

Barbara

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

April 24, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Jay Asaibene, Plant General Manager
Florida Power and Light Company
11770 U.S. Highway One
North Palm Beach, FL 33408

Re: Request for Additional Information Regarding Initial Title V Permit Application
File No. 0990042-001-AV
Riviera Plant, Palm Beach County

Dear Ms. Asaibene:

The initial Title V permit application for the Riviera Plant was received in a timely manner (June 12, 1996) and has been deemed complete by default. However, in order to continue processing the application, the Department is requesting the additional information outlined below. Should your response to any of the listed items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form. Please note that the items are grouped by the appropriate application section reference.

A. Application Info.

1. From the Application Comment section it is noted that, "the facility at one time operated a 75 MW steam generating unit (Unit 2, permit #AO50-174444); however this unit is no longer in service". Please provide the date the unit was removed from service. Has the permit been surrendered to the Department? If so, please provide the letter.

B. Facility Information

1. Please provide a copy of document PRVFS_11.txt, Identification of Additional Applicable Requirements. The referenced document appears to be missing from Section E.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Ms. Jay Asaibene

April 24, 1997

Page 2 of 3

2. Attachment to the application, List of Unregulated Trivial and De Minimis Activities, contained a consolidated listing of trivial activities and unregulated emissions units and/or activities that you proposed for exemption. Please resubmit as follows:
 - a.) Group the unregulated emissions units and/or activities into logical groupings and indicate any pollutants that have the potential-to-emit quantities equal to or greater than the threshold levels specified in Rules 62-213.420(3)(c)3. & 4., F.A.C., from each of the unregulated emissions units and/or activities.
 - b.) Identify emissions units and/or activities that you claim should be exempted and provide adequate information to demonstrate that the units or activities qualify for exemption under the provisions of Rule 62-213.430(6), F.A.C, pursuant to Rule 62-213.420 (3) (m), F.A.C.
 - c.) Do not include trivial activities in this application.
3. In the pollutant identification sections of the application, Sections C (facility) and G (units 3 & 4), what does "HAP" refer to?

C. Emission Units 3 and 4: Boilers

1. The maximum permitted sulfur content is 2.5 percent, by weight. In permits AO 50-206721 and AO 50-206722, the sulfur content is to be verified by submittal of monthly fuel analyses reports, and stack testing for SO₂ using EPA Method 6 is required if the sulfur content of the fuel exceeds 2.5 percent, by weight. Please confirm FPL relies upon its own sampling and analysis program. Please confirm no stack tests for SO₂ been conducted. Please advise if you wish to avoid such compliance test requirements by requesting a maximum fuel oil sulfur content limit of 2.5 percent, by weight, and then relying on fuel sampling and analysis to demonstrate compliance.
2. In Section L for Unit 3 it appears that document PRVU1_1.bmp, Process Flow Diagram, is labeled as PRVEU1_1.bmp. In Section L for Unit 3 it appears that document PRVU1_4.bmp, Description of Stack Sampling Facilities, is labeled as PRVU1_1.bmp. In Section L for Unit 4 it appears that document PRVU2_1.bmp, Process Flow Diagram, is labeled as PRVEU2_1.bmp. In Section L for Unit 4 it appears that document PRVU2_4.bmp, Description of Stack Sampling Facilities, is labeled as PRVU2_1.bmp. Please confirm or correct this.
3. Also, "Previously Submitted" should have been entered in the Acid Rain Application - Phase II form information blank instead of "Not Applicable" in Section L.

Ms. Jay Asaibene

April 24, 1997

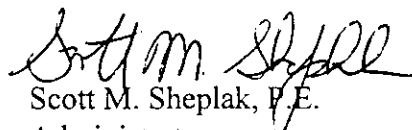
Page 3 of 3

4. Are Units 3 and 4 front wall fired, natural circulation, 24-burner, compact furnaces and thus subject to Rule 62-296.570 (4) (b) 3., F.A.C. as you have identified as the applicable requirement in the application?

Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the new long application form, DEP Form No. 62-210.900, effective March 21, 1996 (enclosed).

A written response to these items is required within 90 (ninety) days of receipt of this notice, unless additional time is requested pursuant to Rule 62-213.420(1)(b)6, F.A.C. **Please provide the requested information as soon as possible in order for us to meet the December 31, 1997 issuance deadline for Acid Rain Sources.** If you should have any questions, please contact Susan DeVore or me at (904) 488-1344.

Sincerely,


Scott M. Sheplak, P.E.
Administrator
Title V Section

SMS/sd

enclosure

cc: Mr. Kennard F. Kosky, P.E., Golder Associates
Mr. Richard G. Piper, FPL Environmental Services Department
Mr. Gary Moncrief, FPL Riviera Plant
Mr. Isidore Goldman, Southeast District Office
Mr. James Stormer, Palm Beach County Health Department

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: () - Fax: () -
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i> _____ Signature _____ Date

* Attach letter of authorization if not currently on file.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- 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.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address
2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Ms. Jay Asaibene, Plant General Manager
 Florida Power and Light Company
 11770 U.S. Highway One
 North Palm Beach, Florida 33408

4a. Article Number
 P 263 584 889

4b. Service Type

Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

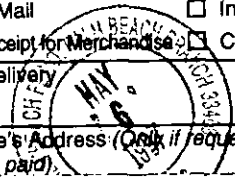
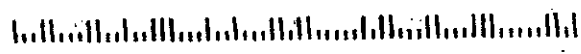
7. Date of Delivery

5. Received By: (Print Name)
 J. Asaibene

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

6. Signature
 X

PS Form 381



Thank you for using Return Receipt Service.

P 263 584 889

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to *Plant General Manager*
Ms. Jay Asaibene
 Street & Number *Fla. Power & Light Co.*
11770 U.S. Highway One
 Post Office, State, & ZIP Code *N. Palm Bch., FL 33408*

Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

04-24-97 *SA*

PS Form 3800, April 1995

Air Pollution Control Section
Division of Environmental Health and Engineering
Palm Beach County Health Department
P.O. Box 29 (901 Evernia Street)
West Palm Beach, FL 33402-0029

FACSIMILE TRANSMITTAL COVER SHEET

DATE: April 21, 1997

FROM: Jeff Koerner, Air Permitting Supervisor
Phone No.: (561) 355-4549, SunCom 273-4549
FAX No: (561) 355-2442

TO: Susan Devore, Title V Section
DEP - Bureau of Air Regulation
FAX No.: 904-922-6979

RE: FPL Riviera Beach
Fuel Analyses Reports

Total Pages: 13 (including this cover sheet)

Here are the analyses for 1996. They send them to us quarterly. We should be getting the first quarter of 1997 shortly.

JFK

RECEIVED
MAR 5 1996
RIVIERA PLANT

U
FLORIDA POWER & LIGHT COMPANY
ENGINEERING & TECHNICAL SERVICES - CENTRAL LABORATORY
STATE OF FLORIDA LABORATORY CERTIFICATION NUMBERS
DRINKING WATER CERTIFICATION NUMBER: 56275
ENVIRONMENTAL CHEMISTRY CERTIFICATION NUMBER: E56078

RIVIERA PLANT
ANALYSES OF FUEL OIL FIRED FEBRUARY 1996

DATE SAMPLED FROM: 01/22/96	TO	02/20/96
API GRAVITY		10.2
DENSITY, LB/GAL		8.317
DENSITY, LB/BBL		349.314
HEAT OF COMBUSTION, BTU/LB		18307
HEAT OF COMBUSTION, BTU/GAL		152259
HEAT OF COMBUSTION, MBTU/BBL		6395
WATER, % BY VOLUME		0.1
COKING INDEX, % BY WEIGHT		7.6
SULFUR, % BY WEIGHT		1.9
SULFUR DIOXIDE EQUIVALENT, LB/MBTU		2.1
ASH, % BY WEIGHT		0.04
PARTICULATE EQUIVALENT, LB/MBTU		0.02
VANADIUM IN ASH AS V2O5, % BY WEIGHT		52
VANADIUM IN OIL AS V2O5, PPM		209
VANADIUM IN OIL AS V, PPM		117
VISCOSITY, SSF @ 122F		149

COMMENTS: NITROGEN = 0.30%.

COPIES TO: PRV PLANT MGR. PRV/PRV ANALYZED BY: *[Signature]*

T.RENK,
PRV/PRV
F-PRV-6
J. McGRADY - JEN/GB
TECHNICAL MANAGER
K WASHINGTON - ETS/JB
J.PRICE - ETS/JB

CERTIFIED BY: *[Signature]*
FEBRUARY 28, 1996

U

FLORIDA POWER & LIGHT COMPANY
 ENGINEERING & TECHNICAL SERVICES - CENTRAL LABORATORY
 STATE OF FLORIDA LABORATORY CERTIFICATION NUMBERS
 DRINKING WATER CERTIFICATION NUMBER: 56275
 ENVIRONMENTAL CHEMISTRY CERTIFICATION NUMBER: E56078

RIVIERA PLANT
 ANALYSES OF FUEL OIL FIRED MARCH 1996

DATE SAMPLED FROM:	TO	
02/20/96	03/25/96	
API GRAVITY		9.4
DENSITY, LB/GAL		8.364
DENSITY, LB/BBL		351.288
HEAT OF COMBUSTION, BTU/LB		18183
HEAT OF COMBUSTION, BTU/GAL		152083
HEAT OF COMBUSTION, MBTU/BBL		6387
WATER, % BY VOLUME		0.4
COKING INDEX, % BY WEIGHT		8.3
SULFUR, % BY WEIGHT		2.2
SULFUR DIOXIDE EQUIVALENT, LB/MBTU		2.4
ASH, % BY WEIGHT		0.07
PARTICULATE EQUIVALENT, LB/MBTU		0.04
VANADIUM IN ASH AS V2O5, % BY WEIGHT		34
VANADIUM IN OIL AS V2O5, PPM		227
VANADIUM IN OIL AS V, PPM		127
VISCOSITY, SSF @ 122F		170

COMMENTS: NITROGEN = 0.20%.

COPIES TO: PRV PLANT MGR. PRV/PRV ANALYZED BY: C. L. Hoff

T. RENK,
 PRV/PRV
 F-PRV-6
 TECHNICAL MANAGER
 K WASHINGTON - ETS/JB
 J. PRICE - ETS/JB

CERTIFIED BY: K. M. Smith

MARCH 28, 1996

FLORIDA POWER & LIGHT COMPANY
ENGINEERING & TECHNICAL SERVICES - CENTRAL LABORATORY
STATE OF FLORIDA LABORATORY CERTIFICATION NUMBERS
DRINKING WATER CERTIFICATION NUMBER: 56275
ENVIRONMENTAL CHEMISTRY CERTIFICATION NUMBER: E56078

RIVIERA PLANT
ANALYSES OF FUEL OIL FIRED APRIL 1996

DATE SAMPLED FROM: 03/25/96 TO 04/22/96	
API GRAVITY	9.7
DENSITY, LB/GAL	8.346
DENSITY, LB/BBL	350.532
HEAT OF COMBUSTION, BTU/LB	18227
HEAT OF COMBUSTION, BTU/GAL	152123
HEAT OF COMBUSTION, MBTU/BBL	6389
WATER, % BY VOLUME	0.2
COKING INDEX, % BY WEIGHT	9.6
SULFUR, % BY WEIGHT	2.1
SULFUR DIOXIDE EQUIVALENT, LB/MBTU	2.3
ASH, % BY WEIGHT	0.06
PARTICULATE EQUIVALENT, LB/MBTU	0.03
VANADIUM IN ASH AS V2O5, % BY WEIGHT	29
VANADIUM IN OIL AS V2O5, PPM	181
VANADIUM IN OIL AS V, PPM	101
VISCOSITY, SSF @ 122F	214

COMMENTS: NITROGEN = 0.43%.

COPIES TO: PRV PLANT MGR. PRV/PRV ANALYZED BY: E. I. Hoff

ENV. SPEC. - PRV/PRV TECHNICAL MANAGER CERTIFIED BY: K. M. Stoddard

T. RENK, K WASHINGTON - ETS/JB APRIL 28, 1996
PRV/PRV J. PRICE - ETS/JB
F-PRV-6

FLORIDA POWER & LIGHT COMPANY
ENGINEERING & TECHNICAL SERVICES - CENTRAL LABORATORY
STATE OF FLORIDA LABORATORY CERTIFICATION NUMBERS
DRINKING WATER CERTIFICATION NUMBER: 56276
ENVIRONMENTAL CHEMISTRY CERTIFICATION NUMBER: E56078
COMPREHENSIVE QUALITY ASSURANCE PLAN NUMBER: 920041
RIVIERA PLANT
ANALYSES OF FUEL OIL FIRED

MAY 1996

DATE SAMPLED FROM: 04/23/96	TO	05/23/96
API GRAVITY		8.7
DENSITY, LB/GAL		8.406
DENSITY, LB/BBL		353.052
HEAT OF COMBUSTION, BTU/LB		18121
HEAT OF COMBUSTION, BTU/GAL		152325
HEAT OF COMBUSTION, MBTU/BBL		6398
WATER, % BY VOLUME		0.1
COKING INDEX, % BY WEIGHT		9.5
GULFUR, % BY WEIGHT		2.1
SULFUR DIOXIDE EQUIVALENT, LB/MBTU		2.3
ASH, % BY WEIGHT		0.06
PARTICULATE EQUIVALENT, LB/MBTU		0.03
VANADIUM IN ASH AS V2O5, % BY WEIGHT		25
VANADIUM IN OIL AS V2O5, PPM		147
VANADIUM IN OIL AS V, PPM		82
VISCOSITY, SSF @ 122F		227

COMMENTS: NITROGEN=0.34 %
 COPIES TO: PRV PLANT MGR. PRV/PRV
 ENV. SPEC. - PRV/PRV
 TECHNICAL MANAGER PRV/PRV
 K. WASHINGTON - ETS/JB
 F-PRV-6 J. PRICE-ETS/JB

ANALYZED BY: S. Odgers
 CERTIFIED BY: K. M. Dinsmore
 MAY 28, 1996

FLORIDA POWER & LIGHT COMPANY
 ENGINEERING & TECHNICAL SERVICES - CENTRAL LABORATORY
 STATE OF FLORIDA LABORATORY CERTIFICATION NUMBERS
 DRINKING WATER CERTIFICATION NUMBER: 56275
 ENVIRONMENTAL CHEMISTRY CERTIFICATION NUMBER: E56078
 COMPREHENSIVE QUALITY ASSURANCE PLAN NUMBER: 920041
 RIVIERA PLANT

ANALYSES OF FUEL OIL FIRED JUNE 1996

DATE SAMPLED FROM: 05/23/96	TO	06/19/96
API GRAVITY		9.0
DENSITY, LB/GAL		8.388
DENSITY, LB/BBL		352.296
HEAT OF COMBUSTION, BTU/LB		18246
HEAT OF COMBUSTION, BTU/GAL		153047
HEAT OF COMBUSTION, MBTU/BBL		6428
WATER, % BY VOLUME		0.2
COKING INDEX, % BY WEIGHT		8.2
SULFUR, % BY WEIGHT		1.9
SULFUR DIOXIDE EQUIVALENT, LB/MBTU		2.1
ASH, % BY WEIGHT		0.06
PARTICULATE EQUIVALENT, LB/MBTU		0.03
VANADIUM IN ASH AS V ₂ O ₅ , % BY WEIGHT		17
VANADIUM IN OIL AS V ₂ O ₅ , PPM		95
VANADIUM IN OIL AS V, PPM		53
VISCOSITY, SSF @ 122F		271

COMMENTS: NITROGEN=0.26 %
 COPIES TO: PRV PLANT MGR. PRV/PRV
 ENV. SPEC. - PRV/PRV
 TECHNICAL MANAGER PRV/PRV
 K. WASHINGTON - ETS/JB
 F-PRV-6 J. PRICE-ETS/JB

ANALYZED BY: *J. Chyano*
 CERTIFIED BY: *Al. [Signature]*
 JUNE 28, 1996

FLORIDA POWER & LIGHT COMPANY
 ENGINEERING & TECHNICAL SERVICES - CENTRAL LABORATORY
 STATE OF FLORIDA LABORATORY CERTIFICATION NUMBERS
 DRINKING WATER CERTIFICATION NUMBER: 55275
 ENVIRONMENTAL CHEMISTRY CERTIFICATION NUMBER: H56078
 COMPREHENSIVE QUALITY ASSURANCE PLAN NUMBER: 920041
 RIVIERA PLANT

ANALYSES OF FUEL OIL FIRED		JULY	1996
DATE SAMPLED FROM:	06/19/96	TO	07/19/96
API GRAVITY			9.5
DENSITY, LB/GAL			9.418
DENSITY, LB/BBL			383.556
HEAT OF COMBUSTION, BTU/LB			18144
HEAT OF COMBUSTION, BTU/GAL			152736
HEAT OF COMBUSTION, MBTU/BBL			6415
WATER, % BY VOLUME			<0.1
COKING INDEX, % BY WEIGHT			10.6
SULFUR, % BY WEIGHT			2.0
SULFUR DIOXIDE EQUIVALENT, LB/MBTU			2.2
ASH, % BY WEIGHT			0.07
PARTICULATE EQUIVALENT, LB/MBTU			0.04
VANADIUM IN ASH AS V2O5, % BY WEIGHT			18
VANADIUM IN OIL AS V2O5, PPM			124
VANADIUM IN OIL AS V, PPM			89
VISCOSITY, SSF @ 122F			343

COMMENTS: NITROGEN=0.32 %
 COPIES TO: PRV PLANT MGR. PRV/PRV
 ENV. SPEC. - PRV/PRV
 TECHNICAL MANAGER PRV/PRV
 K. WASHINGTON - STS/JE
 F-PRV-6 J. PRICE-STB/JE

ANALYZED BY: *[Signature]*
 CERTIFIED BY: *[Signature]*
 JULY 28, 1996

FLORIDA POWER & LIGHT COMPANY
 ENGINEERING & TECHNICAL SERVICES - CENTRAL LABORATORY
 STATE OF FLORIDA LABORATORY CERTIFICATION NUMBERS
 DRINKING WATER CERTIFICATION NUMBER: 56275
 ENVIRONMENTAL CHEMISTRY CERTIFICATION NUMBER: E56078
 COMPREHENSIVE QUALITY ASSURANCE PLAN NUMBER: 920041

RIVERA PLANT
 ANALYSES OF FUEL OIL FIRED AUGUST 1996

DATE SAMPLED FROM: 07/19/96	TO	08/21/96
API GRAVITY		8.4
DENSITY, LB/GAL		8.424
DENSITY, LB/BBL		353.808
HEAT OF COMBUSTION, BTU/LB		18075
HEAT OF COMBUSTION, BTU/GAL		152264
HEAT OF COMBUSTION, MBTU/BBL		6395
WATER, % BY VOLUME		0.2
COKING INDEX, % BY WEIGHT		9.9
SULFUR, % BY WEIGHT		2.2
SULFUR DIOXIDE EQUIVALENT, LB/MBTU		2.4
ASH, % BY WEIGHT		0.07
PARTICULATE EQUIVALENT, LB/MBTU		0.04
VANADIUM IN ASH AS V2O5, % BY WEIGHT		27
VANADIUM IN OIL AS V2O5, PPM		195
VANADIUM IN OIL AS V, PPM		109
VISCOSITY, SSF @ 122F		323

COMMENTS: NITROGEN=0.26 %, SODIUM=8MG/KG, ZINC=16MG/KG
 COPIES TO: PRV PLANT MGR. PRV/PRV ANALYZED BY: *J. Chapman*
 ENV. SPEC. - PRV/PRV TECHNICAL MANAGER PRV/PRV CERTIFIED BY: *H. M. [Signature]*
 K. WASHINGTON - ETS/JB
 F-PRV-6 J. PRICE-ETS/JB AUGUST 28, 1996

REC'D
OCT 11 1996
RIVIERA PLANT

FLORIDA POWER & LIGHT COMPANY
ENGINEERING & TECHNICAL SERVICES - CENTRAL LABORATORY
STATE OF FLORIDA LABORATORY CERTIFICATION NUMBERS
DRINKING WATER CERTIFICATION NUMBER: 56275
ENVIRONMENTAL CHEMISTRY CERTIFICATION NUMBER: E56078
COMPREHENSIVE QUALITY ASSURANCE PLAN NUMBER: 920041

RIVIERA PLANT
ANALYSES OF FUEL OIL FIRED

	SEPTEMBER 1996
DATE SAMPLED FROM: 08/21/96	TO 09/20/96
API GRAVITY	7.6
DENSITY, LB/GAL	8.478
DENSITY, LB/BBL	356.076
HEAT OF COMBUSTION, BTU/LB	18087
HEAT OF COMBUSTION, BTU/GAL	153342
HEAT OF COMBUSTION, MBTU/BBL	6440
WATER, % BY VOLUME	0.1
COKING INDEX, % BY WEIGHT	9.0
SULFUR, % BY WEIGHT	2.3
SULFUR DIOXIDE EQUIVALENT, LB/MBTU	2.5
ASH, % BY WEIGHT	0.08
PARTICULATE EQUIVALENT, LB/MBTU	0.03
VANADIUM IN ASH AS V2O5, % BY WEIGHT	28
VANADIUM IN OIL AS V2O5, PPM	174
VANADIUM IN OIL AS V, PPM	97
VISCOSITY, SSF @ 122F	249

COMMENTS: NITROGEN=0.29 %, SODIUM=5MG/KG, ZINC=7MG/KG

COPIES TO: PRV PLANT MGR. PRV/PRV

ANALYZED BY: J. Chapman

ENV. SPEC. - PRV/PRV

TECHNICAL MANAGER PRV/PRV

CERTIFIED BY: K. M. Daniel

K. WASHINGTON - ETS/JS

F-PRV-6 J. PRICE-ETS/JS

SEPTEMBER 28, 1996

FLORIDA POWER & LIGHT COMPANY
ENGINEERING & TECHNICAL SERVICES - CENTRAL LABORATORY
STATE OF FLORIDA LABORATORY CERTIFICATION NUMBERS
DRINKING WATER CERTIFICATION NUMBER: 58275
ENVIRONMENTAL CHEMISTRY CERTIFICATION NUMBER: E56078
COMPREHENSIVE QUALITY ASSURANCE PLAN NUMBER: 920041

RIVIERA PLANT		OCTOBER	1996
ANALYSES OF FUEL OIL FIRED			
DATE SAMPLED FROM:	TO		
09/20/96			10/22/96
API GRAVITY			7.8
DENSITY, LB/GAL			8.460
DENSITY, LB/BBL			335.320
HEAT OF COMBUSTION, BTU/LB			18157
HEAT OF COMBUSTION, BTU/GAL			153608
HEAT OF COMBUSTION, MBTU/BBL			6452
WATER, % BY VOLUME			0.1
COKING INDEX, % BY WEIGHT			9.6
SULFUR, % BY WEIGHT			2.1
SULFUR DIOXIDE EQUIVALENT, LB/MBTU			2.3
ASH, % BY WEIGHT			0.08
PARTICULATE EQUIVALENT, LB/MBTU			0.03
VANADIUM IN ASH AS V2O5, % BY WEIGHT			24
VANADIUM IN OIL AS V2O5, PPM			138
VANADIUM IN OIL AS V, PPM			77
VISCOSITY, SSF @ 122F			363

COMMENTS: NITROGEN=0.23 %
COPIES TO: PRV PLANT MGR. PRV/PRV
ENV. SPEC. - PRV/PRV
TECHNICAL MANAGER PRV/PRV
K. WASHINGTON - ETS/JE
F-PRV-8 J. PRICE-ETS/JB

ANALYZED BY: *[Signature]*
CERTIFIED BY: *[Signature]*
OCTOBER 28, 1996

FLORIDA POWER & LIGHT COMPANY
 ENGINEERING & TECHNICAL SERVICES - CENTRAL LABORATORY
 STATE OF FLORIDA LABORATORY CERTIFICATION NUMBERS

ENVIRONMENTAL CHEMISTRY CERTIFICATION NUMBER: E56078
 COMPREHENSIVE QUALITY ASSURANCE PLAN NUMBER: 920041

RIVIERA PLANT

ANALYSES OF FUEL OIL FIRED

NOVEMBER 1996

DATE SAMPLED FROM: 10/22/80	TO	11/19/96
API GRAVITY		8.6
DENSITY, LB/GAL		8.412
DENSITY, LB/BSL		353.304
HEAT OF COMBUSTION, BTU/LB		18157
HEAT OF COMBUSTION, BTU/GAL		152737
HEAT OF COMBUSTION, MBTU/BSL		6415
WATER, % BY VOLUME		0.1
COKING INDEX, % BY WEIGHT		9.5
SULFUR, % BY WEIGHT		2.1
SULFUR DIOXIDE EQUIVALENT, LB/MBTU		2.3
ASH, % BY WEIGHT		0.06
PARTICULATE EQUIVALENT, LB/MBTU		0.03
VANADIUM IN ASH AS V2O5, % BY WEIGHT		20
VANADIUM IN OIL AS V2O5, PPM		113
VANADIUM IN OIL AS V, PPM		63
VISCOSITY, SSF @ 122F		350

COMMENTS: NITROGEN=0.30 %
 COPIES TO: PRV PLANT MGR. PRV/PRV
 ENV. SPEC. - PRV/PRV
 TECHNICAL MANAGER PRV/PRV
 K. WASHINGTON - ETS/JB
 F-PRV-6 J. PRICE-ETS/JB

ANALYZED BY: *J. Chapman*

CERTIFIED BY: *K. Washington*

NOVEMBER 28, 1996

FLORIDA POWER & LIGHT COMPANY
CENTRAL LABORATORY
STATE OF FLORIDA LABORATORY CERTIFICATION NUMBERS

ENVIRONMENTAL CHEMISTRY CERTIFICATION NUMBER: E56078
COMPREHENSIVE QUALITY ASSURANCE PLAN NUMBER: 920041

RIVIERA PLANT

ANALYSES OF FUEL OIL FIRED DECEMBER 1996

DATE SAMPLED FROM: 11/19/96	TO	12/20/96
API GRAVITY		8.1
DENSITY, LB/GAL		8.442
DENSITY, LB/BBL		354.564
HEAT OF COMBUSTION, BTU/LB		18189
HEAT OF COMBUSTION, BTU/GAL		153562
HEAT OF COMBUSTION, MBTU/BBL		6449
WATER, % BY VOLUME		0.0
COKING INDEX, % BY WEIGHT		8.9
SULFUR, % BY WEIGHT		2.1
SULFUR DIOXIDE EQUIVALENT, LB/MBTU		2.3
ASH, % BY WEIGHT		0.05
PARTICULATE EQUIVALENT, LB/MBTU		0.03
VANADIUM IN ASH AS V2O5, % BY WEIGHT		19
VANADIUM IN OIL AS V2O5, PPM		100
VANADIUM IN OIL AS V, PPM		56
VISCOSITY, SSF @ 122F		348

COMMENTS: NITROGEN=0.23 %
COPIES TO: PRV PLANT MGR. PRV/PRV
ENV. SPEC. - PRV/PRV
TECHNICAL MANAGER PRV/PRV
K. WASHINGTON - ETS/JB
F-PRV-6 J. PRICE-ETS/JB

ANALYZED BY: *J. Chapman*
CERTIFIED BY: *J. Price*
DECEMBER 28, 1996



Asaibene Scott Lind 4/1

CLAIR

March 31, 1997

Ms. Virginia B. Wetherell, Secretary
State of Florida
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

**Re: Change of Responsible Official Designation
Title V Program**

Dear Ms. Wetherell:

This correspondence is to certify that Ms. Jay Asaibene has replaced Mr. John Lindsay as Plant General Manager of the FPL Riviera Plant. As Plant General Manager, Ms. Asaibene is authorized to act as the "Responsible Official" for that facility, pursuant to State Rule 62-213.200, F.A.C.. Ms. Asaibene is hereby authorized to act on behalf of Florida Power & Light Company on all Title V permit related activities for the Riviera plant.

Sincerely,

Adalberto Alfonso
Vice President
Power Generation Business Unit
Florida Power & Light Company

cc: Scott Sheplak
Tom Tittle

FDEP DARM
FDEP Southeast District

DEPARTMENT OF
ENVIRONMENTAL PROTECTION

APR 04 1997

OFFICE OF THE SECRETARY

Date: 3/26/97 1:26:53 PM
From: Jeffery Koerner WPB
Subject: FPL Riviera Beach Power Plant - Used Oil Fuel

Susan,

I checked the 1996 Annual Operating Report for this facility. They reported no used oil fuel burned during 1996. It is my understanding that the used oil fuel is mineral oil recovered from miscellaneous electrical components and stored at regional tank farms. These tank farms sample and analyze the used oil fuel to ensure that it meets the federal requirements for "on-specification" used oil fuel. It is then blended with No. 2 or No. 6 oil for burning in industrial-sized boilers on site at the tank farm. These boilers are used to heat and thin the No. 6 oil prior to pumping through the pipeline.

Although most of the FPL sites are allowed by permit to burn used oil fuels, they try not to because of the extra requirements to sample, analyze and keep records. They prefer to leave this fuel to the tanks farms. However, some of the gas turbines at various sites do burn used oil fuels containing less than 2 ppm of PCBs. The used oil fuels usually contain less than 0.5% sulfur by weight.

I also checked the quarterly fuel analyses submitted to our agency for the Riviera Beach Power Plant. These reports, dating back to 1995, indicate that no used oil fuel was burned at this plant. FPL does have a tank farm in Palm Beach County that does burn used oil fuel in industrial boilers. The facility ID number is 0990123.

I have attached Facility Emission Reports for each of these sites. Please call if you have any other questions.

Jeff

DEPARTMENT OF ENVIRONMENTAL PROTECTION
 AIR RESOURCES MANAGEMENT SYSTEM
 FACILITY EMISSION REPORT

26-MAR-97

Page:1

AIRS ID: 0990042 # of Emissions Unit: 4
 Owner: FLORIDA POWER & LIGHT
 Name: RIVIERA
 City: RIVIERA BEACH Office: SEPB County: PALM BEACH
 Status: A Compliance Tracking Code: A DFC: 25-SEP-96
 Type: STEAM ELECTRIC PLANT
 SIC: 4911 PSD: N PPS: N NSPS: NESHAP:
 Title V Source: Y Syn Non-Title V Source: Small Business Stationary:
 Major of HAPS: Major of Non-HAP Pollutants: Y
 Syn Minor of HAPS: Syn Minor of Non-HAP Pollutants:

Pollutant	Poten(TPY)	Allow(TPY)	1995 Actual(TPY)	1994 Actual(TPY)
PM	2338.8200		1464.1700	2006.7800
SO2	36768.2500		26765.7800	29640.1000
NOX	15898.4000		6202.3310	5732.4800
VOC	40.4750		215.3100	64.2800
CO	1157.3200		974.6880	427.6400
PM10	0.0000		1464.1700	2006.7800
PB	0.0000		0.0500	0.1800

(It looks like the PTE needs to be changed for some of these pollutants based on the NOx RACT permit revision; apparently the permit engineers did not make these changes yet.)

DEPARTMENT OF ENVIRONMENTAL PROTECTION
 AIR RESOURCES MANAGEMENT SYSTEM
 FACILITY EMISSION REPORT

26-MAR-97

Page:1


AIRS ID: 0990123 # of Emissions Unit: 6
 Owner: FLORIDA POWER & LIGHT
 Name: FPL - OSF/PDC
 City: RIVIERA BEACH Office: SEPB County: PALM BEACH
 Status: A Compliance Tracking Code: B DFC: 09-AUG-96
 Type: PETROLEUM STORAGE/TRANSFER
 SIC: 4911 PSD: N PPS: N NSPS: N NESHAP: N
 Title V Source: N Syn Non-Title V Source: Y Small Business Stationary: N
 Major of HAPS: N Major of Non-HAP Pollutants: N
 Syn Minor of HAPS: N Syn Minor of Non-HAP Pollutants: Y

Pollutant	Poten(TPY)	Allow(TPY)	1995 Actual(TPY)	1994 Actual(TPY)
VOC	9.3600		11.8260	0.0050
SO2	91.1800		2.9300	1.7515
PM	8.1300		2.7900	0.0500
NOX	30.2600		15.6100	0.4904
CO	6.9400		2.7000	0.1341
PM10	7.6300		1.5880	0.0000
PB	0.5800		0.0000	0.0000

(The actual VOC emissions reported for 1995 look too high; we're checking this now.)

Memorandum

To: Vito Giarrusso, FPL
Sent Via Fax: 561/691-7070

From: Joe Kahn, DEP, Title V Section 

Date: October 21, 1997

Re: FPL Riviera Draft Permit Comments
Draft Permit No. 0990042-001-AV

Per our teleconference October 9, 1997 and your comment letter dated October 8, 1997, following are the changes we propose to address your comments. Please look these over and call me with your comments.

For Facility-wide condition 10 electronic mail has been added as an option for submitting applicable correspondence. It has been noted that the Continuous Emission Monitoring data reported under the Acid Rain section is to be submitted to the Acid Rain Division in Washington.

10. Submittals. All reports, tests, notifications or other submittals required by this permit shall be submitted to the Broward County Department of Natural Resource Protection, Air Quality Division, and copies of those submittals shall be sent to the Department of Environmental Protection, Southeast District Office, Air Section. Certain correspondence may be submitted via electronic mail as appropriate. Certain Acid Rain Reports may be submitted to EPA's Acid Rain Division in Washington. Addresses and telephone numbers are:

...

In condition A.17 the wording "5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile" has been removed.

A.17. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

...

4. During each federal fiscal year (October 1 -- September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;
- b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 100 tons per year or more of any other regulated air pollutant; and
- c. Each NESHAP pollutant, if there is an applicable emission standard

Condition A.27 has been revised to refer to condition A.26.

Memo to Vito Giarrusso
October 21, 1997
Page 2 of 2

Condition A.34 has been revised:

A.34. Fuel Analyses Report. The owner or operator shall, by the fifteenth day of each month, submit to the Palm Beach County Health Department, Air Section, a report of fuel analyses that are representative of each fuel fired in the preceding month. The report shall document the heating value, the density or specific gravity, and the percent sulfur content by weight of each fuel fired.

[Rule 62-4.070(3) and 62-213.440, F.A.C., AO 50-206721 Specific Condition 3, AO 50-206722 Specific Condition 3]

Appendix E-1 has been revised per your request and now reads:

- ...
- 7. Hazardous waste accumulation building
- 8. Paint and lube buildings
- ...

We added to the footnote number 1 for Table 1-1 a statement that equivalent emissions are for each unit.

Apparently we published the Notice of Intent in the Palm Beach Post on October 8th, but we are still waiting for proof of publication. That puts us at November 7th as the earliest date to make this permit Proposed.

10/9/97 TELECONF.
FPL RIVIERA

TWY BANK - FPL RIVIERA

VITO GIARUSSO - FPL

JOE KANN, SUSAN DEVANE - DEP

FPL COMMENTS

P. 5, #10 OTHER CEMS REPORTS E-MAILED TO EPA

"CERTAIN CORRESPONDENCE MAY BE E-MAILED AS APPROPRIATE."

"CERTAIN ACID RAIN REPORTS MAY BE SUBMITTED TO EPA ACID RAIN DIVISION WASHINGTON."

P. 9 OK

P. 13 OK, TYPO.

P. 15 CONSISTENT W/ CURRENT PRACTICES.

APP. E-1 OK.

DEP COMMENTS

ADD NOTE TO TABLE 1-1 - EQUIV. EMISSIONS ARE FOR EACH UNIT.

OK W/ FPL.



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

October 8, 1997

Mr. Scott Scheplak, P.E.
 State of Florida
 Department of Environmental Protection
 Division of Air Resources Management
 Title V Section
 Mail Station #5505
 2600 Blair Stone Road
 Tallahassee, FL 32399-2400

Post-It™ brand fax transmittal memo 7671		# of pages ▶ 2
To S. SHEPLAK	From VITO GIARUSSO	
Co.	Co. FPL	
Dept.	Phone # 561-691-7061	
Fax #	Fax # 561-691-7070	

Re: Draft Permit No. 090042-001-AV
FPL Riviera Plant Initial Title V Air Operation 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. Listed below are suggested changes to the language in the draft permit.

Section II. Facility-wide Conditions

Page 5 - No. 10. Submittals: We propose adding an electronic mail as an additional option for applicable correspondence. Also note that Continuous Emission Monitoring data reported under the Acid Rain section is submitted to the Acid Rain Division in Washington.

Section III. Emissions Unit(s) and Conditions

Page 9 - Specific Condition A.17: Frequency of Compliance Tests (a) 4. b.: We request removing the wording "5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; ". The maximum potential to emit lead would be under the following unit conditions, burning 100% oil, at full load and for 8,760 hours resulting in .09 tons per year per unit. Acrylonitrile is not emitted.

Page 13 - Specific Condition A.27: Record Keeping and Reporting Requirements : The second sentence references specific condition A.27. The reference should be A.26.

Page 15 - Specific Condition A.34: Fuel Analysis Report: We request removing the word received and insert the word fired in the first sentence. In the second sentence we request rewording the sentence to read, The report shall document the heating value, the density or specific gravity, and the percent sulfur content by weight of each fuel fired.

Appendix E-1, List of Exempt Emissions Units and/or Activities:

Please revise descriptions no.7 to, Hazardous waste accumulation building and no. 8 to Paint and lube buildings.

Thank you for your prompt attention to the issues raised in this correspondence. Please do not hesitate to contact me at (561) 691-7061 if I may be of further assistance.

Very truly yours,



Vito Giarusso
Sr. Environmental Specialist
Florida Power & Light Company

BY: [Signature] DATE: [Signature]

BY: [Signature] DATE: [Signature]



RECEIVED

ULI 3 1996

BUREAU OF
AIR REGULATION

September 30, 1996

Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
State of Florida
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Electronic Submittal of FPL ~~Riviera Plant~~ Title V Application

Dear Mr. Fancy:

Enclosed, pursuant to DEP Rules 62-210.300(2), F.A.C., and 62-213.420(1)(a)1.a., F.A.C., please find four (4) electronic copies of the subject Title V permit application in the ELSA format. Please note that these are in addition to the four hard copies which have previously been submitted to your office.

If you have any questions regarding this application, please do not hesitate to contact me at (561) 625-7661.

Very truly yours,

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

Richard Piper
Senior Environmental Specialist
Florida Power & Light Company

cc:

DEP Southeast District Office (w/o att)

THE PALM BEACH POST

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

NO. 393840
PUBLIC NOTICE OF INTENT
TO ISSUE TITLE V
AIR OPERATION PERMIT
STATE OF FLORIDA
DEPARTMENT
OF ENVIRONMENTAL
PROTECTION
Title V DRAFT Permit No.:
0990042-001-AV
Riviera Plant
Palm Beach County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Florida Power and Light Company for the Riviera Plant located at 200-300 Broadway, Riviera Beach, Palm Beach County. The applicant's name and address are: Florida Power and Light Company, FPL Environmental Services Department, 700 Universe Blvd., Juno Beach, FL 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 conditions 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, 2600 Blair Stone Road, Mall 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 filed pursuant to Sections 120.569 and 120.57, Florida Statutes (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, 3900 Commonwealth Boulevard, Mall Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). 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 this 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 28-5.207 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 per-

PROOF OF PUBLICATION

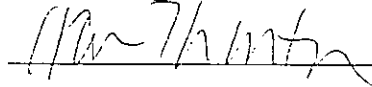
STATE OF FLORIDA
COUNTY OF PALM BEACH

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 P.O. #: ~~00000~~ in the --- Court, was published in said newspaper in the issues of October 8, 1997. 830999

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 14 day of October A.D. 1997



Personally known XX or Produced Identification _____
Type of Identification Produced _____

Karen McLinton
Notary Public, State of Florida
Commission No. OC 591337
My Commission Exp. 11/15/2000
Florida Notary Public Bonding Co.

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 may be different from the position 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 7661d(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 7661d(b)(1), 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 arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 401 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: 850/488-1344
Fax: 850/922-6979

Affected District
/Local Program:
Mr. Isidore Goldman,
Southeast District Office
400 North Congress Avenue
West Palm Beach, FL 33401
Telephone: 561/681-6600
Fax: 561/681-6790

Mr. James Stormer,
Palm Beach County
Health Department
901 Evernia Street,
P.O. Box 29

West Palm Beach, FL 33401
Telephone: 561/355-3070
Fax: 561/355-2442


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. Sheplak, P.E., at the above address, or call 850/488-1344, for additional information.

PUB: The Palm Beach Post
October 8, 1997

Environmental Protection

Memorandum

TO: Isidore Goldman, SED

FROM: Bruce Mitchell 

DATE: January 22, 1997

SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit
Florida Power & Light, Riviera Beach: 0990042-001-AV

The Title V operating permit application package for the referenced facility is being processed in Tallahassee. The application was previously forwarded to your office for your files and future reference. Please have someone review the package for completeness and respond in writing by February 24, 1997, if you have any comments. Otherwise, no response is required. If there are any questions, please call the project engineer, Susan C. DeVore, at 904/488-1344 or SC:278-1344. It is very important to verify the compliance statement regarding the facility. Since we do not have a readily effective means of determining compliance at the time the application was submitted, please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. Also, do not write on the documents.

If there are any questions regarding this request, please call me or Scott Sheplak at the above number(s).

RBM/bjb

cc: Joe Kahn



RECEIVED

JUL 14 1997

BUREAU OF
AIR REGULATION

July 7, 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

Re: FPL Riviera Plant
Title V Permit Request for Additional Information

Dear Mr. Sheplak:

This correspondence is in response to your letter of April 24, 1997. Following are responses to each of the concerns raised in your letter.

A. Application Information

1. From the Application Comment section it is noted that "the facility at one time operated a 75 MW steam generating unit (Unit 2, permit # AO50-174444); however this unit is no longer in service". Please provide the date the unit was removed from service. Has the permit been surrendered to the Department? If so, please provide the letter.

Response: This unit last operated for power production in 1985. The permit was not, however surrendered to the Department. By copy of this letter, FPL formally relinquishes the permit for this unit to the Department.

B. Facility Information

1. Please provide a copy of document PRVFS_11.txt, Identification of Additional Applicable Requirements. The referenced document appears to be missing from Section E.

Response: The reference to the document was in error. Additional applicable requirements are listed in each of the Emission Unit sections of the application. I have attached a revised Section II.E. Facility Supplemental Information page without the incorrect reference.

2. Attachment to the application, List of Unregulated Trivial and De Minimis Activities, contained a consolidated listing of trivial activities, unregulated emissions units and activities that you propose for exemption. Please resubmit as follows:

a) Group the unregulated activities into logical groupings of emissions units and indicate any pollutants that have the potential to emit quantities equal to or greater than the threshold levels specified in Rules 62-213.420(3)(c)3. and 4., F.A.C., from each of the unregulated emissions units.

b) Identify emissions units that you claim should be exempted and provide adequate information to demonstrate that emissions levels are below the levels established for exemption at Rule 62-213.430(6), F.A.C.

c) Do not include trivial activities in the application.

Response: The majority of the activities are, in fact trivial, and have been eliminated from our list per your request.

Activities requested for exemption are as follows:

<u>Item</u>	<u>Rationale</u>
Natural gas metering area relief valves	Safety equipment is exempted by Rule 62-210.300(3)(a)22k F.A.C..
Hydrazine mixing tank	This is an aqueous product stored in stainless steel bins. Typically the facility uses less than two, 135-gallon bins per year; therefore the emissions of hydrazine are below the 1,000 lb. threshold.
Fuel Oil storage tanks and related systems	Combined VOC emissions of the fuel oil storage tanks & equipment are less than the 5 ton threshold.
Lube Oil system	Lubricating oil has a low volatility. There is insufficient quantity on hand at facility to produce a 5 ton release.
Oil / water Separators and related equipment	VOC's are below the 5 ton threshold.
Hazardous Waste Bldg.	Drums are maintained closed. Less than the threshold quantity of any regulated air pollutant.

Paint / Lube Bldg.

Containers are maintained closed. Less than the threshold quantity of any regulated air pollutant.

Miscellaneous mobile vehicle operation (cars, light trucks, heavy duty trucks, backhoes, tractors, forklifts, cranes, etc.)

Exempted by Rule 62-210.300(3)(a)5.

Unregulated Activities are proposed as follows:

1. Painting and solvent cleaning - VOC emissions could exceed 5 TPY
2. Mobile Equipment and Engines - combined Nox emissions could exceed 5 TPY
3. Emergency Diesel Generator - NOx, CO, VOC, PM and SO₂ emissions could each exceed 5 TPY if the generator is operated 8,760 hours per year.

3. In the pollutant identification sections of the application, Sections C (facility) and G (units 3 and 4), what does "HAP" refer to?

Response: The references should have been "HAPS". I have attached corrected pages to this submittal.

C. Emission Units 3 and 4: Boilers

1. The maximum permitted sulfur content is 2.5 percent, by weight. In permits AO 50-206721 and AO 50-206722, the sulfur content is to be verified by submittal of monthly fuel analyses reports and stack testing for SO₂ using EPA Method 6 is required if the sulfur content of the fuel exceeds 2.5 percent, by weight. Please confirm FPL relies upon its own sampling and analysis program. Please confirm no stack tests for SO₂ have been conducted. Please advise if you wish to avoid such compliance test requirements by requesting a maximum fuel oil sulfur content limit of 2.5 percent, by weight, and then relying on fuel sampling and analysis to demonstrate compliance.

Response: FPL does currently rely upon its own sampling and analysis program for fuel sulfur content. The maximum permitted sulfur dioxide emissions are 2.75 lb / mmBtu. FPL may occasionally purchase fuel oil containing in excess of 2.5% sulfur, to be co-fired in the Riviera boiler units with other, lower sulfur oil, or with natural gas. In lieu of performing stack sampling for sulfur dioxide emissions, we propose to submit a certification document to the Southeast District office on a quarterly basis, stating that sufficient natural gas or other low-sulfur fuel was co-fired in the Riviera units along with any fuel with sulfur content higher than 2.5%, to ensure that the 2.75 lb / mmBtu emission limit was not exceeded. Attached is an example certification document for your review. Please note that FPL has utilized this approach at other facilities in our system at the Department's suggestion, for similar situations.

2. In Section L for Unit 3 it appears that document PRVU1_1.bmp, Process Flow Diagram, is labeled as PRVEU1_1.bmp. In Section L for Unit 3 it appears that document PRVU1_4.bmp, Description of Stack Sampling Facilities, is labeled as PRVU1_1.bmp. In Section L for Unit 4 it appears that document PRVU2_1.bmp, Process Flow Diagram, is labeled as PRVEU2_1.bmp. In Section L for Unit 4 it appears that document PRVU2_4.bmp, Description of Stack Sampling Facilities is labeled as PRVU2_1.bmp. Please confirm or correct this.

Response: Your observations are correct. I have revised the various Section L's, which are attached for your use.

3. Also, "Previously Submitted" should have been entered in the Acid Rain Application - Phase II form information blank instead of "Not Applicable" in Section L.

Response: Noted. A corrected Section L is attached.

4. Are Units 3 and 4 front wall fired, natural circulation, 24-burner, compact furnaces and thus subject to Rule 62-296.570(4)(b)3., F.A.C. as you have identified as the applicable requirement in the application?

Response: Yes, that is the description for these units.

I trust that this letter will address the various concerns that were raised in your April 24th letter. Please do not hesitate to contact me at (561) 691-7058 if I may be of further assistance.

Very truly yours,



Rich Piper
Sr. Environmental Specialist
Florida Power & Light Company

7/14/97 cc: Scott Sheplek
Susan DeVore

Quarterly Fuel Certification

This is to certify that during the ___ quarter 199__ all residual oil containing > 2.5% sulfur fired in either of the Riviera Plant units was co-fired with sufficient natural gas or other low-sulfur fuel to ensure that the permitted emission limit of 2.75 lb / mmBtu of sulfur dioxide was not exceeded.

Jay Asaibene
Plant General Manager

E. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements for All Applications For Facility :/

1. Area Map Showing Facility Location: PRVFS-1.bmp (Enter the Attached Document ID, NA - Not Applicable, Waived - WaiverRequested, or Attach an Electronic Submission File)
2. Facility Plot Plan: PRVFS-2.bmp (Enter the Attached Document ID, NA - Not Applicable, Waived - WaiverRequested, or Attach an Electronic Submission File)
3. Process Flow Diagram(s): PRVFS-3.bmp (Enter the Attached Document ID, NA - Not Applicable, Waived - WaiverRequested, or Attach an Electronic Submission File)
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: PRVFS-4.txt (Enter the Attached Document ID, NA - Not Applicable, Waived - WaiverRequested, or Attach an Electronic Submission File)
5. Fugitive Emissions Identification : PRVFS-5.txt (Enter the Attached Document ID, NA - Not Applicable, Waived - WaiverRequested, or Attach an Electronic Submission File)
6. Supplemental Information for Construction Permit Application: NA (Enter the Attached Document ID, NA - Not Applicable, or Attach an Electronic Submission File)

Additional Supplemental Requirements for Category I Applications Only

7. List of Proposed Exempt Activities: Not Applicable (Enter the Attached Document ID, NA - Not Applicable, or Attach an Electronic Submission File)
8. List of Equipment/Activities Regulated under Title VI: PRVFS-8.txt (Enter the Attached Document ID, NA - Not Applicable, Onsite - Equipment/Activities Onsite but not Required to be Individually Listed, or Attach an Electronic Submission File)
9. Alternative Methods of Operation: PRVFS-9.txt (Enter the Attached Document ID, NA - Not Applicable, or Attach an Electronic Submission File)
10. Alternative Modes of Operation (Emissions Trading): NA (Enter the Attached Document ID, NA - Not Applicable, or Attach an Electronic Submission File)
11. Identification of Additional Applicable Requirements: NA (Enter the Attached Document ID, NA - Not Applicable, or Attach an Electronic Submission File)

12. Compliance Assurance Monitoring Plan: NA

(Enter the Attached Document ID, NA - Not Applicable, or Attach an Electronic Submission File)

13. Risk Management Plan Verification: PLANNED

(Enter the Attached Document ID, NA - Not Applicable, Plan Submit - Plan to be submitted to Implementing Agency by Required Date, or Attach an Electronic Submission File)

14. Compliance Report and Plan: PRVFS-13.txt

(Enter the Attached Document ID, NA - Not Applicable, or Attach an Electronic Submission File)

15. Compliance Statement (Hard-copy Required): PRVFS-14.txt

(Enter the Attached Document ID, NA - Not Applicable)

C. FACILITY POLLUTANTS

Facility Pollutant Information :

1. Pollutant Emitted:	2. Pollutant Classification
SO2	A
NOX	A
CO	A
VOC	A
PM	A
PM10	A
H133	A
H106	A
H107	A
SAM	A
HAPS	A

**G. EMISSIONS UNIT POLLUTANTS
(Regulated Emissions Units Only)**

Information for Facility_ID: 1 Emission Unit #: 1

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
SO2	NA	NA	EL
NOX	024	NA	EL
CO	NA	NA	NS
VOC	NA	NA	NS
PM	077	NA	EL
PM10	077	NA	NS
H133	NA	NA	NS
H106	NA	NA	NS
H107	NA	NA	NS
SAM	NA	NA	NS
HAPS	NA	NA	NS

**G. EMISSIONS UNIT POLLUTANTS
(Regulated Emissions Units Only)**

Information for Facility_ID: 1 Emission Unit #: 2

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
SO2	NA	NA	EL
NOX	024	NA	EL
CO	NA	NA	NS
VOC	NA	NA	NS
PM	077	NA	EL
PM10	077	NA	NS
H133	NA	NA	NS
H106	NA	NA	NS
H107	NA	NA	NS
SAM	NA	NA	NS
HAPS	NA	NA	NS

**L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Information for Facility-ID : / Emission Unit # : /

Supplemental Requirements for All Applications

<p>1. Process Flow Diagram : PRVEU1_1.bmp (Enter the Attached Document ID, NA - Not Applicable, Waived - WaiverRequested, or Attach an Electronic Submission File)</p>
<p>2. Fuel Analysis or Specification: PRVU1_2.txt (Enter the Attached Document ID, NA - Not Applicable, Waived - WaiverRequested, or Attach an Electronic Submission File)</p>
<p>3. Detailed Description of Control Equipment : PRVU1_3.txt (Enter the Attached Document ID, NA - Not Applicable, Waived - WaiverRequested, or Attach an Electronic Submission File)</p>
<p>4. Description of Stack Sampling Facilities : PRVU1_1.bmp (Enter the Attached Document ID, NA - Not Applicable, Waived - WaiverRequested, or Attach an Electronic Submission File)</p>
<p>5. Compliance Test Report : NA (Enter the Attached Document ID, NA - Not Applicable, A valid Previously Submitted date, or Attach an Electronic Submission File)</p>
<p>6. Procedures for Startup and Shutdown : PRVU1_6.txt (Enter the Attached Document ID, NA - Not Applicable, or Attach an Electronic Submission File)</p>
<p>7. Operation and Maintenance Plan : NA (Enter the Attached Document ID, NA - Not Applicable, or Attach an Electronic Submission File)</p>
<p>8. Supplemental Information for Construction Permit Application : NA (Enter the Attached Document ID, NA - Not Applicable, or Attach an Electronic Submission File)</p>
<p>9. Other Information Required by Rule or Statute : NA (Enter the Attached Document ID, NA - Not Applicable, or Attach an Electronic Submission File)</p>

Additional Supplemental Requirements for Category I Applications Only

<p>10. Alternative Methods of Operation : PRVU1_10.txt (Enter the Attached Document ID, NA - Not Applicable, or Attach an Electronic Submission File)</p>
<p>11. Alternative Modes of Operation (Emissions Trading) : NA (Enter the Attached Document ID, NA - Not Applicable, or Attach an Electronic Submission File)</p>
<p>12. Identification of Additional Applicable Requirements : PRVU1_12.txt (Enter the Attached Document ID, NA - Not Applicable, or Attach an Electronic Submission File)</p>
<p>13. Enhanced Monitoring Plan : NA (Enter the Attached Document ID, NA - Not Applicable, or Attach an Electronic Submission File)</p>
<p>14. Acid Rain Permit Application</p> <p>Acid Rain Application - Phase II (Form No. 17-210.900(1)(a)) Attached Document ID: Previously Submitted</p> <p>Repowering Extension Plan (Form No. 17-210.900(1)(b)) Attached Document ID: NA</p> <p>New Unit Exemption (Form No. 17-210.900(1)(c)) Attached Document ID: NA</p> <p>Retired Unit Exemption (Form No. 17-210.900(1)(c)) Attached Document ID: NA</p> <p>(For each Document, Enter the Attached Document ID or NA - Not Applicable)</p>

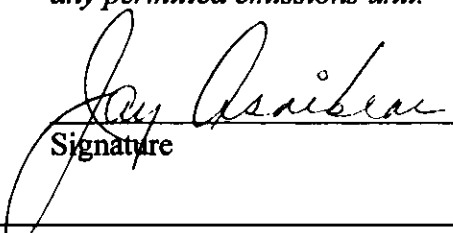
**L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Information for Facility-ID : / Emission Unit # : 2

Supplemental Requirements for All Applications

1. Process Flow Diagram : PRVEU2_1.bmp (Enter the Attached Document ID, NA - Not Applicable, Waived - WaiverRequested, or Attach an Electronic Submission File)
2. Fuel Analysis or Specification: PRVU1_2.txt (Enter the Attached Document ID, NA - Not Applicable, Waived - WaiverRequested, or Attach an Electronic Submission File)
3. Detailed Description of Control Equipment : PRVU1_3.txt (Enter the Attached Document ID, NA - Not Applicable, Waived - WaiverRequested, or Attach an Electronic Submission File)
4. Description of Stack Sampling Facilities : PRVU2_1.bmp (Enter the Attached Document ID, NA - Not Applicable, Waived - WaiverRequested, or Attach an Electronic Submission File)
5. Compliance Test Report : NA (Enter the Attached Document ID, NA - Not Applicable, A valid Previously Submitted date, or Attach an Electronic Submission File)
6. Procedures for Startup and Shutdown : PRVU1_6.txt (Enter the Attached Document ID, NA - Not Applicable, or Attach an Electronic Submission File)
7. Operation and Maintenance Plan : NA (Enter the Attached Document ID, NA - Not Applicable, or Attach an Electronic Submission File)
8. Supplemental Information for Construction Permit Application : NA (Enter the Attached Document ID, NA - Not Applicable, or Attach an Electronic Submission File)
9. Other Information Required by Rule or Statute : NA (Enter the Attached Document ID, NA - Not Applicable, or Attach an Electronic Submission File)

Owner/Authorized Representative or Responsible Official

<p>1. Name and Title of Owner/Authorized Representative or Responsible Official: Name: Ms. Jay Asaibene Title : Plant General Manager</p>
<p>2. Owner or Responsible Official Mailing Address: Organization/Firm: FPL Environmental Services Department Street Address: 700 Universe Blvd City: Juno Beach State: FL Zip Code: 33408</p>
<p>3. Owner or Responsible Official Telephone Numbers: Telephone: 5618453101 Fax: 5618453155</p>
<p>4. Owner or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200 F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statues of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i></p> <p> _____ Signature</p> <p>_____ 5/23/97 Date</p>

* Attach letter of authorization if not currently on file.

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for a emission unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emission units (check here if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Lonnie Adams

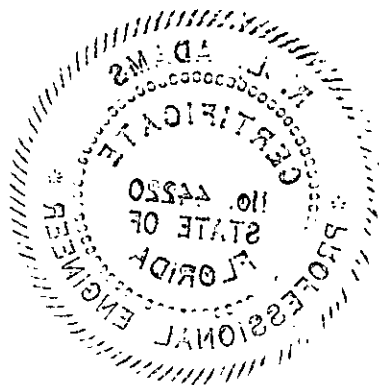
Signature

6/18/97

Date

(seal)

* Attach any exception to certification statement.



Supplement to Professional Engineer Certification Statement

This information supplements the original Title V application for the FPL Riviera plant of June 1996 which was certified by Ken Kosky of KBN Engineering & Applied Sciences. This certification statement applies only to the following items included in this supplemental package submitted on May 25, 1997:

- List of Proposed Exempt Activities
- List of Proposed Unregulated Activities

Ronnie Adams

Signature 6/18/97

6/18/97

Date

(seal)

