

Sheplak, Scott

Bobby,

Good work!

Scott 8/18

From: Mary_Archer@fpl.com
Sent: Wednesday, August 13, 2003 12:49 PM
To: Sheplak, Scott
Subject: Draft Title Vs for Turkey Nuclear and Putnam Power plants

Scott

I have reviewed both drafts and have no change requests. Both public notices have been published.

Hope the permit renewal business is going smoothly.

Thanks for the well written permits, Mary

561-691-7057

Bull, Robert

From: John_Hampp@fpl.com
Sent: Friday, September 26, 2003 10:04 AM
To: Sheplak, Scott
Cc: Bull, Robert
Subject: Turkey Point Title V Renewal Permit - Administrative Changes



PTP_T5_renewal_dr
aft_correctio...

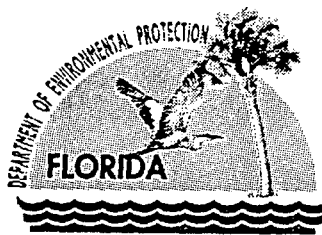
Dear Scott,

Provided in the attached Word document are requested administrative changes to the Draft Title V Permit Renewal for the Turkey Point Fossil Steam Power Plant. (Permit 0250003-005-AV). Some of these changes were granted by the department in May and August of 1999. FPL would like to incorporate these changes into the Title V Renewal to maintain consistency with the facility's previous Title V Permit and other FPL Fossil Steam Unit Title V Permits.

Should you have any questions, or need any additional information, please contact me at your convenience. The original paper copies of this request with copies of the DEP granted changes will be sent today through FedEx or registered mail .

John Hampp
Principal Env. Specialist
FPL
561-691-2894
john_hampp@fpl.com

(See attached file: PTP_T5_renewal_draft_corrections.doc)



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

October 8, 2003

H. O. Nunez
Responsible Official
FPL Turkey Point Fossil Plant
9760 SW 344th Street
Florida City, FL 33055

Re: Initial Title V Air Operation Permit
PROPOSED Title V Permit No.: 0250003-005-AV
FPL Turkey Point Fossil Plant

Dear Mr. Nunez,

One copy of the PROPOSED PERMIT DETERMINATION for the Turkey Point Fossil Plant located at 9760 SW 344th Street, Florida City, Dade County, is enclosed. This letter is only a courtesy to inform you that the DRAFT permit has become a PROPOSED permit.

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 Bobby Bull at 850/921-9585.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

TV/rlb

Enclosures

Copy to: John C. Hampp, Florida Power and Light Company (E-mail)
Kennard F. Kosky, P.E., Golder Associates, Inc. (E-mail)
Patrick Wong, Dade County DERM, AWQD (E-mail)
U.S. EPA, Region 4 (Internet E-mail Memorandum)

"More Protection, Less Process"

Printed on recycled paper.

Sheplak, Scott

From: Sheplak, Scott
Sent: Wednesday, August 16, 2006 8:41 AM
To: 'John_Hampp@fpl.com'
Subject: RE: Turkey Point Fossil Title V Administrative Change

A notification like you have done is all that is required. Be sure to send a copy to the compliance authority for their files also.

Sincerely,

Scott M. Sheplak
Title V Program Coordinator
State of Florida, Department of Environmental Protection Mail Station #5505 2600 Blair
Stone Road Tallahassee, FL 32399 SunCom 291-9532
850/921-9532
Scott.Sheplak@dep.state.fl.us

-----Original Message-----

From: John_Hampp@fpl.com [mailto:John_Hampp@fpl.com]
Sent: Wednesday, August 16, 2006 8:00 AM
To: Sheplak, Scott
Subject: Turkey Point Fossil Title V Administrative Change

Scott,

An administrative type change has been identified and needs to be made to the above referenced permit. The construction, and future operation, of Turkey Point Combined Cycle Unit 5 will require the evaporation of non-hazardous boiler chemical cleaning waste within the boilers of Fossil Units 1 and 2. The evaporation of the non-hazardous chemical cleaning waste has been identified by the department as an Insignificant Activity at FPL's Fossil Generating plants.

Provided below are the previously authorized changes which Florida Power & Light is proposing for the referenced Title V Permit:

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

Brief Description of Emissions Units and Activities

From:
15. Evaporation of chemical cleaning wastes generated from boiler cleaning operations of Fossil Steam Units 1 or 2.

To:
15. Evaporation of chemical cleaning wastes generated from fossil unit boiler cleaning operations

Please contact me at your convenience to discuss the requested changes in the Title V Permit. It is anticipated that construction activities for Turkey Point Unit 5 will necessitate the requested change prior to modification of the existing Title V Permit to incorporate the new emission units. I have also provided a pdf copy of the request letter which the Department will be receiving via mail.

John Hampp
Principal Environmental Specialist
FPL
561-691-2894 Office
561-676-1838 Cell

(See attached file: Title V Admin Change- Chemical clean.pdf)



Wednesday, August 16, 2006

Scott M. Sheplak, P.E.
State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: **Permit No. 0250003-005-AV**
FPL Turkey Point Fossil Plant Draft
Title V Permit Administrative Change

Dear Mr. Sheplak,

An administrative type change has been identified and needs to be made to the above referenced permit. The construction, and future operation, of Turkey Point Combined Cycle Unit 5 will require the evaporation of non-hazardous boiler chemical cleaning waste within the boilers of Fossil Units 1 and 2. The evaporation of the non-hazardous chemical cleaning waste has been identified by the department as an Insignificant Activity at FPL's Fossil Generating plants.

Provided below are the previously authorized changes which Florida Power & Light is proposing for the referenced Title V Permit:

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

Brief Description of Emissions Units and Activities

From:

15. Evaporation of chemical cleaning wastes generated from boiler cleaning operations of Fossil Steam Units 1 or 2.

To:

15. Evaporation of chemical cleaning wastes generated from fossil unit boiler cleaning operations

Should you have any further questions, or need any additional information, please contact me at your convenience.

A handwritten signature in black ink, appearing to read 'John Hampp', written in a cursive style.

John Hampp
Principle Env. Specialist
FPL
JES - JB
700 Universe Blvd.
Juno Beach, FL 33408
561-691-2894 office
561-676-1848 cell
john_hampp@fpl.com



Monday, June 5, 2006

Scott Sheplak, Permit Engineer
Bureau of Air Regulation
Division of Air Resources Management Department of
Environmental Protection
2600 Blair Stone Road, MS#5505
Tallahassee, FL 32399-2400

Dear Mr. Sheplak,

Florida Power & Light Company is requesting an administrative change to the Turkey Point Title V Operating Permit to include the evaporation of non-hazardous boiler chemical cleaning waste from Turkey Point Fossil Unit 5 as an exempt emission unit/activity. As a follow-up to our conversation on June 2, FPL is requesting that this activity be included in the list of approved exempt activities during the next modification of the Title V Permit.

On a periodic basis, as part of routine maintenance, the inside of the steam generator tubes (boiler tubes) of Fossil Units are cleaned using a series of chemical solutions that remove deposited scale which adversely affects the efficiency and reliability of the generating units. The solutions and rinse waters are collected in large mobile tanks ("frac tanks") pursuant to guidance issued by the Department. Upon completion of the cleaning process and prior to disposal of the spent cleaning solution and rinses, representative sampling of the liquids collected in the "frac tanks" is conducted as per 40 CFR 261, Appendix I, to determine the hazardous waste status of the accumulated wastewater, using Toxicity Characteristic Leaching Procedure (TCLP) analysis. If the wastewater is determined to be hazardous, it will be managed as such in accordance with 40 CFR 262.34, 40 CFR 265 Subpart I, and 40 CFR 268 with respect to generators accumulating and treating waste in containers and tanks. Hazardous waste may also be transported to an approved hazardous waste facility for the appropriate disposal. If the spent cleaning solution and rinses are determined to be non-hazardous; they are then disposed by evaporation in the units boiler. Introduction into the boiler will occur at a rate that will not cause an exceedance of the opacity limit of the unit in which evaporation is occurring.

The Department has granted prior Florida Power & Light Company requests for the evaporation of non-hazardous boiler chemical cleaning waste as an exempt or insignificant activity at all existing Fossil sites in compliance with the applicability and requirements of Rule 62-213.430(6) F.A.C.. Specifically, the evaporation of non-hazardous boiler chemical cleaning waste is neither subject to unit-specific applicable requirements nor does it represent a potential exceedance of any major source thresholds. FPL is proposing that the Department change the existing

description for authorization of this activity from the Appendix I-1, List of Exempt Emissions Units and Activities (Page 6 of 6) within the Title V Permit as follows:

From:

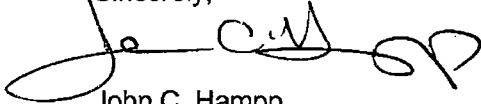
15. Evaporation of chemical cleaning wastes generated from boiler cleaning operations of Fossil Steam Units 1 or 2.

To:

15. Evaporation of chemical cleaning wastes generated from boiler cleaning operations of Plant Fossil Generating Units.

FPL believes that the evaporation of non-hazardous boiler chemical cleaning waste from Turkey Point Unit 5 is an insignificant activity and authorized by the Department through prior determinations made by the Department. Should you have any questions, or need any additional information, please do not hesitate to contact me at either 561-691-2894 (*office*) or 561-676-1838 (*mobile*).

Sincerely,

A handwritten signature in black ink, appearing to read "John C. Hampp", with a large, stylized flourish at the end.

John C. Hampp
Principal Specialist

Florida Power & Light Company
JES-JB
700 Universe Blvd.
Juno Beach, FL 33408
Email: john_hampp@fpl.com

Sheplak, Scott

From: John_Hampp@fpl.com
Sent: Monday, June 05, 2006 2:17 PM
To: Sheplak, Scott
Subject: Turkey Point Plant Insignificant Activity



chemical_cleaning.p
df (139 KB)...

Scott,

As a follow-up to our phone conversation from Friday June 2, I have attached a letter identifying our desire to make a future administrative change to the Turkey Point Title V Permit. Thank you for your help in clarifying what we need to do for the proposed change to the Turkey Point Title V Permit to include evaporation of non-hazardous chemical cleaning waste from Unit 5 as an unregulated activity. FPL will notify the Dade County Compliance office that we have determined that the evaporation of non-hazardous boiler chemical cleaning waste from Unit 5 meets the definition of insignificant under Rule 62-213.430(6) F.A.C. and authorized as an exempt activity. I have attached our determination and request for an administrative change during the next modification or renewal of the Turkey Point Fossil Title V Permit.

(See attached file: chemical_cleaning.pdf)

Should you have any questions, or need any additional information, please contact me at your convenience.

John Hampp
Principal Specialist
FPL
PO Box 14000
JES-JB
Juno Beach FL, 33408
561-691-2894



FPL

Florida Power & Light Company, 9700 S.W. 344 Street, Homestead, FL 33035
Turkey Point Fossil Plant

RECEIVED

AUG 18 2004

August 16, 2004

BUREAU OF AIR REGULATION

Mr. H. Patrick Wong
Division Chief
Dade County Department of Environmental Resources Management
Air Division
33 S.W. 22nd Avenue, Suite 900
Miami, Florida 33130

Dear Mr. Wong,

Re: Semi-Annual Monitoring Report
Florida Power & Light - Turkey Point Plant
Title V Permit No. 0250003-005-AV

Florida Power & Light (FPL) submits this Semi-Annual Monitoring Report for the above referenced facility. Title V Permit Condition 43 of Appendices TV-4 (TV-1, 2, 3 or 4), which implements Rule 62-213.440(1)(b) 3a., states that "The permittee shall submit reports of required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports."

FPL has reviewed the above-referenced Title V permit for conditions related to monitoring and has reviewed all related monitoring information for the period of January 1, through June 30, 2004 and reports no instances of deviation from the Title V Operating Permit.

If you have any questions or require additional information, please contact either myself at (305) 242-3822 or Gary Andersen at (305) 242-3826.

Sincerely,

H. O. Nunez
Plant General Manager
(Responsible Official)

cc:

Ray Gordon
Laxmana Tallam
Al Linero
File

Dade County DERM
FDEP District Office
FDEP Tallahassee ✓





Friday, September 26, 2003

Scott M. Sheplak, P.E.
State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

SEP 29 2003

BUREAU OF AIR REGULATION

Re: **Permit No. 0250003-003-AV**
FPL Turkey Point Fossil Plant
Draft Title V Permit Renewal

Dear Mr. Sheplak,

An administrative type change has been identified and needs to be made to the above referenced permit. On May 13 1999 several administrative corrections had been made to the Turkey Point Title V Air Operating Permit. The Draft Title V renewal Permit omitted those change which had been approved by Bureau of Air Regulation Chair Clair Fancy.

Provided below are the previously authorized changes which Florida Power & Light is proposing for the referenced Draft Permit:

Condition A.1. Permitted Capacity. For each emissions unit, the maximum heat input (mmBtu per Hour) shall not exceed 4, 150 mmBtu per hour while firing natural gas, or 4,000 mmBtu per hour while firing fuel oil. If such a blend of fuels is fired, the heat input shall be prorated based on the percent heat input of each fuel. Power ratings are nominal and are no tlimiting of either unit.

Condition A.20. Fuel Records and Sampling Protocol. The owner or operator shall create and maintain for each emission unit hourly records of the amount of each fuel fired, the ratio of fuel oil to natural gas if co-fired, and the heating value and sulfur content of each fuel fired. These records must be of sufficient detail to identify the testing requirements of specific condition A.18, and, when applicable, demonstrate compliance with the requirements of condition A.13, paragraph b, of this permit. Fuel oil heating value and sulfur content chall be determined by taking a daily sample of fuel fired, combining those samples into a monthly composite and analyzing a representative sample of the composite. Analysis for sulfur content shall be performed using one of ASTM D2622-94, ASTM D4294-90(95), ASTM D1552-95, ASTM D1266-91, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s). Comparison of the as-fired fuel oil sulfur content shall be made and recorded monthly upon receipt of each monthly composite analysis.

FPL is also requesting an administrative change to the Draft TitleV Permit that was nted in August of 1999 and included in the statement of basis of the Draft Renewal Permit but was not included in the permit Conditions and Limits:

A.3. Methods of Operations – Fuels The only fuels allowed to be burned are No. 2 fuel oil, No. 6 residual fuel oil, natural gas, propane, and on-specification used oil generated from FPL operations.

The used oil shall comply with the requirements given in specific condition A.22. Additionally, no more than 750,000 gallons shall be burned annually.

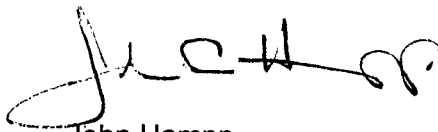
FPL may inject additives such as magnesium oxide, magnesium hydroxide and related cmpounds into each boiler for the purposes of reducing build-up of particulate matter on the interior boiler surfaces, to facilitate proper heat transfer and other boiler operation, and to reduce the particulate matter required to be removed from boiler surfaces during soot blowing and other boiler cleaning operations. The rate of additive injection is not large, generally on the order of 1 gallon per approximately 2,500(±500) gallons of fuel oil (this is approximately 0.04% by volume). The permit requires that emission tests be conducted while injecting additives consistent with normal operating practices.

FPL is also requesting the following change to Appendix I-1, List of Insignificant Emissions Units and Activities to include the administrative change granted for the evaporation of non-hazardous boiler chemical cleaning wastes granted as an administrative change to the original Title v Permit and included in all of the FPL Fossil Steam Title V Air Operating Permits:

Brief Description of Emissions Units and Activities

15. Evaporation of chemical cleaning wastes generated from boiler cleaning operations of Fossil Steam Units 1 or 2.

Should you have any further questions, or need any additional information, please contact me at your convenience.



John Hampp
Principle Env. Specialist
FPL
JES – JB
700 Universe Blvd.
Juno Beach, FL 33408
561-691-2894
john_hampp@fpl.com

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF ADMINISTRATIVELY CORRECTED TITLE V OPERATION PERMIT

In the Matter of a Request for Administrative Correction:

Mr. Doyle Beneby
Plant General Manager
Florida Power & Light
Post Office Box 14000
Juno Beach, Florida 33408

FINAL Permit No.: 0250003-001-AV
Turkey Point Fossil Plant

Enclosed is an ADMINISTRATIVELY CORRECTED page to the initial Title V operation permit, 0250003-001-AV for the operation of the Turkey Point Fossil Plant located 10 miles east of Florida City on Palm Drive, 33035, Dade County. This correction is issued pursuant to Rule 62-210.360, Florida Administrative Code and Chapter 403, Florida Statutes (F.S.). This change is made at the applicant's request dated May 7, 1999. The applicant requested the heat input descriptions for Units 1 & 2 be changed to reflect the actual values. The applicant also requested the permit to reflect the language agreed upon in the Department's March 10, 1998 letter. This corrective action does not alter the effective dates of the existing permit.

Any party to this order (permit) has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by the filing of a Notice of Appeal under Rule 9.110 of the Florida Rules of Appellate Procedure, with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, 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 thirty days from the date this notice is filed with the clerk of the permitting authority.

Executed in Tallahassee, Florida.

Sincerely,



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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF ADMINISTRATIVELY CORRECTED PERMIT (including the corrected page(s)) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 5-13-99 to the person(s) listed or as otherwise noted:

Ms. Mary Archer*
Mr. John Hampp
Mr. Kennard F. Kosky, P.E., Golder Associates
Mr. Isidore Goldman, DEP Southeast District
Mr. Robert Wong, DERM
Ms. Carla E. Pierce, USEPA, Region 4 (INTERNET E-mail Memorandum)
Ms. Gracy R. Danois, USEPA, Region 4 (INTERNET E-mail Memorandum)

Clerk Stamp

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

Sandra G. Knight 5-13-99
(Clerk) (Date)

ADMINISTRATIVE PERMIT CORRECTION
FINAL Permit No.: 0250003-001-AV
Turkey Point Fossil Plant

Condition number A.1. is changed

From:

A.1. Permitted Capacity. For each emissions unit, the maximum heat input (mmBtu per Hour) shall not exceed 4,025 mmBtu per hour while firing natural gas, or 3,850 mmBtu per hour while firing fuel oil. If a blend of fuels is fired, the heat input shall be prorated based on the percent heat input of each fuel. Power ratings are nominal and are not limiting of either unit.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

To:

A.1. Permitted Capacity. For each emissions unit, the maximum heat input (mmBtu per Hour) shall not exceed 4,150 mmBtu per hour while firing natural gas, or 4,000 mmBtu per hour while firing fuel oil. If a blend of fuels is fired, the heat input shall be prorated based on the percent heat input of each fuel. Power ratings are nominal and are not limiting of either unit.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Condition number A.20. is changed

From:

A.20. Fuel Records and Sampling Protocol. In conjunction with specific condition A.13.(b), when the CEMS becomes disabled for periods exceeding 60 minutes, the following information shall be collected:

a. Fuel Records. For each boiler, the quantity of fuel(s) fired or when co-firing, the ratio of fuel oil to natural gas shall be recorded.

b. Sampling Protocol. A fuel oil sample shall be collected hourly, by taking a small portion of the fuel fired and pouring it into a container. On a daily basis the fuel oil from this container shall be analyzed for heating value and sulfur content. Analysis for sulfur content shall be performed using one of the following: ASTM D2622-94, ASTM D4294-90(95), ASTM D1552-95, ASTM D1266-91, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s).
[Rules 62-4.070(3), 62-213.410, 62-213.440 and 62-296.405(1)(c)3., F.A.C.]

To:

A.20. Fuel Records. The owner or operator shall create and maintain for each emission unit hourly records of the amount of each fuel fired, the ratio of fuel oil to natural gas if co-fired, and the heating value and sulfur content of each fuel fired. These records must be of sufficient detail to identify the testing requirements of specific condition A.18, and, when applicable, demonstrate compliance with the requirements of condition A.13, paragraph b, of this permit. Fuel oil heating value and sulfur content shall be determined by taking a daily sample of the fuel fired, combining those samples into a monthly composite, and analyzing a representative sample of the composite. Analysis for sulfur content shall be performed using one of ASTM D2622-94, ASTM D4294-90(95), ASTM D1552-95, ASTM D1266-91, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s). Comparison of the as-fired fuel oil sulfur content shall be made and recorded monthly upon receipt of each monthly composite analysis.

[Rules 62-4.070(3), 62-213.410, 62-213.440 and 62-296.405(1)(c)3., F.A.C.]



FPL

Friday, August 20, 1999

Scott M. Sheplak, P.E.
State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: **Permit No. 0250003-001-AV**
FPL Turkey Point Fossil Plant
Final Title V Permit

Dear Mr. Sheplak,

An administrative type change has been identified and needs to be made to the above referenced permit.

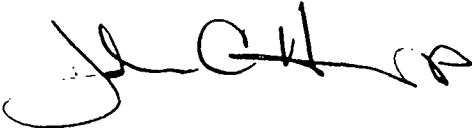
Page 6 Specific Condition A.3. states that Magnesium Hydroxide fuel additives are authorized to be added to the boiler. To maintain consistency with other FPL Title V Permits we request that the permit language be changed as follows:

~~Magnesium hydroxide fuel additives are authorized to be added to the boiler units as needed to enhance combustion and facilitate furnace cleaning in a manner consistent with Best Operational Practices.~~ FPL may inject additives such as magnesium oxide, magnesium hydroxide and related compounds into each boiler for the purposes of reducing build-up of particulate matter on the interior boiler surfaces, to facilitate proper heat transfer and other boiler operation, and to reduce the particulate matter required to be removed from boiler surfaces during soot blowing and other boiler cleaning operations. The rate of additive injection is not large, generally on the order of 1 gallon per approximately 2,500(±500) gallons of fuel oil (this is approximately 0.04% by volume). The permit requires that emission tests be conducted while injecting additives consistent with normal operating practices.

The addition of this language to the FPL Title V permits was recommended by C.H. Fancy in his March 10, 1998 letter to Mr. R. Douglas Neeley at the EPA Region 4 Office. I have provided a copy of the referenced page from that letter as an attachment.

Thank you for your assistance in this administrative change. If you have any questions, or need any additional information, please do not hesitate to contact me at (561) 691-2894.

Sincerely,

A handwritten signature in black ink, appearing to read 'John C. Hampp', with a stylized flourish at the end.

John C. Hampp
Sr. Regulatory Specialist

Florida Power & Light Company
JES-JB
700 Universe Blvd.
Juno Beach, FL 33408
Email: jhampp@email.fpl.com