



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

Scott
cc: Clair
10/6

September 30, 1997

Mr. W. Douglas Beason, Esquire
Assistant General Counsel
Office of General Counsel
State of Florida
Department of Environmental Protection
3900 Commonwealth Boulevard Mail Station 34
Tallahassee, FL 32399-3000

VIA: Facsimile & U.S. Mail

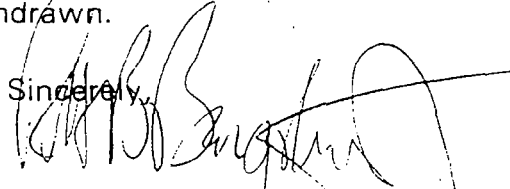
RE: Cape Canaveral Power Plant , Permit No. 0090006-001-AV-DRAFT
FP&L Withdrawal of Petition to Challenge the Draft Title V Permit

Dear Mr. Beason:

This letter is to memorialize Florida Power and Light Company's ("FPL") understanding that the Florida Department of Environmental Protection ("FDEP") amended the DRAFT Cape Canaveral Title V Permit No. 0090006-001-AV, dated June 16, 1997, by striking the existing permit condition language and inserting the language in the attached facsimile from Joe Kahn of FDEP to Rich Piper of FPL dated September 18, 1997. FPL also understands that the revised DRAFT Title V permit for Cape Canaveral will be issued upon receipt of this letter.

The conditions of the June 16, 1997, Draft Title V permit to be revised in the re-issued DRAFT permit are the sulfur dioxide emission limitation and standards, the sulfur dioxide monitoring of operations, and the sulfur dioxide test methods and procedures. FP&L and FDEP negotiated the attached language to be inserted in a revised Draft permit. It is FPL's understanding that all other conditions of the challenged DRAFT permit will remain the same. Based on FPL's understandings as outlined above, FPL requests that its Petition to challenge the Draft Title V permit, dated August 14, 1997, be withdrawn.

Sincerely,


Robert Bergstrom
Authorized House Counsel for
Florida Power and Light Company

RECEIVED

OCT 03 1997

BUREAU OF
AIR REGULATION

attachment

cc:

Mr. Scott Sheplak, P.E., Tallahassee, FDEP
Rich Piper, FPL

Model: Sulfur dioxide compliance demonstration by CEMS**Address: v:\models\boiler\SO2cems.doc**

[These are model conditions for an emissions unit classified as a Rule 62-296.405, F.A.C., type source that co-fires only fuel oil and natural gas, and uses CEMS to demonstrate compliance with the SO₂ standard; 9/17/97]

Emission Limitations and Standards

[F].a. Sulfur Dioxide. Sulfur dioxide emissions shall not exceed 2.75 pounds per million Btu heat input, as measured by applicable compliance methods. Compliance shall be based on the total heat input from all liquid and gaseous fuels burned. The sulfur dioxide emission limitation shall apply at all times including startup, shutdown, and load change, but shall not apply during malfunction provided best operational practices to minimize emissions are adhered to and the duration of excess emissions are minimized and does not exceed two hours in any 24 hour period.

[Rules 62-213.440 and 62-296.405(1)(c)1. [j], F.A.C.]

Monitoring of Operations

[F].b. Sulfur Dioxide. The owner or operator of the emission units shall demonstrate compliance with the sulfur dioxide limit of specific condition [F].a of this permit by the following:

- Through the use of a continuous emission monitoring system (CEMS) installed, calibrated, operated and maintained in accordance with the quality assurance requirements of 40 CFR 75, adopted and incorporated by reference in rule 62-204.800, F.A.C. A Relative Accuracy Test Audit of the SO₂ CEMS shall be conducted no less than annually. Compliance shall be demonstrated based on a 3-hour rolling average.
- In the event the CEMS becomes temporarily inoperable or interrupted, the fuels and the maximum fuel oil to natural gas firing ratio that shall be used is limited to that which was last used to demonstrate compliance prior to the loss of the CEMS, or the emissions units shall fuel switch and be fired with a fuel oil containing a maximum sulfur content of 2.5%, by weight, or less.
- When burning 100% fuel oil, the emissions units shall be fired with a fuel oil containing a maximum sulfur content of 2.5%, by weight, or less.

[Rules 62-213.440, 62-204.800 and 62-296.405(1)(c)3., F.A.C.]

Test Methods and Procedures

[F].c. Sulfur Dioxide. The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedences of the sulfur dioxide emissions limiting standard are occurring. The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, as an alternate sampling procedure authorized by permit, the permittee [elected to] OR [shall]

demonstrate compliance using CEMS for sulfur dioxide. See specific condition [F].b of this permit.

[Rules 62-213.440 and 62-296.405(1)(c)3. and (1)(e)3., F.A.C.; IF "ELECTED TO" ABOVE, ADD:

Proposed by applicant [date]]

Post-It Fax Note	7671	Date	9/18/97	# of Pages	2
To	Rich P. Del	From	Joe K. H.		
Co./Dept.		Co.	DEP		
Phone #		Phone #			
Fax #	561-691-7070	Fax #	850-488-1354		

Attachment - Revised Draft Title V Permit Language