



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

September 16, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Wayne C. Ondler
Environmental Licensing Project Manager
Florida Power & Light Company
P. O. Box 088801
North Palm Beach, FL 33408-8801

Dear Mr. Ondler:

Re: FPL Martin CG/CC Project
PSD-FL-146A: Permit Amendment

The Department has reviewed your attorney's July 28 and August 2, 1994, letters requesting an amendment to the referenced permit and have considered our legal authority to approve the requested permit amendment.

The modifications requested are to relax the concentration and hourly emissions limits on one combustion turbine (CT) for a period of up to 60 days while the first altered dry low NO_x combustor (DLN II) is being adjusted, and then relax the same emission limits for up to 30 days on each of the three remaining CTs while their altered DLN II combustors are being adjusted.

Paragraph 403.061(15), Florida Statutes (F.S.), authorizes the Department to consult with any person proposing to construct, install, or otherwise acquire a pollution control device or system concerning the efficacy of such device or system, or the pollution problem which may be related to the source, device, or system. Paragraph 403.061(16), F.S., authorizes the Department to encourage voluntary cooperation by persons in order to achieve the purposes of the state environmental control act. Paragraph 403.061(18), F.S., authorizes the Department to encourage and conduct studies, investigations, and research relating to the causes and control of pollution. Rule 62-210.700(5), Florida Administrative Code (F.A.C.), authorizes the Department to consider variation in industrial equipment and make allowances for excess emissions that provide practical regulatory controls consistent with the public interest. The Department believes it is in the interest of the public to allow the permittee to conduct tests to improve the performance and reliability of CTs

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equipped with dry low NO_x combustors. The temporary increase in emissions of the CTs over the limited time authorized by this amendment will not contribute significantly to the air pollution problem within Florida.

In accordance with the provisions of Paragraphs 403.061(15), (16), and (18), F.S., and Rule 62-210.700(5), F.A.C., Florida Power & Light Company is hereby authorized to alter the DLN II combustors for the four CTs subject to the referenced permit, operate the CT receiving the first altered DLN II combustor for a maximum period of 60 days for adjustment; and, operate each of the other three CTs for a maximum period of 30 days, after installation of the altered DLN II combustors, for adjustment provided the following conditions are met:

1. The Department's Southeast District air program administrator shall be notified in writing a minimum of 10 days in advance of initially placing any altered DLN II combustor into service.
2. To allow time for evaluation and testing of alterations to the dry low NO_x combustor (DLN) design, the emission limitations in Specific Condition 4 of the referenced permit shall not apply during a sixty (60) day period following installation of the final DLN design configuration in the initial CT and shall not apply during a thirty (30) day period per CT following installation of the final DLN design in each of the remaining three CTs. During the evaluation and testing of the altered combustors, the maximum nitrogen oxides (NO_x) emissions shall comply with the emission limit specified by the new source performance standards for CT, 40 CFR 60, Subpart GG. The annual allowable emissions (TPY) of NO_x for each CT in permit PSD-FL-146 shall not be exceeded.
2. Except during CT performance testing for extreme conditions, carbon monoxide (CO) emissions shall not exceed 100 ppmvd. The maximum CO emissions during a 12 hour test period to evaluate CT performance during extreme conditions shall not exceed 500 ppmvd, 30 minute average. The annual allowable emissions (TPY) of CO for each CT in permit PSD-FL-146 shall not be exceeded.
3. The volatile organic compound (VOC) emissions shall not exceed 20 ppmvd except during CT performance testing for extreme conditions. During the 12 hour test period to evaluate CT

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performance during extreme conditions, VOC emissions shall not exceed 100 ppmvd. The annual allowable emissions (TPY) of VOC from each CT in permit PSD-FL-146 shall not be exceeded.

The VOC emissions shall be evaluated during the testing periods by measuring total unburned hydrocarbons (UHC). FPL shall determine the VOC component of UHC emissions at several different UHC levels during the testing of the first combustion turbine to have the new DLNII combustors installed. The ratio of VOC/UHC concentration shall be measured, as a minimum, at the low, medium, and high UHC concentration observed during the CT performance tests. The VOC component of the UHC emissions shall be attributed against the annual 57 ton VOC emission limit for the facility. The UHC levels shall not exceed 40 ppmvd during the test period. However, during the 12-hour non-continuous CT performance testing for extreme conditions, UHC emissions shall not exceed 500 ppmvd.

4. After the adjustment period, each CT must be in compliance with all limitations in the referenced permit.

5. Within 45 days after the completion of the project, the permittee shall furnish the Department with a report summarizing the variation in parameters and emissions of NO_x, VOC, unburned hydrocarbon, and CO from the modified DLN II on all of the CTs and any operation problems with the CT units remaining to be resolved.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

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The Petition shall contain the following information:

- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit 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 Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

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A copy of this letter shall be filed with the referenced permit and shall become a condition of that permit.

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/WH/bjb

Attachment: Douglas Roberts' July 26, 1994, letter.
Douglas Roberts' August 2, 1994, letter.

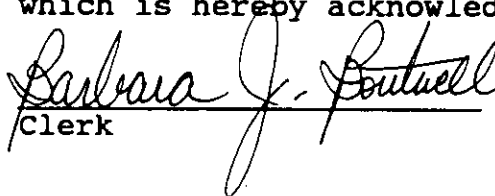
cc: I. Goldman, SED
J. Harper, EPA
R. Donelan, Esq., DEP
H. Oven, PPS
J. Bunyak, NPS
D. Roberts, Esq., HBG&S

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this EXEMPTION and all copies were mailed by certified mail before the close of business on 9/21/94 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to 120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


Clerk

9/21/94
Date

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.

1. Addressee's Address

2. Restricted Delivery
Consult postmaster for fee.

3. Article Addressed to
Mr. Wayne C. Ondler
Environmental Licensing Project
Manager
Florida Power & Light Company
P.O. Box 088801
North Palm Beach, FL 33408-8801

4a. Article Number
P 872 562 697

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

7. Date of Delivery
9-23-94

5. Signature (Addressee)

6. Signature (Agency)
[Signature]

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

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

is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service

P 872 562 697



Receipt for Certified Mail

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


PS Form 3800, JUNE 1991

Sent to Mr. Wayne C. Ondler	
Street and No. P. O. Box 088801	
P.O., State and ZIP Code North Palm Beach, FL 33408	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 9/21/94 PSD-FL-146A	

Memorandum

Florida Department of
Environmental Protection

CLAIR

TO: Howard Rhodes
FROM: Clair Fancy 
DATE: September 16, 1994
SUBJECT: Amendment of Permit No. PSD-FL-146A
FPL Martin CG/CC Project

Attached for your approval and signature is a letter that will amend the construction permit for four gas combustion turbines (CT). The amendment will temporarily relax the emission standards for the CTs while alternated low NO_x burners are being tested.

A public notice was required for the amendment. The only comments received were from FPL. They asked permission to monitor total unburned hydrocarbons instead of volatile organic compounds during the tests. This change was acceptable to the Department.

I recommend your approval and signature.

CF/WH/bjb

Attachment