sanford Power Plant  
Florida Power & Light Company

Cc: Leonard Kozlov - FDEP Central District  
Trina Vielhauer - FDEP ✓