



October 27, 2008

Trina L. Vielhauer, Chief  
Bureau of Air Regulation  
State of Florida  
Department of Environmental Protection  
2600 Blair Stone Road  
Mail Station #5505  
Tallahassee, FL 32399-2400

**Re: Comments to Draft Air Operating Permit; Turkey Point Nuclear Power Plant,  
Permit No. 0250003-010-AV**

Dear Trina,

As an initial matter, FPL requests that the Department involve major stakeholders in the development of permitting format changes to avoid extended delays in permit review. FPL specifically requests confirmation from FDEP that these formatting changes are not intended to, and in fact do not, result in any changes to the substantive requirements applicable to this facility. Moving specific requirements into Appendices makes it much more difficult to determine precisely what requirements are applicable.

Regarding the Draft Title V Permit referenced above, FPL has the following comments:

- Statement of Basis: Please provide a list of all changes made in the draft permit no. 0250003-010-AV as compared to the current air operating permit.
- Page 3,  
Section II. Facility-Wide Conditions, FW3.: FPL requests that the last sentence in the condition be removed from the permit. The current status should not be a part of this requirement.

Section II. Facility-Wide Conditions, FW5.:

FPL requests that the strike through language below be removed from the condition and that the underlined be added. It is located in brackets at the end of condition FW5. This information was provided at the request of the Department through the permit application.

[Rule 62-296.320(4)(c)2., F.A.C. and ~~proposed~~ provided by applicant in Title V air operation permit renewal application received June 23, 2008.]

Section II. Facility-Wide Conditions, FW6. FPL requests the following replace the FW6 condition and include the permitting note.

**“FW6. Annual Operating Report.** The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by May 1<sup>st</sup> for 2009 and April 1<sup>st</sup> for each year thereafter. [Rule 62-210 370(3), F.A.C.]

*{Permitting Note: If the applicant chooses to use the Electronic Annual Operating Report software, instructions provided with the system should be followed.}*

- Page 4,

Section II. Facility-Wide Conditions, FW8.: FPL requests the following permitting note be added to the condition.

*{Permitting Note: As specified in Specific Condition RR7 of Appendix RR, the applicant shall use DEP Form No. 62-213 900(7) to comply with this requirement.}*

Section II. Facility-Wide Conditions, FW10.: FPL requests this condition be removed as there were no CAIR units in the permit application.

- Page 5,

Specific Condition No.A.1, and the description above and Conditions A.3.:

“the fuel requirement changed from low sulfur diesel to Ultra low sulfur diesel.. this results in a lower sulfur limit & will prohibit the use low sulfur diesel after Jan 1, 2009.

Specific Condition No.A.2,

**FPL requests the following change:** “A.2. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR2, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

- Page 6, Test Methods and Procedures

Specific Condition No.A.9: FPL requests the following clarifying information be added to this condition as not all of the referenced test conditions of Appendix TR are applicable for the diesels units.

“NOx Emissions: For units that are not equipped with a continuous emissions monitoring system (CEMS) for NOx, compliance with the emission limits shall

be demonstrated by annual emission testing in accordance with applicable EPA Reference Methods from Rule 62-297.401, F.A.C., or other methods approved by the Department in accordance with the requirements of Rule 62-297.620, F.A.C., except as otherwise provided in Rule 62-296.570(4)(b), F.A.C. Annual emission testing shall be conducted during each federal fiscal year (October 1 - September 30). Annual compliance testing while firing oil is unnecessary for units operating less than 400 hours in the current federal fiscal year. 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. For small diesel engines (heat input less than 5 million Btu per hour) operating 400 hours per year or more, compliance shall be demonstrated by a stack test on at least one representative engine for each group of identical engines within the facility.  
[Rules 62-296.570(4)(a)3., and 62-297.310(7)(a)3., F.A.C.]”

FPL requests that methods 1 – 4 and 7 be removed from the Test Methods table below and that Method 3A be added This will leave Methods 3A and 7E in the permit Test Table

A.9. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
7	Determination of Nitrogen Oxide Emissions from Stationary Sources
7E	Determination of Nitrogen Oxide Emissions from Stationary Sources (Instrumental Analyzer Procedure)

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-296 320(4)(b), 62-296.570(4)(a)3 , 62-297 310 & 62-297 401 F A.C ]

- Page 6-7, Test Methods and Procedures  
NEW Specific Condition No.A. \_\_\_ : FPL requests that an additional condition be added as described below:

Please insert the following condition with renumbering:

“ By this permit, annual and permit renewal compliance testing for NOx emissions is not required for these emissions units while burning diesel fuel for less than 400 hours in each generator or engine in the current federal fiscal year.  
[Rules 62-297.310(7)(a)3. and 4., F.A.C.]”

- Page 8,  
Section V, Appendices: FPL requests revision to the statement **“The Following Appendices Are Enforceable Parts of This Permit:”**

*Some of the Appendices listed specifically Appendix TR has parts that are applicable.*

**FPL suggests modifying the statement to: "The Following Appendices Are Supporting Documents for the Air Operating Permit and are Enforceable as allowed by rule applicability."**


- The following refers to Attachment: "Table 1 and 2 2008.pdf"  
**Table 1** Please remove all of the blank table pages as these are confusing to plant operators

Page 1 of 1 Table 2 Please correct per the marked up copies attached

Thanks for your consideration in this matter, and, if you should have any questions, please do not hesitate to contact Mary Archer at (561) 691-7057.

Sincerely,



 Paul Skinner  
Plant Chemistry Manager  
Turkey Point Nuclear Power Plant  
Florida Power and Light Company

Cc: Tom Cascio, FDEP;  
Dade County Department of Environmental Resources Management