

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Mr. Rudy Sanchez  
Plant General Manager  
Florida Power & Light Company  
Environmental Services Department  
P.O. Box 14000  
Juno Beach, FL 33408

ORDER EXTENDING PERMIT EXPIRATION DATE  
Cutler Plant, **Facility ID No.: 0250001**

Section 403.0872(2)(b), Florida Statutes (F.S.), specifies that any facility which submits to the Department of Environmental Protection (Department) a timely and complete application for a Title V permit "is entitled to operate in compliance with its existing air permit pending the conclusion of proceedings associated with its application."

Section 403.0872(6), F.S., provides that a proposed Title V permit which is not objected to by the United States Environmental Protection Agency (EPA) "must become final no later than fifty-five (55) days after the date on which the proposed permit was mailed" to the EPA.

Pursuant to the Federal Acid Rain Program as defined in rule 62-210.200, Florida Administrative Code (F.A.C.), all Acid Rain permitting must become effective on January 1 of a given year.

This facility which will be permitted pursuant to section 403.0872, F.S., (Title V permit) will be required to have a permit effective date subsequent to the final processing date of the facility's Title V permit.

To prevent misunderstanding and to assure that the above identified facility continues to comply with existing permit terms and conditions until its Title V permit becomes effective, it is necessary to extend the expiration date(s) of its existing valid permit(s) until the effective date of its Title V permit. Therefore, under the authority granted to the Department by section 403.061(8), F.S., **IT IS ORDERED:**

1. The expiration date(s) of the existing valid permit(s) under which the above identified facility is currently operating is (are) hereby extended until the effective date of its permit issued pursuant to section 403.0872, F.S., (Title V permit);
2. The facility shall comply with all terms and conditions of its existing valid permit(s) until the effective date of its Title V permit;

3. The facility will continue to comply with the requirements of Chapter 62-214, F.A.C., and the Federal Acid Rain Program, as defined in rule 62-210.200, F.A.C., pending final issuance of its Title V permit.

### PETITION FOR ADMINISTRATIVE REVIEW

The Department will take the action described in this Order unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 of the Florida Statutes, or a party requests mediation as an alternative remedy under section 120.573, F.S., before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed decision may petition for an administrative hearing in accordance with sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. Petitions must be filed within 21 days of receipt of this Order. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 of the Florida Statutes, or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this Order. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A person whose substantial interests are affected by the Department's proposed decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information:

(a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any;

(b) A statement of the preliminary agency action;

(c) A statement of the relief sought; and

(d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following:

(a) The names, addresses, and telephone numbers of any persons who may attend the mediation;

(b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time;

(c) The agreed allocation of the costs and fees associated with the mediation;

(d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation;

(e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen;

(f) The name of each party's representative who shall have authority to settle or recommend settlement; and

(g) The signatures of all parties or their authorized representatives.

As provided in section 120.573 of the Florida Statutes, the timely agreement of all parties to mediate will toll the time limitations imposed by sections 120.569 and 120.57, F.S., for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such a modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under sections 120.569 and 120.57, F.S., remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under section 120.542 of the Florida Statutes. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

(a) The name, address, and telephone number of the petitioner;

(b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;

(c) Each rule or portion of a rule from which a variance or waiver is requested;

(d) The citation to the statute underlying (implemented by) the rule identified in (c) above;

(e) The type of action requested;

- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested. The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in section 120.542(2) of the Florida Statutes, and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

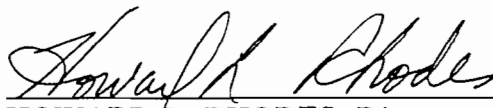
This Order constitutes final agency action unless a petition is filed in accordance with the above paragraphs. Upon timely filing of a petition or request for mediation, this Order will not be effective until further Order of the Department.

RIGHT TO APPEAL

Any party to this Order has the right to seek judicial review of the Order pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Notice of Agency Action is filed with the Clerk of the Department.

DONE AND ORDERED this 18<sup>th</sup> day of July, 1997 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



HOWARD/L. RHODES, Director  
Division of Air Resources Management  
Twin Towers Office Building  
Mail Station 5500  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
850/488-0114

CERTIFICATE OF SERVICE

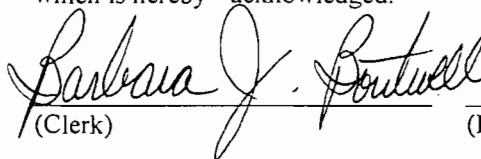
The undersigned duly designated deputy agency clerk hereby certifies that this order and all copies were sent by certified mail before the close of business on 7/18/97 to the person(s) listed:

[R.O.]

[District/Local Program Administrator and office]

Clerk Stamp

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

 7/18/97  
(Clerk) (Date)

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1.  Addressee's Address
- 2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
 Mr. H. Patrick Wong, Chief  
 Dade County Department of  
 Environmental Resources Mgmt.  
 Suite 900  
 33 Southwest Second Avenue  
 Miami, Florida 33130-1540

4a. Article Number  
 2 127 635 507

4b. Service Type  
 Registered       Insured  
 Certified       COD  
 Express Mail       Return Receipt for Merchandise

7. Date of Delivery  
 7/21

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)  
*[Handwritten Signature]*

PS Form 3811, December 1991      \*U.S. GPO: 1992-323-402      **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

Z 127 635 507



**Receipt for Certified Mail**

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

Sent to Mr. H. Patrick Wong, Chief	
Street and No. 33 Southwest Second Avenue	
P.O., State and ZIP Code Miami, Florida 33130-1540	
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 07/18/97 Facility ID#: 0250001 FP&L - Culter Plant	

PS Form 3800, March 1993

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1.  Addressee's Address
- 2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
 Mr. Rudy Sanchez  
 Plant General Manager  
 Florida Power & Light Company  
 Environmental Services Department  
 P.O. Box 14000  
 Juno Beach, Florida 33408

4a. Article Number  
 2 127 635 506

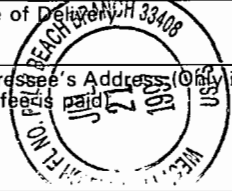
4b. Service Type  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

7. Date of Delivery  
 JUN 18 1997  
 JUNO BEACH, FL 33408

5. Signature (Addressee)  
*[Handwritten Signature]*

8. Addressee's Address (Only if requested and fees paid)

6. Signature (Agent)



Thank you for using Return Receipt Service.

2 127 635 506



**Receipt for Certified Mail**

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


Sent to Mr. Rudy Sanchez	
Street and No. P. O. Box 14000	
P.O., State and ZIP Code Juno 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 07/18/97	
Facility ID#: 0250001	
Cutler Plant - FP&L	

PS Form 3800, March 1993



MEMORANDUM

TO: Scott M. Sheplak, P.E.

FROM: Tom Cascio 

DATE: July 15, 1997

Re: PROPOSED Permit Determination and  
PROPOSED Title V Permit No. 0250001-001-AV  
Florida Power & Light Company  
Cutler Plant

This permit is for the initial Title V air operation permit for the subject facility.

The DRAFT Title V Permit was revised based on written comments received from Rich Piper of the Florida Power and Light Company, and subsequent clarifying phone conversations with him. I believe all concerns have been satisfactorily addressed, and recommend that the PROPOSED Permit Determination and PROPOSED Title V Permit be sent out as attached.

**Florida's PROPOSED Permit Electronic Notification Cover Memorandum**

**TO:** Yolanda Adams, U.S. EPA Region 4  
**CC:** Carla E. Pierce, U.S. EPA Region 4  
**THRU:** Scott M. Sheplak, P.E., Tallahassee Title V Section  
**FROM:** Tom Cascio, Permit Engineer  
**DATE:** 07/16/97  
**RE:** U.S. EPA Region 4 PROPOSED Title V Operation Permit Review

The following PROPOSED Title V operation permit(s) and associated documents have been posted on the DEP World Wide Web Internet site for your review. Please provide any comments via Internet E-mail, within fifty five (55) days of receiving this notice, to Scott M. Sheplak, P.E., at "Sheplak\_S@dep.state.fl.us".

<u>Applicant Name</u>	<u>County</u>	<u>Method of Transmittal</u>	<u>Electronic File Name(s)</u>
Florida Power & Light Company Cutler Plant	Dade	INTERNET	0250001p.zip

This zipped file contains the following electronic files:

comments.doc  
0250001p.doc  
02500011.xls  
02500012.xls  
0250001h.doc



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

July 15, 1997

Mr. Rudy Sanchez  
Plant General Manager  
Florida Power & Light Company  
Environmental Services Department  
P.O. Box 14000  
Juno Beach, FL 33408

Re: PROPOSED Title V Permit No.: 0250001-001-AV  
Cutler Plant

Dear Mr. Sanchez:

One copy of the "PROPOSED PERMIT DETERMINATION" for the Cutler Plant located at 14925 SW 67 Avenue, Miami, Dade County, is enclosed. This letter is only a courtesy to inform you that the DRAFT permit has become a PROPOSED permit.

An electronic version of this determination has been posted on the Division of Air Resource Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is <http://www.dep.state.fl.us/air>.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED permit is made by the USEPA within 45 days, the PROPOSED permit will become a FINAL permit no later than 55 days after the date on which the PROPOSED permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED permit, the FINAL permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn. If you have any questions, please contact Tom Cascio at 850/488-1344.

Sincerely,

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/c

Enclosures

copy furnished to:

Mr. William Muly Reichel, Florida Power & Light Company  
Mr. Kennard F. Kosky, P.E., Golder Associates  
Mr. Richard Piper, Florida Power & Light Company  
Mr. H. Patrick Wong, Dade County Department of Environmental Resources Management  
Ms. Carla E. Pierce, USEPA, Region 4 (INTERNET E-mail Memorandum)  
Ms. Yolanda Adams, USEPA, Region 4 (INTERNET E-mail Memorandum)

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

## PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 0250001-001-AV

Page 1 of 3

### **I. Public Notice.**

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" to the Florida Power and Light Company for the Cutler Plant located at 14925 SW 67 Avenue, Miami, Dade County was clerked on April 24, 1997. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in the Miami Herald on May 27, 1997. The DRAFT Title V Air Operation Permit was available for public inspection at the Dade County Department of Environmental Resources Management in Miami and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on June 2, 1997.

### **II. Public Comment(s).**

Comments were received and the DRAFT Title V Operation Permit was changed. The comments were not considered significant enough to reissue the DRAFT Title V Permit and require another Public Notice. Comments were received from one respondent during the 30 (thirty) day public comment period. Listed below is each comment letter in the chronological order of receipt and a response to each comment in the order that the comment was received. The comments will not be restated. Where duplicative comments exist, the original response is referenced.

A. Letter from Mr. Richard Piper dated June 10, 1997, and received on June 16, 1997.

#### **1. Comment # 1:**

**Response:** The use of fuel additives was not addressed in the DRAFT permit, nor was the evaporation of boiler chemical cleaning waste. The Department acknowledges that both activities were identified in the permit application. To satisfy these concerns, the evaporation of boiler chemical cleaning waste has been added to Appendix E-1, List of Exempt Emissions Units and/or Activities, and the fuel additives have been addressed in the emission unit description.

#### **2. Comment # 2:**

**Response:** This concern was addressed in the DRAFT Permit in specific condition A.32. Therefore, no change is necessary.

#### **3. Comment # 3:**

**Response:** Discussions with Florida Power and Light Company management resulted in the mutually acceptable methodology of demonstration of compliance using vendor receipts to verify the 0.5% maximum sulfur content, by weight, limit for all fuel oil deliveries to the plant.

As a result of this comment **Condition # A.11** is hereby changed:

**From:** Sulfur Dioxide. Sulfur dioxide emissions when burning liquid fuel shall not exceed 1.1 pounds per million Btu heat input, as measured by applicable compliance methods. Any calculations used to demonstrate compliance shall be based solely on the Btu value and the percent sulfur of the liquid fuel being burned.

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

**To:** Sulfur Dioxide.

- a. When burning liquid fuel, sulfur dioxide emissions shall not exceed 1.1 pounds per million Btu heat input, as measured by applicable compliance methods.
- b. The No. 2 or No. 6 fuel oil sulfur content shall not exceed 0.5 percent, by weight. See specific condition **A.25**.

[Rules 62-296.405(1)(c)1.i. and 62-296.405(1)(e)3., F.A.C.; AO13-173751 and AO13-173753]

As a result of this comment **Condition # A.17** is hereby changed:

**From:** Sulfur Dioxide. **The permittee elected to demonstrate compliance using fuel sampling and analysis.**

This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions **A.24** and **A.25**.

[Rule 62-296.405(1)(f)1.b., F.A.C.]

**To:** Sulfur Dioxide. **The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery.** This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions **A.11**, **A.24** and **A.25**.

[Rule 62-296.405(1)(f)1.b., F.A.C.]

As a result of this comment **Condition # A.24** is hereby changed:

**From:** 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. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. 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. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. **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 demonstrate compliance using fuel sampling and analysis.** See specific condition **A.25**.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.401, F.A.C.; and, AO13-173751 and AO13-173753]

**To:** 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. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. 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. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. **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 demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery.** See specific conditions **A.11** and **A.25**.

[Rules 62-213.440, 62-296.405(1)(e)3. and 62-297.401, F.A.C.; and, AO13-173751 and AO13-173753]

As a result of this comment **Condition # A.25** is hereby changed:

**From:** For each emissions unit, the following fuel sampling and analysis protocol shall be used as an alternate sampling procedure authorized by permit to demonstrate compliance with the sulfur dioxide standard:

- a. Determine and record the as-fired fuel sulfur content for liquid fuels using either ASTM D2622-92, ASTM D4294-90, or both ASTM D4057-88 and ASTM D129-91 to analyze a representative sample of the blended fuel following each fuel delivery.
- b. Record daily the amount of each fuel fired, the density of each fuel, and the percent sulfur content by weight of each fuel.
- c. Utilize the information in a. and b., above, to calculate the SO<sub>2</sub> emission rate to ensure compliance at all times.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b., and 62-297.440, F.A.C.]

**To:** The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or equivalent.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

**4. Comment # 4:**

**Response:** The Department agrees that the form included as Figure 1 is not appropriate for these emissions units and it has been removed from the PROPOSED Title V Air Operation Permit document.

**5. Comment # 5:**

**Response:** The Department believes that no conflict exists between the Title V Conditions # 3 and # 52. Therefore, no change will be made.

**6. Comment # 6:**

**Response:** The Department believes that the reference to fees for construction permits is appropriate because of potential future facility modifications.

**7. Comment # 7:**

**Response:** Since the effective date of the Title V Air Operation Permit will be January 1, it is assumed that all required responses will be on a calendar year time frame basis.

The enclosed PROPOSED Title V Air Operation Permit includes the aforementioned changes to the DRAFT Title V Air Operation Permit.

**B. Document(s) on file with the permitting authority:**

-Letter received June 16, 1997, from Mr. Richard Piper.

**III. Conclusion.**

The permitting authority will issue the PROPOSED Permit No.: 0250001-001-AV, with any changes noted above.

Florida Power and Light Company  
Cutler Plant  
**Facility ID No.: 0250001**  
Dade County

Initial Title V Air Operation Permit  
**PROPOSED Permit No.: 0250001-001-AV**

Permitting Authority:

State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
Title V Section

Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Telephone: 850/488-1344  
Fax: 850/922-6979

Initial Title V Air Operation Permit  
**PROPOSED Permit No.: 0250001-001-AV**

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# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

**Permittee:**

Florida Power and Light Company  
9700 SW 344 Street  
Florida City, Florida 33034

**PROPOSED Permit No.:** 0250001-001-AV

**Facility ID No.:** 0250001

**SIC Nos.:** 49, 4911

**Project:** Initial Title V Air Operation Permit

This permit is for the operation of the Cutler Plant. This facility is located at 14925 SW 67 Avenue, Miami, Dade County; UTM Coordinates: Zone 17, 570.4 km East and 2834.9 km North; Latitude: 25° 37' 52" North and Longitude: 80° 17' 56" West.

**STATEMENT OF BASIS:** This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. 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 permitting authority, in accordance with the terms and conditions of this permit.

**Referenced attachments made a part of this permit:**

Appendix E-1, List of Exempt Emissions Units and/or Activities

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

APPENDIX TV-1, TITLE V CONDITIONS

APPENDIX SS-1, STACK SAMPLING FACILITIES

Phase II Acid Rain Application/Compliance Plan received December 6, 1995

Alternate Sampling Procedure: ASP No. 97-B-01

Order Extending Permit Expiration Date

**Effective Date:** January 1, 1998

**Renewal Application Due Date:** July 5, 2002

**Expiration Date:** December 31, 2002

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Howard L. Rhodes, Director  
Division of Air Resources  
Management

HLR/sms/tc

**Section I. Facility Information.**

**Subsection A. Facility Description.**

This facility consists of two natural gas fired conventional steam electric generating stations, designated as Units 5 and 6 by the Florida Power and Light Company. Unit 5 is comprised of a Combustion Engineering outdoor-type boiler/steam generator and a Westinghouse outdoor reheat condensing steam turbine which drives a hydrogen-cooled generator with nameplate rating of 74.5 megawatts. Unit 6 is comprised of a Combustion Engineering outdoor-type boiler/steam generator and a General Electric tandem compound single reheat turbine generator with generator nameplate rating of 162 megawatts. Also included in this permit are miscellaneous unregulated emissions units and/or activities.

Based on the initial Title V permit application received June 12, 1996, this facility is not a major source of hazardous air pollutants (HAPs).

**Subsection B. Summary of Emissions Unit ID Nos. and Brief Descriptions.**

**E.U.**

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
-003	Fossil Fuel Fired Steam Generator #5
-004	Fossil Fuel Fired Steam Generator #6

Unregulated Emissions Units and/or Activities

-xxx	Painting and solvent cleaning
-xxx	Mobile equipment and engines
-xxx	Emergency diesel generator

*Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s) on all correspondence, test report submittals, applications, etc.*

**Subsection C. Relevant Documents.**

The documents listed below are not a part of this permit, however, are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

- Table 1-1, Summary of Air Pollutant Standards and Terms
- Table 2-1, Summary of Compliance Requirements
- Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
- Appendix H-1, Permit History/ID Number Changes

These documents are on file with permitting authority:

Initial Title V Permit Application received June 12, 1996  
Additional Information Request dated December 18, 1996  
Additional Information Response received April 4, 1997

## **Section II. Facility-wide Conditions.**

**The following conditions apply facility-wide:**

1. APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97), is a part of this permit. {Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}
2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.  
[Rule 62-296.320(2), F.A.C.]
3. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:
  - a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and
  - b. certification forms and/or RMPs according to the promulgated rule schedule.[40 CFR 68]
4. Exempt Emissions Units and/or Activities. Appendix E-1, List of Exempt Emissions Units and/or Activities, is a part of this permit.  
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]
5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.  
[Rule 62-213.440(1), F.A.C.]
6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.  
[Rule 62-296.320(1)(a), F.A.C.]

7. General Particulate Emission Limiting Standards. General Visible Emissions Standard.  
Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity).  
[Rule 62-296.320(4)(b)1., F.A.C.]

**8. Not federally enforceable.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following:

- a. In order to perform sandblasting on fixed plant equipment, sandblasting enclosures are constructed and operated as necessary.
- b. Maintenance of paved areas is performed as needed.
- c. Mowing of grass and care of vegetation are done on a regular basis.
- d. Access to plant property by unnecessary vehicles is controlled and limited.
- e. Bagged chemical products are stored in weather tight buildings until they are used. Spills of powdered chemical products are cleaned up as soon as practical.
- f. Vehicles are restricted to slow speeds on the plant site.

[Rule 62-296.320(4)(c)2., F.A.C.; Proposed by applicant in the initial Title V permit application received June 12, 1996.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the Dade County Department of Environmental Resources Management office.

**Section III. Emissions Units and Conditions.**

**Subsection A. This section addresses the following emissions units.**

**E.U.**

**ID No.    Brief Description**

- 003    Fossil Fuel Fired Steam Generator #5
- 004    Fossil Fuel Fired Steam Generator #6

Fossil Fuel Fired Steam Generator #5 is a nominal 75 megawatt (electric) steam generator designated as Cutler Unit #5. The emission unit is fired on No. 2 or No. 6 fuel oil with a maximum heat input of 170 MMBtu per hour, or natural gas with a maximum heat input of 940 MMBtu per hour. It commenced commercial operation in November 1954.

Fossil Fuel Fired Steam Generator #6 is a nominal 160 megawatt (electric) steam generator designated as Cutler Unit #6. The emission unit is fired on No. 2 or No. 6 fuel oil with a maximum heat input of 290 MMBtu per hour, or natural gas with a maximum heat input of 1620 MMBtu per hour. It commenced commercial operation in July 1955.

Fuel additives such as, but not limited to, magnesium hydroxide are used to enhance combustion and facilitate furnace cleaning, in a manner consistent with Best Operational Practices.

Both emissions units consist of a boiler/steam generator which drives a single reheat turbine generator, and are equipped with a 150 foot exhaust stack. The control devices consist of multiple cyclones.

{Permitting note: the emissions units are regulated under Acid Rain, Phase II, and Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input.}

**The following specific conditions apply:**

**Essential Potential to Emit (PTE) Parameters**

**A.1. Permitted Capacity.** The maximum operation heat input rates are as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
5	940	Natural Gas
	170	No. 2 or No. 6 Fuel Oil
6	1620	Natural Gas
	290	No. 2 or No. 6 Fuel Oil

[Rules 62-4.160(2), 62-210.200 (PTE), and 62-296.405, F.A.C.; AO13-173751; AO13-173753 ]

**A.2. Emissions Unit Operating Rate Limitation After Testing.** See specific condition A.27.  
[Rule 62-297.310(2), F.A.C.]

**A.3. Methods of Operation. Fuels.**

- a. Startup: The only fuels allowed to be burned are natural gas, No. 2 fuel oil, or No. 6 fuel oil, both with a 0.5% maximum sulfur content by weight.
- b. Normal: The only fuel allowed to be burned is natural gas.

[Rule 62-213.410, F.A.C.; AO13-173751, Specific Condition No. 1; AO13-173753, Specific Condition No. 1]

**A.4. Emergency Operation.**

No. 2 fuel oil or No. 6 fuel oil may be burned during emergency conditions, as authorized by Metropolitan Dade County.

[AO13-173751; AO13-173753]

**A.5. Hours of Operation.** The emissions units may operate continuously, i.e., 8,760 hours/year.

[Rule 62-210.200 (PTE), F.A.C.]

**Emission Limitations and Standards**

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**A.6. Visible Emissions.** Visible emissions shall not exceed 20 percent opacity, except for one two-minute period per hour during which opacity shall not exceed 40 percent. Emissions units governed by this visible emissions limit shall compliance test for particulate matter emissions annually and as otherwise required by Chapter 62-297, F.A.C.

[Rule 62-296.405(1)(a), F.A.C.]

**A.7. Visible Emissions - Soot Blowing and Load Change.** Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

[Rule 62-210.700(3), F.A.C.]

**A.8. Particulate Matter.** Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods.

[Rule 62-296.405(1)(b), F.A.C.]

**A.9. Particulate Matter - Soot Blowing and Load Change.** Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.  
[Rule 62-210.700(3), F.A.C.]

**A.10. Not federally enforceable. Sulfur Dioxide.** Sulfur dioxide emissions when burning liquid fuel shall not exceed 0.55 lb/MMBtu heat input, and 93.5 pounds per hour for Unit #5, and 159.5 pounds per hour for Unit #6, as measured by applicable compliance methods.  
[AO13-173751 and AO13-17353, based on Metropolitan Dade County Code Sec. 24-17(2)(c)(iii).]

**A.11. Sulfur Dioxide.**

a. When burning liquid fuel, sulfur dioxide emissions shall not exceed 1.1 pounds per million Btu heat input, as measured by applicable compliance methods.

b. The No. 2 or No. 6 fuel oil sulfur content shall not exceed 0.5 percent, by weight. See specific condition **A.25.**

[Rules 62-296.405(1)(c)1.i. and 62-296.405(1)(e)3., F.A.C.; AO13-173751 and AO13-173753]

**A.12. Nitrogen Oxides.** Nitrogen oxides emissions shall not exceed 0.20 pounds per million Btu heat input, and 188 pounds per hour for Unit #5 and 324 pounds per hour for Unit #6, as measured by applicable compliance methods.

[Rule 62-296.570(4)(b)4., F.A.C.; AO13-173751 and AO13-173753]

**Excess Emissions**

**A.13.** Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

**A.14.** 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 shall be minimized.

[Rule 62-210.700(2), F.A.C.]

**A.15.** Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

**A.16.** A written quarterly report shall be submitted to the Department's Southeast District Office and the Dade County Department of Environmental Resources Management of all opacity exceedances of emissions limitations. 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.

[AO13-173751 and AO13-173753, Specific Condition No. 5]

### **Monitoring of Operations**

**A.17. Sulfur Dioxide.** The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery. This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions **A.11**, **A.24** and **A.25**.

[Rule 62-296.405(1)(f)1.b., F.A.C.]

**A.18. Determination of Process Variables.**

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

**A.19.** A continuous monitoring system for NO<sub>x</sub> shall be calibrated, maintained, operated, and output recorded for determining compliance with the emissions limits.

[AO13-173751 and AO13-173753]

### **Test Methods and Procedures**

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**A.20. Visible Emissions.** The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. See specific condition **A.21**.

[Rule 62-296.405(1)(e)1., F.A.C.]



**A.21. DEP Method 9.** The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
  - a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
  - b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.]

**A.22. Particulate Matter.** Testing of particulate matter emissions shall be conducted if unit operation on oil, exclusive of start-up, exceeds 400 hours per year.

[Rule 62-297.310(7), F.A.C.; AO13-173751, AO13-173753, Specific Condition No. 2]

**A.23. Particulate Matter.** The test methods for particulate emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor is computed according to EPA Method 19 is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17.

[Rules 62-213.440, 62-296.405(1)(e)2., and 62-297.401, F.A.C.]

**A.24. 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. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. 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. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. **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 demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery.** See specific conditions **A.11** and **A.25**.

[Rules 62-213.440, 62-296.405(1)(e)3. and 62-297.401, F.A.C.; and, AO13-173751 and AO13-173753]

**A.25.** The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or equivalent. [Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

**A.26. Required Number of Test Runs.** For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

**A.27. Operating Rate During Testing.** Testing of emissions shall be conducted with each emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.  
[Rules 62-297.310(2) & (2)(b), F.A.C.]

**A.28. Calculation of Emission Rate.** The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.  
[Rule 62-297.310(3), F.A.C.]

**A.29. Applicable Test Procedures.**

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. **Opacity Compliance Tests.** When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.

TABLE 297.310-1  
 CALIBRATION SCHEDULE

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/-0.001" mean of at least three readings Max. deviation between readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually	Spirometer or calibrated wet test or dry gas test meter	2%
	2. One Point: Semiannually 3. Check after each test series	Comparison check	5%

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube. [Rule 62-297.310(4), F.A.C.]

**A.30. Required Stack Sampling Facilities**. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit. [Rule 62-297.310(6), F.A.C.]

**A.31. Frequency of Compliance Tests**. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid fuel for more than 400 hours other than during startup.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
  - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
- a. Visible emissions, if there is an applicable standard;
  - b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
  - c. Each NESHAP pollutant, if there is an applicable emission standard.
5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

10. An annual compliance test conducted for visible emissions shall not be required for units exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62-210.300(4), F.A.C.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.]

**A.32.** By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rule 62-297.310(7)(a)4., F.A.C.]

**A.33.** Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

**Record keeping and Reporting Requirements**

**A.34.** In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department or the appropriate Local Program.  
[Rule 62-210.700(6), F.A.C.]

**A.35.** Submit to the Department or the appropriate Local Program a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years.  
[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

**A.36. Test Reports.**

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department or the appropriate Local Program on the results of each such test.
- (b) The required test report shall be filed with the Department or the appropriate Local Program as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department or the appropriate Local Program to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
1. The type, location, and designation of the emissions unit tested.
  2. The facility at which the emissions unit is located.
  3. The owner or operator of the emissions unit.
  4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
  5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
  6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
  7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
  8. The date, starting time and duration of each sampling run.
  9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
  10. The number of points sampled and configuration and location of the sampling plane.

11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]



**Section IV. This section is the Acid Rain Part.**

**Operated by: Florida Power and Light Company**

**ORIS code: 610**

**Subsection A. This subsection addresses Acid Rain, Phase II.**

The emissions units listed below are regulated under Acid Rain Part, Phase II.

**E.U.**

**ID No.**    **Description**

-003    Fossil Fuel Fired Steam Generator #5

-004    Fossil Fuel Fired Steam Generator #6

**A.1.** The Phase II permit application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these Phase II acid rain units must comply with the standard requirements and special provisions set forth in the application listed below:

a. DEP Form No. 62-210.900(1)(a), dated July 1, 1995.

[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

**A.2.** Sulfur dioxide (SO<sub>2</sub>) allowance allocations and nitrogen oxide (NO<sub>x</sub>) requirements for each Acid Rain unit are as follows:

E.U. ID No.	EPA ID	Year	2000	2001	2002
-003	PCU5	SO <sub>2</sub> allowances, under Table 2, 3, or 4 of 40 CFR 73	0*	0*	0*
		NO <sub>x</sub> limit	**	**	**
-004	PCU6	SO <sub>2</sub> allowances, under Table 2, 3, or 4 of 40 CFR 73	0*	0*	0*
		NO <sub>x</sub> limit	**	**	**

\*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2, 3, or 4 of 40 CFR 73.

\*\*If applicable, by January 1, 1999, this Part will be reopened to add NO<sub>x</sub> requirements in accordance with the regulations implementing section 407 of the Clean Air Act.

**A.3.** Comments, notes, and justifications: None.

**Appendix E-1. List of Exempt Emissions Units and/or Activities.**

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Full Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining whether a facility containing such emissions units or activities would be subject to any applicable requirements. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., are also exempt from the permitting requirements of Chapter 62-213, F.A.C., provided such emissions units and activities also meet the exemption criteria of Rule 62-213.430(6)(b), F.A.C. The below listed emissions units and/or activities are hereby exempt pursuant to Rule 62-213.430(6), F.A.C.

1	Natural Gas Metering Area Relief Valves
2	Hydrazine Mixing Tank
3	Lube Oil Vapor Extraction Vents
4	Lube Oil Dump Tank Vent
5	Oil Separation Basin
6	Hazardous Waste Building
7	Paint/Lube Building
8	Miscellaneous mobile vehicle operation
9	Portable Unleaded Gasoline Tank
10	Portable Diesel Fuel Tank - 2" Vent
11	Evaporation of Boiler Chemical Cleaning Waste

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

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘exempt emissions units’.

<b>Emissions Unit</b>	<b>Description</b>
-xxx	Painting and Solvent Cleaning
-xxx	Mobile Equipment and Engines
-xxx	Emergency Diesel Generator

### Appendix H-1. Permit History/ID Number Changes

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**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</u> <sup>1,2</sup>	<u>Revised Date(s)</u>
-003	Fossil Fuel Steam Generator #5	AO13-173751	02/27/90	02/22/95	08/14/96	04/19/90, 08/02/93
-004	Fossil Fuel Steam Generator #6	AO13-173753	02/26/90	02/22/95	08/14/96	04/19/90, 08/02/93

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

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

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

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**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}

**Table 1-1, Summary of Air Pollutant Standards and Terms**

Florida Power and Light Company  
Cutler Plant

**PROPOSED Permit No.: 0250001-001-AV**  
**Facility ID No.: 0250001**

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID Nos.		Brief Description							
-003		Fossil Fuel Fired Steam Generator #5							
Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
<b>Visual Emissions</b>									
Steady State	gas	8760	20% Opacity					Rule 62-296.405(1)(a), F.A.C.	A.6
Soot Blowing or Load Changing	gas		60% Opacity					Rule 62-210.700(3), F.A.C.	A.7
<b>Particulate Matter</b>									
Steady State	gas	8760	0.1 lb/MMBtu			94.0	120.86	Rule 62-296.405(1)(b), F.A.C.	A.8
Soot Blowing or Load Changing	gas		0.3 lb/MMBtu			282.0		Rule 62-210.700(3), F.A.C.	A.9
<b>Sulfur Dioxide</b>									
	oil	startup	1.1 lb/MMBtu			187		Rules 62-213.440 and 62-296.405(1)(c)1.i., F.A.C.	A.11
	oil	startup	0.55 lb/MMBtu***	93.5					A.10
<b>Nitrogen Oxides</b>	gas	8760	0.2 lb/MMBtu	188			823.44	Rule 62-296.570(4)(b)4., F.A.C.	A.12

-004		Fossil Fuel Fired Steam Generator #6							
Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
<b>Visual Emissions</b>									
Steady State	gas	8760	20% Opacity					Rule 62-296.405(1)(a), F.A.C.	A.6
Soot Blowing or Load Changing	gas		60% Opacity					Rule 62-210.700(3), F.A.C.	A.7
<b>Particulate Matter</b>									
Steady State	gas	8760	0.1 lb/MMBtu			162.0	208.28	Rule 62-296.405(1)(b), F.A.C.	A.8
Soot Blowing or Load Changing	gas		0.3 lb/MMBtu			486.0		Rule 62-210.700(3), F.A.C.	A.9
<b>Sulfur Dioxide</b>									
	oil	startup	1.1 lb/MMBtu			319.0		Rules 62-213.440 and 62-296.405(1)(c)1.i., F.A.C.	A.11
	oil	startup	0.55 lb/MMBtu***	159.5					A.10
<b>Nitrogen Oxides</b>	gas	8760	0.2 lb/MMBtu	324			1,419.12	Rule 62-296.570(4)(b)4., F.A.C.	A.12

**Notes:**

- \* The "Equivalent Emissions" listed are for informational purposes only.
- \*\* Values computed using the ratio of 3/21 for soot blowing/steady state per 24 hour day.
- \*\*\* Limit based on Metropolitan Dade County Code.

**Table 2-1, Summary of Compliance Requirements**

Florida Power and Light Company  
Cutler Plant

PROPOSED Permit No.: 0250001-001-AV  
Facility ID No.: 0250001

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.		Brief Description					
-003		Fossil Fuel Fired Steam Generator #5					
-004		Fossil Fuel Fired Steam Generator #6					
Pollutant Name or Parameter	Fuels	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
Steady State	gas	DER Method 9	Annual	1-Oct	1 hour		A.20, A.21
Soot Blowing or Load Changing	gas	DER Method 9	Annual	1-Oct	1 hour		A.20, A.21
<b>Particulate Matter</b>							
Steady State	gas	EPA Method 5 or 17	Annual	1-Oct	3 hour		A.22, A.23
Soot Blowing or Load Changing	gas	EPA Method 5 or 17 ***	Annual	1-Oct			A.22, A.23
<b>Sulfur Dioxide</b>	oil	Sulfur limit with vendor fuel analysis	Daily				A.11,A.17, A.24, A.25
<b>Nitrogen Oxides</b>	gas	CMS	Continuous			Yes	A.19
Notes: *Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C. **CMS [=] continuous monitoring system ***EPA Method 17 may be used only if the stack gas exit temperature is less than 375 degrees F.							

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

1. Clair Enny

3. \_\_\_\_\_

4. \_\_\_\_\_

2. \_\_\_\_\_

5. \_\_\_\_\_

PLEASE PREPARE REPLY FOR:

\_\_\_\_ SECRETARY'S SIGNATURE

\_\_\_\_ DIV/DIST DIR SIGNATURE

\_\_\_\_ MY SIGNATURE

YOUR SIGNATURE

\_\_\_\_ DUE DATE \_\_\_\_\_

ACTION/DISPOSITION

\_\_\_\_ DISCUSS WITH ME

\_\_\_\_ COMMENTS/ADVISE

REVIEW AND RETURN

\_\_\_\_ SET UP MEETING

\_\_\_\_ FOR YOUR INFORMATION

\_\_\_\_ HANDLE APPROPRIATELY

\_\_\_\_ INITIAL AND FORWARD

\_\_\_\_ SHARE WITH STAFF

\_\_\_\_ FOR YOUR FILES

COMMENTS:

Re: PROPOSED Title V Permit

I recommend forwarding  
to EPA.

Attached order needs to  
be signed by Howard  
Rhodes,

Tom \_\_\_\_\_ Forward electronic to  
EPA.  
Brockera \_\_\_\_\_ Hard copy to  
SIA  
7/16

FROM: Scott Sheplak

DATE: 7/15

PHONE: \_\_\_\_\_