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February 25, 1998

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Mr. Scott Sheplak, P.E.  
State of Florida  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

BUREAU OF  
AIR REGULATION

cc: Joe Kahn  
Bruce  
Cindy

**Re: Exemption of Heat Ducts at FPL Turkey Point and Port Everglades plants**

Dear Scott:

As we discussed several weeks ago, I recently became aware of the presence of heat ducts on the boilers at Turkey Point (units 1 and 2) and Port Everglades (units 3 and 4) which need to be identified in the Title V permits. The openings on the Port Everglades units are ducts to reduce the heat build up in the penthouse. The ducts at PTF were test ports used to evaluate the performance of the penthouse seals and they have been closed.

FPL has undertaken calculations of the potential emissions associated with these ducts and has determined that they are small enough to qualify as exempt pursuant to state rules 62-210.300(3)(a) and 62-213.430(6)(b), F.A.C.. Accordingly, we request that these ducts be added to the list of exempt activities for the Turkey Point fossil and Port Everglades Title V permits. Attached for your files please find a certification from a professional engineer attesting to this fact for each facility.

If you have any questions regarding this, please do not hesitate to contact me at (561) 691-7058.  
Thank-you.

Very truly yours,

Richard Piper  
Sr. Environmental Specialist  
Florida Power & Light Company

cc: Daniela Banu  
Tom Tittle

Broward County DNRP  
DEP Southeast District

The emissions associated with the boiler heat ducts at the Port Everglades facility, units 3&4 penthouse have been calculated. The calculations reveal that the emissions from these sources are negligible; that is, that the potential to emit criteria pollutants is less than 5 tons per year, and the potential to emit hazardous air pollutants is less than 1,000 pounds per year per pollutant, and 2,500 pounds per year combined.

*Ronnie Adams*

2/24/98 Ron Adams (seal)

The emissions associated with the boiler test ports at the Turkey Point facility, units 1 and 2 penthouse have been calculated. The calculations reveal that the emissions from these sources are negligible; that is, that the potential to emit criteria pollutants is less than 5 tons per year, and the potential to emit hazardous air pollutants is less than 1,000 pounds per year per pollutant, and 2,500 pounds per year combined.

*Ron Adams*

2/24/98 Ron Adams (seal)

