



# FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Rick Scott  
Governor

Carlos Lopez-Cantera  
Lt. Governor

Noah Valenstein  
Secretary

*(Sent by Electronic Mail – Return Receipt Requested)*

Mr. Gary Kowalczyk, Regional Plant Manager  
Florida Power and Light (FPL) Company  
9700 S.W. 344th Street  
Homestead, Florida 33035

Re: Title V Air Operation Permit Renewal  
Proposed Permit No. 0250003-030-AV  
Turkey Point Fossil Plant

Dear Mr. Kowalczyk:

One copy of the proposed permit determination for the renewal of the Title V air operation permit for the Turkey Point Fossil Plant located in Miami-Dade County, 10 miles east of Florida City on SW 344 Street, Homestead, Florida, is enclosed. This letter is only a courtesy to inform you that the draft permit has become a proposed permit.

An electronic version of this determination has been posted on the Division of Air Resource Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review.

Interested persons may view the proposed permit by visiting the following website:

<https://fldep.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the proposed Title V air operation permit is made by the USEPA within 45 days, the proposed permit will become a final permit no later than 55 days after the date on which the proposed permit was mailed (posted) to USEPA. If USEPA has an objection to the proposed permit, the final permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Lara Rabbath, at 850-717-9082, or by email at [Lara.Rabbath@dep.state.fl.us](mailto:Lara.Rabbath@dep.state.fl.us).

Sincerely,

*For:*

Syed Arif, P.E., Program Administrator  
Office of Permitting and Compliance  
Division of Air Resource Management  
SA/dlr/lcr

Copies sent by electronic mail to the following:

Gary Kowalczyk, FPL: [Gary.Kowalczyk@fpl.com](mailto:Gary.Kowalczyk@fpl.com)  
Brian McCaul, FPL: [Brian.McCaul@fpl.com](mailto:Brian.McCaul@fpl.com)  
Christina Akly, P.E., FPL: [Christina.Akly@fpl.com](mailto:Christina.Akly@fpl.com)  
Gary Andersen, FPL: [Gary.Andersen@fpl.com](mailto:Gary.Andersen@fpl.com)  
Southeast District: [sed.air@dep.state.fl.us](mailto:sed.air@dep.state.fl.us)  
Mr. Rick Garcia, Miami-Dade RER: ([garcima@miamidade.gov](mailto:garcima@miamidade.gov))  
DEP Siting Office: [SCO@dep.state.fl.us](mailto:SCO@dep.state.fl.us)  
EPA Region 4: [R4TitleVFL@epa.gov](mailto:R4TitleVFL@epa.gov)  
Ms. Lynn Searce, DEP OPC: [lynn.searce@dep.state.fl.us](mailto:lynn.searce@dep.state.fl.us)

## NOTICE OF PROPOSED PERMIT

---

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

## PROPOSED PERMIT DETERMINATION

---

### Permit No. 0250003-030-AV

#### I. Public Notice.

An Intent to Issue Air Permit issued to FPL for the Turkey Point Fossil Plant located in Miami-Dade County, was clerked on August 3, 2018. The Public Notice of Intent to Issue Air Permit was published in Miami Today on August 23, 2018. The draft Title V air operation permit was available for public inspection at the permitting authority's office in Tallahassee. Proof of publication of the Public Notice of Intent to Issue Air Permit was received on August 24, 2018.

#### II. Public Comment(s).

No comments were received from the public during the 30-day public comment period; however, comments were received from the Permittee. The comments were not considered significant enough to reissue the draft Title V air operation permit and require another Public Notice; therefore, the draft Title V air operation permit was changed. Those comments are addressed below. Additions to the permit are indicated by a double underline. Deletions from the permit are indicated by a ~~strike through~~.

#### Applicant

1. *Comment:* The visible emissions (VE) limit seen in Specific Condition **A.11.** of Draft Permit No. 02500003-030-AV is applicable to natural gas operation. However, if Unit 5 must startup on oil, it will not be able to meet the VE limits. On other facility permits with the same issue, e.g. Lauderdale Power Plant Unit 6, the language has been revised to ensure units can meet the limit for periods of startup, shutdown and malfunction (SSM) for both fuels.

*Response:* At this time, the Department will not process the request to revise Specific Condition **A.11.** (Alternate Visible Emissions Standard). Specific Condition **A.11.** (as seen in Draft Permit No. 02500003-030-AV) cites Permit No. 0250003-006-AC and the application for an air construction permit revision excluded mention of this request. Therefore, the applicant must submit a new application to address this issue.

2. *Comment:* Please consider including additional text to clarify the optional CO CEMS to the testing requirements contained in Specific Condition **A.19.** (Annual Compliance Tests) of Draft Permit No. 0250003-030-AV.

*Response:* The Department has established the requested revisions into Final Permit No. 0250003-029-AC and the changes are reflected in Specific Condition **A.19.** of the proposed permit.

3. *Comment:* Please consider including text to clarify the testing requirements of 40 CFR part 75 and Rule 62-297.310, F.A.C.

*Response:* The following changes have been made to Specific Condition **A.20.** (Compliance Tests Prior to Renewal) as a result of this request:

Compliance Tests Prior To Renewal. Prior to permit renewal, compliance tests shall be performed for the following pollutants: VE, CO, VOC (if the CO test indicates an exceedance of the CO standard), NO<sub>x</sub> (if substitution with the 40 CFR 75 RATA is not performed) and ammonia. The permittee may submit the most recent compliance test to satisfy this requirement, provided such test occurred within the term of the current operating permit. [Rules 62-210.300(2)(a) & 62-297.310(8)(b), F.A.C.; and, Permit No. 0250003-024-AC (PSD-FL338B)]

#### III. Conclusion.

The enclosed proposed Title V air operation permit includes the aforementioned changes to the draft Title V air operation permit. The permitting authority will issue the proposed permit No. 0250003-030-AV, with the changes noted above.