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SEP 25 2009

BUREAU OF AIR REGULATION

September 24, 2009

Jeffrey F. Koerner PE, Administrator
New Source Review Section
Air Permitting
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Rd. Tallahassee, Florida 32399-2400

Re: Request for Additional Information Response for Title V Permit No. 1270009-018-AV FPL Sanford Power Plant

Dear Mr. Koerner:

This communication is in response to the Department's request for additional information per the attached letter dated July 16, 2009.

The items addressed in this response do not require an engineering analysis so the RO and PE certification forms have not been attached. The Items 4 and 5 referencing Excess Emissions will be addressed in an alternate document.

The requested information is addressed as follows:

Item 1. The Retired Unit Exemption Form: The steam generating units (Units 4&5) that previously burned residual fuel oil (including provisions for used oil) were replaced before 2003 with 8 advanced CTs burning natural gas. The Retired Unit Exemption forms were completed for previous Title V permit renewals/modifications. The current configuration is a combined cycle configuration that includes the 8 CTs, and 8 heat recovery steam generators (HRSGs) which provide steam for the existing Units 4 and 5 steam turbines from CTs 4A - 4D & CTs 5A-5D [plus associated HRSGs for all CTs].

Item 2. "Phase II NOx Compliance Plan" forms are for coal fired units. The Sanford facility burns only natural gas and oil.

Item 3. The signed CAIR form was submitted with the PE Signature Page. A copy is attached.

Item 4. Changes to Excess Emissions Conditions with clarifications will be addressed in a construction permit application [concurrent title V changes will be requested when the application is submitted].

Per the September 23, 2009, conversation between Jeff Koerner and Tammy McWade of FDEP and Mary Archer and Randy Hopkins of FPL it was understood that the following DNL tuning language would be incorporated into the new Title V permit and would also be addressed in the submittal of the construction permit application to incorporate that addition into the construction

permit. This language is also present in the FPL Martin and Manatee Power Plants Title V permits.

DLN Tuning. CEMS data collected during initial or other major DLN tuning sessions shall be excluded from the CEMS compliance demonstration provided the tuning session is performed in accordance with the manufacturer's specifications. A "major tuning session" would occur after completion of initial construction, a combustor change-out, a major repair or maintenance to a combustor, or other similar circumstances. Prior to performing any major tuning session, the permittee shall provide the Compliance Authority with an advance notice that details the activity and proposed tuning schedule. The notice may be by telephone, facsimile transmittal, or electronic mail. [Rule 62-4.070(3), F.A.C.]

Item 5. Startup – Shutdown attachment PSNCT4A-4D – clarification of emissions will be addressed in the construction permit application addressed in item 5 above.

Item 6. The attachment was inadvertently mislabeled. The natural gas analyses would be site wide applicable.

Item 7. This Insignificant activity has been addressed for the Sanford Power Plant since the first Title V permit was issued to the facility. It can be found in the current Title V permit at the location indicated below. This activity is allowed pending analysis of the spent cleaning solution to be non-hazardous.

Florida Power & Light Company FINAL Permit No. 1270009-011-AV

Sanford Power Plant Facility ID No. 1270009

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

Item 13.

"13. Evaporation of on-site generated boiler non-hazardous used cleaning chemicals (includes, but not limited to citrosol and ammonia) by injection into an operating boiler furnace provided that the boiler tube scale and other sediment has been substantially removed from the spent cleaning solution. This activity occurs once every three to five years or longer."

Item 8. One existing emergency diesel generator is located on site and is addressed in the current Title V permit as item 1 in Appendix U-1, List of Unregulated Emissions Units and/or Activities.

Appendix U-1, List of Unregulated Emissions Units and/or Activities

"1. Small diesel emergency generator operated less than 400 hours per year:

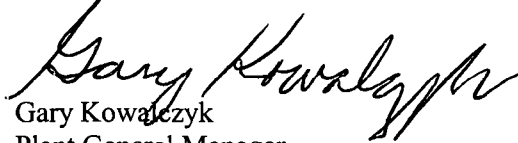
a. Stationary Detroit Diesel Model No. 7124-7200N: 500 KW emergency generator"

This emergency diesel generator is an existing generator and is not subject to any of the addressed federal regulations. The generator is categorically exempt from permitting as provided by Rule 62-210.300(3)(a). It is also exempt from 40 CFR Part 60 Subparts JJJJ due to the manufacture date (prior to June 12, 2006), and from ZZZZ due to the size (500 Hp), plus, the Sanford facility is not a major source for HAPs. The generator is not subject to 40 CFR part 63, subpart III since it was manufactured prior to April 1, 2006

Appendix ICE has been attached to address all emergency generators on site. Two small emergency propane generators were added in 2008 to address storm emergency generation needs.

Please do not hesitate to contact me at (321) 637-2251 or Mary Archer at (561) 691-7057 regarding these issues or additional questions.

Sincerely,



Gary Kowalczyk
Plant General Manager
Sanford Power Plant
Florida Power & Light Company

Cc: Caroline Shine – FDEP Central District

Attachments:

Request for additional information letter from FDEP
Copy of CAIR form
Appendix ICE



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kotkamp
Lt. Governor

Michael W. Sole
Secretary

July 16, 2009

Electronic Mail - Received Receipt Requested

Mr. Gary Kowalczyk, Plant General Manager
FPL Sanford Plant
950 S. Highway 17-92
Debary, FL 32713

Re: Request for Additional Information
Project No. 1270009-018-AV
Florida Power and Light, Sanford Power Plant
Title V Air Operation Permit Renewal

Dear Mr. Kowalczyk:

On May 20, 2009, the Department received your application for a Title V air operation permit renewal for the above referenced facility. The application is incomplete as submitted. In order to continue processing your application, the Department will need the additional information requested below pursuant to Rule 62-213.420(1)(b)3., Florida Administrative Code (F.A.C.), and Rule 62-4.070(1), F.A.C. Should your response to any of the items below require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. The current Title V permit identifies the "Retired Unit Exemption" form. Please provide this form for the renewal application or explain why this form is no longer necessary.
2. The current Title V permit identifies the "Phase II NO_x Compliance Plan" form. Please provide this form for the renewal application or explain why this form is no longer necessary.
3. The current Title V permit identifies the "Clean Air Interstate Rule (CAIR)" form. Please provide this form for the renewal application.

(Note: Title V renewal application must include all relevant information.)

Section III.B. Emissions Units and Conditions

4. You have requested a change to current permit Condition III.B.13, which specifies allowable periods of excess emissions during startups and shutdowns and CEMS data exclusion during "major tuning sessions". The details of this condition were carefully crafted during initial issuance of the original air construction permit. Changes will likely require a concurrent air construction permit revision. Please provide operational data, including emissions data, during startups, shutdowns and tuning sessions to support each requested change and provide the additional information necessary to justify your request. The proposed change only specifies Condition III.B.13 for Unit 5; however, Unit 4 is mentioned in the request. Should the request include a change in Condition III.C.13 for Unit 4? Please clarify.
5. See attachment PSNCT4A-4D_6 Startup - Shutdown, Controlling Excess Emissions - Operating Procedures: Should the requested change in allowable periods of excess emissions be included in this document? Please clarify.

REQUEST FOR ADDITIONAL INFORMATION

Attachments

6. The attachments submitted for EU 005 through EU 012 for Natural Gas Analysis reads document PSNU3_2. Should the name of the documents be PSNU4_2? Please clarify.
7. Attachment PSNU1-11 Alternative Methods of Operation: This does not appear in the current Title V permit. Is this a new operation? When did the plan begin processing spent boiler cleaning chemicals? What are the primary contaminants of concern?

Other

8. Please identify whether any of the facility's engines are subject to any of the following federal regulations: 40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines; 40 Code of Federal Regulations (CFR) 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines; and 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. If applicable.
 - a. Please provide the following information for each emission unit subject to an applicable subpart: in-service date, cylinder displacement, and rule applicability.
 - b. Please identify the standards, operating limits, and monitoring requirements.

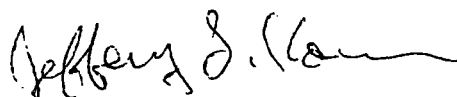
Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Please complete and submit a new R.O. certification statement page from the long application form, DEP Form No. 62-210.900(1), effective March 16, 2008.

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please complete and submit a new P.E. certification statement page from the long application form, DEP Form No. 62-210.900(1), effective March 16, 2008.

The Department must receive a response from you within 90 days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)5., F.A.C.

If you should have any questions, please call Tammy McWade, at 850/488-1906 or Jeff Koerner.

Sincerely,



Jeffery F. Koerner, Administrator
New Source Review Section
850/921-9536

This letter was sent to the following people by electronic mail with received receipt requested.

Mr. Gary Kowalczyk, Plant General Manager (gary.kowalczyk@fpl.com)
Ms. Mary Archer, Project Manager (mary.archer@fpl.com)
Mr. Kennard Kosky, P.E. (kkosky@golder.com)
Mr. Alan Zahm, DEP Central District Office (alan.zahm@dep.state.fl.us)
Mr. Mike Halpin, DEP Siting Office (mike.halpin@dep.state.fl.us)
Ms Ana M. Oquendo, EPA Region 4 (oquendo.ana@epa.gov)
Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
Ms Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

Clean Air Interstate Rule (CAIR) Part

For more information, see instructions and refer to 40 CFR 96.121, 96.122, 96.221, 96.222, 96.321 and 96.322; and Rule 62-296.470, F.A.C.

This submission is: New Revised Renewal

STEP 1

Identify the source by plant name and ORIS or EIA plant code

Plant Name: Sanford	State: Florida	ORIS or EIA Plant Code: 000619
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STEP 2

In column "a" enter the unit ID# for every CAIR unit at the CAIR source.

In columns "b," "c," and "d," indicate to which CAIR program(s) each unit is subject by placing an "X" in the column(s).

For new units, enter the requested information in columns "e" and "f."

a	b	c	d	e	f
Unit ID#	Unit will hold nitrogen oxides (NO _x) allowances in accordance with 40 CFR 96.106(c)(1)	Unit will hold sulfur dioxide (SO ₂) allowances in accordance with 40 CFR 96.206(c)(1)	Unit will hold NO _x Ozone Season allowances in accordance with 40 CFR 96.306(c)(1)	New Units Expected Commence Commercial Operation Date	New Units Expected Monitor Certification Deadline
PSN 3	X	X	X		
PSN 4	X	X	X		
PSN 5	X	X	X		
SNCT4A	X	X	X		
SNCT4B	X	X	X		
SNCT4C	X	X	X		
SNCT4D	X	X	X		
SNCT5A	X	X	X		
SNCT5B	X	X	X		
SNCT5C	X	X	X		
SNCT5D	X	X	X		

STEP 3

Read the standard requirements.

Plant Name (from STEP 1) Sanford

CAIR NO_x ANNUAL TRADING PROGRAM

CAIR Part Requirements.

- (1) The CAIR designated representative of each CAIR NO_x source and each CAIR NO_x unit at the source shall:
 - (i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.122 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and
 - (ii) [Reserved];
- (2) The owners and operators of each CAIR NO_x source and each CAIR NO_x unit at the source shall have a CAIR Part included in the Title V operating permit issued by the DEP under 40 CFR Part 96, Subpart CC, and operate the source and the unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

- (1) The owners and operators, and the CAIR designated representative, of each CAIR NO_x source and each CAIR NO_x unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HH, and Rule 62-296.470, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HH, shall be used to determine compliance by each CAIR NO_x source with the following CAIR NO_x Emissions Requirements.

NO_x Emission Requirements.

- (1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_x source and each CAIR NO_x unit at the source shall hold, in the source's compliance account, CAIR NO_x allowances available for compliance deductions for the control period under 40 CFR 96.154(a) in an amount not less than the tons of total NO_x emissions for the control period from all CAIR NO_x units at the source, as determined in accordance with 40 CFR Part 96, Subpart HH.
- (2) A CAIR NO_x unit shall be subject to the requirements under paragraph (1) of the NO_x Requirements starting on the later of January 1, 2009, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.170(b)(1) or (2) and for each control period thereafter.
- (3) A CAIR NO_x allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the NO_x Requirements, for a control period in a calendar year before the year for which the CAIR NO_x allowance was allocated.
- (4) CAIR NO_x allowances shall be held in, deducted from, or transferred into or among CAIR NO_x Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FF and GG.
- (5) A CAIR NO_x allowance is a limited authorization to emit one ton of NO_x in accordance with the CAIR NO_x Annual Trading Program. No provision of the CAIR NO_x Annual Trading Program, the CAIR Part, or an exemption under 40 CFR 96.105 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.
- (6) A CAIR NO_x allowance does not constitute a property right.
- (7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart EE, FF, or GG, every allocation, transfer, or deduction of a CAIR NO_x allowance to or from a CAIR NO_x unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR NO_x unit.

Excess Emissions Requirements.

If a CAIR NO_x source emits NO_x during any control period in excess of the CAIR NO_x emissions limitation, then:

- (1) The owners and operators of the source and each CAIR NO_x unit at the source shall surrender the CAIR NO_x allowances required for deduction under 40 CFR 96.154(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AA, the Clean Air Act, and applicable state law.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the CAIR NO_x source and each CAIR NO_x unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the DEP or the Administrator.
 - (i) The certificate of representation under 40 CFR 96.113 for the CAIR designated representative for the source and each CAIR NO_x unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.113 changing the CAIR designated representative.
 - (ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_x Annual Trading Program.
 - (iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR NO_x Annual Trading Program or to demonstrate compliance with the requirements of the CAIR NO_x Annual Trading Program.
- (2) The CAIR designated representative of a CAIR NO_x source and each CAIR NO_x unit at the source shall submit the reports required under the CAIR NO_x Annual Trading Program, including those under 40 CFR Part 96, Subpart HH.

Plant Name (from STEP 1) Sanford

STEP 3,
Continued

Liability.

- (1) Each CAIR NO_x source and each CAIR NO_x unit shall meet the requirements of the CAIR NO_x Annual Trading Program.
- (2) Any provision of the CAIR NO_x Annual Trading Program that applies to a CAIR NO_x source or the CAIR designated representative of a CAIR NO_x source shall also apply to the owners and operators of such source and of the CAIR NO_x units at the source.
- (3) Any provision of the CAIR NO_x Annual Trading Program that applies to a CAIR NO_x unit or the CAIR designated representative of a CAIR NO_x unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

No provision of the CAIR NO_x Annual Trading Program, a CAIR Part, or an exemption under 40 CFR 96.105 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_x source or CAIR NO_x unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

CAIR SO₂ TRADING PROGRAM

CAIR Part Requirements.

- (1) The CAIR designated representative of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall:
 - (i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.222 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and
 - (ii) [Reserved];
- (2) The owners and operators of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall have a CAIR Part included in the Title V operating permit issued by the DEP under 40 CFR Part 96, Subpart CCC, for the source and operate the source and each CAIR unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

- (1) The owners and operators, and the CAIR designated representative, of each CAIR SO₂ source and each SO₂ CAIR unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HHH, and Rule 62-296.470, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HHH, shall be used to determine compliance by each CAIR SO₂ source with the following CAIR SO₂ Emission Requirements.

SO₂ Emission Requirements.

- (1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall hold, in the source's compliance account, a tonnage equivalent in CAIR SO₂ allowances available for compliance deductions for the control period, as determined in accordance with 40 CFR 96.254(a) and (b), not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO₂ units at the source, as determined in accordance with 40 CFR Part 96, Subpart HHH.
- (2) A CAIR SO₂ unit shall be subject to the requirements under paragraph (1) of the Sulfur Dioxide Emission Requirements starting on the later of January 1, 2010 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.270(b)(1) or (2) and for each control period thereafter.
- (3) A CAIR SO₂ allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the SO₂ Emission Requirements, for a control period in a calendar year before the year for which the CAIR SO₂ allowance was allocated.
- (4) CAIR SO₂ allowances shall be held in, deducted from, or transferred into or among CAIR SO₂ Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FFF and GGG.
- (5) A CAIR SO₂ allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO₂ Trading Program. No provision of the CAIR SO₂ Trading Program, the CAIR Part, or an exemption under 40 CFR 96.205 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.
- (6) A CAIR SO₂ allowance does not constitute a property right.
- (7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart FFF or GGG, every allocation, transfer, or deduction of a CAIR SO₂ allowance to or from a CAIR SO₂ unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR SO₂ unit.

Excess Emissions Requirements.

If a CAIR SO₂ source emits SO₂ during any control period in excess of the CAIR SO₂ emissions limitation, then:

- (1) The owners and operators of the source and each CAIR SO₂ unit at the source shall surrender the CAIR SO₂ allowances required for deduction under 40 CFR 96.254(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AAA, the Clean Air Act, and applicable state law.

Plant Name (from STEP 1) Sanford

**STEP 3,
Continued**

Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the CAIR SO₂ source and each CAIR SO₂ unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Department or the Administrator.

(i) The certificate of representation under 40 CFR 96.213 for the CAIR designated representative for the source and each CAIR SO₂ unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.213 changing the CAIR designated representative.

(ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HHH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HHH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.

(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR SO₂ Trading Program.

(iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR SO₂ Trading Program or to demonstrate compliance with the requirements of the CAIR SO₂ Trading Program.

(2) The CAIR designated representative of a CAIR SO₂ source and each CAIR SO₂ unit at the source shall submit the reports required under the CAIR SO₂ Trading Program, including those under 40 CFR Part 96, Subpart HHH.

Liability.

(1) Each CAIR SO₂ source and each CAIR SO₂ unit shall meet the requirements of the CAIR SO₂ Trading Program.

(2) Any provision of the CAIR SO₂ Trading Program that applies to a CAIR SO₂ source or the CAIR designated representative of a CAIR SO₂ source shall also apply to the owners and operators of such source and of the CAIR SO₂ units at the source.

(3) Any provision of the CAIR SO₂ Trading Program that applies to a CAIR SO₂ unit or the CAIR designated representative of a CAIR SO₂ unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

No provision of the CAIR SO₂ Trading Program, a CAIR Part, or an exemption under 40 CFR 96.205 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR SO₂ source or CAIR SO₂ unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

CAIR NO_x OZONE SEASON TRADING PROGRAM

CAIR Part Requirements.

(1) The CAIR designated representative of each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall:

(i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.322 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and

(ii) {Reserved};

(2) The owners and operators of each CAIR NO_x Ozone Season source required to have a Title V operating permit or air construction permit, and each CAIR NO_x Ozone Season unit required to have a Title V operating permit or air construction permit at the source shall have a CAIR Part included in the Title V operating permit or air construction permit issued by the DEP under 40 CFR Part 96, Subpart CCCC, for the source and operate the source and the unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

(1) The owners and operators, and the CAIR designated representative, of each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HHHH, and Rule 62-296.470, F.A.C.

(2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HHHH, shall be used to determine compliance by each CAIR NO_x Ozone Season source with the following CAIR NO_x Ozone Season Emissions Requirements.

NO_x Ozone Season Emission Requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall hold, in the source's compliance account, CAIR NO_x Ozone Season allowances available for compliance deductions for the control period under 40 CFR 96.354(a) in an amount not less than the tons of total NO_x emissions for the control period from all CAIR NO_x Ozone Season units at the source, as determined in accordance with 40 CFR Part 96, Subpart HHHH.

(2) A CAIR NO_x Ozone Season unit shall be subject to the requirements under paragraph (1) of the NO_x Ozone Season Emission Requirements starting on the later of May 1, 2009 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.370(b)(1),(2), or (3) and for each control period thereafter.

(3) A CAIR NO_x Ozone Season allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the NO_x Ozone Season Emission Requirements, for a control period in a calendar year before the year for which the CAIR NO_x Ozone Season allowance was allocated.

(4) CAIR NO_x Ozone Season allowances shall be held in, deducted from, or transferred into or among CAIR NO_x Ozone Season Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FFFF and GGGG.

(5) A CAIR NO_x Ozone Season allowance is a limited authorization to emit one ton of NO_x in accordance with the CAIR NO_x Ozone Season Trading Program. No provision of the CAIR NO_x Ozone Season Trading Program, the CAIR Part, or an exemption under 40 CFR 96.305 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.

(6) A CAIR NO_x Ozone Season allowance does not constitute a property right.

(7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart EEEE, FFFF or GGGG, every allocation, transfer, or deduction of a CAIR NO_x Ozone Season allowance to or from a CAIR NO_x Ozone Season unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR NO_x Ozone Season unit.

Plant Name (from STEP 1) Sanford

**STEP 3,
Continued**

Excess Emissions Requirements.

If a CAIR NO_x Ozone Season source emits NO_x during any control period in excess of the CAIR NO_x Ozone Season emissions limitation, then:
 (1) The owners and operators of the source and each CAIR NO_x Ozone Season unit at the source shall surrender the CAIR NO_x Ozone Season allowances required for deduction under 40 CFR 96.354(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
 (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AAAA, the Clean Air Act, and applicable state law.

Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the DEP or the Administrator.
 (i) The certificate of representation under 40 CFR 96.313 for the CAIR designated representative for the source and each CAIR NO_x Ozone Season unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.113 changing the CAIR designated representative.
 (ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HHHH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HHHH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_x Ozone Season Trading Program.
 (iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR NO_x Ozone Season Trading Program or to demonstrate compliance with the requirements of the CAIR NO_x Ozone Season Trading Program.
 (2) The CAIR designated representative of a CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall submit the reports required under the CAIR NO_x Ozone Season Trading Program, including those under 40 CFR Part 96, Subpart HHHH.

Liability.

(1) Each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit shall meet the requirements of the CAIR NO_x Ozone Season Trading Program.
 (2) Any provision of the CAIR NO_x Ozone Season Trading Program that applies to a CAIR NO_x Ozone Season source or the CAIR designated representative of a CAIR NO_x Ozone Season source shall also apply to the owners and operators of such source and of the CAIR NO_x Ozone Season units at the source.
 (3) Any provision of the CAIR NO_x Ozone Season Trading Program that applies to a CAIR NO_x Ozone Season unit or the CAIR designated representative of a CAIR NO_x Ozone Season unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

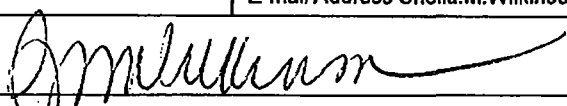
No provision of the CAIR NO_x Ozone Season Trading Program, a CAIR Part, or an exemption under 40 CFR 96.305 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_x Ozone Season source or CAIR NO_x Ozone Season unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

STEP 4

Certification (for designated representative or alternate designated representative only)

Read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign, and date.

I am authorized to make this submission on behalf of the owners and operators of the CAIR source or CAIR units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Sheila M Wilkinson	Title PGD Technical Services General Manager (DR)
Company Owner Name: Florida Power & Light	
Phone 561-691-2287	E-mail Address Sheila.M.Wilkinson@fpl.com
Signature 	Date 1/15/09

APPENDIX ICE

REQUIREMENTS FOR INTERNAL COMBUSTION ENGINES

This Title V facility contains stationary internal combustion engines that have been exempted from the requirement to obtain an air construction permit because they qualify for one of the categorical exemptions listed in Rule 62-210.300(3)(a), Florida Administrative Code (F.A.C.). However, they are included in this permit as regulated emissions units because they are subject to one or more of the following federal rules:

- 40 CFR 60, Subpart III—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.
- 40 CFR 60, Subpart IJJJ—Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.
- 40 CFR 63, Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

The below listed engines are subject to the specified federal rules.

<u>E.U.</u>		<u>In-service</u>	<u>Cylinder</u>	<u>Rated</u>	<u>Rule</u>
<u>ID No.</u>	<u>Brief Description of Engine</u>	<u>Date</u>	<u>Displacement</u>	<u>Horsepower</u>	<u>Applicability</u>

The following table also contains equipment that is exempt from the above listed federal rules and is addressed here for clarity.

EU ID no	Engine description	In-service date	Cylinder displacement	Rated hp	Rule applicability
New Guardian generator model 0053241 <u>Serial Number</u> 4647695	CI-ICE 25kw emergency propane generator	Mfgr Date: 2006 In-service occurred EOY 2008	1.6 liter	33.5	Rule 62-210.300(3)(a)20 Federal rules not applicable Equipment included on "Insignificant List"
New Guardian generator model 0053241 <u>Serial Number</u> 4649188	CI-ICE 25kw emergency propane generator	Mfgr Date: 2006 In-service occurred EOY 2008	1.6 liter	33.5	Rule 62-210.300(3)(a)20 Federal rules not applicable Equipment included on "Insignificant List"
EU004	RICE	Prior to 1996			Exempt Existing equipment

Revised data 09/02/2009

The engines listed above are currently demonstrating compliance with the emissions limitations of the applicable federal rule through the retention of a manufacturer's certification statement. So long as that certification is able to be retained, no additional compliance demonstration is required. At such time that the manufacturer's certification is no longer valid (i.e. due to operation or maintenance practices that are inconsistent with the manufacturer's recommendations), the permittee shall begin demonstrating compliance with the standards listed in the applicable federal rule (included in the appendices as an enforceable part of this permit) in a manner that is prescribed by that rule.

Notes:

1 kw = 1.34 hp

http://www.generac.com/Commercial/Commercial/Products/Commercial_Series_22_-150_kw/

Attachment PSNU4-2.DOC

Fuel Analysis

Natural Gas Analysis (typical)²

<u>Parameter</u>	<u>Typical value</u>	<u>Max value</u>
Specific gravity(@ 60° F)	0.580 - 0.600	none
Heat content (Btu/cu ft)	1031 - 1056	none
% sulfur (grains/CCF)	0.10 – 0.50 ¹	20 grain / ccf
% nitrogen (by volume)	0.3 – 0.6	none
% ash	negligible	none

*Note: The values listed are "typical" values based upon information supplied to FPL by Florida Gas Transmission (FGT). However, analytical results from grab samples of fuel taken at any given point in time may vary from those listed.

(1) Data from laboratory analysis

(2) The values are "typical" based upon the following:

- Information gathered by FPL through laboratory analysis, and
- FPL's fuel purchasing specifications. It should be noted that the analytical results obtained from grab samples taken at any given time may vary from those

listed.