



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Sent by Electronic Mail – Received Receipt Requested

Mr. Randall R. LaBauve, Vice President
Environmental Services
Florida Power & Light Company (FPL)
700 Universe Boulevard
Juno Beach, FL 33408

Re: Exemption from the Requirement to Obtain an Air Construction Permit
Florida Power and Light Company, Turkey Point Nuclear Plant
Project No. 0250003-014-AC
Four Temporary Diesel Air Compressors

Dear Mr. LaBauve:

On April 4, 2011, Florida Power and Light Company submitted a request for an exemption to temporarily install and operate four diesel-powered air compressors at the existing Turkey Point Nuclear Plant, which is located in Miami-Dade County at 9700 Southwest 344th Street in Homestead, Florida. Maintenance is planned for the instrument air systems on Unit 4 and then on Unit 3. First, one temporary air compressor will provide the instrument air for Unit 4 when maintenance is being performed on the instrument air system, while two temporary compressors will serve as backups for that unit. The fourth temporary air compressor will serve as backup for Unit 3. After completing the work on Unit 4, these functions will be repeated when the maintenance effort is switched to the instrument air system for Unit 3. During most of the maintenance outage, only one temporary air compressor will run to maintain system air while the other three serve as backup air compressors. There will be some small overlap with the permitted air compressor when the temporary compressors are initially brought on line and again when the temporary compressors are taken offline. Additional details of the maintenance project are in FPL's attached letter.

Since the proposed compressor engines are portable and will remain on site for less than 12 months, the engines are considered non-road engines as defined and regulated in 40 CFR Part 89 for the "Control of Emissions from New and In-use Non-road Compression-Ignition Engines". As such, the engines are not subject to the provisions for engines in Subpart IIII in 40 CFR 60 (New Source Performance Standards) or Subpart ZZZZ in 40 CFR 63 (National Emissions Standards for Hazardous Air Pollutants). Emissions from the temporary air compressors resulting from the instrument air maintenance project are expected to have similar impacts as the existing permitted air compressors.

Determination: Pursuant to Rule 62.4.040(1)(b) of the Florida Administrative Code (F.A.C.) and for the reasons stated above, the Bureau of Air Regulation determines that the activity will not emit air pollutants, "... in sufficient quantity, with respect to its character, quality or content, and the circumstances surrounding its location, use and operation, as to contribute significantly to the pollution problems within the State, so that the regulation thereof is not reasonably justified." Therefore, the temporary project is exempt from the requirement to obtain air construction and operation permits. This determination may be revoked if the proposed activity is substantially modified or the basis for the exemption is determined to be materially incorrect.

EXEMPTION FROM AIR PERMITTING

A copy of this letter shall be maintained at the site of the proposed activity. This permitting decision is made pursuant to Chapter 403, Florida Statutes.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212, F.A.C. The Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Department of Environmental Protection's Division of Air Resource Management. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/717-9000.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the agency clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions must be filed within 21 days of receipt of this exemption from air permitting requirements. A petitioner shall 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 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, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

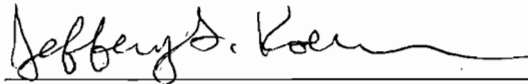
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this permitting action. Persons whose substantial interests will be affected by any such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

Mediation: Mediation is not available in this proceeding.

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing 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, Mail Station #35, 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 must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.


COF

Trina Vielhauer, Deputy Director
Division of Air Resource Management

TLV/jfk/scd

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Permit Exemption was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on 4/6/11 to the persons listed below.

- Mr. Randall R. LaBauve, FPL (randall_r_labauve@fpl.com)
- Ms. Mary Archer (mary.archer@fpl.com)
- Mr. Lennon Anderson, SED Office (lennon.anderson@dep.state.fl.us)
- Ms. Mallika Muthias, Miami-Dade DERM (muthim@miamidade.gov)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
- Ms. Ana M. Oquendo, EPA Region 4 (oquendo.ana@epa.gov)
- Mr. Dee Morse, NPS (dee_morse@nps.gov)
- Ms. Victoria Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

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.

 (Clerk) _____ 4/6/11 (Date)



Florida Power & Light Company

April 4, 2011

Mr. Jeff Koerner, PE
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Rd. Tallahassee, Florida 32399-2400

**Re: FPL Turkey Point Nuclear Plant
Title V Air Operation Permit No. 0250003-010-AV
Request for Exemption / permit condition for Temporary Portable Equipment**

Dear Mr. Koerner,

The purpose of this correspondence is to request an exemption from permitting for four temporary portable air compressors to serve as temporary replacement for the electric and diesel air compressors at the Turkey Point Nuclear Power Plant. The Nuclear plant has maintenance/reliability work planned for the instrument air systems that will take place first on Unit 4's system and then on Unit 3's system. The refueling outage for Unit 4 overlaps with the instrument work but is unrelated. The instrument air work will involve both Unit 3 and Unit 4 instrument air systems.

Two instrument air compressors are currently installed on each unit, one is electrical and the other is diesel. The air operating permit reflects the two diesel air compressors. Four temporary portable diesel air compressors will be on site to provide the instrument air and backup. Most of the time during the two maintenance outages one of the diesel air compressors will run to maintain system air and three will be backup in case of a failure of the running air compressors.

- **Activity No 1:** DURING the Unit 4 refueling outage, only ONE temporary diesel driven air compressor is being used, and it will be used for a short period of time (about a week). During this time, it will be a backup, and will not be normally running, and the existing permanent (permitted) Unit 4 compressor will be out of service for discharge piping changes.
- **Activity No 2:** AFTER the Unit 4 refueling outage, for a 2-3 month window, Most of the Unit 4 Instrument Air System tubing and valves will be replaced. During this time FOUR temporary diesel driven compressors will be used, and the Unit 4 permitted compressor will be disconnected. THREE of temporary compressors will be used for Unit 4, with at least one of these three always running. The FOURTH will be used as a backup for Unit 3.
- **Activity No 3:** AFTER Change No. 2 above, the same thing will happen a second time for another 2-3 months, but this time it will be the Unit 3 permanent (permitted) diesel driven compressor that will be out of service, and again FOUR temporary compressors will be used. A piping modification to install a new isolation valve will require the piping from the Unit 3 permitted compressor to be isolated. This time, THREE of the temporary compressors will be used for Unit 3 with one always running, and the FOURTH will be a backup for Unit 4.

- **Separate Permitting Activity:** The permitted compressors are to be replaced with new compressors at the end of the activities 2 and 3 listed above. During the activities above the permitted compressors will be disconnected and removed from the systems to prepare to install new permitted equipment which will be covered under the appropriate and separate permitting activity.

There will be a short period of time when the rental compressors and the permitted compressors may run at the same time. The temporary compressors must get connected to the system and tested to ensure proper operation before the work can start. Typically once the temporary compressors are verified operational then within a day the permanent compressor will be taken out of service.

Specification sheets are attached for the possible rental equipment specifications. The highest emitting compressor specifications are used to estimate emissions during the 2 – 3 month work period that will occur on each unit.

The fuel flow rate for the temporary compressors could, at times, be higher than the consumption because of how the system operates. The numbers for the consumption should be used because that reflects how much fuel is consumed by the engine on average. The flow rate of over 200 gph is not a constant steady state flow. The 30.9 gph numbers should be used for emissions determination.

The four compressors are the only rental combustion equipment involved in the two instrument air system outages.

A 792 gallon double walled temporary fuel tank will be used (TransCube Model 30TCG) for the outages on both units. Only one tank will be used, and it will supply the THREE temporary diesel driven air compressors. There are no diesel supply lines for the existing permanent (permitted) compressors. All fuel is contained in a tank in the base of the machine that is filled manually. The rental compressors are similar, and also have a fuel tank within the machine. This onboard tank will be used on the fourth compressor during the Unit 4 work and also used for the backup to Unit 3.

In the rule analysis of the equipment to be brought on site FPL determined that the equipment would be considered non-road and that NSPS or NESHAPS would not apply. The plant is already utilizing ultra low sulfur diesel as addressed in the Title V air permit.

Thank you for your consideration in this matter, and if you need additional clarification information, please do not hesitate to contact me on my cell phone (561) 758-3760 or email mary.archer@fpl.com.

Sincerely,



Mary Archer
Project Manager
FPL Environmental Services

Cc: Dade County DERM
SE District Office, FDEP

Permitted Equipment and Temporary Portable Equipment calculations

Permitted equipment will be out of service during the work.

<u>current compressors</u>		current permit	potential
AP-42 Emission		Instrument Air	Instrument Air
Pollutant	Factor (lb/mmbtu) (diesel fuel)	Diesels (2 ea) (lb/hour) (diesel fuel)	Diesels (2 ea) (ton/year)
gph (ea)		15	
		**	
SOx	0.29	1.18	5.18
NOx	4.41	17.99	78.81
CO	0.95	3.88	16.98
PM	0.31	1.26	5.54
VOC	0.35	1.43	6.25

* Used 136,000 btu/gal x gph for each machine for mmbtu/hour calculation

** Air compressor gph is for all 1 ; lb/hour is for 2.

<u>Rental compressors</u>			current permit	potential
Detroit Diesel Emission			Instrument Air	Instrument Air
Pollutant	Factor (g/hr) (diesel fuel)	Factor lb/hr	Diesels (1 ea) (lb/hour) (diesel fuel)	Diesels (1 ea) (ton/4400hrs)
gph (ea)			30.9	
			**	
SOx		0.29	1.22	2.68
NOx	2965	6.54	27.47	60.43
CO	213	0.47	1.97	4.34
PM	27.2	0.06	0.25	0.55
HC	58.4	0.13	0.54	1.19

1 gram = 0.0022046 pound

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Wednesday, April 06, 2011 10:55 AM
To: 'randall_r_labauve@fpl.com'
Cc: Anderson, Lennon; 'Archer, Mary'; 'muthim@miamidade.gov'; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; 'oquendo.ana@epa.gov'; 'dee_morse@nps.gov'; Gibson, Victoria; DeVore, Christy; Walker, Elizabeth (AIR)
Subject: FP&L - Turkey Point Nuclear Plant 0250003-014-AC - Exemption
Attachments: 0250003-014-AC_Exemption.pdf; 0250003-014-AC_FPL Letter.pdf

Tracking:	Recipient	Delivery	Read
	'randall_r_labauve@fpl.com'		
	Anderson, Lennon	Delivered: 4/6/2011 10:56 AM	
	'Archer, Mary'		
	'muthim@miamidade.gov'		
	'forney.kathleen@epa.gov'		
	'abrams.heather@epa.gov'		
	'oquendo.ana@epa.gov'		
	'dee_morse@nps.gov'		
	Gibson, Victoria	Delivered: 4/6/2011 10:56 AM	Read: 4/6/2011 11:02 AM
	DeVore, Christy	Delivered: 4/6/2011 10:56 AM	
	Walker, Elizabeth (AIR)	Delivered: 4/6/2011 10:56 AM	

Dear Sir/Madam:

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The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <<http://www.adobe.com/products/acrobat/readstep.html>> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Sylvia Livingston
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/717-9043 (New Phone)
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: LaBauve, Randall R [Randall.R.LaBauve@fpl.com]
Sent: Wednesday, April 06, 2011 11:48 AM
To: Livingston, Sylvia
Cc: Anderson, Lennon; Archer, Mary; muthim@miamidade.gov; forney.kathleen@epa.gov; abrams.heather@epa.gov; oquendo.ana@epa.gov; dee_morse@nps.gov; Gibson, Victoria; DeVore, Christy; Walker, Elizabeth (AIR)
Subject: RE: FP&L - Turkey Point Nuclear Plant 0250003-014-AC - Exemption

I am in receipt of your letter. Thank you,

Randy

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Wednesday, April 06, 2011 10:55 AM
To: LaBauve, Randall R
Cc: Anderson, Lennon; Archer, Mary; muthim@miamidade.gov; forney.kathleen@epa.gov; abrams.heather@epa.gov; oquendo.ana@epa.gov; dee_morse@nps.gov; Gibson, Victoria; DeVore, Christy; Walker, Elizabeth (AIR)
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The Department of Environmental Protection values your feedback as a customer. DEP Secretary Herschel T. Vinyard Jr. is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

Livingston, Sylvia

From: Muthiah P.E., Mallika [MuthiM@miamidade.gov]
Sent: Wednesday, April 06, 2011 11:49 AM
To: Livingston, Sylvia
Subject: RE: FP&L - Turkey Point Nuclear Plant 0250003-014-AC - Exemption

Mallika Muthiah, P.E., Chief
Air Facilities Section
Miami-Dade County Environmental Resources Management
Tel.: 305-372-6925
Fax: 305-372-6954
www.miamidade.gov/DERM
"Delivering Excellence Every Day"

The Miami-Dade Department of Environmental Resources Management (DERM) values your feedback as a customer. DERM is committed to its mission "to balance today's needs through responsible governance, education, and conservation, to protect our environment for tomorrow." And as part of our mission, we continuously assess and improve the quality of services provided to you. Please take a few minutes to comment on our quality of service. Simply click on this <http://derm.miamidade.gov/survey>. Thank you in advance for completing our customer survey.

Miami-Dade County is a public entity subject to Chapter 119 of the Florida Statutes concerning public records. E-mail messages are covered under such laws and thus subject to disclosure.

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Sylvia Livingston



FPL.

an FPL Group company
Recycled Paper

**Mary J Archer, QEP
Environmental Services
Project Manager**

**Florida Power & Light Company
700 Universe Blvd.
Juno Beach, FL 33408
561-691-7057 tel 561-758-3760 mobile
Mary.Archer@fpl.com**



Florida Power & Light Company

April 4, 2011

Mr. Jeff Koerner, PE
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Rd. Tallahassee, Florida 32399-2400

RECEIVED
APR 08 2011
BUREAU OF
AIR REGULATION

Re: **FPL Turkey Point Nuclear Plant**
Title V Air Operation Permit No. 0250003-010-AV
Request for Exemption / permit condition for Temporary Portable Equipment

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Thank you for your consideration in this matter, and if you need additional clarification information, please do not hesitate to contact me on my cell phone (561) 758-3760 or email mary.archer@fpl.com.

Sincerely,



Mary Archer
Project Manager
FPL Environmental Services

Cc: Dade County DERM
SE District Office, FDEP