

Hopkins, Randy

**From:** Hopkins, Randy  
**Sent:** Monday, April 20, 2009 1:11 PM  
**To:** 'trina.vielhauer@dep.state.fl.us'  
**Cc:** 'james.bradner@dep.state.fl.us'; Archer, Mary; Kowalczyk, Gary  
**Subject:** Sanford Power Plant Unit 4B Excess Emissions Period Request  
**Attachments:** Sanford\_4B\_Rotor\_Excess\_Emiss\_Request 2009.pdf; Document - Project #1270009-014-AC.pdf

Trina,

Attached is a request for an extended excess emissions period for FPL Sanford Plant Unit 4B for manufacturer required testing following a rotor/blade change out. Also in the attachment is an authorization for a similar rotor/blade replacement excess emissions request during manufacturer testing. The original documents are being mailed to your office.

Please contact me at your convenience with any questions.

Thank you,

*Randy Hopkins*  
*Sr. Plant Leader*  
*FPL Sanford Plant*  
W: 386-575-5385  
C: 386-795-5568

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**FPL**

April 20, 2009

Trina Vielhauer, Chief  
Bureau of Air Regulation  
FDEP Division of Air Resources  
2600 Blair Stone Road, MS #5505  
Tallahassee, Florida 32399-2400

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APR 21 2009

**BUREAU OF AIR REGULATION**

**RE: FPL Sanford Power Plant - Title V Air Operating Permit 1270009-016-AV  
Combustion Turbine 4B  
Excess Emissions Request for Rotor/Blade Change-out**

Dear Ms. Vielhauer:

Florida Power & Light is requesting an extended excess emissions period for the Sanford Plant Unit 4B combustion turbine following the rotor/blade change out currently underway. In accordance with manufacturer's specifications, it has been identified that a Full Speed No Load (FSNL) operation and extended tuning period is necessary following the rotor/blade change out. The extended start-up period is scheduled to occur during the period of May 2, 2009 through May 16, 2009. The Department granted a similar request following the replacement of the Unit 5C rotor/blade change out in January 2007. (Authorization letter attached.)

If you have any questions or require additional information, please contact me at (386) 575-5211 or Randy Hopkins at (386) 575-5385.

Sincerely,

A handwritten signature in cursive script that reads "Gary Kowalczyk".

Gary Kowalczyk  
Plant General Manager  
FPL Sanford Plant

Attachment

Cc: Mr. Jim Bradner, Manager  
FDEP Central Florida District  
3313 Maguire Blvd., Suite 232  
Orlando, Florida 32803-3767

Ms. Mary Archer – FPL/JES

FPL Sanford Plant File



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blairstone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor  
Jeff Kottkamp  
Lt. Governor  
Michael W. Sole  
Secretary

January 23, 2007

*Electronically sent – Received Receipt requested.*

Roxane R. Kennedy, Plant General Manager  
Florida Power & Light Company – Sanford Plant  
950 South Highway 17-92  
DeBary, Florida 32713

Re: FPL Sanford Plant Combustion Turbine 5C  
Project No. 1270009-014-AC  
Combined Cycle Combustion Turbine – Excess Emissions  
Authorization Following Rotor/Blade Change-out

Dear Ms. Kennedy:

The Department has reviewed the request dated January 18, 2007 for excess emissions resulting from Full Speed No Load (FSNL) testing, which is recommended by the equipment manufacturer following a rotor/blade change-out. The FSNL testing is scheduled to occur between January 24 and February 8, 2007. Similar requests have previously been granted for other units at both the FPL Martin and Sanford Plants. 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 Central District Office for each day that FSNL testing is performed; and,
- The owner or operator submits a report summarizing the hourly NOx emissions during the FSNL testing.

Nothing in this action waves any federal requirements of the applicable New Source Performance Standards (NSPS) for this unit.

The Department will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14

(fourteen) days of receipt of this notice. Petitions filed by any other person must be filed within 14 (fourteen) days of receipt of this proposed action. A petitioner must 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, 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 each 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, as well as the rules and statutes which entitle the petitioner to relief; (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 permitting authority'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 permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by the filing of a Notice of Appeal, under Rule 9.110 of the Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, 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 of Appeal must be filed within thirty days from the date this notice is filed with the Clerk of the permitting authority.

Executed in Tallahassee, Florida.

  
Trina L. Vielhauer, Chief  
Bureau of Air Regulation

TLV/al/cem

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this authorization and all copies were sent electronically (with Received Receipt) before the close of business on 1/24/07 to the persons listed:

Roxane Kennedy, FPL: roxane\_kennedy@fpl.com

Mary Archer, FPI.: mary\_archer@fpl.com

Randy Hopkins, FPL: randy\_hopkins@fpl.com

Len Kozlov, P.E., CD: leonard.kozlov@dep.state.fl.us

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED,**  
on this date, pursuant to §120.52(7), Florida  
Statutes, with the designated Department Clerk,  
receipt of which is hereby acknowledged.

Mary J. Army      1/24/07  
(Clerk)                      (Date)