

*General File*

Florida Power & Light Company, P.O. Box 14000, Juno Beach, FL 33408-0420



April 30, 1997

Mr. Tom Cascio  
State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**RECEIVED**

MAY 08 1997

BUREAU OF  
AIR REGULATION

**Re: FPL Canaveral Plant**  
**Title V Permit**

Dear Mr. Cascio,

This correspondence is in response to Mr. John Brown's letter of November 19, 1996. Following are responses to each of the concerns raised in John's letter:

1. Please provide a copy of the document PCCFS\_11.txt, Identification of Additional Applicable Requirements. The referenced document appears to be missing from Section E.

*Response: The reference to the document was in error. Additional applicable requirements are listed in each of the Emission Unit sections of the application.*

2. Attachment PCC-FW, List of Unregulated Trivial or De minimis Activities, contained consolidation of trivial activities, unregulated emission units and activities that you propose for exemption. Please resubmit as follows:

a) Group the unregulated activities into logical groupings of emissions units and indicate any pollutants that have the potential to emit quantities equal to or greater than the threshold levels specified in Rules 62-213.420(3)(c)3. and 4., F.A.C., from each of the unregulated emissions units.

b) Identify emissions units that you claim should be exempted and provide adequate information to demonstrate that emissions levels are below the levels established for exemption at Rule 62-213.430(6), F.A.C.

c) Do not include trivial activities in the application.

Response: The majorities of the activities are, in fact trivial, and have been eliminated from our list per your request. **Activities requested for exemption** are as follows:

<b><u>Item</u></b>	<b><u>Rationale</u></b>
Natural gas metering area relief valves	Safety equipment is exempted by Rule 62-210.300(3)(a)22k F.A.C..
Hydrazine mixing tank & relief valves	This is a 33% aqueous product stored in stainless steel bins. Typically the facility uses less than 300-gallons per year; therefore the emissions of hydrazine are below the 1,000 lb. threshold.
Ammonia Hydroxide mixing tank & relief valves	The facility uses less than 300-gallons per year of a 28% aqueous solution; therefore the emissions of ammonia are below the 1,000 lb. threshold.
Lube Oil tank vents & extraction vents	These items concern lubricating oils which have a low volatility. There is insufficient quantity on hand as the facility to produce a 5-ton release.
Oil Separation Basin (oily waste separator)	VOC's are below the 5-ton threshold. There is insufficient quantity on hand at the facility to produce a 5-ton release.
Miscellaneous mobile vehicle operation (cars, light trucks, heavy-duty trucks, backhoes, tractors, forklifts, cranes, etc.)	Exempted by Rule 62-210.300(3)(a)5.
Diesel Fuel Tank – 2" vent	VOC emissions from both tanks do not exceed the 5-ton threshold.

**Unregulated Activities** are proposed as follows:

**Emission Unit 3**

- Painting of Plant equipment
- Non-halogenated solvent cleaning operations
- Parts Washer with #2 Distillate
- Use of spray cans & solvents for routine maintenance activities

Combined VOC emissions from all 3 activities combined could exceed 5 tons per year

**Emission Unit 4**

- Miscellaneous mobile equipment operation (compressors, chain saws, small generators, welding machines, etc.)
- Internal Combustion engines which drive compressors, generators, water pumps or other auxiliary equipment

Combined NOx emissions could approach 15 tons per year for 10 pieces of equipment each operating 1,000 hrs per year. No other pollutants approach the relevant permitting thresholds.

**Unregulated Activities** (continued)

**Emission Unit 5**

Emergency diesel generators

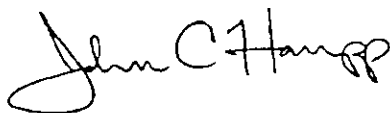
The facility maintains one 500 kW fixed main emergency diesel. The plant also maintains two small diesel generators and two small gasoline generators as plant Hurricane supplies. Maximum emissions are estimated as follows for 8,760 hours of operation per year:

SO <sub>2</sub>	7.4 TPY
NO <sub>x</sub>	65.7 TPY
CO	106.2 TPY

No other pollutants approach the relevant permitting thresholds.

Should you have any questions, or need any additional information, you may contact me by telephone at (561) 691-2894 or at the address provided below.

Sincerely,



John C. Hampp  
Sr. Regulatory Specialist  
Florida Power & Light Company

**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official:

Name: John Franklin  
Title : Plant General Manager

2. Owner or Responsible Official Mailing Address:


Organization/Firm: FPL Environmental Services Department  
Street Address: 11770 U.S. Highway One  
City: North Palm Beach State: FL Zip Code: 33408

3. Owner or Responsible Official Telephone Numbers:

Telephone: 4076330221 Fax: 4076330232

4. Owner or Responsible Official Statement:

*I, the undersigned, am the owner or authorized representative\* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200 F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.*

  
Signature

4-30-97  
Date

\* Attach letter of authorization if not currently on file.

4. Professional Engineer Statement:

*I, the undersigned, hereby certify, except as particularly noted herein\*, that:*

*(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and*

*(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for a emission unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.*

*If the purpose of this application is to obtain a Title V source air operation permit (check here [ ] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.*

*If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emission units (check here [ ] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.*

*If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.*

*William F. Brown*  
Signature

*4/30/97*  
Date

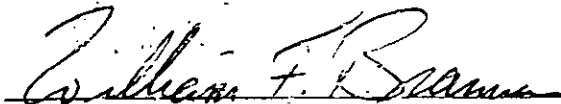
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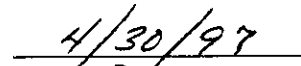
\* Attach any exception to certification statement.

## Supplement to Professional Engineer Certification Statement

This information supplements the original Title V application for the FPL Canaveral plant of June 1996 which was certified by Ken Kosky of KBN Engineering & Applied Sciences. This certification statement applies only to the following items included in this supplemental package submitted on April 22, 1997:

- List of Unregulated Activities
- List of Exempt Activities
- List of Equipment / Activities Regulated under Title VI

  
Signature

  
Date

(seal)