



September 18, 1997

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SEP 23 1997

BUREAU OF
AIR REGULATION

Mr. W. Douglas Beason, Esquire
Assistant General Counsel
Office of General Counsel
State of Florida
Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

**RE: Martin Power Plant
Notice of Intent to Issue Proposed
Permit No. 0850001-004-AV - Draft**

Dear Mr. Beason:

On August 15, 1997, Florida Power and Light Company (FPL) received the referenced Notice of Intent to Issue Proposed Permit for its Martin Power Plant located in Martin County, Florida. The Notice of Intent was issued by the Department's Tallahassee Office and was signed by C.H. Fancy, P.E., Chief of Bureau of Air Regulation.

FPL has been working in good faith with the Department to identify and resolve outstanding permit issues regarding the referenced facility. The Department and FPL agree that more time is needed to complete the permitting process for this facility. FPL hereby requests, pursuant to Rule 62-103.070, F.A.C., an extension to and including September 30, 1997, in which to file a petition for administrative proceedings regarding the Notice of Intent to Issue the Proposed Air Construction and Air Operating permits. FPL does not request an extension of time in which to public notice the Notice of Intent to Issue the Permits as required under Section 403.815, F.S. and Rule 62-103.150, F.A.C. As good cause for granting the requests for extension of time for filing and public noticing, FPL states the following:

This request is filed simply as a protective measure to avoid waiver of FPL's right to challenge the permit as issued. Granting of this request will not prejudice either party, but will further their mutual interests and likely avoid the need to initiate formal administrative proceedings. FPL is committed to amicably resolving all outstanding issues related to this permit issuance so that the Department's Title V program objectives may be met.

I hereby certify that I have contacted Mr. Scott M. Sheplak, P.E., regarding this request, and he has agreed to this request for extension of time.

Page 2

Accordingly, I hereby request that you formally extend the time for filing of a petition for administrative proceedings to and including September 30, 1997.

Sincerely,

A handwritten signature in cursive script, appearing to read "Richard Piper".

Richard Piper
Senior Environmental Specialist
Florida Power & Light Company

Page 3

cc: Mr. Scott Sheplak, P.E., Tallahassee FDEP

9/23/97

Tom Caserio
Scott Sheplak



September 17, 1997

Mr. 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 22 1997

BUREAU OF
AIR REGULATION

Re: Draft Permit No. 0850001-004-AV
FPL Martin Plant Initial Title V Permit

Dear Mr. Sheplak:

After reviewing the subject draft Title V permit, FPL has identified several issues which need to be addressed. Please contact me at your earliest convenience to discuss them.

Section I

Subsection A Facility Description

The language in the second paragraph is not quite right; it should read as follows: "Each combined cycle unit has the net capability of **430MW at 95°F** and consists of two combustion turbines....."

Also, steam injection is additionally used for power augmentation, not just in the control of NOx for distillate oil firing.

Section III. Emission Units and Conditions

Subsection A - Units 1 and 2

Specific Condition A.10. 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.]

Comment: This rule is not applicable to NSPS Subpart D units. An opacity restriction of 20 percent except for one 6-minute period per hour up to 27 percent is the limitation for these units, pursuant to 40 CFR 60.42(a)(2). Although we'd like to have a 60% opacity limit during sootblowing & loadchanging, the Federal Rules preempt this; therefore this condition should be stricken.

Specific Condition A.12. Nitrogen Oxides....(b) When different fossil fuels are burned simultaneously in any combination, the applicable standard (in ng / J) is determined by proration using the following formula:

$$PS_{NOx} = [x(86) + y(130) / (x+y)]$$

where:

PS_{NOx} is the prorated standard for nitrogen oxides when firing different fuels simultaneously, in nanograms per joule heat input derived from all fossil fuels fired;

x = is the percentage of total heat input derived from gaseous fossil fuel;

y= is the percentage of total heat input derived from liquid fossil fuel.

The Martin Units 1 and 2 continuous emission monitor for NOx uses this equation for the calculation of NOx emissions, with the exception that the values are expressed in lb / mmBtu rather than in nanograms per joule (ng / J). Therefore, the following change is requested:

$$PS_{NOx} = [x(.20) + y(.30) / (x+y)]$$

where:

PS_{NOx} is the prorated standard for nitrogen oxides when firing different fuels simultaneously, in **lb / mmBtu** heat input derived from all fossil fuels fired;

x = is the percentage of total heat input derived from gaseous fossil fuel;

y= is the percentage of total heat input derived from liquid fossil fuel.

Specific Condition A.16.

(1)(i) For sources subject to the opacity standard of 40 CFR 60.42(b)(1), excess emissions are defined as any six minute period during which the average opacity of emissions exceeds 35 percent opacity, except that one six-minute average per hour of up to 42 percent opacity need not be reported.

(1)(ii) For.....reported.

(1)(iii) For.....reported.

Comment: These specific conditions only apply to specific fossil fuel fired units identified in the NSPS regulations. They are not applicable to the Martin units and would serve only to confuse future readers of the permit. They should be stricken.

Subsection B - Description of Emission Units (page 25) - Please note that steam injection may be employed for power augmentation while firing the combustion turbines on natural gas fuel, as well as for NOx control while firing distillate oil fuel.

Specific Condition B.3. - Permitted Capacity - It should be noted that the maximum heat input rate to each combustion turbine is represented by a curve. During high temperature ambient conditions, the inlet air is less dense, and less heat input can be achieved by the unit. Conversely, at low ambient temperatures, the inlet air is more dense; consequently higher heat inputs may be

achieved. Please refer to attached letter dated September 6, 1996 amending the AC and PSD permits for the combustion turbine units.

Specific Condition B.18. - This specific condition appears to have been taken verbatim from the Code of Federal Regulations. It should be noted that the Martin combustion turbine units are only required to utilize steam or water injection while firing distillate oil fuel, and not while firing natural gas fuel. Please note that as of this date, the Martin units have not yet fired distillate oil fuel, so there has been no steam-to-fuel ratio established.

Specific Condition B.19. - FPL submitted a request for approval of a Customized Fuel Monitoring Schedule on April 28, 1993 which was subsequently deferred by USEPA for approval by FDEP. A copy of supporting documentation is attached to this correspondence as Attachment A. Therefore, FPL requests that Specific Condition B.19. be replaced with the following condition:

"The Martin facility requested approval for and was granted approval to utilize a customized fuel monitoring schedule pursuant to 40 CFR 60.334(b). This schedule is incorporated by reference as Attachment A to this permit."

Specific Condition B.20. - In the Customized Fuel Monitoring Schedule, monitoring of the natural gas nitrogen content was not required, pursuant to EPA policy. This specific condition should therefore be clarified to apply only to the firing of distillate oil fuel.

Specific Condition B.21. - This condition only applies to steam injection which is only required during distillate oil firing on the Martin units. As stated above, distillate oil has not yet been fired in the Martin units, therefore the water-to-fuel ratio has not yet been established for the combustion turbine units. This specific condition should therefore be clarified to apply only to the firing of distillate oil fuel.

Specific Condition B.22 - Language in the Specific Condition includes a reference to sulfur dioxide testing which is not required for natural gas firing and should be removed or clarified. In addition, the multiple load testing requirement only applied to the initial testing of the combustion turbines, and not to subsequent annual compliance testing. Please refer to DEP Guidance Document DARM-EM-05, "Rate of Operation During Compliance Testing for Combustion Turbines".

Specific Condition B.23. - This condition should be clarified as to which portions apply to natural gas and which apply to distillate oil fuel. The Customized Fuel Monitoring Schedule approved by EPA is the surrogate for the natural gas requirements. Distillate oil fuel, when fired, will be subject to the ASTM methods specified for the analysis of sulfur and nitrogen.

Specific Condition B.24 - This specific condition is superseded by the Customized Fuel Monitoring Schedule. The language should be changed to reflect that situation.

Specific Condition B.25 - FPL has constructed several stack tests on each of the combustion turbine units at the Martin facility which Department personnel have witnessed. The sampling platforms and ancillary equipment have been installed and used several times. This Specific Condition is therefore superfluous and should be removed.

Specific Condition B.26 - Please note that FPL applied for a modification to the Site Certification and PSD permit on September 6, 1996 for the purpose of incorporating an ambient temperature curve to be utilized during compliance testing in accordance with DEP Guidance Document DARM-EM-05, "Rate of Operation During Compliance Testing for Combustion Turbines" (see Attachment B to this correspondence). Reference to the ambient temperature vs. heat input curves should be mentioned in this Specific Condition in order to avoid future confusion regarding the appropriate heat input during compliance testing.

The Department in the same document referenced above (Attachment B) also removed the requirement for annual VOC testing for the combustion turbines. Please revise the specific condition accordingly.

Specific Condition B.30 - In the PSD permit amendment of September 6, 1996, the Department incorporated language that blends the requirements of Part 60 and Part 75 (see Attachment B to this document).

Auxiliary Boiler Specific Conditions

Specific Condition C.9 - This condition appears to be somewhat in conflict with Specific Condition C.8. I would suggest that condition C.8. fulfills the requirements of C.9. so that C.9. is superfluous.

Specific Condition C.10 - In view of the fact that the operation of the auxiliary boiler is limited to periods of startup and shutdown (see Specific Condition C.3.), this specific condition would not appear to be applicable (we don't take 30 days to startup up a unit, so we'll never achieve a 30-day rolling average).

Specific Condition C.11 - The Martin auxiliary boiler may be fired only by either natural gas or distillate oil fuels; therefore 40 CFR 60.42(c)(h)(2) and 40 CFR 60.42(c)(h)(3) do not apply and references to these rules should be stricken.

Specific Condition C.13 - Compliance and performance test methods and procedures for sulfur dioxide should be negligible for the auxiliary boiler, given that its operation is limited so startup and shutdown and it to date has fired only natural gas fuel. 40 CFR 60.44c does not address natural gas firing. Since the emission rate for SO₂ is on the order of 0.01 lb / hour, FPL proposes that no annual testing be required if operational hours are less than 400 hours per year; and that permit renewal testing only be required if operational hours exceed 400 hours over the 5-year permit term. If and when distillate oil fuel is fired in the auxiliary boiler, FPL will utilize the procedures specified in 40 CFR 60.44c(g) or 40 CFR 60.44c(h) to demonstrate compliance with the sulfur dioxide emission limiting standard.

Specific Condition C.14 - This specific condition will not apply to this emission unit. Although only natural gas has been fired in the auxiliary boiler to date, if and when distillate oil is fired, it will not, by definition, be the only fuel combusted; therefore this condition is inapplicable and should be removed.

Specific Condition C.19(a) - The initial startup notifications, federally-enforceable capacity factor limitation and anticipated annual capacity factor are all not applicable. This facility has been operating for several years and the current PSD permit imposes federally-enforceable limits on capacity factor (limited to startup and shutdown). An "emerging technology" is certainly not used to

control SO2 emissions; they are controlled by using primarily natural gas fuel and by limiting the hours of operation of the emission unit.

Specific Condition C.19(b) - It is unclear whether 40 CFR 60.42c or 40 CFR 60.43c currently apply to the auxiliary boiler at Martin, since these rules do not mention natural gas as a fuel at all; but rather coal, oil and other fuels. No emission testing has been performed on the emission unit to date. If and when emission testing is performed, test data will be submitted to the Department. There is no CEM on the auxiliary boiler, so the reference to 40 CFR 60 Appendix B should be stricken.

Specific Condition C.19(d) - In view of the fact that this emission unit has a federally-enforceable restriction on hours of operation (limited to startup and shutdown), and the emission unit has, to date, only fired natural gas, with an SO₂ emission rate of 0.01 pound per hour, it seems unnecessary to require quarterly reports.

Specific Condition C.19(e) - The reference to 40 CFR 60.43c appears to be in error, since this citation refers to the standard for particulate matter emissions rather than sulfur dioxide emissions (the CFR also appears to have this incorrect reference citation). Assuming that 40 CFR 60.42c is the citation that is intended, once again it is unclear as to whether the various restrictions provided in the rule would apply to a natural gas-fired emission unit. In addition, the limitation to operation of this emission unit to hours of startup and shutdown only would also appear to limit the applicability of 30-day average emission rates, etc.. FPL proposes that this entire specific condition be stricken until and unless a request is made by FPL to increase the allowed operating hours to something other than startup and shutdown.

Specific Condition C.22 - In view of the fact that this emission unit is restricted to operation during startup and shutdown only (historically it has operated 364 hours in 1993 during the initial plant startup, then only an hour per month for testing), and the low emission rates when it does operate, the reporting requirements of this specific condition do not appear to provide any environmental benefit. FPL requests that this specific condition be stricken.

Diesel Generator Specific Conditions

Specific Condition D.1 - The diesel generator also needs to be tested weekly to ensure that it will function properly when needed to provide emergency power. I suggest the language be modified as follows:

"The diesel generator shall operate only for emergency power generation or for weekly operational testing."

Thank you for your prompt attention to the issues raised in this correspondence. Please do not hesitate to contact me at (561) 691-7058 if I may be of further assistance.

Very truly yours,



Richard Piper
Sr. Environmental Specialist
Florida Power & Light Company

9/22/97 cc: Scott Sheplak
Tom Casco

I N T E R O F F I C E M E M O R A N D U M

Date: 18-Sep-1997 10:12am EST
From: Rich_Piper
Rich_Piper@email.fpl.com@PMDF@
Dept:
Tel No:
SUNCOM:

TO: sheplak_s (sheplak_s@A1@DER)
CC: Willie_Welch (Willie_Welch@email.fpl.com@PMDF@EPIC
CC: Gary_Driebe (Gary_Driebe@email.fpl.com@PMDF@EPIC6
Subject: ^{FPL} Martin Draft permit
O&S 0001-004-AV

Scott,

We've discovered one item which we didn't address yesterday during our conversation on the Martin draft permit: Specific Condition D.4.

This condition requires daily sampling of fuel oil fired in the diesel generator. We'd like to propose the following as an alternative:

"Distillate oil fuel fired in the Emergency Diesel Generator shall meet the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78 (or the latest version), "Standard Specification for Fuel Oils".

This language is taken from the NSPS Subpart Dc rules (which don't apply to this emission unit), but we can meet these specifications based on the data we've obtained to date. Please let me know what you think. Thanks

- Rich



September 10, 1997

Mr. W. Douglas Beason, Esquire
Assistant General Counsel
Office of General Counsel
State of Florida
Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

**RE: Martin Power Plant
Notice of Intent to Issue Proposed
Permit No. 0850001-004-AV - Draft**

Dear Mr. Beason:

On August 15, 1997, Florida Power and Light Company (FPL) received the referenced Notice of Intent to Issue Proposed Permit for its Martin Power Plant located in Martin County, Florida. The Notice of Intent was issued by the Department's Tallahassee Office and was signed by C.H. Fancy, P.E., Chief of Bureau of Air Regulation.

FPL has been working in good faith with the Department to identify and resolve outstanding permit issues regarding the referenced facility. The Department and FPL agree that more time is needed to complete the permitting process for this facility. FPL had previously requested and been granted an extension of time to September 12, 1997 in which to file a petition for administrative proceedings regarding the Notice of Intent to Issue the Proposed Air Construction and Air Operating permits. FPL hereby requests, pursuant to Rule 62-103.070, F.A.C., an extension to and including September 19, 1997, in which to file a petition for administrative proceedings regarding the Notice of Intent to Issue the Proposed Air Construction and Air Operating permits. FPL does not request an extension of time in which to public notice the Notice of Intent to Issue the Permits as required under Section 403.815, F.S. and Rule 62-103.150, F.A.C. As good cause for granting the requests for extension of time for filing and public noticing, FPL states the following:

This request is filed simply as a protective measure to avoid waiver of FPL's right to challenge the permit as issued. Granting of this request will not prejudice either party, but will further their mutual interests and likely avoid the need to initiate formal administrative proceedings. FPL is committed to amicably resolving all outstanding issues related to this permit issuance so that the Department's Title V program objectives may be met.

I hereby certify that I have contacted Mr. Scott M. Sheplak, P.E., regarding this request, and he has agreed to this request for extension of time.

Page 2

Accordingly, I hereby request that you formally extend the time for filing of a petition for administrative proceedings to and including September 19, 1997.

Sincerely,

A handwritten signature in cursive script, appearing to read "Richard Piper".

Richard Piper
Senior Environmental Specialist
Florida Power & Light Company

Page 3

cc: Mr. Scott Sheplak, P.E., Tallahassee FDEP

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BUREAU OF
AIR REGULATION

THE PALM BEACH POST

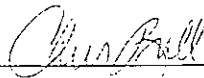
Published Daily and Sunday
West Palm Beach, Palm Beach County, Florida

PROOF OF PUBLICATION

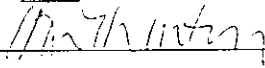
STATE OF FLORIDA
COUNTY OF PALM BEACH

Before the undersigned authority personally appeared Chris Bull who on oath says that she is Classified Advertising Manager of The Palm Beach Post, a daily and Sunday newspaper published at West Palm Beach in Palm Beach County, Florida; that the attached copy of advertising, being a Notice in the matter of Intent to issue Title V in the --- Court, was published in said newspaper in the issues of August 18, 1997.

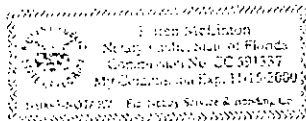
Affiant further says that the said The Post is a newspaper published at West Palm Beach, in said Palm Beach County, Florida, and that the said newspaper has heretofore been continuously published in said Palm Beach County, Florida, daily and Sunday and has been entered as second class mail matter at the post office in West Palm Beach, in said Palm Beach County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she/he has neither paid nor promised any person, firm or corporation any discount rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.



Sworn to and subscribed before me this 22 day of August A.D. 1997



Personally known XX or Produced Identification
Type of Identification Produced _____



NO. 37553
PUBLIC NOTICE OF INTENT
TO ISSUE TITLE V
AIR OPERATION PERMIT
STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
REGULATION
Title V DRAFT Permit No
0850001-004-AV
Martin Plant
Martin County
The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to the Florida Power & Light Company for the Martin Plant located 7 miles North of Indiantown on State Road 710, Indiantown, Martin County. The applicant's name and address are: Florida Power & Light Company, Environmental Services Department, P.O. Box 14000, Juno Beach, Florida 33408.
The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.
The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2800 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.
The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is pursued pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S. will not be available for this proposed action.
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 (received) in the Office of General Counsel of the Department of Environmental Protection, 1900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 904/498-9730; Fax: 904/497-4938). Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. 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 within the applicable 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 the 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 2B-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 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 permitting authority's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the permitting authority'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 permitting authority's action or proposed action;
(f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority'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 permitting authority 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 permitting authority's final action will be different from the action taken by it in this notice of intent. 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.
In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7561(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7561(d)(3), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection occur after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effect date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C., Fair Lane Road with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7561(d)(3) and must be filed with the Administrator of the EPA at 410 M Street, SW, Washington, D.C. 20460. A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:
Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive,
Suite 4
Tallahassee, Florida 32301
Telephone: 904/498-1344
Fax: 904/922-9879
Affected District:
Department of Environmental Protection
Southeast District
400 North Congress Avenue
West Palm Beach, Florida
33416-5425
Telephone: 561/681-6600
Fax: 561/681-6755
The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Shepley, P.E., at the above address, or call 850/488-1344, for additional information.
PUB: The Palm Beach Post
August 18, 1997