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DIVISION OF AIR  
RESOURCE MANAGEMENT

August 23, 2011

Project No 0250003 - 016 - AC

Jeff Koerner – Chief  
Bureau of Air Regulation  
Division of Air Resources Management  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399

**RE: Request To Modify Turkey Point Plant BART Permit – 0250003-008-AC**

Dear Mr. Koerner:

As a follow-up to your August 2<sup>nd</sup> meeting with Messrs. Ray Butts and John Hampp of FPL, I'm sending you our proposed language change for the Turkey Point BART Permit, 0250003-008-AC.

Turkey Point Unit 2 is on Inactive Reserve and is expected to remain so until at least 2020. Rather than spend approximately \$1.7 million to install new state-of-the-art multi-cyclones by December 31, 2013 on an inoperative unit, we propose new language to Section 3, Condition 1 below. The change is a clarification to postpone the installation of the dust collectors by December 31, 2013 while the unit is on Inactive Reserve. If for some unexpected reason the unit would be reactivated to service, it would be restricted to 100% natural gas firing until the new state-of-the-art multi-cyclones are installed.

The language follows:

SECTION 3

CONTROL EQUIPMENT

From:

1. Particulate Controls: As soon as practicable, but not later than December 31, 2013, the permittee shall replace the existing multi-cyclones on these units with new state-of-the-art multi-cyclones. [Rule 62.296.340 (BART), F.A.C. and Application No. 0250003-008-AC]

To:

1. Particulate Controls: As soon as practicable, but not later than December 31, 2013, the permittee shall replace the existing multi-cyclones on these units with new state-of-the-art multi-cyclones. For a unit on "Inactive Reserve" prior to December 31, 2013, new state-of-the-art multi-cyclones shall be installed before reactivation of the unit. Otherwise, the unit shall be restricted to 100% natural gas firing until the new state-of-the-art multi-cyclones are installed. [Rule 62.296.340 (BART), F.A.C. and Application No. 0250003-008-AC, and Applicant Request]

In addition, we would like to offer some modified language to condition 15 of Section 3 to provide more flexibility for units, and particularly, units that may be on Inactive Reserve. We propose that the language be modified as follows:

From:

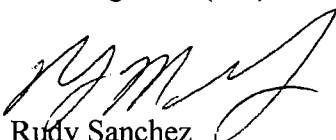
15. BART Alternative Permit Application : As an alternative to the SO<sub>2</sub> and PM limits in conditions 4 and 5, above, not later than 12/31/2011, FPL may submit an application requesting to either: repower Units 1 and 2 with natural gas-fired combustion turbines, burn only natural gas in Units 1 and 2 and meet a PM emissions limit of 0.05 lb/MMbtu , or permanently shut down Units 1 and 2. [Rule 62-296.340, F.A.C.]

To:

15. BART Alternative Permit Application : As an alternative to the SO<sub>2</sub> and PM limits in conditions 4 and 5, above, not later than 12/31/2012 for operating units, or 12/31/2017 for units on Inactive Reserve, FPL may submit an application requesting to either: repower Units 1 and 2 with natural gas-fired combustion turbines, burn only natural gas in Units 1 and 2 and meet a PM emissions limit of 0.05 lb/MMbtu , or permanently shut down Units 1 and 2. [Rule 62-296.340, F.A.C.]

If needed, I have enclosed for your use the R.O. Certification Page and the P.E. Certification page.

We look forward to working with the Department to accommodate this simple change. If you have any questions, or require additional information, please call me at 305-242-3822 or Kevin Washington at (561) 691-2877.



Rudy Sanchez  
Turkey Point General Manager and R.O.

Attachments:2

# APPLICATION INFORMATION

## Professional Engineer Certification

|   |
|---|
| 1. Professional Engineer Name: Edward Preast<br>Registration Number: 33225  |
| 2. Professional Engineer Mailing Address... P.O. Box 14000 JES/JB<br>Organization/Firm: Florida Power & Light Co.<br>Street Address: 700 Universe Blvd.<br>City: Juno Beach State: FL Zip Code: 33408   |
| 3. Professional Engineer Telephone Numbers...<br>Telephone: ( 561 ) 691-2679 ext. Fax: ( 561 ) 691-7049   |
| 4. Professional Engineer E-mail Address: ed.preast@fpl.com  |
| 5. Professional Engineer Statement:<br><i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i><br><i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i><br><i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i><br><i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i><br><i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i><br><i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i><br><i>Edward Preast</i><br>Signature<br>(seal)<br><i>August 15, 2011</i><br>Date |

\* Attach any exception to certification statement.

**Application Responsible Official Certification**

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

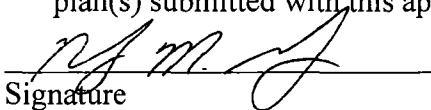
1. Application Responsible Official Name: Rudy Sanchez
  
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):
  - For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.
  - For a partnership or sole proprietorship, a general partner or the proprietor, respectively.
  - For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.
  - The designated representative at an Acid Rain source.
  
3. Application Responsible Official Mailing Address...

Organization/Firm: Turkey Point Fossil Power Plant  
Street Address: 9700 S.W. 344 Street  
City: Florida City State: FL Zip Code: 33035
  
4. Application Responsible Official Telephone Numbers...

Telephone: (305) 242 - 3822 ext. Fax: ( ) -
  
5. Application Responsible Official Email Address: rudy\_sanchez@fpl.com
  
6. Application Responsible Official Certification:

I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

Signature



Date

August 23, 2011