Wendy

Florida Power & Light Company, Environmental Services Dept., P.O. Box 14000, Juno Beach, FL 33408

FPL

December 21, 1999

To: Scott M. Sheplak
Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5505
Tallahassee, FL 32399-2400

Applicant: Florida Power and Light Company;
Martin Plant Combined Cycle Units #3 & #4, DEP File No. 0850001-004-AV, Inlet Foggers Installation

The undersigned has read Sections 120.60(1) and 403.0876, Florida Statutes (F.S.), and fully understands the applicant's rights under those sections.

With regard to the above referenced permit application, the applicant hereby, with full knowledge and understanding of its rights under Sections 120.60(1) and 403.0876, F.S., waives the right under those statutes to have the application for a permit issued or denied by the State of Florida Department of Environmental Protection within the ninety day time period proscribed in those sections. Said waiver is made freely and voluntarily by the applicant, is in its self-interest, and is made without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Protection.

This waiver shall expire on March 01, 2000 .

The undersigned is authorized to make this waiver on behalf of the applicant.

December 21, 1999

for

Rich Piper / Repowering Licensing Manager

November 30, 1999

Mr. Greg Worley
EPA Region 4
Air Toxics and Pesticide Management Division
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-3104

Dear Mr. Worley:

In Subpart GG, NO_x, SO_2, and O_2 concentrations are to be determined with EPA Method 20. The span value for the NO_x analyzer used is set at 300 ppm in 60.335(c)(3). We (the Florida Department of Environmental Protection) are requesting the Agency's approval to develop an alternate sampling procedure (ASP) which will allow the modification of the NO_x analyzer span parameter from the current fixed level of 300 ppm, to more appropriate levels dependent upon source emission limiting standards.

When Subpart GG was last amended in 1989, typical NO_x emission limiting standards for stationary gas turbines were in the range of 75 ppm and greater. This lower range (75 ppm) represented 25% of the analyzer span (300 ppm) to be used with Method 20 as defined in Subpart GG. In the past decade technological advances in turbine design and emissions control techniques have substantially lowered NO_x emission limiting standards at the Subpart GG sources. Currently, in the state of Florida there are several Subpart GG sources with NO_x emission limiting standards lower than 20 ppm, with some as low as 9 ppm. As 9 ppm represents only 3% of the 300 ppm span requirement for NO_x measurement outlined in Subpart GG; obtaining reliable NO_x emissions data from these sources is often difficult as the signal-to-noise ratio may approach one. Adjusting the span to a lower level will improve the quality of data collected from these sources.

The Department would like to propose an ASP for the Method 20 aspect of Subpart GG [60.335(c)(3)] which would allow for adjustment of the NO_x analyzer span settings from 300 ppm, as presently defined, to levels more appropriate to current emission limiting standards. We propose modifying this clause so that, in place of the 300 ppm span requirement, a span setting of between 1.5 times and 3 times the emission limiting standard for the source be used. This modification will greatly enhance the collection and quality of data obtained from the affected sources with NO_x emission limiting standards less than 75 ppm.

The proposed ASP would be applicable on an industry-wide basis with the Department acting as the 'petitioner'. This ASP would enhance the data quality at the affected sources and represents a proactive approach as the number of gas turbines with emission limits below 75 ppm are expected to increase in the near future. The aim of this modification is to adjust the NO_x analyzer span to levels which will permit the majority of data collected to fall within 25%-75% of the span.

Again, we are seeking approval from the Agency to develop an ASP which would allow the modification of the Subpart GG Method 20 NO_x analyzer span setting from 300 ppm to a level within 1.5 times and 3 times a source's particular emission limiting standard. We would like to receive input from the Agency on this matter. Please call David Pocengal at 850-921-9577 or write to me.

Sincerely,

M. D. Harley, P.E., DEE
P.E. Administrator
Emissions Monitoring Section
Bureau of Air Monitoring and
Mobile Sources

cc: David McNeal

FPL Archived Message

To: Jay Blum@FPL
cc:
Subject: Foggers Emissions Estimates

Here 'tis

---------- Forwarded by Rich Piper on 12/10/98 11:37 AM ----------

Ken Kosky <KKosky@GOLDER.com> on 12/01/98 02:55:00 PM

To: Rich Piper
cc:
Subject: Foggers Emissions Estimates

Rich: Attached is a spreadsheet that contains annual emissions estimates for Martin CC, PFM Simple Cycle and PNN. Please note the basis of the heat rate increase. In looking at the meteorological, typical summer high temperatures and relative humilities suggest an "average" temperature differential of 8 degrees F. We have met data to perform more detailed calculations but it is probably more involved than necessary. Using this temperature difference and the manufacturer curves (except for PNN which I had to assume a heat rate reduction) an estimated heat input increase is estimated and used to calculate the annual tons/year. Also, the estimates on a per machine basis and would have to include a calculation for the facility (that's what the summary is for). Anyway take a look and call if you have questions. Regards, Ken

- fog2a.xls

DEPOSITION EXHIBIT
Sierra 11
11/26/02

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