



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW
ATLANTA, GEORGIA 30303-8909

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BUREAU OF
AIR REGULATION

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C.H. Fancy, Chief
Bureau of Air Regulation
Division of Air Resources Management
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399

SUBJ: Proposed Title V Permits for Florida Power & Light

Dear Mr. Fancy:

This is in response to your letter dated March 10, 1998, regarding proposed changes to seven Florida Power & Light (FP&L) proposed title V permits. These proposed permits were the subject of the U.S. Environmental Protection Agency's (EPA) December 11, 1997, objection. EPA Region 4 has completed its review of the Florida Department of Environmental Protection's (FDEP) proposed changes to the FP&L permits (and the associated Statements of Basis). Based on our review, we have one remaining comment which is outlined below.

On Page 4, Statement of Basis revision for the Manatee, Martin, Port Everglades, Riviera, and Turkey Point Permits, in order to avoid misinterpretation, we recommend that the State revise the paragraph as follows:

"These units are subject to a steady-state PM emission limit of 0.1 lb/mmBtu, which is effectively equivalent to ~~0.149 lb/mmBtu~~ because of rounding, and 0.3 lb/mmBtu for soot blowing which is equivalent to ~~0.349 lb/mmBtu~~." FPL has presented historical PM test results which show that the steady-state and soot blowing average results are less than half the applicable effective standards 0.075 lb/mmBtu. The Department has determined that sources with steady-state emissions less than half of the effective standard 0.075 lb/mmBtu shall test annually. . . .

FDEP has adequately addressed all the issues outlined in EPA's December 11, 1997, objection letter and considers the objection to be resolved. Therefore, once all the proposed changes are incorporated into the seven FP&L permits, the State may proceed with permit issuance.

We commend you and your staff for facilitating the resolution of these issues with Florida Power & Light. If you have any further questions regarding this matter, please contact Carla Pierce, Chief, Operating Source Section at (404) 562-9099.

Sincerely,



R. Douglas Neeley
Chief
Air, Radiation &
Technology Branch

cc: Florida Power & Light