

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

RECEIVED  
SEP 17 2002  
BUREAU OF AIR REGULATION

IN RE:  
FLORIDA POWER & LIGHT CO.  
MANATEE COUNTY, FLORIDA

DRAFT REVISION TO TITLE V  
DRAFT PERMIT NO. 0810010-008-AV  
OGC CASE NO. 02-1066

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**NOTICE OF WITHDRAWAL OF  
REQUEST FOR ENLARGEMENT OF TIME**

By and through undersigned counsel, Florida Power & Light Co. ("FPL") hereby gives notice:

1. On July 23, 2002, FPL requested, pursuant to Florida Administrative Code Rule 62-110.106(4), an Enlargement of Time, to and including August 22, 2002, in which to file a Petition for Administrative Proceedings in the above-styled matter.

2. On August 23, 2002, FPL requested an additional extension of time to and including October 7, 2002 in which to file a Petition for Administrative Proceedings in the above-styled matter.


3. FPL and the Department have reached agreement on all issues involving the above-referenced permit. The agreement between FPL and the Department is reflected in correspondence dated August 23, 2002 and September 7, 2002, copies of which are attached to this Notice (Exhibits A-1 and A-2). The Department has agreed to issue the referenced Title V air operation permit with certain changes that satisfactorily address FPL's concerns with the permit, obviating the need for an enlargement of time.

Therefore, FPL hereby withdraws its Request for Enlargement of Time, conditioned

upon the Department's issuance of the air construction permit in accordance with the Department's agreement with FPL.

Respectfully submitted this 16<sup>th</sup> day of September, 2002.

HOPPING GREEN & SAMS, P.A.

By: 

Peter C. Cunningham  
Florida Bar No. 0321907  
Angela R. Morrison  
Florida Bar No. 0855766  
Post Office Box 6526  
Tallahassee, FL 32314  
850-222-7500

Attorneys for FLORIDA POWER & LIGHT CO.

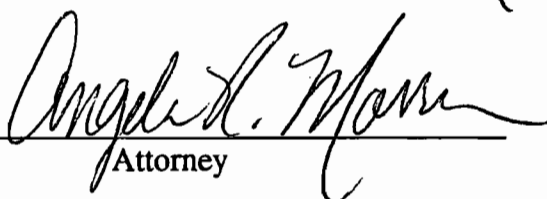
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by U.S. Mail on this 16<sup>th</sup> day of September, 2002:

Jeff Koerner  
Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road, MS 5505  
Tallahassee, FL 32399-2400

Scott Sheplak  
Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road, MS 5505  
Tallahassee, FL 32399-2400

W. Douglas Beason, Esq.  
Department of Environmental Protection  
Office of General Counsel  
3900 Commonwealth Blvd.  
Tallahassee, FL 32399

  
\_\_\_\_\_  
Attorney



August 23, 2002

Jeff Koerner – Permit Engineer  
Bureau of Air Regulation  
State of Florida  
Department of Environmental Protection  
2600 Blair Stone Road  
Mail Station #5505  
Tallahassee, FL 32399-2400

**Re: Manatee Plant Draft Title V Revision Permit No. 0810010-008-AV**

Dear Mr. Koerner:

FPL would like to provide you with comments to the Draft Title V Permit referenced above. Our general comments follow in prose form, followed by a marked-up copy of the permit [Attachment No.1] with the suggested language that we believe is consistent with our comments. Deletions in the marked-up version are indicated by strikethrough, added language is indicated by underline.

Our first comment is that the Title V revision be conformed to the language agreed to, approved, and incorporated into the recent Final Air Construction Permit No. 08100010-007-AC issued by the Department.

Additional Comments:

Specific Condition No. A3: The sentence reading “When available, the Department strongly encourages the permittee to fire natural gas as a clean-burning alternative to fuel oil” should be deleted, as it is not an enforceable requirement.

Specific Condition No. A9: Conform the language referring to sulfur content in natural gas with the Air Construction Permit which includes a permitting note regarding the sulfur content of natural gas.

Specific Condition No. A16: Delete paragraph (c). There is no requirement to monitor heat input except during compliance testing.

Specific Condition No. A24: Delete the 4<sup>th</sup> paragraph that requires monthly record keeping for sulfur content in natural gas which is in conformance with the Air Construction Permit referenced above.

Specific Conditions No. A39 & A40: Conform the language to the Air Construction Permit referenced above.



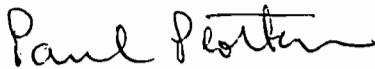
Appendix S, Table 1-1, Page S2 (of 3): Delete the SO<sub>2</sub> standard for natural gas (10 gr S/ 100 SCF of gas) and the associated Equivalent Emissions for gas SO<sub>2</sub>.

Appendix S, Table 2-1, Page S3 (of 3): Delete the annual PM and VE testing for Gas.

Appendix H, Permit History, Page H1 (of 1): Delete the reference to Air Construction Permit 0810010-006-AC. It is for Unit 3, not Units 1 & 2. Also, Permit 0810010-007-AC is no longer "Draft", but "Final".

Thank you for your consideration in this matter. If you should have any questions, please feel free to contact me at (941) 776-5211, or Kevin Washington at (561) 691-2877.

Sincerely yours,



Paul Plotkin

Manatee Plant General Manager

Attachment: 1

C.c.s: Clair Fancy  
Al Linero  
Scott Sheplak

Bcc FPL only: Lynn French  
Mary Maxwell  
Kevin Washington

PMT/PMT  
PMT/PMT  
JES/JB

Florida Power & Light Company  
Manatee Power Plant  
Facility ID No. 0810010  
Manatee County

Title V Air Operation Permit  
DRAFT Permit No. 0810010-008-AV  
(Revision to Initial Title V Air Operation Permit No. 0810010-001-AV)

Permitting Authority:

State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
Title V Section

Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Telephone: 850/488-0114  
Fax: 850/922-6979

Initial Title V Air Operation Permit  
DRAFT Permit No. 0810010-008-AV

Table of Contents

<u>Section</u>	<u>Page Number</u>
Placard Page .....	1
I. Facility Information .....	2
A. Facility Description.	
B. Summary of Emissions Unit ID No(s). and Brief Description(s).	
C. Relevant Documents.	
II. Facility-wide Conditions .....	3 - 4
III. Emissions Units and Conditions	
A. Emissions Units 1 & 2, Fossil Fuel Steam Generators .....	5 - 175
IV. Acid Rain Part	
A. Acid Rain, Phase II .....	186 - 197
Attachments .....	end



**Permittee:**

Florida Power & Light Company

**DRAFT Permit No.** 0810010-008-AV

**Facility ID No.** 0810010

**SIC Nos.** 49, 4911

**Project:** Revised Title V Air Operation Permit

This permit is for the operation of the Manatee Plant. This facility is located at 19050 State Road 62, Parrish, Manatee County; UTM Coordinates: Zone 17, 367.250 km East and 3054.150 km North; Latitude: 27° 36' 21" North and Longitude: 82° 20' 44" West.

**STATEMENT OF BASIS:** This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

**Previous administrative permit corrections incorporated into revised Title V permit:**

Notice of Administrative Permit Correction dated 07/16/98

Notice of Administrative Permit Correction dated 09/14/98

**Referenced attachments made a part of this permit:**

Appendix U-1, List of Unregulated Emissions Units and/or Activities

Appendix I-1, List of Insignificant Emissions Units and/or Activities

Appendix TV-1, Title V Conditions (version dated 12/02/97)

Appendix SS-1, Stack Sampling Facilities (version dated 10/07/96)

Table 297.310-1, Calibration Schedule (version dated 10/07/96)

Phase II Acid Rain Application/Compliance Plan received 12/6/95

Alternate Sampling Procedure: ASP Number 97-B-01

Order Granting Reduced Sampling Frequency, OGC Case Nos. 83-0580

and 83-0581, Order dated April 24, 1984

Order Extending Permit Expiration Date

**Effective Date:** January 1, 1999

**Revision Date:** (DRAFT)

**Renewal Application Due Date:** July 5, 2003

**Expiration Date:** December 31, 2003

(DRAFT)

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Howard L. Rhodes, Director

Division of Air Resources Management

**Section I. Facility Information.**

**Subsection A. Facility Description.**

This facility consists of two fossil fuel steam generators, Unit 1 and Unit 2, each rated at 800 megawatts (MW) (900 MW gross capacity) output. The steam generators each burn a variable combination of natural gas, No. 6 fuel oil, No. 2 fuel oil, propane, and used oil from FPL operations, discharging pollutants through a stack 499 feet above ground level. Each unit is a Foster-Wheeler oil fired steam generator, equipped with multiple cyclones, a flue gas recirculation system and staged combustion. Each operates a Westinghouse tandem compound, reheat-type extraction turbine.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the initial Title V permit application received June 12, 1996, this facility is a major source of hazardous air pollutants (HAPs).

**Subsection B. Summary of Emissions Unit ID Nos. and Brief Descriptions.**

<b>E.U. ID No.</b>	<b>Brief Description</b>
001	Fossil Fuel Steam Generator, Unit 1
002	Fossil Fuel Steam Generator, Unit 2
<b>Unregulated Emissions Units and/or Activities</b>	
003	Emergency Diesel Generator, Miscellaneous Mobile Equipment and Internal Combustion Engines
004	Painting of Plant Equipment and Non-halogenated Solvent Cleaning Operations

*Please reference the Permit No., Facility ID No., and appropriate Emissions Units ID Nos. on all correspondence, test report submittals, applications, etc.*

**Subsection C. Relevant Documents.**

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

- Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
- Appendix H-1, Permit History/ID Number Changes
- Table 1-1, Summary of Air Pollutant Standards and Terms
- Table 2-1, Summary of Compliance Requirements

These documents are on file with the permitting authority:

- Initial Title V Permit Application received June 12, 1996
- Additional Information Request dated May 13, 1997
- Additional Information Response received August 15, 1997
- DEP Letter to US EPA Region 4 dated March 10, 1998
- US EPA Region 4 letter to DEP received March 25, 1998
- Air Permit No. 0810010-007-AC issued on (DRAFT)

## Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-1, TITLE V CONDITIONS, is a part of this permit.  
{Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}
2. **Not Federally Enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited.** The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.  
[Rule 62-296.320(2), F.A.C.]
3. **General Particulate Emission Limiting Standards. General Visible Emissions Standard.** Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.  
[Rule 62-296.320(4)(b)1. & 4, F.A.C.]
4. **Prevention of Accidental Releases (Section 112(r) of CAA).** If required by 40 CFR 68, the permittee shall submit to the implementing agency:
  - a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and
  - b. certification forms and/or RMPs according to the promulgated rule schedule.[40 CFR 68]
5. **Unregulated Emissions Units and/or Activities.** Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.  
[Rule 62-213.440(1), F.A.C.]
6. **Insignificant Emissions Units and/or Activities.** Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.  
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]
7. **Not Federally Enforceable. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions.** The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The owner or operator shall:
  - a. Tightly cover or close all VOC or OS containers when they are not in use.
  - b. Tightly cover all open tanks which contain VOC or OS when they are not in use.
  - c. Maintain all pipes, valves, fittings, etc., which handle VOC or OS in good operating condition.
  - d. Immediately confine and clean up VOC or OS spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.[Rule 62-296.320(1)(a), F.A.C.]

**8. Not Federally Enforceable.** No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a. The facility shall construct temporary sandblasting enclosures when necessary, in order to perform sandblasting on fixed plant equipment.
- b. Maintenance of paved areas as needed.
- c. Regular mowing of grass and care of vegetation.
- d. Limiting access to plant property by unnecessary vehicles.
- e. Bagged chemical products are stored in concrete block buildings until they are used.
- f. ~~f.~~ Spills of powdered chemical products are cleaned up as soon as practicable.
- g. During construction, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary.

[Rule 62-296.320(4)(c)2., F.A.C., proposed by the applicant in the initial Title V permit application received June 12, 1996]

**9.** When appropriate, any recording, monitoring or reporting requirements that are time-specific shall be in accordance with the effective date of this permit, which defines day one.

[Rule 62-213.440, F.A.C.]

**10. Statement of Compliance.** The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within 60 (sixty) days after the end of the calendar year. {See condition No. 51., Appendix TV-1, Title V Conditions}

[Rule 62-214.420(11), F.A.C.]

**11. Submittals.** All reports, tests, notifications or other submittals required by this permit shall be submitted to the Department's Southwest District, Air Section:

Department of Environmental Protection  
Southwest District Office  
3804 Coconut Palm Drive  
Tampa, FL 33619-8218  
Telephone: 813/744-6100  
Fax: 813/744-6458

Any reports, data, notifications, certifications and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency  
Region 4  
Air, Pesticides & Toxics Management Division  
Operating Permits Section  
61 Forsyth Street  
Atlanta, GA 30303  
Phone: 404/562-9099  
Fax: 404/562-9095

**Section III. Emissions Units and Conditions.**

**Subsection A. This section addresses the following emissions unit(s).**

E.U. ID No.	Brief Description
001	Fossil Fuel Steam Generator, Unit 1
002	Fossil Fuel Steam Generator, Unit 2

Fossil fuel fired steam generators Unit 1 and Unit 2 are each nominal 800 megawatt (900 MW gross capacity) (electric) steam generators designated as Manatee Plant Unit 1 and Unit 2. The emissions units are fired on a variable combination of natural gas, No. 6 fuel oil, No. 2 fuel oil, propane, and used oil from FPL operations. Propane is utilized primarily for ignition of the main fuel. When firing fuel oil (or combinations of authorized fuels), the maximum heat input for each boiler is 8650 mmBtu per hour. When firing natural gas alone, the maximum heat input for each boiler is 5670 MMBtu per hour.

Each emissions unit consists of a boiler which drives a turbine generator. Emissions are controlled with multiple cyclones, a flue gas recirculation system and staged combustion. The twin register low-NOx burners (ABB Combustion Services, Ltd.) are dual fuel with mechanical atomization for oil firing. Each unit is equipped with a 499 foot stack.

{Permitting notes: These emissions units are regulated under Acid Rain, Phase II; and Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input. Fossil fuel fired steam generator Unit 1 began commercial operation in 1976 and fossil fuel fired steam generator Unit 2 began commercial operation in 1977. These emissions units may inject additives such as magnesium oxide, magnesium hydroxide and related compounds into each boiler.}

**The following specific conditions apply to the emissions units listed above:**

**Essential Potential to Emit (PTE) Parameters**

**A.1. Permitted Capacity.** The maximum operation heat input rates are as follows:

Unit No.	mmBtu/hr Heat Input	Fuel Type
1	8650	No. 2 or 6 Fuel Oil <u>(Alone or w/Natural Gas)</u>
	5670	Natural Gas <u>(Alone)</u>
2	8650	No. 2 or 6 Fuel Oil <u>(Alone or w/Natural Gas)</u>
	5670	Natural Gas <u>(Alone)</u>

[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.405, F.A.C.; Permit No. 0810010-007-AC]

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.}

**A.2. Emissions Unit Operating Rate Limitation After Testing.** See specific condition A.26 and A.27 of this permit.  
[Rule 62-297.310(2), F.A.C.]

**A.3. Methods of Operation - Fuels.**

- a. Startup: The only fuels allowed to be burned are any combination of natural gas, No. 6 fuel oil, No. 2 fuel oil and propane.
- b. Normal: The only fuels allowed to be burned are any combination of natural gas, No. 6 fuel oil, No. 2 fuel oil, propane and on-specification used oil from FPL operations.  
When available, the Department strongly encourages the permittee to fire natural gas as a clean-burning alternative to fuel oil.

[Rule 62-213.410, F.A.C.; Permit No. 0810010-007-AC]

**A.4. Hours of Operation.** The emissions units may operate continuously, i.e., 8,760 hours/year.  
[Rule 62-210.200(PTE), F.A.C.]

**Emission Limitations and Standards**

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**A.5. Visible Emissions.** Visible emissions shall not exceed 40 percent opacity. Emissions units governed by this visible emissions standard shall compliance test for particulate matter emissions annually.  
[Rule 62-296.405(1)(a), F.A.C.; and OGC Case Nos. 83-0580 & 83-0581, Order dated April 24, 1984.]

**A.6. 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.

Visible emissions above 60 percent opacity shall be allowed for not more than 4, six (6)-minute periods, during the 3-hour period of excess emissions allowed by this condition.

[Rule 62-210.700(3), F.A.C., Note: these units have operational continuous opacity monitors.]

**A.7. Particulate Matter.** Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods.  
[Rule 62-296.405(1)(b), F.A.C.]

**A.8. Particulate Matter - Soot Blowing and Load Change.** Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.  
[Rule 62-210.700(3), F.A.C.]

**A.9. Sulfur Dioxide.** The sulfur content of fuel oils burned shall not exceed 1.0 percent by weight, as received at the plant. ~~The sulfur content of natural gas shall not exceed 10 grains of sulfur per 100 standard cubic feet of natural gas.~~ {Permitting Note: The maximum fuel sulfur

*content of pipeline natural gas is 10 grains of sulfur per 100 standard cubic feet of natural gas. However, pipeline quality natural gas typically contains less than 1 grain of sulfur per 100 SCF of natural gas.* The blending of natural gas shall not be used to demonstrate compliance with the sulfur dioxide standard for "liquid fuel" in Rule 62-296.405(c), F.A.C. See specific conditions A.9, A.15, A.23 and A.24 of this permit.

[Rules 62-213.440 and 62-296.405(1)(c)1.g., F.A.C., and applicant agreement with EPA on March 3, 1998, and Permit No. 0810010-007-AC]

**A.10. Nitrogen Oxides.** Nitrogen oxides emissions shall not exceed 0.30 pounds per million Btu heat input. Compliance shall be demonstrated based on a 30-day rolling average as measured by a continuous emission monitoring system (CEMS). The CEMS must meet the performance specifications contained in 40 CFR 75.

[Rules 62-296.405(1)(d)2. and (1)(d)4., F.A.C., AO 41-204804 and AO 41-219341, Issued August 30, 1993]

#### **Excess Emissions**

**A.11.** Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

**A.12.** Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.

[Rule 62-210.700(2), F.A.C.]

**A.13.** Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

#### **Monitoring of Operations**

**A.14. Annual Tests Required.** Except as provided in specific conditions A.17 through A.19 of this permit, emission testing for particulate emissions and visible emissions shall be performed annually, each federal fiscal year, except for units that are not operating because of scheduled maintenance outages and emergency repairs, which will be tested within thirty days of returning to service.

[Rules 62-4.070(3) and 62-213.440, F.A.C.]

**A.15. Sulfur Dioxide.** The permittee elected to demonstrate compliance using fuel sampling and analysis. This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions A.9, A.23 and A.24 of this permit.

[Rule 62-296.405(1)(f)1.b., F.A.C.]

**A.16. Determination of Process Variables.**

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine

process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

~~(c) The permittee shall install, operate, and maintain a system to continuously monitor and record the amount of natural gas consumption and heat input. This system shall be designed to interact with the existing continuous emissions monitors.~~

[Rule 62-297.310(5) and 62-4.070(3), F.A.C.; Permit No. 0810010-007-AC]

**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.

(a) General Compliance Testing.

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid fuel for more than 400 hours other than during startup.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
- b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

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.

5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.



(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C., SIP approved]

**A.18. When VE Tests Not Required**. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rule 62-297.310(7)(a)4., F.A.C.]

**A.19. When PM Tests Not Required**. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

### **Test Methods and Procedures**

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**A.20. Visible emissions**. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. See specific condition **A.21** of this permit. VE testing shall be conducted in accordance with the requirements of specific condition **A.27** of this permit.

[Rule 62-296.405(1)(e)1., F.A.C.]

**A.21. DEP Method 9.** The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
  - a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
  - b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value. [Rule 62-297.401, F.A.C.]

**A.22. Particulate Matter.** The test methods for particulate emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17. Particulate testing shall be conducted in accordance with the requirements of specific conditions A.26 and A.27 of this permit. [Rules 62-213.440, 62-296.405(1)(e)2., and 62-297.401, F.A.C.]

**A.23. Sulfur Dioxide.** The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedences of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. **The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, as an alternate sampling procedure authorized by permit, the permittee elected to demonstrate compliance using fuel sampling and analysis.** See specific conditions A.9 and A.24 of this permit.

[Rules 62-213.440, 62-296.405(1)(e)3. and 62-297.401, F.A.C.]

**A.24. Fuel Sampling and Analysis Methods:** The following fuel sampling and analysis protocol shall be used as an alternate sampling procedure authorized by permit to demonstrate compliance with the sulfur dioxide standard:

Compliance with the liquid fuel sulfur limit shall be verified by a fuel analysis provided by the vendor or performed by FPL upon each fuel delivery at the Port Manatee Fuel Oil Terminal with the following exception: in cases where No. 6 fuel oil is received with a sulfur content exceeding 1.0 percent by weight, and blending at the terminal is required to obtain a fuel mix equal to the applicable percent sulfur limit, an analysis of a fuel sample representative of fuel from the fuel storage tanks shall be performed by FPL prior to transferring oil to the Manatee plant. Reports of percent sulfur content of these analyses shall be maintained at the power plant facility.

The owner or operator shall maintain records of the as-fired fuel oil heating value, density or specific gravity, and the percent sulfur content. Fuel sulfur content, percent by weight, for liquid fuels shall be determined by either ASTM D2622-94, ASTM D4294-90 (95), ASTM D1552-95, ASTM D1266-91, or both ASTM D4057-88 and ASTM D129-95 (or latest editions) to analyze a representative sample of the fuel oil.

~~Compliance with the fuel sulfur limit for natural gas shall be demonstrated by keeping monthly reports obtained from the vendor indicating the average sulfur content of the natural gas being supplied from the pipeline for each month of operation. Methods for determining the sulfur content of the natural gas shall be the most recent versions of ASTM methods D4084-82, D3246-81 or other equivalent methods approved by the Department.~~

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b., 62-4.070(3) and 62-297.440, F.A.C.; applicant agreement with EPA on March 3, 1998; Permit No. 0810010-007-AC]

**A.25. Required Number of Test Runs.** For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

**A.26. Operating Rate During Testing.** Testing of emissions shall be conducted with each emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new

test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

**A.27. Operating Conditions During Testing - PM and VE.** When required, testing for particulate matter and visible emissions shall be conducted while firing No. 6 fuel oil at the maximum allowable rate of 8650 million Btu per hour, except as provided below. Particulate and visible emissions shall be conducted under both sootblowing and non-sootblowing conditions, and shall be conducted while injecting additives consistent with normal operating practices.

Testing may be conducted while firing No. 6 fuel oil at less than 90 percent of the maximum allowable rate; however, subsequent emissions unit operation is limited as described in specific condition A.26 of this permit.

[Rules 62-4.070(3) and 62-213.440 F.A.C., AO 41-204804 Specific Condition 5, AO 41-219341 Specific Condition 5]

**A.28. Calculation of Emission Rate.** The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

**A.29. Applicable Test Procedures.**

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1 (attached to this permit).

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

[Rule 62-297.310(4), F.A.C.]

**A.30. Required Stack Sampling Facilities.** When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.  
[Rule 62-297.310(6), F.A.C.]

**A.31. Testing While Injecting Additives.** The owner or operator shall conduct emission tests while injecting additives consistent with normal operating practices.  
[Rule 62-213.440, F.A.C., applicant agreement with EPA on March 3, 1998]

**Record Keeping and Reporting Requirements**

**A.32. Excess Emissions - Malfunctions.** In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department's Southwest District, Air Section, in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department's Southwest District, Air Section.  
[Rule 62-210.700(6), F.A.C.]

**A.33. Excess Emissions - Reports.** Submit to the Department's Southwest District, Air Section, a written report of emissions in excess of emission limiting standards for opacity and sulfur dioxide as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years.  
[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

**A.34. Test Reports.**

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department's Southwest District, Air Section, on the results of each such test.
- (b) The required test report shall be filed with the Department's Southwest District, Air Section, as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department's Southwest District, Air Section, to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
1. The type, location, and designation of the emissions unit tested.
  2. The facility at which the emissions unit is located.
  3. The owner or operator of the emissions unit.
  4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
  5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
  6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
  7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
  8. The date, starting time and duration of each sampling run.

9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

**A.35. Fuel Analysis Report.** The owner or operator shall, by the fifteenth day following each calendar month, submit to the Department's Southwest District, Air Section, a report of fuel analyses that are representative of each fuel received in the preceding month. The report shall document the heating value, 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 41-204804 Specific Condition 6, AO 41-219341 Specific Condition 6]

**A.36. COMS for Periodic Monitoring.** The owner or operator is required to install continuous opacity monitoring systems (COMS) pursuant to 40 CFR Part 75. The owner or operator shall maintain and operate COMS and shall make and maintain records of opacity measured by the COMS, for purposes of periodic monitoring.

[Rule 62-213.440, F.A.C., and applicant agreement with EPA on March 3, 1998]

### **Miscellaneous Conditions**

**A.37. Used Oil.** Burning of on-specification used oil is allowed at this facility in accordance with all other conditions of this permit and the following additional conditions:

- a. **On-specification Used Oil Allowed as Fuel:** This permit allows the burning of used oil fuel meeting EPA "on-specification" used oil specifications, with a PCB concentration of less than 50 ppm, originating from FPL operations. Used oil that does not meet the specifications for on-specification used oil shall not be burned at this facility.

On-specification used oil shall meet the following specifications: [40 CFR 279, Subpart B.]

Arsenic shall not exceed 5.0 ppm;  
Cadmium shall not exceed 2.0 ppm;  
Chromium shall not exceed 10.0 ppm;  
Lead shall not exceed 100.0 ppm;  
Total halogens shall not exceed 1000 ppm;  
Flash point shall not be less than 100 degrees F.

- b. Quantity Limited: The maximum total quantity of used oil that may be burned in both emissions units is 40,000 gallons in any consecutive 12-month period.
- c. Used Oil Containing PCBs Not Allowed: Used oil containing a PCB concentration of 50 or more ppm shall not be burned at this facility. Used oil shall not be blended to meet this requirement.
- d. PCB Concentration of 2 to less than 50 ppm: On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall be burned only at normal source operating temperatures. On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall not be burned during periods of startup or shutdown.
- e. Testing Required: The owner or operator shall sample and analyze each batch of used oil to be burned for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point, PCBs.

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods), latest edition.

Split samples of the used oil shall be retained for three months after analysis for further testing if necessary.

[AO 41-204804 Specific Condition 9, and AO 41-219341 Specific Condition 9]

- f. Record Keeping Required: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department: [40 CFR 279.61 and 761.20(e)]
  - (1) The gallons of on-specification used oil received and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
  - (2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
  - (3) Results of the analyses required above.
- g. Reporting Required: The owner or operator shall submit to the Department's Southwest District, Air Section, within thirty days of the end of each calendar month in which used

oil is burned, the analytical results and the total amount of on-specification used oil burned during the previous calendar month

The owner or operator shall submit, with the Annual Operation Report form, the analytical results and the total amount of on-specification used oil burned during the previous calendar year.

[Rules 62-4.070(3) and 62-213.440, F.A.C., 40 CFR 279 and 40 CFR 761, unless otherwise noted]

**A.38. Construction Notifications:** Within 15 days of beginning construction, the permittee shall notify the Compliance Authority that construction has commenced. Within 15 days of completing construction, the permittee shall notify the Compliance Authority that construction has concluded. Each notification shall include an updated proposed schedule of activities through the initial shakedown period and the firing of natural gas. [Rule 62-4.070(3), F.A.C.; Permit No. 0810010-007-AC]

**A.39. Initial Compliance Tests for Gas Firing:** When firing 100% natural gas, the permittee shall conduct initial compliance tests to determine the emissions of particulate matter and level of opacity from Units 1 and 2. Test results shall demonstrate compliance with the applicable standards. A transmissometer calibrated in accordance with Rule 62-297.520, F.A.C., may also be used to demonstrate compliance with the visible emissions standard. Initial tests shall be conducted within 60 days after completing shakedown for each unit, but not later than 180 days after first fire on natural gas. [Rule 62-296.405(1)(e)1, F.A.C.; Permit No. 0810010-007-AC]

**A.40. PSD Applicability Report:** Before ~~March~~ August 1<sup>st</sup> of each year, the permittee shall submit a report to the Bureau of Air Regulation and the Compliance Authority summarizing annual emissions for the previous year. The reports shall be used to verify the permittee's predictions of future representative actual annual emissions. ~~made during the project to add natural gas.~~ The reports shall be submitted for five separate years that are representative of normal post-change operations after completing construction of the natural gas project. The reports shall begin during the first year that natural gas is fired and continue for five years. Reports are subject to the following conditions.

a. The Department determines the "past actual emissions" for Units 1 and 2 as follows:

<u>Pollutant</u>	<u>Past Actual Emissions Two-Year Average Tons per Year</u>	<u>Future Representative Actual Annual Emissions Calculation Methods</u>
<u>Carbon Monoxide (CO)</u>	<u>18,987</u>	<u>AOR (oil), Initial/Annual Performance Test (gas)</u>
<u>Nitrogen Oxides (NOx)</u>	<u>8179 8762</u>	<u>CEMS, Acid Rain Reporting</u>
<u>Particulate Matter (PM)</u>	<u>2384</u>	<u>AOR (oil); Initial Performance Tests (oil and gas)</u>
<u>Sulfur Dioxide (SO2)</u>	<u>31,753</u>	<u>CEMS, Acid Rain Reporting</u>
<u>Volatile Organic Compounds (VOC)</u>	<u>149</u>	<u>AOR (oil), Initial Performance Test (gas)</u>



“Past actual annual emissions” are based on: the two-year average for operation during 2000 and 2001; annual CO, PM, and VOC emissions reported in the certified Annual Operating Reports submitted by the permittee; and data collected by the Continuous Emissions Monitoring Systems for NO<sub>x</sub> and SO<sub>2</sub> emissions as reported indicated by the EPA Scorecard values for the Acid Rain Program. “Future actual annual emissions” shall be based on: actual annual fuel combustion (heat input) rates; tested emission rates for CO (gas), PM (oil and gas), and VOC (gas); a series of annual tested emission rates for CO (gas); certified Annual Operating Report data for CO (oil), PM (oil), and VOC (oil); and data collected by the Continuous Emissions Monitoring Systems for NO<sub>x</sub> and SO<sub>2</sub> emissions as indicated by the EPA Scorecard values reported for the Acid Rain Program. The calculation methodology shall remain consistent from year to year.

- b. In accordance with 40 CFR 52.21(b)(33)(ii), the permittee shall, “Exclude, in calculating any increase in emissions that results from the particular physical change or change in the method of operation at an electric utility steam generating unit, that portion of the unit’s emissions following the change that could have been accommodated during the representative baseline period and is attributable to an increase in projected capacity utilization at the unit that is unrelated to the particular change, including any increased utilization due to the rate of electricity demand growth for the utility system as a whole.” The permittee shall identify and quantify the excluded emissions and present a justification for the exclusion.
- c. Each report shall compare the actual emissions for the given year with the past actual annual emissions as described above. If the difference between the current actual annual emissions and the past actual annual emissions defined above is greater than the PSD significant emission rates defined in Table 212.400-2 of Chapter 62-212, F.A.C., then Units 1 and 2 shall be subject to a full PSD review at that time. This review shall include a determination of the Best Available Control Technology (BACT) for each PSD-significant pollutant.
- d. Performance Test Methods: ~~When firing natural gas, the permittee shall conduct performance tests to determine the emissions of carbon monoxide, particulate matter, and volatile organic compounds from Units 1 and 2. These tests shall be used to document the emission rates of these pollutants for use in the PSD Applicability Reports. Tests shall be conducted at least once during each year the reports are required. The test methods for particulate matter are specified in Condition A.22. The test method for carbon monoxide shall be EPA Method 10. The test method for volatile organic compounds shall be EPA Method 25 or 25A. Optionally, EPA Method 18 may be conducted in conjunction with EPA Method 25A to deduct emissions of methane and ethane. EPA methods are described in 40 CFR 60, Appendix A, and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used for testing unless prior written approval is received from the Department.~~

[Rules 62-204.800, 62-210.200(11), 62-212.400, and 62-297.100, F.A.C.; 40 CFR 52.21(b)(33)(ii); 40 CFR 60, Appendix A; Permit No. 0810010-007-AC]

**Section IV. This section is the Acid Rain Part.**

**Operated by:** Florida Power and Light Company  
**ORIS code:** 6042

**Subsection A. This subsection addresses Acid Rain, Phase II.**

The emissions units listed below are regulated under Acid Rain, Phase II.

<b>E.U. ID No.</b>	<b>Brief Description</b>
001	Fossil Fuel Steam Generator, Unit 1
002	Fossil Fuel Steam Generator, Unit 2

**A.1.** The Phase II permit application(s) submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these Phase II acid rain unit(s) must comply with the standard requirements and special provisions set forth in the application(s) listed below:

- a. DEP Form No. 62-210.900(1)(a), dated July 1, 1995.  
 [Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

**A.2.** Sulfur dioxide (SO<sub>2</sub>) allowance allocations for each Acid Rain unit are as follows:

<b>E.U. ID No.</b>	<b>EPA ID</b>	<b>Year</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>
001	ID No. 01 PMT1	SO <sub>2</sub> allowances, under Table 2 or 3 of 40 CFR Part 73	13654*	13654*	13654*	13654*
002	ID No. 02 PMT2	SO <sub>2</sub> allowances, under Table 2 or 3 of 40 CFR Part 73	12581*	12581*	12581*	12581*

\* The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2 or 3 of 40 CFR 73.

**A.3. Emission Allowances.** Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

1. No permit revision shall be required for increase in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.400(3), F.A.C.
2. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.
3. Allowances shall be accounted for under the Federal Acid Rain Program.

[Rule 62-213.440(1)(c), F.A.C.]

**A.4. Fast-Track Revisions of Acid Rain Parts.** Those Acid Rain sources making a change described at Rule 62-214.370(4), F.A.C., may request such change as provided in Rule 62-213.413, Fast-Track Revisions of Acid Rain Parts.  
[Rule 62-213.413, F.A.C.]

**A.5. Comments, notes, and justifications: None.**

**Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers**  
(version dated 02/05/97)

**Abbreviations and Acronyms:**

°F: Degrees Fahrenheit  
BACT: Best Available Control Technology  
CFR: Code of Federal Regulations  
DEP: State of Florida, Department of Environmental Protection  
DARM: Division of Air Resource Management  
EPA: United States Environmental Protection Agency  
F.A.C.: Florida Administrative Code  
F.S.: Florida Statute  
ISO: International Standards Organization  
LAT: Latitude  
LONG: Longitude  
MMBtu: million British thermal units  
MW: Megawatt  
ORIS: Office of Regulatory Information Systems  
SOA: Specific Operating Agreement  
UTM: Universal Transverse Mercator

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**Citations:**

*The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, permit numbers, and ID numbers.*

**Code of Federal Regulations:**

*Example:* [40 CFR 60.334]

Where:	40	reference to	Title 40
	CFR	reference to	Code of Federal Regulations
	60	reference to	Part 60
	60.334	reference to	Regulation 60.334

**Florida Administrative Code (F.A.C.) Rules:**

*Example:* [Rule 62-213, F.A.C.]

Where:	62	reference to	Title 62
	62-213	reference to	Chapter 62-213
	62-213.205	reference to	Rule 62-213.205, F.A.C.

**ISO:** International Standards Organization refers to those conditions at 288 degrees K, 60 percent relative humidity, and 101.3 kilopascals pressure.

**Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers  
(continued)**

**Identification Numbers:**

Facility Identification (ID) Number:

*Example:* Facility ID No.: 1050221

*Where:*

105 = 3-digit number code identifying the facility is located in Polk County  
0221 = 4-digit number assigned by state database.

Permit Numbers:

*Example:* 1050221-002-AV, or  
1050221-001-AC

*Where:*

AC = Air Construction Permit  
AV = Air Operation Permit (Title V Source)  
105 = 3-digit number code identifying the facility is located in Polk County  
0221 = 4-digit number assigned by permit tracking database  
001 or 002 = 3-digit sequential project number assigned by permit tracking database

*Example:* PSD-FL-185  
PA95-01  
AC53-208321

*Where:*

PSD = Prevention of Significant Deterioration Permit  
PA = Power Plant Siting Act Permit  
AC = old Air Construction Permit numbering

**Appendix I-1, List of Insignificant Emissions Units and/or Activities**

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62.210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

<b>Brief Description of Emissions Units and/or Activities</b>
1. Spent boiler chemical cleaning liquid evaporation.
2. Propane relief valves
3. Hydrazine mixing tank an relief valves.
4. Fuel oil storage tanks and related equipment.
5. Lube oil tank vents and extraction vents
6. Oil/water separators and related equipment
7. Miscellaneous mobile vehicle operation (cars, light trucks, heavy-duty trucks, backhoes, tractors, forklifts, cranes, etc.)

Appendix H-1, Permit History/ID Number Changes

Permit History (for tracking purposes):

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date	Extended Date <sup>1,2</sup>	Revised Date(s)	
001	Fossil Fuel Steam Generator, Unit 1	AO41-204804*	08/30/93	01/14/97		05/27/97	
		<del>0810010-001-AV</del>	<del>05/29/98</del>	<del>12/31/03</del>			
		<del>0810010-002-AV</del>	(Revised Initial Application)				
		<del>0810010-003-AV</del>	Title V Administrative Permit Correction				07/16/98
		<del>0810010-004-AV</del>	Title V Administrative Permit Correction				09/14/98
		<del>0810010-005-AC</del>	<del>12/22/99</del>				
		<del>0810010-006-AC</del>	<del>Pending</del>				
		<del>0810010-007-AC</del>	<del>(Draft) 08/12/02</del>	<del>(Draft) 07/01/2003</del>			
		0810010-008-AV	Revision of Title V Permit No. 0810010-001-AV			(Draft)	
002	Fossil Fuel Steam Generator, Unit 2	AO41-219341*	08/30/93	01/14/97		05/27/97	
		<del>0810010-001-AV</del>	<del>05/29/98</del>	<del>12/31/03</del>			
		<del>0810010-002-AV</del>	(Revised Initial Application)				
		<del>0810010-003-AV</del>	Title V Administrative Permit Correction				07/16/98
		<del>0810010-004-AV</del>	Title V Administrative Permit Correction				09/14/98
		<del>0810010-005-AC</del>	<del>12/22/99</del>				
		<del>0810010-006-AC</del>	<del>Pending</del>				
		<del>0810010-007-AC</del>	<del>(Draft) 08/12/02</del>	<del>(Draft) 07/01/2003</del>			
		0810010-008-AV	Revision of Title V Permit No. 0810010-001-AV			(Draft)	

\* These permits were partially revised by Operation Permit Amendments, 0810010-002-AO.

ID Number Changes (for tracking purposes):

From: Facility ID No.: 40MAN410010

To: Facility ID No.: 0810010

Notes:

1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.

2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

**Appendix U-1, List of Unregulated Emissions Units and/or Activities**

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘insignificant emissions units’.

<b>E.U. ID No.</b>	<b>Brief Description of Emissions Units and/or Activity</b>
003	Emergency Diesel Generator, Miscellaneous Mobile Equipment and Internal Combustion Engines
004	Painting of Plant Equipment and Non-halogenated Solvent Cleaning Operations



Appendix S  
Permit Summary Tables

Table 1-1, Summary of Air Pollutant Emission Standards

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Emissions Unit	Brief Description
001	Fossil Fuel Steam Generator, Unit 1, heat input of 8650 mmBtu/hr on fuel oil
002	Fossil Fuel Steam Generator, Unit 2, heat input of 8650 mmBtu/hr on fuel oil

Pollutant	Fuel(s)	Hours per Year	Allowable Emissions			Equivalent Emissions <sup>1</sup>		Regulatory Citations	See Permit Condition(s)
			Standard(s)	lb/hour	TPY	lb/hour	TPY		
VE Steady State	Gas, Oil, Propane	8760	40% opacity					Rule 62-296.405(1)(a), F.A.C.	A.5
VE Soot Blowing or Load Change	Gas, Oil, Propane	8760	60 % opacity (>60% opacity for not more than 4, six-minute periods)					Rule 62-210.700(3), F.A.C.	A.6
PM Steady State	Gas/Oil, Propane	8760	0.1 lb/mmBtu			865, 865	3,789, 43*	Rule 62-296.405(1)(b), F.A.C.	A.7
PM Soot Blowing or Load Change	Gas/Oil, Propane	8760	0.3 lb/mmBtu			2,595, 2,595	1,421, 130*	Rule 62-210.700(3), F.A.C.	A.8

\* The equivalent annual emissions for propane are based on the expected annual usage of propane reported by the applicant primarily as a startup fuel. Propane usage is not limited by this permit.

Appendix S  
Permit Summary Tables

Table 1-1, Summary of Air Pollutant Emission Standards, Continued

Emissions Unit		Brief Description							
001		Fossil Fuel Steam Generator, Unit 1							
002		Fossil Fuel Steam Generator, Unit 2							

Pollutant	Fuels	Hours per Year	Allowable Emissions			Equivalent Emissions <sup>1</sup>		Regulatory Citations	See Permit Condition(s)
			Standard(s)	lb/hour	TPY	lb/hour	TPY		
SO <sub>2</sub>	Oil, Propane	8760	1.1 lb/mmBtu			9,515 (oil)	41,676 (oil)	Rules 62-213.440 & 62-296.405(1)(c)1.g., F.A.C.	A.9
	Gas	8760	<del>10 gr S/100</del> SCF of gas			156 (gas)	683 (gas)	Permit No. 0810010-007-AC	A.9
NO <sub>x</sub>	Gas/Oil; Propane	8760	0.30 lb/mmBtu			2,595; 2,712	11,366; 11,879	Rules 62-296.405(1)(d)2., F.A.C.	A.10

Notes:

<sup>1</sup> The "Equivalent Emissions" listed are for informational purposes only. Equivalent emissions are for each emissions unit.

Appendix S  
Permit Summary Tables

Table 2-1, Summary of Compliance Requirements

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Emissions Unit	Brief Description
001	Fossil Fuel Steam Generator, Unit 1
002	Fossil Fuel Steam Generator, Unit 2

Pollutant or Parameter	Fuels	Compliance Method	Testing Frequency	Frequency Base Date <sup>1</sup>	Minimum Compliance Test Duration	CMS <sup>2</sup>	See Permit Condition(s)
SO <sub>2</sub>	Gas, Oil	Fuel sampling & analysis	As received			Yes	A.9, A.15, A.23 & A.24
NO <sub>x</sub>	Gas, Oil, Propane	Continuous Emissions Monitor	Continuous			Yes	A.10
PM	Gas, Oil, Propane	Rule 62-296.405(1)(e)2	Annual	July	3 hours		A.22, A.26 & A.27
VE	Gas, Oil, Propane	DEP Method 9	Annual	July	1 hour	Yes	A.20, A.21 & A.27
On-spec. Used Oil		Record Keeping and Analysis	As fired				A.37

Notes:

<sup>1</sup> Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.

<sup>2</sup> CMS = continuous monitoring system

----- Forwarded by Kevin Washington/GC/FPL on 09/04/2002 02:08 PM -----

"Koerner, Jeff"

<Jeff.Koerner@dep.s  
tate.fl.us> To: "Kevin Washington (E-mail)"  
<kevin\_washington@fpl.com>

cc:

09/04/2002 01:46 PM Subject: FPL Manatee Plant - Title V Revision to Add Gas  
to Units 1 and 2

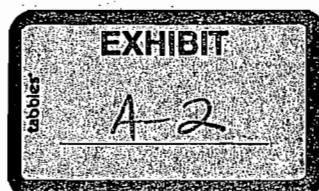
Kevin,

For your consideration, I have attached the following draft responses to FPL's comments regarding this project. To my knowledge, we have received no other comments. FPL still has an outstanding "request for an extension of time" to file a petition. This would have to be withdrawn before we could revise the permit and send to EPA as "PROPOSED". Let me know.

Thanks!

Jeff Koerner  
New Source Review Section  
850/921-9536

<<Comments on draft Title V Permit Revision.doc>>  
(See attached file: Comments on draft Title V Permit Revision.doc)



**COMMENTS ON DRAFT TITLE V PERMIT REVISION**

The following summarizes comments offered by the Florida Power and Light Company and the Department's response.

1. *Request:* Amend permit to reflect the minor changes made to final air construction Permit No. 0810010-007-AC. *Response:* The Department agreed and revised accordingly.
2. *Request, Condition A.3:* Remove the following sentence, "When available, the Department strongly encourages the permittee to fire natural gas as a clean-burning alternative to fuel oil." It is not an enforceable requirement. *Response:* The Department did not agree to the change as this requirement was included in final air construction Permit No. 0810010-007-AC.
3. *Request, Condition A.9:* Consistent with final air construction Permit No. 0810010-007-AC, move the text identifying the fuel sulfur content to the permitting note. *Response:* The Department agreed and revised the condition to be consistent with final air construction Permit No. 0810010-007-AC.
4. *Request, Condition A.16:* Delete paragraph "c" because there is no requirement to monitor heat input except during compliance testing. *Response:* The Department did not agree to the change as this requirement was included in final air construction Permit No. 0810010-007-AC.
5. *Request, Condition A.24:* Consistent with final air construction Permit No. 0810010-007-AC, delete the 4<sup>th</sup> paragraph related to monthly record keeping for the sulfur content of natural gas. *Response:* The Department agreed and revised the condition to be consistent with final air construction Permit No. 0810010-007-AC.
6. *Request, Conditions A.39 and A.40:* Revise conditions to be consistent with final air construction Permit No. 0810010-007-AC. *Response:* The Department agreed. No change was necessary for Condition No. A.39. Condition No. A.40 was revised consistent with the minor changes made to Condition Nos. 11, 13, 14, and 18 in final air construction Permit No. 0810010-007-AC. The following summarizes these changes.
  - The reporting deadline was revised from March 1<sup>st</sup> to August 1<sup>st</sup> of each year. This is necessary because EPA must review and approve the final annual emissions of nitrogen oxides and sulfur dioxide for the acid rain program.
  - The annual emissions of nitrogen oxides were corrected from 8179 to 8762 tons per year based on the final emissions approved by EPA.
  - The condition was clarified to indicate that initial "compliance" tests are required only for particulate matter and opacity. Initial tests for carbon monoxide and volatile organic compounds are required to establish emission factors for reporting purposes.
  - The condition was clarified as follows to indicate the basis for reporting annual emissions from gas firing in the PSD Applicability Report: initial test for particulate matter and volatile organic compounds; initial and annual (during annual NO<sub>x</sub> RATA) tests for carbon monoxide; and CEMS data for emissions of nitrogen oxides and sulfur dioxide as indicated by the EPA Scorecard values for the acid rain program.
  - The condition was clarified as follows to indicate the basis for reporting annual emissions from oil firing in the PSD Applicability Report: emissions data for carbon monoxide, particulate matter, and volatile organic compounds as reported in the certified Annual Operating Reports; and CEMS data for emissions of nitrogen oxides and sulfur dioxide as indicated by the EPA Scorecard values for the acid rain program.
  - Consistent with the previous fuel sulfur changes, the requirement to keep fuel sulfur records for natural gas was removed.
7. *Request, Appendix S, Table 1-1:* Consistent with the previous fuel sulfur changes, remove the fuel sulfur specification and associated "equivalent emissions". *Response:* The Department agreed and revised accordingly.

8. *Request, Appendix S, Table 2-1:* Delete the annual PM and VE testing for gas firing. *Response:* The Department agreed and revised accordingly. Existing Condition Nos. A.18 and A.19 do not require testing for PM and VE "... while burning only gaseous fuel(s) ...". These condition references were added to the table.
9. *Request, Appendix H-1:* Delete reference to air construction Permit No. 0810010-006-AC as it is pending and relates to the proposed Unit 3 and not Units 1 and 2. Revise reference for Permit No. 0810010-007-AC from draft to final. *Response:* The Department agreed and revised accordingly.