



RECEIVED

APR 04 1997

BUREAU OF
AIR REGULATION

March 28, 1997

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

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

Dear Mr. Cascio:

This correspondence is in response to Mr. John Brown's letter of December 18, 1996 (which, for some reason we didn't receive until January 10th). Following are responses to each of the concerns raised in John's letter.

1. Electronic Submittal of Application (ELSA) - Please provide a new set of diskettes, since we were unable to process the ones provided.

Response: As we discussed on the telephone, we will be working on a resubmittal of this information; however we understand that the Department is relying on the hard copy submittal in the meantime.

2. Please provide a copy of document PCUFS_8.txt, List of Equipment / Activities Regulated Under Title VI. The referenced document appears to be missing from Section E.

Response: The referenced document is attached for your use.

3. Please provide a copy of document PCUFS_11.txt, Identification of Additional Applicable Requirements.

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

4. Attachment to the application, List of Unregulated Trivial and De Minimis Activities, contained a consolidated listing of trivial activities, unregulated emissions 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 majority of the activities are, in fact trivial, and have been eliminated from our list per your request. **Activities requested for exemption** are as follows:*

<u>Item</u>	<u>Rationale</u>
Natural gas metering area relief valves	Safety equipment is exempted by Rule 62-210.300(3)(a)22k F.A.C..
Hydrazine mixing tank	This is an aqueous product stored in stainless steel bins. Typically the facility uses less than two, 135-gallon bins per year; therefore the emissions of hydrazine are below the 1,000 lb. threshold.
Lube Oil Vapor Extractor vents Lube Oil Dump Tank vent	Both of these items concern lubricating oil, which has a low volatility. There is insufficient quantity on hand at the facility to produce a 5 ton release.
Oil Separation Basin	VOC's are below the 5 ton threshold. There is insufficient quantity on hand at the facility to produce a 5 ton release.
Hazardous Waste Bldg.	Drums are maintained closed. Less than the threshold quantity of any regulated air pollutant.
Paint / Lube Bldg.	Containers are maintained closed. Less than the threshold quantity of any regulated air pollutant.
Miscellaneous mobile vehicle operation (cars, light trucks, heavy duty trucks, backhoes, tractors, forklifts, cranes, etc.)	Exempted by Rule 62-210.300(3)(a)5.
Portable unleaded Gasoline Tank Portable 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
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, electric saws & drills, 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.

Emission Unit 5

Emergency diesel generators

The facility maintains one main emergency diesel generator in a trailer in the plant switchyard. Maximum emissions are estimated as follows for 8,760 hours of operation per year:

SO2	10.5 TPY
NOx	69.6 TPY
CO	110.3 TPY

No other pollutants approach the relevant permitting thresholds.

We are in agreement with the Department that on-specification used oil should not have appeared in the 2 flow diagrams submitted with the initial application. We also acknowledge the Department's observation regarding the Acid Rain application form.

I trust that this letter will address the various concerns that were raised in the December 18th letter. Please do not hesitate to contact me at (561) 691-7058 if I may be of further assistance.

Very truly yours,



Rich Piper
Sr. Environmental Specialist
Florida Power & Light Company

bcc:

R. Sanchez
G. Andersen
R. Adams
J. Hampp

PCU / PCU
PCU / PCU
GPA / JB
GPA / JB

cc: Tom Casio

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AIR John Bra.

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



CUTLER
BARRER
For permit file
Barbara
copy of
1/27/97

DEPARTMENT OF ENVIRONMENTAL PROTECTION

FEB 04 1997

OFFICE OF THE SECRETARY

January 27, 1997

Ms. Virginia B. Wetherell, Secretary
State of Florida
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

Re: **Change of Responsible Official Designation**
Title V Program

Dear Ms. Wetherell:

This correspondence is to certify that Mr. Rudy Sanchez has replaced Mr. Al Alfonso as Plant General Manager of the FPL Turkey Point Fossil and the **FPL Cutler** power plants. As Plant General Manager, Mr. Sanchez is authorized to act as the "Responsible Official" for those facilities, pursuant to State Rule 62-213.200, F.A.C.. Mr. Sanchez is hereby authorized to act on behalf of Florida Power & Light Company on all Title V permit related activities for the facilities named above.

Sincerely,

Antonio Rodriguez
Vice President
Power Generation Business Unit
Florida Power & Light Company

RESOURCES MANAGEMENT

cc:

John Brown
Tom Tittle

FDEP DARM
FDEP Southeast District



March 28, 1997

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

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AIR REGULATION

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Rich Piper
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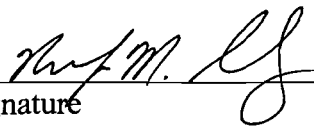
cc: Tom Cascio

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Attachment PCUFS_8.txt
List of Equipment / Activities Regulated Under Title VI

The Cutler facilities contains no devices which contain CFC's in excess of the 50 pound reporting threshold.

Owner/Authorized Representative or Responsible Official

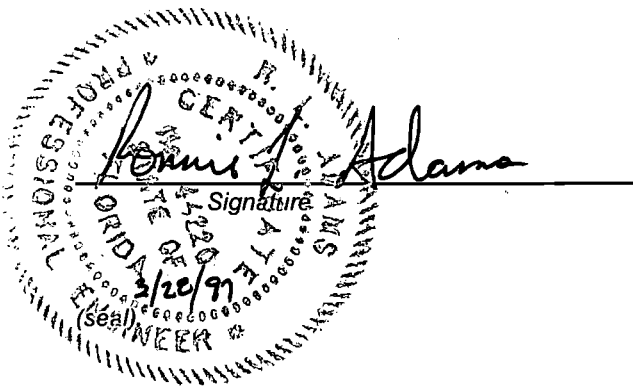
1. Name and Title of Owner/Authorized Representative or Responsible Official: Name: Rudy Sanchez Title : Plant General Manager
2. Owner or Responsible Official Mailing Address: Organization/Firm: FPL Environmental Services Department Street Address: P.O. Box 14000 City: Juno Beach State: FL Zip Code: 33408
3. Owner or Responsible Official Telephone Numbers: Telephone: 3052466060 Fax: 3052466905
4. Owner or Responsible Official Statement: <i>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 statues 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.</i>  _____ Signature 3/28/97 _____ Date

* Attach letter of authorization if not currently on file.

Supplement to Professional Engineer Certification Statement

This information supplements the original Title V application for the FPL Cutler 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 March 28, 1997:

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



3/28/97
Date

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.

Signature Ronald A. Allen Date 3/28/97
(seal) 3/28/97
No. 44210
STATE OF FLORIDA
PROFESSIONAL ENGINEER

* Attach any exception to certification statement.

Appendix H-1, Permit History/ID Number Changes

Florida Power & Light Company
Cutler

[DRAFT/PROPOSED/FINAL]Permit No.: 0250001-001-AV
Facility ID No.: 0250001

Permit History (for tracking purposes):

E.U.

<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date^{1,2}</u>	<u>Revised Date(s)</u>
-001	Fossil Fuel Steam Generator #5	AO13-173751	02/27/90	02/22/95	08/14/96	
-002	Fossil Fuel Steam Generator #6	AO13-173753	02/26/90	02/22/95	08/14/96	

(if applicable) ID Number Changes (for tracking purposes):

From: **Facility ID No.:** 50DAD130001

To: **Facility ID No.:** 0250001

Notes:

- 1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
 - 2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.
- {Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

Memorandum

TO: H. Patrick Wong, Dade County

FROM: Bruce Mitchell *BM*

DATE: December 18, 1996

SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit
Florida Power & Light, Cutler Plant: 0250001-001-AV

The Title V operating permit application package for the referenced facility is being processed in Tallahassee. The application was previously forwarded to your office for your files and future reference. Please have someone review the package for completeness and respond in writing by January 20, 1997, if you have any comments. Otherwise, no response is required. If there are any questions, please call the project engineer, Tom Cascio, at 904/488-1344 or SC:278-1344. It is very important to verify the compliance statement regarding the facility. Since we do not have a readily effective means of determining compliance at the time the application was submitted, please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. Also, do not write on the documents.

If there are any questions regarding this request, please call me or Scott Sheplak at the above number(s).

RBM/bm

12/18/96 Reading File
Tom Cascio



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

December 18, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Adalberto Alfonso
Plant General Manager
Florida Power & Light Company
11770 U.S. Highway One
North Palm Beach, Florida 33408

Re: Request for Additional Information Regarding Initial Title V Permit Application
File No. 0250001-001-AV
Cutler Plant, Dade County

Dear Mr. Alfonso:

The initial Title V permit application for the Cutler Plant was received in a timely manner (June 12, 1996) and has been deemed complete by default. However, in order to continue processing this application, the Department is requesting the additional information outlined below. Should your response to any of the listed items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form. Please note that the items are grouped by the appropriate application section reference.

A. Electronic Submission of Application (ELSA).

Please provide a new set of ELSA diskettes, since we were not able to process the ones provided. Our Systems Support Group reported that the electronic data were unreadable.

B. Facility Information.

1. Please provide a copy of document PCUFS_8.txt, List of Equipment/Activities Regulated Under Title VI. The referenced document appears to be missing from Section E.
2. Please provide a copy of document PCUFS_11.txt, Identification of Additional Applicable Requirements. The referenced document also appears to be missing from Section E.
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 - 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

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

Z 311 902 876



**Receipt for
Certified Mail**

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, March 1993

Sent to Mr. Adalberto Alfonso	
Street and No. 11770 U.S. Highway One	
P.O., State and ZIP Code North Palm Beach, FL 33408	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date December 18, 1996	

Mr. Adalberto Alfonso
Florida Power & Light Company
Additional Information Request
Page 2 of 2

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.


C. Emissions Units 5 and 6: Boilers.

1. We note as an informational item that "On Spec Used Oil" is included as a "Permitted Fuel Option" on Attachments PCUE1_1.bmp, and PCUE2_2.bmp, Emission Unit Process Flow Diagrams. However our understanding is that this option was deleted from the active operation permits via a revision on 4/19/90.

2. Also, "Previously Submitted" should have been entered in the Acid Rain Application - Phase II form information blank instead of "Not Applicable" in Section L.

A written response to these items is required within ninety days of receipt of this notice, unless additional time is requested pursuant to Rule 62-213.420(1)(b)6, F.A.C. If you should have any questions, please contact Tom Cascio or me at (904) 488-1344.

Sincerely,


John C. Brown, Jr., P.E.
Administrator
Title V Section

JCB/tc

CC: Mr. Kennard F. Kosky, P.E., KBN Engineering and Applied Sciences
Mr. Isidore Goldman, Southeast District Office
Mr. H. Patrick Wong, Dade County Department of Environmental Resources Management

12/18/96 Reading File
Tom Cascio



CUTLER POWER PLANT

Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406 • 407-964-9668

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary

Scott Benyon, Deputy Assistant Secretary

FILE

PERMITTEE:
Mr. Martin A. Smith
Manager - Environmental Permitting
and Programs
Florida Power & Light Company
P. O. Box 078768
West Palm Beach, Florida 33407

I.D. NUMBER: 50/DAD/13/0001/03
PERMIT/CERTIFICATION NUMBER: AO 13-173751 *
DATE OF ISSUE: FEB 22 1995
EXPIRATION DATE: February 22, 1995
COUNTY: Dade
LATITUDE/LONGITUDE: 25°37'52"N/80°17'56"W
UTM: Zone 17; 570.4 Km. E; 2834.9 Km. N
PROJECT: Florida Power & Light Company
Cutler Plant #5

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule 17-2, and in conformance with all existing regulations of the Florida Department of Environmental Regulation. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

OPERATE: An air pollution source consisting of a 75 MW Class fossil fuel steam generator Unit #5 (85 MW capacity). The unit has a heat input rate of 170 mm BTU/hr. on oil and 940 mm BTU/hr. on natural gas. The unit discharges pollutants through a stack 150 feet above ground level. The unit is equipped with Aerotec multiple cyclones.

IN ACCORDANCE WITH: Application for Renewal of Permit to Operate Air Pollution Sources received December 13, 1989, modified February 9, 1990, information received February 25, 1988 and March 31, 1988 and original Application to Operate dated February 23, 1971, as modified by submittals received September 9 and 23, 1983. (None are attached.)

LOCATED AT: 14925 SW 67 Avenue, Miami, Dade County.

TO SERVE: An electric service utility (SIC # 4911).

SUBJECT TO: General Conditions 1-14 and Specific Conditions 1-8.

* This permit is a renewal of AO 13-071893 issued February 22, 1985.

PERMITTEE:
 Mr. Martin A. Smith
 Florida Power & Light Company
 West Palm Beach, Florida

I. D. NUMBER: 50/DA 13/0001/03
 PERMIT/CERTIFICATION NUMBER: AC-13-173751
 DATE OF ISSUE:
 EXPIRATION DATE: February 22, 1995

SPECIFIC CONDITIONS:

FILE

- Permitted Fuels:
 During Start-up - No. 6 Residual Oil with 0.5% maximum sulfur content
 OR
 No. 2 fuel oil with 0.5% maximum sulfur content
 OR
 100% natural gas
 Operations other than start-up - 100% natural gas.
- Source Emission Limiting Standards and Compliance Testing Requirements:

POLLUTANT	EMISSION ¹ LIMITING STDS.	TESTING FREQUENCY ²			TEST ³ METHOD
		ANNUAL	QUARTERLY	OTHER	
Particulate Matter					
- Steady-State	0.1 lb/MMBtu**	X	---	---	EPA Method 5 or 17 *
Sulfur Dioxide	0.55 lb/MMBtu*** 93.5 lb/Hr	---	---	X	Monthly Fuel Analysis
Visible Emissions					
- Steady-State	20% Opacity except for up to 2 minutes per hour up to 40%	X	---	---	DER Method 9
- Load Changing	60% Opacity for up to 3 hrs in 24 hrs.	---	---	---	---

* EPA Method 17 may be used only if the stack temperature is less than 375 ° F.

- FAC 17-2.600(5) and FAC 17-2.250(3)
- FAC 17-2.700(2)
- FAC 17-2.700(1)(d)

** Testing of particulate emissions will be conducted if unit operation on oil, exclusive of start-up, exceeds 400 hours per year, per FAC 17-2.700(2)(a)5.

*** Based on Metropolitan Dade County Code Sec. 24-17(2)(c)(iii)

3. Compliance Testing Related Requirements:

- (a) Notification - FAC 17-2.700(2)(a)5

Notification of scheduled test dates shall be given to the Department Southeast Florida District Office and the Dade County Department of Environmental Resources Management at least 15 days prior to testing unless otherwise agreed to by the Department.

BEST AVAILABLE COPY

PERMITTEE:
Mr. Martin A. Smith
Florida Power & Light Company
West Palm Beach, Florida

I.D. NUMBER: 50/DAD/13/0001/03
PERMIT/CERTIFICATION NUMBER: AO 13-173751
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SPECIFIC CONDITIONS:

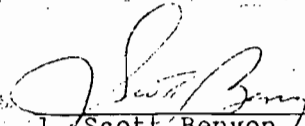
FILE

(c) An estimate of the total quantity of used oil burned during the applicable calendar year shall be included in the Annual Operation Report (AOR) for Air Emissions Sources. The permittee will submit with the AOR a summary of the range of values for each constituent analyzed pursuant to Specific Condition 7(a).

8. The permittee shall be aware of and operate under the attached "General Permit Conditions #1 thru 14.". General Permit Conditions are binding upon the permittee and enforceable pursuant to Chapter 403 of the Florida Statutes.

Issued this 27th day of February, 1990

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



J. Scott Benyon
Deputy Assistant Secretary

PERMITTEE:
Mr. Martin A. Smith
Florida Power & Light Company
West Palm Beach, Florida

I. D. NUMBER: 50/DAD/13/0001/03
PERMIT/CERTIFICATION NUMBER: AO 13-173751
DATE OF ISSUE:
EXPIRATION DATE: February 22, 1995

FILE

SPECIFIC CONDITIONS:

(b) Conditions:

Testing of emissions should be conducted using No. 6 fuel oil and with the source operating within 10% of its rated capacity. Testing may be conducted at less than 90% of rated capacity; however, if so, subsequent source operation is limited to up to 110% of the test load. Once the unit is so limited, then operation at higher capacities is allowed for a cumulative total of no more than fifteen days for purposes of additional compliance testing to regain rated capacity in permit, with prior notification to the Department.

(c) Report Submittal - FAC 17-2.700(7)

A copy of the test results shall be submitted to the Department Southeast Florida District Office and the Dade County Department of Environmental Resources Management within 45 days after the last test run is completed.

4. Annual Operations Report - FAC 17-4.14:

On or before March 1 of each calendar year, a completed DER Form 17-1.202(6), Annual Operations Report Form for Air Emissions Sources shall be submitted to the Department Southeast Florida District Office and the Dade County Department of Environmental Resources Management.

5. Excess Emissions - FAC 17-2.250(1), (2) and (3):

Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions is minimized.

Excess emissions resulting from malfunction shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions is minimized but in no case exceeds two hours in any 24-hour period unless specifically authorized by the Department for longer duration.

In addition to the requirements of General Condition 8 of this permit, a written quarterly report shall be submitted to the Department Southeast Florida District Office and the Dade County Department of Environmental Resources Management of all opacity exceedances of emissions limitations specified in Florida Administrative Code Rule 17-2.250(1) through (4) and 17-2.600(5)(b)1. The report shall state the cause, period of non-compliance, and steps taken for corrective action and/or prevention of recurrence. The Department shall also be notified when there are no exceedances for a quarter. All recorded data shall be maintained on file by the permittee for no less than two (2) years and made available to the Department upon request.

6. Emergency Operation:

Fuel oil may be burned during emergency conditions, as authorized by Metropolitan Dade County.

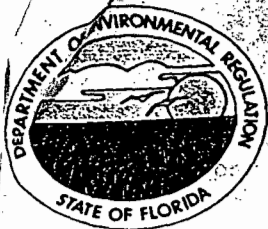
7. Used oil fuel:

Burning of used oil meeting EPA specifications (40CFR S266.40) and generated from FPL operations shall be permitted under the following conditions:

- (a) Each batch of used oil to be burned shall be sampled and analyzed for: Arsenic, Chromium, Cadmium, total Halogens, and Lead using EPA/DER or ASTM approved methods. Split samples of the used oil shall be retained for three (3) months after analysis for further testing if necessary.
- (b) Results of used oil sampling and analysis performed pursuant to Specific Condition 7(a) shall be retained by permittee for at least three (3) years and made available for inspection by DER upon request.

FILE

Best Available Copy



Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406 • 407-964-9668

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary
Scott Benyon, Deputy Assistant Secretary

APR 19 1990

Dade County

AP - Florida Power & Light Company
Modifications - Cutler Unit 5

CERTIFIED MAIL P 294 716 ⁰⁴⁶
RETURN RECEIPT REQUESTED

Mr. M. A. Smith - Manager
Environmental Permitting Programs
Florida Power & Light Company
P. O. Box 078768
West Palm Beach, Florida 33407

Dear Mr. Smith:

RE: Modification of Permit, Permit Number AO 13-173751

We are in receipt of your request for a modification of the permit. The permit is changed as follows:

Re: Specific Condition #7.

Delete Specific Condition #7.

Renumber Specific Condition #8 as Specific Condition #7.

In addition, Page 1 of 6 is changed as follows:

FROM:

SUBJECT TO: General Conditions 1-14 and Specific Conditions 1-8.

TO:

SUBJECT TO: General Conditions 1-14 and Specific Conditions 1-7.

This letter must be attached to the original permit and becomes part of that permit.

This letter constitutes final agency action unless a person substantially affected by this action requests an administrative hearing pursuant to Section 120.57, Florida Statutes. The petition must be filed within fourteen (14) days from receipt of this letter. The petition must comply with the requirements of Florida Administrative Code Rule 28-5.201 and be filed pursuant to Rule 17-103.155(1) in the Office of General Counsel of the Department of Environmental Regulation at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions which are not filed in accordance with the above provisions will not be accepted by the department. If a formal proceeding pursuant to Section 120.57(1) is requested, at such formal hearing all parties shall have an opportunity to respond, to present evidence and argument on all

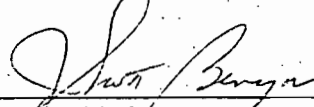
Mr. M. A. Smith
 Florida Power & Light Company
 West Palm Beach, Florida
 Page 2 of 2

DER Permit Number AO 13-1

issues involved, to conduct cross-examination of witnesses and submit rebuttal evidence, to submit proposed findings of facts and orders, to file exceptions to any order or hearing officer's recommended order, and to be represented by counsel. If an informal proceeding is requested, the agency will, in accordance with its rules of procedure, give affected persons or parties their counsel an opportunity, at a convenient time and place, to present to the agency or hearing officer written or oral evidence in opposition to the agency's action or refusal to act, or a written statement challenging the grounds upon which the agency has chosen to justify its action or inaction, pursuant to Section 120.57(2), Florida Statutes. The hearing process is designed to formulate agency action. Accordingly, the Department's final action as a result of a hearing may be different from the position taken by it in this stage. Therefore any person who may wish to contest the Department's ultimate permitting decision, must petition for hearing within the fourteen day period described above. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.

Executed in West Palm Beach, Florida.

STATE OF FLORIDA
 DEPARTMENT OF REGULATION


 J. Scott Benyon
 Deputy Assistant Secretary
 1900 South Congress Ave., Suite A
 West Palm Beach, FL 33406
 407/964-9668

JSB:SB/k20

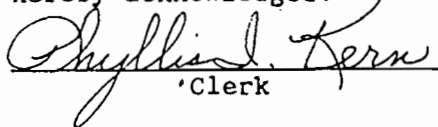
cc Dade County Environmental Resources Management

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT, and all copies were mailed before the close of business on APR 15 1990 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGEMENT FILED,
 on this date, pursuant to §120.52(10),
 Florida Statutes, with the designated
 Department Clerk, receipt of which is
 hereby acknowledged.


 Clerk

APR 19 1990
 Date



Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406 • 407-964-9668

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

Scott Benyon, Deputy Assistant Secretary

FILE

PERMITTEE:

Mr. M. A. Smith
Manager - Environmental Permit-
ting & Programs
Florida Power & Light Company
P. O. Box 078768
West Palm Beach, Florida 33407

I.D. NUMBER: 50/DAD/13/0001/04
PERMIT/CERTIFICATION NUMBER: AO 13-173753 *
DATE OF ISSUE: FEB. 26 1990
EXPIRATION DATE: February 22, 1995
COUNTY: Dade
LATITUDE/LONGITUDE: 25°37'52"N/80°17'56"W
UTM: Zone 17; 570.4 Km. E; 2834.9 Km. N
PROJECT: Florida Power & Light Company
Cutler Unit #6

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule 17-2, and in conformance with all existing regulations of the Florida Department of Environmental Regulation. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

OPERATE: An air pollution source consisting of a 160 MW Class fossil fuel steam generator (160 MW capacity) (Unit #6). The unit has a heat input of 290 mm BTU/hr. on fuel oil and 1620 mm BTU/hr. on natural gas. Unit #6 discharges emissions 150 feet above ground level.

IN ACCORDANCE WITH: Application for Renewal to Operate Air Pollution Sources received December 13, 1989, modified February 9, 1990, information received February 25, 1988 and March 31, 1988 and original Application to Operate dated February 23, 1971 as modified by submittals received September 9 and 23, 1983 (none are attached).

LOCATED AT: 14925 SW 67 Avenue, Miami, Dade County, Florida

TO SERVE: An electric service utility (SIC # 4911).

SUBJECT TO: General Conditions 1-14 and Specific Conditions 1-8.

* This permit is a renewal of AO 13-072894 issued February 22, 1985.

PERMITTEE:
Mr. M. A. Smith
Florida Power & Light Company
West Palm Beach, Florida

I.D. NUMBER: D0001/04
PERMIT/CERTIFICATION NUMBER: AO 13-173753
DATE OF ISSUE: FEB. 26 1990
EXPIRATION DATE: February 22, 1995

SPECIFIC CONDITIONS:

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(b) Conditions:

Testing of emissions should be conducted using No 6 fuel oil and with the source operating within 10% of its rated capacity. Testing may be conducted at less than 90% of rated capacity, however, if so, subsequent sources operation is limited to up to 110% of the test load. Once the unit is so limited, then operation at higher capacities is allowed for a cumulative total of no more than fifteen days for purposes of additional compliance testing to regain rated capacity in permit, with prior notification to the Department.

(c) Report Submittal - FAC 17.2700(7):

A copy of the test results shall be submitted to the Department Southeast Florida District Office and the Dade County Department of Environmental Resources Management within 45 days after the last test run is completed.

4. Annual Operations Report - EAC 17-4.14:

On or before March 1 of each calendar year, a completed DER Form 17-1.202(6), Annual Operations Report Form for Air Emissions Sources shall be submitted to the Department Southeast Florida District Office and the Dade County Department of Environmental Resources Management.

5. Excess Emissions - FAC 17-2.250(2), (2) and (3):

Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions is minimized.

Excess emissions resulting from malfunction shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions is minimized but in no case exceeds two hours in any 24-hour period unless specifically authorized by the Department for longer duration.

In addition to the requirements of General Condition 8 of this permit, a written quarterly report shall be submitted to the Department Southeast Florida District Office and the Dade County Department of Environmental Resources Management of all opacity exceedances of emissions limitations specified in Florida Administrative Code Rule 17-2.250(1) through (4) and 17-2.600(5)(b)1. The report shall state the cause, period of non-compliance, and steps taken for corrective action and/or prevention of recurrence. The Department shall also be notified when there are no exceedances for a quarter. All recorded data shall be maintained on file by the permittee for no less than two (2) years and made available to the Department upon request.

6. Emergency Operation:

Fuel oil may be burned during emergency conditions, as authorized by Metropolitan Dade County.

7. Burning of used oil meeting EPA specifications (40CFR S266.40) and generated from FPL operations shall be permitted under the following conditions:

- (a) Each batch of used oil to be burned shall be sampled and analyzed for: Arsenic, Chromium, Cadmium, total Halogens, and Lead using EPA/DER or ASTM approved methods. Split samples of the used oil shall be retained for three (3) months after analysis for further testing if necessary.

PERMITTEE:
Mr. M. A. Smith
Florida Power & Light Company
West Palm Beach, Florida

I.D. NUMBER: DAL 0001/04
PERMIT/CERTIFICATION NUMBER: AO 13-173753
DATE OF ISSUE: FEB 26 1990
EXPIRATION DATE: February 22, 1995

SPECIFIC CONDITIONS:

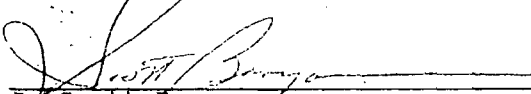
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- (b) Results of used oil sampling and analysis performed pursuant to Specific Condition 7(a) shall be retained by permittee for at least three (3) years and made available for inspection by DER upon request.
- (c) An estimate of the total quantity of used oil burned during the applicable calendar year shall be included in the Annual Operation Report (AOR) for Air Emissions Sources. The permittee will submit with the AOR a summary of the range of values for each constituent analyzed pursuant to Specific Condition 7(a).

8. The permittee shall be aware of and operate under the attached "General Permit Conditions #1 thru 14.". General Permit Conditions are binding upon the permittee and enforceable pursuant to Chapter 403 of the Florida Statutes.

Issued this 26th day of February, 1990

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



J. Scott Benyon
Deputy Assistant Secretary

FILE



Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406 • 407-964-9668

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary

Scott Benyon, Deputy Assistant Secretary

APR 19 1990

Dade County,
AP - Florida Power & Light
Modifications
Cutler Unit No. 6

CERTIFIED MAIL P 294 716 015
RETURN RECEIPT REQUESTED

Mr. M. A. Smith, Manager -
Environmental Permitting Programs
Florida Power & Light Company
P. O. Box 078768
West Palm Beach, Florida 33407

Dear Mr. Smith:

RE: Modification of Permit, Permit Number AO 13-173753

We are in receipt of your request for a modification of the permit. The permit is changed as follows:

Description:

DELETE: Specific Condition No. 7.

RENUMBER: Specific Condition No. 8 to Specific Condition No. 7.

In addition:

Page 1 of 6 is changed as follows:

FROM:

SUBJECT TO: General Conditions 1-14 and Specific Conditions 1-8.

TO:

SUBJECT TO: General Conditions 1-14 and Specific Conditions 1-7.

This letter must be attached to the original permit and becomes part of that permit.

This letter constitutes final agency action unless a person substantially affected by this action requests an administrative hearing pursuant to Section 120.57, Florida Statutes. The petition must be filed within fourteen (14) days from receipt of this letter. The petition must comply with the requirements of Florida Administrative Code Rule 28-5.201 and be filed pursuant to Rule 17-103.155(1) in the Office of General Counsel of the Department of Environmental Regulation at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions

Mr. Martin A. Smith
Florida Power & Light Company
West Palm Beach, Florida

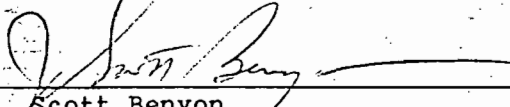
DER Permit No. AO 13-173753

FILE

which are not filed in accordance with the above provisions will not be accepted by the department. If a formal proceeding pursuant to Section 120.57(1) is requested, at such formal hearing all parties shall have an opportunity to respond, to present evidence and argument on all issues involved, to conduct cross-examination of witnesses and submit rebuttal evidence, to submit proposed findings of facts and orders, to file exceptions to any order or hearing officer's recommended order, and to be represented by counsel. If an informal proceeding is requested, the agency will, in accordance with its rules of procedure, give affected persons or parties their counsel an opportunity, at a convenient time and place, to present to the agency or hearing officer written or oral evidence in opposition to the agency's action or refusal to act, or a written statement challenging the grounds upon which the agency has chosen to justify its action or inaction, pursuant to Section 120.57(2), Florida Statutes. The hearing process is designed to formulate agency action. Accordingly, the Department's final action as a result of a hearing may be different from the position taken by it in this stage. Therefore any person who may wish to contest the Department's ultimate permitting decision must petition for hearing within the fourteen day period described above. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.

Executed in West Palm Beach, Florida.

STATE OF FLORIDA
DEPARTMENT OF REGULATION


J. Scott Benyon
Deputy Assistant Secretary
1900 South Congress Ave., Suite A
West Palm Beach, FL 33406
407/964-9668

JSB:SB/k20

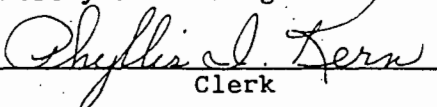
cc: Dade County Environmental Resources Management

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on APR 19 1990 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to §120.52(10), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


Clerk

APR 19 1990
Date