

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

March 10, 1998

Mr. R. Douglas Neeley, Chief
Air and Radiation Technology Branch
Air, Pesticides and Toxics Management Division
United States Environmental Protection Agency
Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8909

Re: Proposed Changes to FPL Proposed Title V Permits to Satisfy EPA Objections

Dear Mr. Neeley:

This letter is to document changes that the Department proposes to satisfy EPA Region 4 objections to Florida's Proposed Title V permits for the following Florida Power and Light plants: Lauderdale, Manatee, Martin, Port Everglades, Putnam, Riviera and Turkey Point Fossil. These objections were detailed in a letter from EPA Region 4 dated December 11, 1997 in which EPA indicated the primary basis for objection was that the permits do not meet the periodic monitoring requirements of 40 CFR 70.6(a)(3)(i). Also, the objection letter stated that some permits have deviations from applicable requirements, or have issues related to practical enforceability. The objection letter implied a program deficiency in the area of periodic monitoring as it relates to Florida's Title V permits. Our preference is to resolve this issue separately, so we do not have to encounter this situation on each Title V permit we issue. Obviously a case-by-case objection for periodic monitoring is neither efficient nor equitable. We have, however, proposed changes to these FPL permits to resolve EPA's objections on these permits, in advance of addressing the issue on a program-wide basis.

The changes proposed in this letter result primarily from our meeting with you and your staff and representatives of FPL on March 3rd at your office. That meeting enabled us to clarify many of the issues and identify changes that could be made to the permits that would allow Florida to issue Final Title V permits for these plants. Please review the following proposed changes to the referenced permits. If you concur with our changes, we will issue Final permits with these changes.

The following items and changes are presented generally in the order of our discussion of the issues at our March 3rd meeting.

Manatee, Martin, Port Everglades, Riviera and Turkey Point

FPL has been unable to correlate opacity to PM, ash or additive injection data, even given the large amount of data available for these facilities. FPL is also unaware of industry or government studies detailing such a correlation. Therefore, all parties agreed that correlating opacity to PM data would not be pursued. Instead, for the units with COMS, a permit condition will be added that requires the owner or operator to maintain and operate COMS and to make and maintain records of the readings for purposes of periodic monitoring. The following condition will be added:

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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Add a new condition to each permit in the sections for the fossil fuel steam generators titled Record Keeping and Reporting Requirements:

X.x. 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]

Port Everglades and Lauderdale

Pursuant to our discussion, for simple-cycle and combined-cycle combustion turbine units without COMS, the permits will be revised to require that each unit shall have a Method 9 visible emissions test conducted upon exceeding 400 hours of operation on fuel oil, and every 150 hours of operation on fuel oil thereafter, in any given federal fiscal year. The statement of basis for these permits will be revised to include a demonstration supporting such a testing frequency, specifically referring to the low historical operational use of fuel oil and the difficulty of scheduling VE tests for remote-started units. The following specific changes will be made:

Add to the statement of basis for Lauderdale and Port Everglades:

The Department has determined that the appropriate VE testing frequency for the simple-cycle turbines is a VE test upon exceeding 400 hours of operation on fuel oil, and every 150 hours of operation on fuel oil thereafter, in any given federal fiscal year (October 1 through September 30). This frequency is justified by the low historical operational use of fuel oil for these units and the previous VE tests which documented compliance while firing fuel oil. The Lauderdale units have fired fuel oil a total of 34.5 hours in 1992, 17.4 hours in 1993, 8.4 hours in 1994, 2.4 hours in 1995, 282.4 hours in 1996, and 11.1 hours in 1997. The Port Everglades units have fired fuel oil a total of 50.5 hours in 1992, 30.7 hours in 1993, 7.9 hours in 1994, 2.5 hours in 1995, 4.1 hours in 1996, and 5.9 hours in 1997.

Also add to the statement of basis for Lauderdale

The Department has determined that the appropriate VE testing frequency for the combined-cycle turbines is a VE test upon exceeding 400 hours of operation on fuel oil, and every 150 hours of operation on fuel oil thereafter, in any given federal fiscal year (October 1 through September 30). This frequency is justified by the low historical operational use of fuel oil for these units and the previous VE tests which documented compliance while firing fuel oil. These units have fired fuel oil a total of 97.7 hours in 1993 (the year that PM testing was conducted on oil), 12.0 hours in 1994, 0.0 hours in 1995, 0.2 hours in 1996, and 0.0 hours in 1997. The combined-cycle turbines were not operational prior to 1993.

The permit for Lauderdale will be revised:

B.14. Visible Emissions Testing Required. The owner or operator shall conduct testing for visible emissions, using EPA Method 9, while the combustion turbine is operating at 90-100 percent of its capacity, according to the following schedule.

The owner or operator shall conduct testing for visible emissions while firing fuel oil for each simple-cycle turbine unit upon that turbine's exceeding 400 hours of operation on fuel oil, and every 150 hours of operation on fuel oil thereafter, in any given federal fiscal year (October 1 through September 30). Such

tests shall be performed within 15 days of exceeding such operating hours, to allow for prior notification of the tests.

Regardless of the number of hours of operation on fuel oil, at least one compliance test shall be conducted on all twenty-four combustion turbines every five years, coinciding with the term of the operation permit for these turbines. At least one quarter of such tests shall be conducted while burning fuel oil, and at least one quarter of such tests shall be conducted while burning natural gas.

[Rule 62-213.440, F.A.C., applicant agreement with EPA on March 3, 1998, and AC06-179848, Specific Condition No. 23]

The permit for Port Everglades will be revised:

C.6. Visible Emissions Testing Required. The owner or operator shall conduct testing for visible emissions, using EPA Method 9, while the combustion turbine is operating at 90-100 percent of its capacity, according to the following schedule.

The owner or operator shall conduct testing for visible emissions while firing fuel oil for each simple-cycle turbine unit upon that turbine's exceeding 400 hours of operation on fuel oil, and every 150 hours of operation on fuel oil thereafter, in any given federal fiscal year (October 1 through September 30). Such tests shall be performed within 15 days of exceeding such operating hours, to allow for prior notification of the tests.

[Rule 62-213.440, F.A.C., applicant agreement with EPA on March 3, 1998, and AO 06-230618]

The permit for Lauderdale will be revised:

A.19. Except as specified in this condition for visible emissions testing on fuel oil, annual compliance tests shall be performed on each combustion turbine unit with the fuel(s) used for more than 400 hours in the preceding 12-month period. Tests shall be conducted using EPA reference methods, or equivalent, in accordance with the July 1, 1996 version of 40 CFR 60 Appendix A. The stack test for each turbine shall be performed according to the requirements of specific condition A.20.

(The table and its footnote have been omitted in this letter for clarity. They will remain in the permit.)

The owner or operator shall conduct testing for visible emissions while firing fuel oil, using EPA Method 9, for each combustion turbine unit upon that turbine's exceeding 400 hours of operation on fuel oil, and every 150 hours of operation on fuel oil thereafter, in any given federal fiscal year (October 1 through September 30). Such tests shall be performed within 15 days of exceeding such operating hours, to allow for prior notification of the tests.

[Rule 62-213.440, F.A.C., applicant agreement with EPA on March 3, 1998, and PSD-FL-145, Specific Condition No. 10]

Manatee, Martin, Port Everglades, Riviera and Turkey Point

After reviewing historical particulate matter emissions data for these plants, the Department believes that a demonstration is appropriate, based on that data, to support each permit's annual PM testing frequency. As discussed in our meeting, these facilities are subject to a steady-state PM emission limit of 0.1 lb/mmBtu, which is effectively equivalent to 0.149 lb/mmBtu because of rounding, and 0.3 lb/mmBtu for soot blowing, which is equivalent to 0.349 lb/mmBtu. We proposed evaluating the required PM testing frequency based on the historical average test results, with sources with historical emissions less than half the standard required to test annually, sources with historical emissions less than three quarters of the standard required to test semi-

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annually, and the remaining sources required to test quarterly. FPL has presented historical PM test results which show that the steady-state and soot blowing average results are less than half the applicable effective standards. The statement of basis for these permits will be revised to include a demonstration supporting an annual testing frequency, specifically referring to the low historical emission rate in relation to the effective standards for steady-state operation and soot-blowing operation. The following specific changes will be made:

Add to the statement of basis for each permit:

The Department has determined that the appropriate particulate testing frequency for the fossil fuel steam generators is annually whenever fuel oil is used for more than 400 hours in the preceding year. This frequency is justified by the low emission rate documented in previous emissions tests while firing fuel oil. These units are subject to a steady-state PM emission limit of 0.1 lb/mmBtu, which is effectively equivalent to 0.149 lb/mmBtu because of rounding, and 0.3 lb/mmBtu for soot blowing, which is equivalent to 0.349 lb/mmBtu. FPL has presented historical PM test results which show that the steady-state and soot blowing average results are less than half the applicable effective standards. The Department has determined that sources with emissions less than half of the effective standard shall test annually. A summary of results of particulate emission testing in lb/mmBtu for the units at Martin* are 0.057 (steady-state) and 0.059 (soot-blowing).

* The revised statement of basis for the following facilities will reflect the appropriate emission test results: results for Manatee are 0.066 (steady-state) and 0.081 (soot-blowing); Port Everglades are 0.059 (steady-state) and 0.068 (soot-blowing); Riviera are 0.063 (steady-state) and 0.079 (soot-blowing); Turkey Point are 0.048 (steady-state) and 0.061 (soot-blowing).

Lauderdale

For the combined-cycle combustion turbine units, the Department believes that annual PM testing is appropriate, and can be justified through a demonstration in the statement of basis. The statement of basis for these permits will be revised to include a demonstration supporting such a testing frequency, specifically referring to the low historical operational use of fuel oil for these units and the low emission rate documented in previous emissions tests while firing fuel oil. The following specific changes will be made:

Add to the statement of basis:

The Department has determined that the appropriate particulate testing frequency for the combined-cycle turbines is annually whenever fuel oil is used for more than 400 hours in the preceding 12-month period. This frequency is justified by the low historical operational use of fuel oil for these units and the low emission rate documented in previous emissions tests while firing fuel oil. These units have fired fuel oil a total of 97.7 hours in 1993 (the year that PM testing was conducted on oil), 12.0 hours in 1994, 0.0 hours in 1995, 0.2 hours in 1996, and 0.0 hours in 1997. The units were not operational prior to 1993. Results of particulate emission testing conducted on the combined cycle combustion turbines in 1993 while firing fuel oil show that all turbines had emissions well below the PM emission limit. Average particulate emissions for Unit 4A was 41.4 lb/hr, Unit 4B was 52.0 lb/hr, Unit 5A was 45.9 lb/hr, and Unit 5B was 48.0 lb/hr, versus an emission limit for each unit of 58 lb/hr.

Manatee, Port Everglades and Riviera (and Martin and Turkey Point)

A permit condition will be added for each of these plants requiring the owner or operator to conduct emission tests while injecting additives consistent with normal operating practices. The statement of basis will

also be revised to discuss the purpose of the additives. Note that the Turkey Point permit has language in condition A.3 regarding injection of additives. The following specific changes will be made:

Add to the statement of basis for each permit:

FPL may inject additives such as magnesium oxide, magnesium hydroxide and related compounds into each boiler for the purposes of reducing build-up of particulate matter on the interior boiler surfaces, to facilitate proper heat transfer and other boiler operation, and to reduce the particulate matter required to be removed from boiler surfaces during soot blowing and other boiler cleaning operations. The rate of additive injection is not large, generally on the order of 1 gallon of additive per approximately 2,500 (\pm 500) gallons of fuel oil (this is approximately 0.04% by volume). The permit requires that emission tests be conducted while injecting additives consistent with normal operating practices.

Add a new condition to each permit in the sections for the fossil fuel steam generators titled Test Methods and Procedures for the Manatee, Port Everglades and Riviera and Martin plants:

X.x. 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]

Manatee, Port Everglades, Riviera and Turkey Point

No revisions of the permits are necessary to allow the 40 percent opacity limit. All parties in the meeting agreed that the previous Secretary orders are consistent with Florida's SIP and do not represent a variance from SIP requirements. The use of the word "variance" in these orders was not intended in the legal context but was instead intended to represent a difference or change. This issue is considered resolved, so no changes to the permits will be made.

The note in conditions A.14 and B.14 of the Port Everglades permit that refers to an informal agreement regarding visible emissions is not intended to be an enforceable part of the permit, so we agree it is not an enforceable condition. It is instead intended to identify the agreement for the information of the compliance inspector. No change to the permit is needed.

Manatee

The permit will be revised to limit the sulfur content of the fuel oils received at the plant to 1.0 percent by weight, and require fuel analysis by either the vendor or FPL to document compliance with the sulfur limit.

Add to the permit:

A.9. Sulfur Dioxide. The sulfur content of fuel oils burned shall not exceed 1.0 percent by weight, as received at the plant. 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]

A.24. 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.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C., and applicant agreement with EPA on March 3, 1998]

Lauderdale, Manatee, Martin, Putnam and Turkey Point

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 note will be added to the permitted capacity condition for each permit clarifying this, and an explanation that regular record keeping is not required for heat input will be added to the statement of basis. The following specific changes will be made:

Add to the statement of basis for each permit:

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 note below the permitted capacity condition clarifies this. Regular record keeping is not required for heat input. Instead the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.

Add to each permit below the condition titled Permitted Capacity:

{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.}

Manatee, Martin, Port Everglades, Riviera and Turkey Point

No revisions of the permits are necessary to address the comment related to records of soot blowing and load changes. All parties in the meeting agreed that the current permit requirements related to reporting of excess emissions are sufficient to satisfy this comment. FPL will continue to document and report excess emission events. This issue is considered resolved, so no changes to the permits will be made.

Lauderdale and Martin

The permits will be revised to specify that the 12-month average sulfur content be calculated as a weighted average based upon the sulfur content of the oil and the amount burned on a daily basis. The following specific changes will be made:

The permit for Lauderdale will be changed:

A.13. Sulfur Dioxide. The sulfur content of the light distillate fuel oil shall not exceed a maximum of 0.3 percent, by weight, and shall not exceed an average of 0.2 percent, by weight, during any consecutive 12-month period. The 12-month average sulfur content shall be calculated as a weighted average based upon the sulfur content of the oil and the amount burned on a daily basis. Compliance shall be demonstrated in accordance with the requirements of 40 CFR 60.335 by testing all oil shipments for sulfur content, nitrogen content, and heating value, using ASTM D 2800-96 or the latest edition.

[Rule 62-213.440, F.A.C., applicant agreement with EPA on March 3, 1998, and PSD-FL-145, Specific Conditions No. 5 and No. 11]

The permit for Martin will be changed:

B.28. The average sulfur content of the light distillate oil shall not exceed 0.3%, by weight, during any consecutive 12-month period. The maximum sulfur content of the light distillate fuel oil shall not exceed 0.5%, by weight. The 12-month average sulfur content shall be calculated as a weighted average based upon the sulfur content of the oil and the amount burned on a daily basis. Compliance shall be demonstrated in accordance with the requirements of 40 CFR 60.334 by testing for sulfur content, for nitrogen content, and for heating value of oil storage tanks once per day when firing oil using ASTM D 2880-96.

[Rule 62-213.440, F.A.C., applicant agreement with EPA on March 3, 1998, and PSD-FL-146, Specific Condition No. 11]

C.8. Sulfur Dioxide. Sulfur dioxide emissions limitations for the auxiliary steam boiler are established by firing natural gas or limiting the light distillate fuel oil's average sulfur content to 0.3%, by weight, during any consecutive 12-month period. The 12-month average sulfur content shall be calculated as a weighted average based upon the sulfur content of the oil and the amount burned on a daily basis.

[Rule 62-213.440, F.A.C., applicant agreement with EPA on March 3, 1998, and PSD-FL-146, revised 7/19/93]

D.3. Sulfur Dioxide. Sulfur dioxide emissions limitations for the diesel generator are established by limiting the light distillate fuel oil's average sulfur content to 0.3%, by weight, during any consecutive 12-month period. The 12-month average sulfur content shall be calculated as a weighted average based upon the sulfur content of the oil and the amount burned on a daily basis.

[Rule 62-213.440, F.A.C., applicant agreement with EPA on March 3, 1998, and PSD-FL-146, revised 7/19/93]

Port Everglades and Riviera (and Turkey Point)

No revisions of the permits are necessary to address the comment related to operation in the event the CEMS become temporarily inoperable. All parties in the meeting agreed that the current permit requirements related to firing fuel oil and gas in the event of temporary CEMS inoperability are sufficient to satisfy this comment. The Turkey Point permit was mentioned in the comment. As discussed briefly, the Department will

revise the Turkey Point permit to be consistent with the Port Everglades and Riviera permits. This issue is considered resolved, so no changes to the Port Everglades and Riviera permits will be made.

The permit for Turkey Point, however, will be revised to be similar to the Port Everglades and Riviera permits:

A.13. Sulfur Dioxide. The permittee shall demonstrate compliance with the sulfur dioxide limit of specific condition A.9 of this permit by the following:

a. Through the use of CEMS installed, operated, and maintained in accordance with the quality assurance requirements of 40 CFR 75, adopted and incorporated by reference in Rule 62-204.800 F.A.C. A relative accuracy test audit of the SO₂ CEMS shall be conducted at least annually. Compliance shall be demonstrated on a 3-hour rolling average.

b. In the event the CEMS becomes temporarily inoperable or interrupted, the fuel oil sulfur content and the maximum fuel oil to natural gas firing ratio is limited to that which was last used to demonstrate compliance prior to the loss of the CEMS. Alternatively, the boilers may fire 100 percent fuel oil with a maximum sulfur content of 1.0 percent by weight, or less, or 100 percent natural gas. See specific condition A.19.

[Rule 62-204.800, 62-213.440, 62-296.405(1)(c)3., F.A.C., AO13-238932, AO13-238939]

Port Everglades, Riviera and Turkey Point

The possible malfunctions related to sulfur dioxide emissions at these plants that were discussed at the meeting were unexpected loss of natural gas supply at the plant or failure of the fuel feed system. Another malfunction that could occur is burner failure. The Department agreed to remove the reference to malfunction in the sulfur dioxide emissions permit conditions. The excess emission provisions from Rule 62-210.700 are applicable, and are already included in the permit. A comment will be added to the statement of basis clarifying this issue. The following specific changes will be made:

Add to the statement of basis for each permit:

This facility is allowed to co-fire natural gas with fuel oil in any ratio that will cause emissions to not exceed the sulfur dioxide limitation of this permit. The permit specifies that compliance with the sulfur dioxide standard shall be based on the total heat input from all liquid and gaseous fuels burned. The permit also requires that the sulfur dioxide emission limitation shall apply at all times including startup, shutdown, and load change. However, excess emissions of sulfur dioxide are allowed during malfunctions in accordance with the excess emissions conditions of this permit, which are based on Rule 62-210.700, F.A.C. Malfunctions that could occur and affect sulfur dioxide emissions include unexpected loss of natural gas supply at the plant, failure of the fuel feed system or burner failure.

The permit for Port Everglades (conditions A.8 and B.8), Riviera (condition A.9) and Turkey Point (condition A.9) will be changed:

X.x. Sulfur Dioxide. Sulfur dioxide emissions shall not exceed 2.75* pounds per million Btu heat input, as measured by applicable compliance methods. Compliance shall be based on the total heat input from all liquid and gaseous fuels burned. The sulfur dioxide emission limitation shall apply at all times including startup, shutdown, and load change.

[Rules 62-213.440 and 62-296.405(1)(c)1.j., F.A.C.]

* The appropriate limit for the Turkey Point permit is 1.1 lb/mmBtu because of local ordinance, and the permit will have that limit.

Mr. R. Douglas Neeley
March 10, 1998
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Lauderdale, Manatee, Martin, Port Everglades, Putnam, Riviera and Turkey Point

Appendix E-1 will be replaced with Appendix I-1 that includes Florida's standard language that refers to Insignificant Emissions Units and/or Activities. The rule change requiring this became effective after these permits were posted. All permitting offices are making this administrative change subsequent to the rule change. We understand that EPA has already reviewed this appendix for similar sources, so the actual text will not be reproduced here.

All Permits

EPA's objection letter detailed several minor issues that required correction, such as marking conditions as not federally enforceable, making minor changes to permit condition language, or correcting typographical errors. Although not discussed at our March 3rd meeting, we will also address each of those issues in the Final permits.

As you know, the 90 day period ends March 11th. All parties involved have been expeditiously seeking resolution of these issues. We feel that EPA's concerns have been adequately addressed and we look forward to issuing final permits. Please advise as soon as possible if you concur with the specific changes detailed above. Please call me at 850/921-9503 if you have any questions. You may also contact Mr. Scott M. Sheplak, P.E., at 850/921-9532, or Mr. Joseph Kahn, P.E., at 850/921-9519, if you need any additional information.

Sincerely,



C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CF/jk

cc: Howard L. Rhodes
Scott Sheplak
Pat Comer
Rich Piper, FPL
Peter Cunningham, HGSS

Florida's PROPOSED Permit Electronic Notification Cover Memorandum

TO: Yolanda Adams, U.S. EPA Region 4
CC: Carla E. Pierce, U.S. EPA Region 4
THRU: Scott Sheplak, P.E., Bureau of Air Regulation
FROM: Steve Welsh, Permit Engineer
DATE: 11/14/97
RE: PROPOSED Title V Operation Permit Review

The following PROPOSED Title V operation permit and associated documents have been posted on the DEP World Wide Web Internet site for your review. Please provide any comments via Internet E-mail, within fifty five (55) days of receiving this notice, to Scott Sheplak at "sheplak_s@dep.state.fl.us".

<u>Applicant Name</u>	<u>County</u>	<u>Method of Transmittal</u>	<u>Electronic File Name</u>
Florida Power and Light Turkey Point Fossil Plant	Dade	INTERNET	0250003p.zip

This zipped file contains the following electronic files:
0250003p.doc
0250003e.doc
0250003u.doc
0250003h.doc
0250003.sob

fednot_p.doc, version dated 8/13/97
Last Updated: 8/13/97, new format for statewide use, JK

STATEMENT OF BASIS

Florida Power & Light
Turkey Point Fossil Plant
Facility ID No.: 0250003
Dade County

Initial Title V Air Operation Permit
PROPOSED Permit No.: 0250003-001-AV

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 in 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.

The Turkey Point Title V Source is composed of two separate co-located power plants: the Fossil Plant and the Nuclear Plant. This permit, No. 0250003-001-AV, addresses only the operations at the Fossil Plant. The (non-nuclear) operations at the Nuclear Plant are addressed in a separate Title V permit, No. 0250003-002-AV.

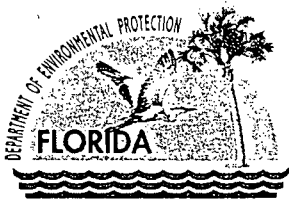
The Fossil Plant consists of two fossil steam generating units, and five "black start" diesel peaking generators. The boilers began operation in 1967 and 1968. To reduce pollution, both boilers incorporate "low-NOx burners" and mechanical cyclone dust collectors.

Emissions units -001 and -002 consist of two Foster-Wheeler 440 MW Class Steam Generating Units that burn a variable combination of natural gas, used oil from FP&L operations, & No. 6 fuel oil. Stack height is 400 feet. The units are equipped with low excess air burners and UOP Air Correction Division multiple cyclones with reinjection. Visible emissions are monitored by a transmissometer in the stack. The units are subject to NOx RACT. Sulfur dioxide, carbon dioxide, nitrogen oxides, visible emissions, and gas flow rate are all continuously monitored. The units began operation in April 1967 (-001) and April 1968 (-002), respectively.

Emissions unit -003 consists of five MKW Powersystems, Inc. Model EMD MP-45 "black start" emergency diesel generators. The generators support boilers -001 and -002 as "peaking units", and, in the event the facility loses primary power, they serve as a backup. These units fire No. 2 fuel oil. The generators commenced operation in April, 1968.

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

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



Department of Environmental Protection

Lawton Chiles
Governor

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Virginia B. Wetherell
Secretary

November 14, 1997

Adalberto Alfonso
Plant General Manager
Florida Power & Light
P.O. Box 14000
Juno Beach, FL 33408

Re: PROPOSED Title V Permit No.: 0250003-001-AV
Turkey Point Fossil Plant

Dear Mr. Alfonso:

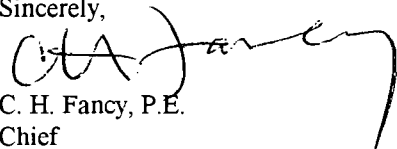
One copy of the PROPOSED Title V Air Operation Permit for the Turkey Point Fossil Plant located 9.5 miles east of Florida City on SW 344 Street, Florida City, Palm Drive, 33034, Dade County, is enclosed. This letter is only a courtesy to inform you that the DRAFT permit has become a PROPOSED permit.

An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is <http://www.dep.state.fl.us/air>.

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

If you should have any questions, please contact Steve Welsh at 850/488-1344.

Sincerely,


C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/w
Enclosures

copy furnished to:
Ken Kosky, P.E.
Rich Piper, FPL
Isidore Goldman, DEP Southeast District
Robert Wong, DERM
Ms. Yolanda Adams, USEPA, Region 4 (INTERNET E-mail Memorandum)
Ms. Carla E. Pierce, USEPA, Region 4 (INTERNET E-mail Memorandum)

11/20/97 cc: Steve Welsh
Reading Site

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 0250003-001-AV

I. Public Notice

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" for the Turkey Point Fossil Plant located 9.5 miles east of Florida City on SW 344 Street, Florida City, Palm Drive, 33034, Dade County was clerked on September 8, 1997. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in the Miami Herald on September 26, 1997. The DRAFT Title V Air Operation Permit was available for public inspection at:

Permitting Authority:

Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 904/488-1344
Fax: 904/922-6979

Affected District/Local Program:

FDEP Southeast District
400 North Congress Avenue, Second Floor
P. O. Box 15425
West Palm Beach, Florida 33416-5425

Dade County Department of Environmental Resources Management
33 Southwest Second Avenue, Suite 900
Miami, Florida 33130-1540.

Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on September 30, 1997.

II. Public Comment

Comments were received and the DRAFT Title V Operation Permit was changed. The comments were not considered significant enough to reissue the DRAFT Title V Permit and require another Public Notice. Comments were received from Florida Power and Light (FPL) in a letter dated October 6, October 16, and November 13, 1997. Their comments and the Department's response is given below.

Comment # 1: FPL requested to submit appropriate correspondence by E-mail.

Response: The Department agreed to this request. As a result of this comment, facility-wide conditions 10. and 11. were changed as follows:

From: no previous text.

To: Note: if acceptable to the agency, applicable correspondence may be submitted by electronic mail.

Comment # 2: FPL requested that megawatt descriptions are nominal and don't impose a limit on either boiler.

Response: The Department agreed to this request. As a result of this comment, the description of the boilers was changed.

Comment # 3: FPL requested to correct the maximum heat input to both boilers.

Response: FPL failed to supply adequate documentation to uphold this request, therefore the request was dismissed.

Comment # 4: FPL requested that fuel additives be allowed to enhance combustion efficiency.

Response: The Department agreed to this request. As a result of this comment, specific condition A.3 was changed as follows:

From: no previous text.

To: Magnesium hydroxide fuel additives are authorized to be added to the boiler units as needed to enhance combustion and facilitate furnace cleaning in a manner consistent with Best Operational Practices.

Comment # 5: FPL requested that language from Rule 62-210.700(3), F.A.C. be incorporated into specific condition A.6.

Response: The Department agreed to this request. As a result of this comment, specific condition A.6 was changed as follows:

From: no previous text.

To: Additionally, visible emissions above 60% opacity shall be allowed for not more than four, six minute periods, during the 3-hour period of excess emissions.

Comment # 6: FPL requested that the sulfur dioxide emission limitation be reworded to reflect cofiring of fuels, as negotiated with their Cape Canaveral permit.

Response: The Department agreed to this request. As a result of this comment, specific condition A.9 was changed as follows:

From: When burning liquid fuel, sulfur dioxide emissions shall not exceed 1.1 pounds per million Btu heat input, as measured by applicable compliance methods. Any calculations used to demonstrate compliance shall be based solely on the Btu value and the percent sulfur of the liquid fuel being burned.

To: Sulfur dioxide emissions shall not exceed 1.1 pounds per million Btu heat input, as measured by applicable compliance methods. Compliance shall be based on the use of a continuous emission monitoring system (CEMS). The sulfur dioxide emission limitation shall apply at all times including startup, shutdown, and load change, but shall not apply during malfunction provided best operational practices to minimize emissions are adhered to. See specific condition A.13.

Comment # 7: FPL requested that Specific Condition A.10 be deleted.

Response: The Department agreed to this request. As a result of this comment, specific condition A.10. was changed as follows:

From: Sulfur Dioxide - Sulfur Content. The as-fired sulfur content of the fuel(s) shall not exceed 1.0 percent, by weight. See conditions A.15., A.21., and A.22.

[Rule 62-296.405(1)(e)3., F.A.C.]

To: deleted text. Note, deletion of this condition changed the numbering sequence in the Proposed permit.

Comment # 8: FPL requested that Specific Condition A.11 be modified to reflect the request of comment # 3.

Response: See comment # 3.

Comment # 9: FPL requested that Specific Condition A.15. be modified to reflect the use of CEMS as the primary method of compliance, rather than using sulfur content of the fuel.

Response: The Department agreed to this request. As a result of this comment, specific condition A.15., now A.13., was changed as follows:

From: Sulfur Dioxide. The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery. This protocol is allowed since the emissions unit has no operating flue gas desulfurization device. See specific conditions A.10, A.21., and A.22.

[Rule 62-296.405(1)(f)1.b., F.A.C., AO13-238932, AO13-238939]

To: Sulfur Dioxide. The permittee shall demonstrate compliance with the sulfur dioxide limit of specific condition A.9 of this permit by the following:

a. Through the use of CEMS installed, operated, and maintained in accordance with the quality assurance requirements of 40 CFR 75, adopted and incorporated by reference in Rule 62-204.800 F.A.C. A relative accuracy test audit of the SO₂ CEMS shall be conducted no less than annually. Compliance shall be demonstrated on a 3-hour rolling average.

b. In the event the CEMS becomes temporarily inoperable or interrupted for periods exceeding 60 minutes, the fuel oil sulfur content and the maximum fuel oil to natural gas firing ratio is limited to that which was last used to demonstrate compliance prior to the loss of the CEMS. Alternatively, the boilers may fire 100 percent fuel oil or 100 percent natural gas with a maximum sulfur content of 1.0 percent by weight, or less. See specific condition A.19.

[Rule 62-204.800, 62-213.440, 62-296.405(1)(c)3., F.A.C., AO13-238932, AO13-238939]

Comment # 10: FPL requested that Specific Condition A.17 be changed to reflect that 40 CFR 75 is the applicable acid rain regulation rather than 40 CFR 60.

Response: The Department agreed to this request. As a result of this comment, specific condition A.17. (now A.14.) was changed as follows:

From: Nitrogen Oxides. The permittee shall operate, maintain, and calibrate a continuous monitoring system to determine compliance with the NOx emission limits as specified above. Determination of compliance shall be in accordance with the testing, compliance, emission monitoring, reporting, recordkeeping, certification and quality assurance provisions of 40 CFR 60, subpart Da and 40 CFR 60.46a, 60.48a, 60.49a and Appendices B and F of 40 CFR 60. This condition shall be amended as necessary to implement the provisions of 40 CFR 75 when the State implements Title IV, CAA, for sources subject to those requirements.

[Rule 62-296.405(1)(f), F.A.C., AO13-238939, AO13-238932]

To: Nitrogen Oxides. The permittee shall operate, maintain, and calibrate a CEMS to determine compliance with the NOx emission limits as specified above. Determination of compliance shall be in accordance with the testing, compliance, emission monitoring, reporting, recordkeeping, certification and quality assurance provisions of 40 CFR 75.

[Rule 62-296.405(1)(f), F.A.C., AO13-238939, AO13-238932]

Comment # 11: FPL noted that the use of Orsat analyzers in Specific Condition A.20. (now A.15.) is not applicable for EPA Method 3A. FPL requested that this condition be revised to reflect this.

Response: The Department dismissed this request.

Comment # 12: FPL requested that Specific Condition A.21 be changed to reflect the use of CEMS as the primary compliance method.

Response: The Department agreed to this request. See Comment #9.

Comment # 13: FPL requested that Specific Condition A.22. be deleted.

Response: The Department agreed to this request. As a result of this comment, specific condition A.22. was changed as follows:

From: For each emissions unit, 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:

- a. Determine and record the **as-fired** fuel sulfur content, percent by weight, for liquid fuels using 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 blended fuel** following each fuel delivery.
- b. Record daily the amount of each fuel fired, the density of each fuel, the Btu value, and the percent sulfur content by weight of each fuel.
- c. Utilize the information in a. and b., above, to demonstrate compliance with the sulfur limitation at all times.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

To: condition deleted.

Comment # 14: FPL requested that Specific Condition A.28(a)4.b. be deleted.

Response: The Department dismissed this request.

Comment # 15: FPL requested that a new specific condition be added to address operating conditions during PM and VE testing.

Response: The Department agreed to this request and added specific condition. A.18:

Operating Conditions During Testing - PM and VE. Compliance testing during sootblowing and steady-state operation for particulate matter and visible emissions shall be conducted at least once annually, if liquid fuel is fired for more than 400 hours. A visible emissions test shall be conducted during one run of each particulate matter test. Testing shall be conducted as follows:

- a. When Burning Fuel Oil Up To 1% Sulfur. When only fuel oil containing less than or equal to 1% sulfur, by weight, is fired (or co-fired with natural gas) in an emissions unit, particulate matter and visible emissions tests during sootblowing and steady-state operation shall be performed on such emissions unit while firing solely fuel oil containing at least 90% of the average sulfur content of the fuel oils fired in the previous 12 month period, except that such test shall not be required to be performed during any year that testing is performed in accordance with specific condition A.18.b.
- b. When Burning Fuel Oil Greater Than 1% Sulfur. If fuel oil containing greater than 1% sulfur, by weight, is co-fired with natural gas in an emissions unit, particulate matter and visible emissions tests during sootblowing and steady-state operation shall be performed as soon as practicable, but in no event more than 60 days after firing such fuel oil, while co-firing such oil with the appropriate proportion of natural gas required to maintain SO₂ emissions between 90 to 100% of the SO₂ emission limit (corresponding to 0.99 and 1.1 lb/mmBtu heat input). Following successful completion of such PM and VE testing, further PM and VE testing shall not be required during the next 12 months unless fuel oil is fired that contains greater than 0.20% sulfur above the percentage sulfur concentration fired during the most recent co-firing test. If fuel oil is co-fired containing greater than 0.20% sulfur above the percentage sulfur concentration fired during the most recent co-firing test, additional PM and VE tests shall be performed as described above as soon as practicable, but in no event more than 60 days after firing such higher sulfur fuel oil.

[Rules 62-4.070(3), 62-213.440, 62-296.405(1)(c)3. and 62-297.310(7)(a)9., F.A.C.]

Comment # 16: FPL requested that Specific Condition A.31 be reworded to more clearly reflect the requirements of the secondary compliance method, fuel sampling.

Response: The Department agreed to this request. Due to previous changes, the Specific Condition A.31. contained in the Draft permit is now Specific Condition A.19. in the Proposed permit, and reflects the following changes:

From: In order to document continuing compliance with the fuel oil sulfur limit in specific condition A.3, the permittee shall keep records of the sulfur content, in percent by weight, of all the fuel burned based on either vendor provided as-shipped analyses or on analyses of as-received samples. The records shall be maintained for a minimum of five years and shall be made available to the Department upon request. The permittee shall submit a copy of the fuel oil analysis for the fuel oil burned during each compliance test with the results from the test.

[Rule 62-4.070(3), F.A.C.]

To: Fuel Records and Sampling Protocol. In conjunction with specific condition A.13.(b), when the CEMS becomes disabled for periods exceeding 60 minutes, the following information shall be collected:

a. Fuel Records. For each boiler, the quantity of fuel(s) fired or when co-firing, the ratio of fuel oil to natural gas shall be recorded.

b. Sampling Protocol. A fuel oil sample shall be collected hourly, by taking a small portion of the fuel fired and pouring it into a container. On a daily basis the fuel oil from this container shall be analyzed for heating value and sulfur content. Analysis for sulfur content shall be performed using one of the following: ASTM D2622-94, ASTM D4294-90(95), ASTM D1552-95, ASTM D1266-91, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s).

[Rules 62-4.070(3), 62-213.410, 62-213.440 and 62-296.405(1)(c)3., F.A.C.]

Comment # 17: FPL requested that Specific Condition B.4 Hours of Operation be modified so that fuel usage (gallons per hour) be considered equivalent to hours of operation.

Response: The Department dismissed this request. The unit is authorized to operate continuously and shall perform the applicable emissions testing if operated for more than 400 hours per year.

Comment # 18: FPL requested a new condition stating that annual and permit renewal compliance testing for visible emissions, NOx, and particulate matter not be required for emissions units while burning diesel fuel for less than 400 hours per year. Fuel usage would be used to determine hours of engine operation as discussed in comment # 17., above.

Response: The Department dismissed this request.

Comment # 19: FPL requested that Specific Conditions B.10 through B.22 be deleted since these units were not anticipated to operate more than 400 hours per year; emissions testing would be onerous; and the conditions “cluttered” the permit.

Response: The Department revisited these conditions and moved some conditions into Sections C, “Common Conditions”.

Comment # 20: FPL requested that EPA Method 7E be referenced as an acceptable test method in Specific Condition B.10.

Response: The Department agreed to this request.

Comment # 21: FPL requested that Specific Condition B.19 addressing stack sampling be deleted.

Response: The Department agreed to this request, since it also in Appendix TV-1.

Comment # 22: FPL requested that “evaporation of spent boiler chemical cleaning solution” be added to Appendix E-1, List of Exempt Emissions Units and/or Activities.

Response: The Department agreed to this request.

Comment # 23: FPL requested that both a 20,000 gallon and 25,000 gallon No. 2 fuel oil tank be added to Appendix U-1, List of Unregulated Emissions Units and/or Activities.

Response: The Department agreed to this request.

B. Documents on file with the permitting authority:

-Letters dated and received October 6 and October 16, 1997 from FPL.

III. Conclusion

The permitting authority hereby issues the PROPOSED Permit No.: 0250003-001-AV, with the changes noted above.

Florida Power & Light
Turkey Point Fossil Plant
Facility ID No.: 0250003
Dade County

Initial Title V Air Operation Permit
PROPOSED Permit No.: 0250003-001-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: 850/488-1344
Fax: 850/922-6979

Compliance Authority:

Dade County Department of Environmental Resources Management
33 Southwest Second Avenue, Suite 900
Miami, Florida 33130-1540

Telephone: 305/372-6925
Fax: 305/372-6954

November 14, 1997

Initial Title V Air Operation Permit
PROPOSED Permit No.: 0250003-001-AV

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Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

Permittee:

Florida Power & Light
Turkey Point Fossil Plant
P.O. Box 14000
Juno Beach, Florida 33408

PROPOSED Permit No.: 0250003-001-AV

Facility ID No.: 0250003

SIC Nos.: 49, 4911

Project: Initial Title V Air Operation Permit

This permit is for the operation of the Turkey Point Fossil Plant. This facility is located at 9.5 miles east of Florida City on SW 344 Street, Florida City, Dade County; UTM Coordinates: Zone 17, 567.2 km East and 2813.2 km North; Latitude: 25° 26' 09" North and Longitude: 80° 19' 52" 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 operate the Turkey Point Fossil Plant as described in the application in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix E-1, List of Exempt Emissions Units and/or Activities

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

APPENDIX TV-1, TITLE V CONDITIONS (version dated 08/11/97)

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)

TABLE 297.310-1, CALIBRATION SCHEDULE (version dated 10/07/96)

Figure 1 - SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM REPORT (version dated 7/96)

Phase II Permit Application dated 12/04/95

Order of the Department's Secretary dated April 24, 1984

ASP Number 97-B-01

Effective Date: January 1, 1998

Renewal Application Due Date: July 5, 2002

Expiration Date: December 31, 2002

Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/clp/sw

Section I. Facility Information

Subsection A. Facility Description

The Turkey Point Title V Source is composed of two separate co-located power plants: the Fossil Plant and the Nuclear Plant. This permit, No. 0250003-001-AV, addresses only the operations at the Fossil Plant. The (non-nuclear) operations at the Nuclear Plant are addressed in a separate permit, No. 0250003-002-AV.

The Fossil Plant consists of two fossil steam generating units, and five "Black Start" diesel peaking generators. The boilers began operation in 1967 and 1968. To reduce pollution, both boilers incorporate "low-NOx burners" and mechanical cyclone dust collectors. Also included in this permit are miscellaneous unregulated and exempt emissions units and activities.

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

Subsection B. Summary of Emissions Unit ID Nos. and Brief Description

E.U. ID

<u>No.</u>	<u>Brief Description</u>
-001	440 MW Boiler (EPA ID # PTP1)
-002	440 MW Boiler (EPA ID # PTP2)
-003	(5) 2.75 MW Diesel Peaking Generators
-xxx	Unregulated Emissions Units and/or Activities (See Appendix U-1.)

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s) 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:

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/ID Number Changes

These documents are on file with the permitting authority:

Initial Title V Permit Application received June 12, 1996

Section II. Facility-wide Conditions

The following conditions apply facility-wide:

1. APPENDIX TV-1, TITLE V CONDITIONS (version dated 08/11/97), 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. Exempt Emissions Units and/or Activities. Appendix E-1, List of Exempt 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. 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.
[Rule 62-296.320(1)(a), F.A.C.]

8. Not Federally Enforceable. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

1. Paving of roads, parking areas and equipment yards;
2. Landscaping and planting vegetation;
3. Maintenance of paved areas;
4. Regular mowing of grass and care of vegetation;
5. Limiting access to plant property by unnecessary vehicles;
6. Bagged chemical products are stored in weather-tight buildings until they are used. Spills of powdered chemical products are cleaned up as soon as possible.
7. Vehicles are restricted to slow speeds on the plant site.

[Rule 62-296.320(4)(c)2., F.A.C.; Proposed by 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 the permit, which defines day one.

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

10. The permittee shall submit all compliance, annual operating reports and other correspondence required of this permit to:

Dade County Department of Environmental Resources Management (DERM)
33 Southwest Second Avenue, Suite 900
Miami, Florida 33130-1540
Telephone: 305/372-6925
Fax: 305/372-6954

Note: if acceptable to the agency, applicable correspondence may be submitted by electronic mail.

11. Unless otherwise directed, reports, data, notification, certifications, or other correspondence required of the United States Environmental Protection Agency should be sent to:

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

Note: if acceptable to the agency, applicable correspondence may be submitted by electronic mail.

Section III. Emissions Units and Conditions

Subsection A. Foster-Wheeler 440 MW Boilers

<u>E.U. ID No.</u>	<u>Brief Description</u>
-001	440 MW Boiler (EPA ID # PTP1)
-002	440 MW Boiler (EPA ID # PTP2)

Emissions units -001 and -002 consist of two Foster-Wheeler 400 MW Class (440 MW gross capacity) Steam Generating Units that burn a variable combination of natural gas, used oil from FP&L operations, No. 6 and No. 2 fuel oils, and propane. Power ratings are nominal and are not limiting of either unit. The height of each of the two stacks is 400 feet. Each unit is equipped with low excess air burners and UOP Air Correction Division multiple cyclones with reinjection. Visible emissions are monitored by a transmissometer in each stack. The units are subject to NOx RACT. Sulfur dioxide, carbon dioxide, nitrogen oxides, visible emissions, and gas flow rate are all continuously monitored. Unit -001 began commercial operation in April 1967; unit -002 in April 1968.

{Permitting note: The emissions units are regulated under Acid Rain-Phase II, Fossil Fuel Steam Generators with more than 250 million Btu per Hour Heat Input - Rule 62-296.405, F.A.C., and RACT Requirements for Major VOC- and NOx-Emitting Facilities - Rule 62-296.570, F.A.C.}

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

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. For each emissions unit, the maximum heat input (mmBtu per Hour) shall not exceed 4,025 mmBtu per hour while firing natural gas, or 3,850 mmBtu per hour while firing fuel oil. If a blend of fuels is fired, the heat input shall be prorated based on the percent heat input of each fuel. Power ratings are nominal and are not limiting of either unit.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

A.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition C.6.
[Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation - Fuels The only fuels allowed to be burned are new No. 2 fuel oil, new No. 6 residual oil, natural gas, propane, and on-specification used oil generated exclusively from FPL operations.

The used oil shall comply with the requirements given in specific condition A.20. Additionally, no more than 750,000 gallons shall be burned annually.

Magnesium hydroxide fuel additives are authorized to be added to the boiler units as needed to enhance combustion and facilitate furnace cleaning in a manner consistent with Best Operational Practices.

[Rule 62-4.160(2), 62-210.200, 62-213.440(1), F.A.C., AO13-238939, AO13-238932]

A.4. Hours of Operation. The emissions units may operate continuously, i.e., 8,760 hours per year.

[Rule 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: 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 and visible emissions annually.

[Rule 62-296.405(1)(a), F.A.C.; and, authorized by Order of the Department's Secretary 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. Additionally, visible emissions above 60 percent opacity shall be allowed for not more than four, six minute periods, during the 3-hour period of excess emissions.

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.

[Rule 62-210.700(3), F.A.C.]

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. Sulfur dioxide emissions shall not exceed 1.1 pounds per million Btu heat input, as measured by applicable compliance methods. Compliance shall be based on the use of a continuous emission monitoring system (CEMS). The sulfur dioxide emission limitation shall apply at all times including startup, shutdown, and load change, but shall not apply during malfunction provided best operational practices to minimize emissions are adhered to. See specific condition A.13.

[Rules 62-213.440, F.A.C., and AO13-238939 and AO13-238932, Dade County Code Section 24-17]

A.10. Nitrogen Oxides. NO_x emissions from each boiler stack shall not exceed the following limits based on a 30-day rolling average:

	<u>Natural Gas</u>	<u>Fuel Oil</u>
lbs./mmBtu	0.40	0.53
lbs./hour	1,610	2,041

These limits shall apply at all times except during periods of startup, shutdown, or malfunction as provided by Rule 62-210.700, F.A.C. Compliance shall be based on the use of a CEMS. See specific condition A.14.

[Rule 62-296.570(4)(b)2, and (c), F.A.C.]

Monitoring and Testing Requirements

{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.11. 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.12.

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

A.12. 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.13. Sulfur Dioxide. The permittee shall demonstrate compliance with the sulfur dioxide limit of specific condition A.9 of this permit by the following:

a. Through the use of CEMS installed, operated, and maintained in accordance with the quality assurance requirements of 40 CFR 75, adopted and incorporated by reference in Rule 62-204.800 F.A.C. A relative accuracy test audit of the SO₂ CEMS shall be conducted at least annually. Compliance shall be demonstrated on a 3-hour rolling average.

b. In the event the CEMS becomes temporarily inoperable or interrupted for periods exceeding 60 minutes, the fuel oil sulfur content and the maximum fuel oil to natural gas firing ratio is limited to that which was last used to demonstrate compliance prior to the loss of the CEMS. Alternatively, the boilers may fire 100 percent fuel oil or 100 percent natural gas with a maximum sulfur content of 1.0 percent by weight, or less. See specific condition A.19.

[Rule 62-204.800, 62-213.440, 62-296.405(1)(c)3., F.A.C., AO13-238932, AO13-238939]

A.14. Nitrogen Oxides. The permittee shall operate, maintain, and calibrate a CEMS to determine compliance with the NO_x emission limits as specified above. Determination of compliance shall be in accordance with the testing, compliance, emission monitoring, reporting, recordkeeping, certification and quality assurance provisions of 40 CFR 75.

[Rule 62-296.405(1)(f), F.A.C., AO13-238939, AO13-238932]

A.15. 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.

[Rules 62-213.440, 62-296.405(1)(e)2., and 62-297.401, F.A.C.]

A.16. 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.17. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:

- a. only gaseous fuel; or

b. gaseous fuel in combination with any amount of liquid fuel for less than 400 hours per year; or

c. only liquid fuel for less than 400 hours per year.

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

A.18. Operating Conditions During Testing - PM and VE. Compliance testing during sootblowing and steady-state operation for particulate matter and visible emissions shall be conducted at least once annually, if liquid fuel is fired for more than 400 hours. A visible emissions test shall be conducted during one run of each particulate matter test. Testing shall be conducted as follows:

- a. When Burning Fuel Oil Up To 1% Sulfur. When only fuel oil containing less than or equal to 1% sulfur, by weight, is fired (or co-fired with natural gas) in an emissions unit, particulate matter and visible emissions tests during sootblowing and steady-state operation shall be performed on such emissions unit while firing solely fuel oil containing at least 90% of the average sulfur content of the fuel oils fired in the previous 12 month period, except that such test shall not be required to be performed during any year that testing is performed in accordance with specific condition A.18.b.
- b. When Burning Fuel Oil Greater Than 1% Sulfur. When fuel oil containing greater than 1% sulfur, by weight, is co-fired with natural gas in an emissions unit, particulate matter and visible emissions tests during sootblowing and steady-state operation shall be performed as soon as practicable, but in no event more than 60 days after firing such fuel oil, while co-firing such oil with the appropriate proportion of natural gas required to maintain SO₂ emissions between 90 to 100% of the SO₂ emission limit (corresponding to 0.99 and 1.1 lb/mmBtu heat input). Following successful completion of such PM and VE testing, further PM and VE testing shall not be required during the next 12 months unless fuel oil is fired that contains greater than 0.20% sulfur above the percentage sulfur concentration fired during the most recent co-firing test. If fuel oil is co-fired containing greater than 0.20% sulfur above the percentage sulfur concentration fired during the most recent co-firing test, additional PM and VE tests shall be performed as described above as soon as practicable, but in no event more than 60 days after firing such higher sulfur fuel oil.

[Rules 62-4.070(3), 62-213.440, 62-296.405(1)(c)3. and 62-297.310(7)(a)9., F.A.C.]

Recordkeeping and Reporting Requirements

A.19. Fuel Records and Sampling Protocol. In conjunction with specific condition A.13.(b), when the CEMS becomes disabled for periods exceeding 60 minutes, the following information shall be collected:

a. Fuel Records. For each boiler, the quantity of fuel(s) fired or when co-firing, the ratio of fuel oil to natural gas shall be recorded.

b. Sampling Protocol. A fuel oil sample shall be collected hourly, by taking a small portion of the fuel fired and pouring it into a container. On a daily basis the fuel oil from this container shall be analyzed for heating value and sulfur content. Analysis for sulfur content shall be performed using one of the following: ASTM D2622-94, ASTM D4294-90(95), ASTM D1552-

95, ASTM D1266-91, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s).
[Rules 62-4.070(3), 62-213.410, 62-213.440 and 62-296.405(1)(c)3., F.A.C.]

Miscellaneous Conditions

A.20. Used Oil. Burning of on-specification used oil is allowed by these emissions units in accordance with all other conditions of this permit and the following conditions:

a. **On-specification Used Oil Emissions Limitations:** This emissions unit is permitted to burn on-specification used oil, which contains a PCB concentration of less than 50 ppm. On-specification used oil is defined as used oil that meets the specifications of 40 CFR 279 - Standards for the Management of Used Oil, listed below. "Off-specification" used oil shall not be burned. Used oil which fails to comply with any of these specification levels is considered "off-specification" used oil.

CONSTITUENT/PROPERTY	ALLOWABLE LEVEL
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash point	100 degrees F minimum

b. **Quantity Limitation:** This emissions unit is permitted to burn "on-specification" used oil that is generated by FP&L in the production and distribution of electricity, not to exceed 750,000 gallons during any consecutive 12 month period.

c. **PCB Limitation:** 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. **Operational Requirements:** On-specification used oil with a PCB concentration of greater than or equal to 2, and less than 50 ppm shall be burned only at normal source operating temperatures. On-specification used oil with a PCB concentration of greater than or equal to 2 ppm shall not be burned during periods of startup or shutdown.

e. **Testing Requirements:** 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 and 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).

f. **Record Keeping Requirements:** 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:

(1) The gallons of on-specification used oil generated 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 Requirements: The owner or operator shall submit to DERM, within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

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.

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

Additionally, all conditions of Subsection C. apply to this emissions unit.

Subsection B. Five Diesel Peaking Generators

E.U. ID

<u>No.</u>	<u>Brief Description</u>
-003	(5) 2.75 MW Diesel Generators

This emissions unit consists of five MKW Powersystems, Inc. Model EMD MP-45 "black start" emergency diesel generators. The generators support boilers -001 and -002 as "peaking units", and, in the event the facility loses primary power, they serve as a backup. These units fire No. 2 fuel oil. The emissions from the generators are limited by the fuel type. The units commenced operation in April, 1968.

{Permitting note: These units are regulated under Reasonably Available Control Technology (RACT) - Requirements for Major VOC- and NOx-Emitting Facilities Rule 62-297.570, F.A.C.}

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum heat input to each generator shall not exceed 24.89 mmBtu per hour.

[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE) and 62-296.405, F.A.C.]

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition C.6.

B.3. Methods of Operation - Fuels. The only fuel authorized to be burned in this unit is new No. 2 fuel oil. The sulfur content shall not exceed 0.5 percent by weight.

[Rules 62-4.160(2), 62-210.200, and 62-213.440(1), F.A.C., and requested by applicant.]

B.4. Hours of Operation. The generators may operate continuously, i.e., 8,760 hours/year.

[Rule 62-210.200, F.A.C.]

Emission Limitations and Standards

{Permitting note: 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.}

B.5. Visible Emissions: Visible emissions shall not exceed 20 percent opacity.

[Rule 62-296.320(4)(b)1., F.A.C.]

B.6. Nitrogen Oxides. NOx emissions shall not exceed 4.75 lb per million Btu heat input. These limits shall apply at all times except during periods of startup, shutdown, or malfunction as provided by Rule 62-210.700, F.A.C.

[Rule 62-296.570(4)(b)7. and (c), F.A.C.]

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.}

B.7. Visible Emissions: The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C.
[Rule 62-297.310(7)(a), F.A.C.]

B.8. NOx Emissions: For units that are not equipped with a continuous emissions monitoring system (CEMS) for NOx, compliance with the emissions 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 for NOx while firing oil is unnecessary for units operating less than 400 hours in the current federal fiscal year.*
[Rule 62-296.570(4)(a)3., F.A.C.]

B.9. The test method for NOx shall be EPA Method 7 or 7E, incorporated and adopted by reference in Chapter 62-297, F.A.C.
[Rules 62-296.570(4)(a)3. and 62-297.401(7), F.A.C.]

Additionally, all conditions of Subsection C. apply to this emissions unit.

Subsection C. Common Conditions

This section contains conditions applicable to the emissions units described in Subsections A and B.

Excess Emissions

C.1. 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.]

C.2. 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.]

C.3. 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

C.4. 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.

[Rule 62-297.310(5), F.A.C.]

Test Methods and Procedures

C.5. 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.]

C.6. Operating Rate During Testing. Testing of emissions shall be conducted with each emissions unit operating 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 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.]

C.7. 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.]

C.8. 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:
 - a. (Not applicable.)
 - b. (Not applicable.)
 - 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. (See attachment).
- (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.]

C.9. 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.]

C.10. 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.

1. (Not applicable.)
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: 5 tons per year or more of lead or

- lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 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.
6. (Not applicable.)
7. (Not applicable.)
8. (Not applicable.)
9. (See Specific Condition C.14.)
10. An annual compliance test conducted for visible emissions shall not be required for units exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62-210.300(4), F.A.C.
- (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)(a)2., 3., 4., 5., 10., (b) & (c), F.A.C.; SIP approved]

Recordkeeping and Reporting Requirements

C.11. In the case of excess emissions resulting from malfunctions, the permittee shall notify the Dade County Department of Environmental Resources Management 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 Dade County Department of Environmental Resources Management.
[Rule 62-210.700(6), F.A.C.]

C.12. Submit to the Dade County Department of Environmental Resources Management a written report of emissions in excess of emission limiting standards 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 permittee 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.]

C.13. 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 and Dade County Department of Environmental Resources Management on the results of each such test.

(b) The required test report shall be filed with the Department and Dade County Department of Environmental Resources Management 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 and Dade County Environmental Resources Management 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.]

C.14. The owner or operator shall notify the Dade County Department of Environmental Resources Management, 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.

[Rule 62-297.310(7)(a)9., F.A.C.]

Section IV. Acid Rain Part

Turkey Point Fossil Plant

Facility ID No.: 0250003

Operated by: Florida Power and Light Company

ORIS code: 621

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

E.U.

ID No. Description

-001 440 MW Boiler (EPA ID # PTP1)

-002 440 MW Boiler (EPA ID # PTP2)

1. The Acid Rain Part application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these acid rain units must comply with the standard requirements and special provisions set forth in the application listed below:

- a. DEP Form No. 62-210.900(1)(a), dated 07/01/95.

[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

2. Sulfur dioxide (SO₂) allowance allocations requirements for each Acid Rain unit:

E.U. ID No.	EPA ID No.	Year	2000	2001	2002
-001	PTP 1	SO ₂ allowances, under Table 2 of 40 CFR 73	5818*	5818*	5818*
-002	PTP 2	SO ₂ allowances, under Table 2 of 40 CFR 73	5861*	5861*	5861*

*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 of 40 CFR 73.

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.

- a. No permit revision shall be required for increases 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.
- b. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.
- c. Allowances shall be accounted for under the Federal Acid Rain Program.
[Rule 62-213.440(1)(c)1., 2. & 3., F.A.C.]

4. 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.]

5. Comments, notes, and justifications:
 - a. Turkey Point has no Phase I units/allowances.
 - b. Phase II Permit Application received 12/6/95.

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

Florida Power & Light

PROPOSED Permit No.: 0250003-001-AV

Turkey Point Fossil Station

Page 1 of 2

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Full 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 whether a facility containing such emissions units or activities would be subject to any applicable requirements. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., are also exempt from the permitting requirements of Chapter 62-213, F.A.C., provided such emissions units and activities also meet the exemption criteria of Rule 62-213.430(6)(b), F.A.C. The below listed emissions units and/or activities are hereby exempt pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

1. Internal combustion engines in boats, aircraft and vehicles used for transportation of passengers or freight.
2. Cold storage refrigeration equipment, except for any such equipment located at a Title V source using an ozone-depleting substance regulated under 40 CFR Part 82.
3. Vacuum pumps in laboratory operations.
4. Equipment used for steam cleaning.
5. Belt or drum sanders having a total sanding surface of five square feet or less and other equipment used exclusively on wood or plastics or their products having a density of 20 pounds per cubic foot or more.
6. Equipment used exclusively for space heating, other than boilers.
7. Laboratory equipment used exclusively for chemical or physical analyses.
8. Brazing, soldering or welding equipment.
9. One or more emergency generators located within a single facility provided:
 - a. None of the emergency generators is subject to the Federal Acid Rain Program; and
 - b. Total fuel consumption by all such emergency generators within the facility is limited to 32,000 gallons per year of diesel fuel, 4,000 gallons per year of gasoline, 4.4 million standard cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.
10. One or more heating units and general purpose internal combustion engines located within a single facility provided:
 - a. None of the heating units or general purpose internal combustion engines is subject to the Federal Acid Rain Program; and
 - b. Total fuel consumption by all such heating units and general purpose internal combustion engines within the facility is limited to 32,000 gallons per year of diesel fuel, 4,000 gallons per year of gasoline, 4.4 million standard cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.
11. Fire and safety equipment.

Appendix E-1, List of Exempt Emissions Units and/or Activities

Florida Power & Light
Turkey Point Fossil Station
Page 2 of 2

PROPOSED Permit No.: 0250003-001-AV

12. Surface coating operations within a single facility if the total quantity of coatings containing greater than 5.0 percent VOCs, by volume, used is 6.0 gallons per day or less, averaged monthly, provided:

- a. Such operations are not subject to a volatile organic compound Reasonably Available Control Technology (RACT) requirement of Chapter 62-296, F.A.C.; and
- b. The amount of coatings used shall include any solvents and thinners used in the process including those used for cleanup.

13. Surface coating operations utilizing only coatings containing 5.0 percent or less VOCs, by volume.

14. Degreasing units using heavier-than-air vapors exclusively, except any such unit using or emitting any substance classified as a hazardous air pollutant.

Note: No exemption shall be granted to any emissions unit or activity if:

1. Such unit or activity would be subject to any unit-specific applicable requirement;
2. Such unit or activity, in combination with other units and activities proposed for exemption, would cause the facility to exceed any major source threshold(s) as defined in Rule 62-213.420(3)(c)1., F.A.C., unless it is acknowledged in the permit application that such units or activities would cause the facility to exceed such threshold(s); or
3. Such unit or activity would emit or have the potential to emit:
 - a. 500 pounds per year or more of lead and lead compounds expressed as lead;
 - b. 1,000 pounds per year or more of any hazardous air pollutant;
 - c. 2,500 pounds per year or more of total hazardous air pollutants; or
 - d. 5.0 tons per year or more of any other regulated pollutant.

[Rule 62-213.430(6), F.A.C.]

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

Florida Power & Light
Turkey Point Fossil Station

PROPOSED Permit No.: 0250003-001-AV

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 ‘exempt emissions units’.

E.U. ID No. Brief Description of Emissions Units and/or Activity

-xxx	20,000 gallon No. 2 fuel oil tank
	25,000 gallon No. 2 fuel oil tank
	2,000 gallon unleaded gasoline tank
	2,000 gallon vehicular diesel tank
	11,256,000 gallon No. 5 & 6 fuel oil tank, installed 07/67
	11,256,000 gallon No. 5 & 6 fuel oil tank, installed 07/68
	504,000 gallon No. 5 & 6 fuel oil tank, installed 07/68
	504,000 gallon No. 5 & 6 fuel oil tank, installed 07/68
	1,500 gallon mineral acid tank, installed 04/95
	Hydrazine tank
	Ammonia tank
	Phosphate tank
	Off-loading of Fuel from Tankers
	Propane Storage Tank
	Sandblast Shed
	Unleaded gasoline dispensing facility with a monthly gasoline throughput of less than 20,000 gallons.

[electronic file name: 0250003u.doc]

Table 1-1, Summary of Air Pollutant Standards and Terms

Florida Power and Light
 Turkey Point Station - Fossil

PROPOSED Permit #: 0250003-001-AV
Facility ID #: 0250003

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

E.U. -001, -002 Two 440 MW 4,025 MMBtu/hr Boilers

Pollutant/Parameter	Fuel	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citations	See Permit Condition
			Standard(s)	lbs/hour	TPY	lbs./hour	TPY		
SO2			1.1 lbs/MMBtu			11,000	48,180	Dade County Code 24-17(2)(a)(ii)	III. A.9
PM			0.1 lbs/MMBtu			500	2,190	Rule 62-296.405(1)(b)	III. A.7
VE			40%				n/a	Rule 62-296.320(4)(b)1	III. A.5
NOx			0.53 lbs/MMBtu (oil) 0.40 lbs/MMBtu (natural gas)			2,120	9,287	Rule 62-296.570(4)(b)2	III. A.10

Notes: ** -- Annual emissions (TPY) based on 3 hours per day at 0.3 lb/mmBtu and 21 hours per day at 0.1lb/MMBtu.
 * -- Equivalent Emissions provided for information only.

Table 1-1, Summary of Air Pollutant Standards and Terms

Florida Power and Light
Turkey Point Station - Fossil

PROPOSED Permit #: 0250003-001-AV
Facility ID #: 0250003

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

E.U. -003 Five 2.75 MW Diesel Generators, 24.89 MMBtu/hr

Pollutant/Parameter	Fuel	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citations	See Permit Condition
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
VE	#2 oil		20%				n/a	Rule 62-296.320(4)(b)4.a.	III.B.5.
NOx	#2 oil		4.75 lbs/MMBtu			2,120	9,287	Rule 62-296.570(4)(b)7	III.B.6.

Notes: * * -- Annual emissions (TPY) based on 3 hours per day at 0.3 lb/mmBtu and 21 hours per day at 0.1lb/MMBtu.
 * -- Equivalent Emissions provided for information only.

Table 2-1, Summary of Compliance Requirements

Florida Power & Light
Turkey Point Station - Fossil

PROPOSED Permit #: 0250003-001-AV
Facility ID #: 0250003

This table summarizes information for convenience purposes only, & does not supersede any terms or conditions of this permit.
E.U. -001, -002 Two 440 MW Steam Boilers, 4,025 MMBtu/hr

Pollutant/ Parameter	Fuel	Compliance Method	Frequency of Sampling	Frequency Base Date *	Min. Compliance Test Duration	CEMS **	Permit Condition
SO2		Fuel sampling & analysis	After each fuel oil shipment	1-Oct		X	III. A.13
PM		EPA Method 5B	annual				III. A.15
VE		DEP Method 9	annual				III. A.11
NOx		40 CFR 75	continuous			X	III. A.14

Notes:

*Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.

**CEMS = continuous emissions monitoring system (CEMS primary method of compliance; fuel sampling & analysis secondary)

Table 2-1, Summary of Compliance Requirements

Florida Power & Light
Turkey Point Station - Fossil

PROPOSED Permit #: 0250003-001-AV
Facility ID #: 0250003

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

E.U. -003

Five 2.75 MW Diesel Generators, 24.89 MMBtu/hr

Pollutant/ Parameter	Fuel	Compliance Method	Frequency of Sampling	Frequency Base Date *	Min. Compliance Test Duration	CMS**	Permit Condition
VE		EPA Method 9	annual				III. B.7
NOx		Rule 62- 296.570(4)(a)3.					III. B.8

Notes:

*Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.

**CMS = continuous monitoring system

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On this date of:

Petition for Reduction in Quarterly
Particulate Emissions Compliance
Testing;
FLORIDA POWER AND LIGHT COMPANY,

Petitioner.

OCC Case Nos.: 83-0570
83-0577, 83-0576,
83-0585, 83-0586,
83-0587, 83-0588
83-0581, 83-0580

ED

ORDER GRANTING PETITION FOR REDUCED
FREQUENCY OF PARTICULATE TESTING

On September 16, 1983, the Petitioner, FLORIDA POWER AND LIGHT COMPANY, filed a Petition for Reduction in Quarterly Particulate Emissions Compliance Testing pursuant to Florida Administrative Code Rule 17-2.600(5)(b)1 for the following fossil fuel steam generating units:

- Port Everglades Plant Unit No. 2
- Port Everglades Plant Unit No. 3
- Port Everglades Plant Unit No. 4
- Turkey Point Plant Unit No. 1
- Turkey Point Plant Unit No. 2
- Riveria Plant Unit No. 3
- Riveria Plant Unit No. 4
- Manatee Plant Unit No. 1
- Manatee Plant Unit No. 2

Each of the units has a heat input exceeding 250 million Btu per hour.

The petition and supporting documentation submitted by the Petitioner indicate that between August 1979 and July 21, 1983, these units were afforded relief from the particulate standard contained in Florida Administrative Code Rule 17-2.600(5)(b)2 under the terms of a Department-issued variance. During the same period of time the Company elected to test quarterly as permitted under Rule 17-2.600(5)(b)1. Despite the existence of the variance, the tests results submitted during the last two years reveal that each of the above-listed units met the particulate emissions limitations contained in Rule 17-2.600(5)(b)2 of 0.1 pounds per million Btu heat input.

Florida Administrative Code Rule 17-2.600(5)(b)1 specifically provides that I may reduce the frequency of particulate testing

upon a demonstration that the particulate standard has been regularly met. The particulate standard referred to is the general standard found in the rule--0.1 parts per million Btu heat input--not a relaxed emission limit established by a variance.

The intent of Rule 17-2.600(5)(b)1 is to ensure that before the frequency of particulate testing is reduced, the source has established a record of complying with the requirements of Florida Administrative Code Chapter 17-2 relating to particulate matter emissions. Petitioner has documented that each of these units has a history of regulary complying with the particulate matter standard applicable to them.

IT IS ORDERED that the present petition is GRANTED. Under the terms of Rule 17-2.600(5)(b)1, Petitioner may reduce the frequency of particulate testing to an annual basis for each of the units named in this Order. If, however, any of the units fails to comply with the applicable particulate or visible emission standard, this Order will terminate upon written notice by the Department.


The Petitioner may request a hearing in accordance with Section 120.57, Florida Statutes, and Florida Administrative Code Chapters 17-1 and 28-5. The request for hearing must be filed (received) in the Office of General Counsel of the Department, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within (14) days of receipt of this Order. Failure to file a request for hearing within this time shall constitute a waiver of Petitioner's right to request a hearing under Section 120.57, Florida Statutes.

DONE and ORDERED this 24 day of April, 1984.

ACCEPTED FOR DEPARTMENT
PP 23. at this time pursuant to S120.52 (9).
Florida Statutes, with the designated Depart-
ment Clerk, receipt of which is hereby acknow-
ledged.

April 24, 1984
Clerk

Date


VICTORIA J. TSCHINKEL
Secretary

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION
2600 Blair Stone Road
Tallahassee, Florida 32301
(904)488-4805

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Order Denying
Petition for Reduced Frequency of Particulate Testing and the
Order Granting Petition for Reduced Frequency of Particulate
Testing have been furnished by U.S. Mail to Peter C. Cunningham,
Esquire, Hop, ing Boyd Green and Sams, Post Office Box 6326,
Tallahassee, Florida 32314 this 29th day of April, 1984.

Nancy E. Wright

NANCY E. WRIGHT
Assistant General Counsel

State of Florida Department
of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301
904/488-9730

Appendix H-1, Permit History/ID Number Changes

Florida Power & Light
Turkey Point

PROPOSED Permit No.: 0250003-001-AV
Facility ID No.: 0250003

Permit History

E.U.

<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u>	<u>Revised Date</u>
-001	440 MW Steam Generating Unit #1	AO13-238939	12/23/93	12/01/98		
-002	440 MW Steam Generating Unit #2	AO13-238932	01/07/94	12/01/98		
-003	Five 2.75 MW Diesel Generators	new unit				

ID Number Changes:

From: Facility ID No.: 50DAD130003

To: Facility ID No.: 0250003

Phase II Permit Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31 and Chapter 214, F.A.C.

This submission is: New Revised

Turkey Point Fossil Plant	FL	621
Plant Name	State	ORIS Code

STEP 1
Identify the source by plant name, State, and ORIS code from NADB

Compliance Plan

a	b	c	d	e
Boiler ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)	Repowering Plan	New Units Commence Operation Date	New Units Monitor Certification Deadline

STEP 2
Enter the boiler ID# from NADB for each affected unit, and indicate whether a repowering plan is being submitted for the unit by entering "yes" or "no" at column c. For new units, enter the requested information in columns d and e

PTP1	Yes	N/A	N/A	N/A
PTP2	Yes	N/A	N/A	N/A
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			

STEP 3
Check the box if the response in column c of Step 2 is "Yes" for any unit

For each unit that will be repowered, the Repowering Extension Plan form is included and the Repowering Technology Petition form has been submitted or will be submitted by June 1, 1997.

Plant Name (from Step 1)

STEP 4.
Read the standard requirements and certification, enter the name of the designated representative, and sign and date.

Standard RequirementsPermit Requirements.

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Submit a complete Acid Rain part application (including a compliance plan) under 40 CFR part 72, Rules 62-214.320 and 330, F.A.C. in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain part application or a superseding Acid Rain part issued by the permitting authority; and
 - (ii) Have an Acid Rain Part.

Monitoring Requirements.

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements.

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1)(i) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
 - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,

Plant Name (from Step 1)

Recordkeeping and Reporting Requirements (cont.)

(iv) Copies of all documents used to complete an Acid Rain part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability.

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.
- (6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 75, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities. No provision of the Acid Rain Program, an Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment. (There are no attachments to this document)

Name		William M. Reichel
Signature	<i>William M. Reichel</i>	Date 1/4/95

STEP 5 (optional)
Enter the source AIRS
and FINDS identification
numbers, if known

AIRS
FINDS

BEST AVAILABLE COPY



Certificate of Representation

For more information, see instructions and refer to 40 CFR 72.24

This submission is: New Revised

STEP 1
Identify the source by plant name, State, and ORIS code from NADB

Plant Name	Turkey Point Power Plant	State	FL	ORIS Code	621
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STEP 2
Enter requested information for the designated representative

Name		William Muly Reichel, Manager, Operation Services			
Address		P.O. Box 14000 700 Universe Blvd. Juno Beach, Florida 33408			
Phone Number	407-691-2870	Fax Number	407-691-2855		

STEP 3
Enter requested information for the alternate designated representative (optional)

Name		Antonio Rodriguez, Vice President, Operations			
Address		P.O. Box 14000 700 Universe Blvd. Juno Beach, Florida 33408			
Phone Number	407-691-2900	Fax Number	407-691-2606		

STEP 4
Complete Step 5, read the certifications and sign and date

I certify that I was selected as the designated representative or alternate designated representative, as applicable, by an agreement binding on the owners and operators of the affected source and each affected unit at the source.

I certify that I have given notice of the agreement, selecting me as the designated representative or alternate designated representative, as applicable for the affected source and each affected unit at the source identified in this certificate of representation, daily for a period of one week in a newspaper of general circulation in the area where the source is located or in a State publication designed to give general public notice.

I certify that I have all necessary authority to carry out my duties and responsibilities under the Acid Rain Program on behalf of the owners and operators of the affected source and of each affected unit at the source and that each such owner and operator shall be fully bound by my actions, inactions, or submissions.

I certify that I shall abide by any fiduciary responsibilities imposed by the agreement by which I was selected as designated representative or alternate designated representative, as applicable.

I certify that the owners and operators of the affected source and of each affected unit at the source shall be bound by any order issued to me by the Administrator, the permitting authority, or a court regarding the source or unit.

NA Where there are multiple holders of a legal or equitable title to, or a leasehold interest in, an affected unit, or where a utility or industrial customer purchases power from an affected unit under life-of-the-unit, firm power contractual arrangements, I certify that:

NA I have given a written notice of my selection as the designated representative or alternate designated representative, as applicable, and of the agreement by which I was selected to each owner and operator of the affected source and of each affected unit at the source; and

NA Allowances and the proceeds of transactions involving allowances will be deemed to be held or distributed in proportion to each holder's legal, equitable, leasehold, or contractual reservation or entitlement or, if such multiple holders have expressly provided for a different distribution of allowances by contract, that allowances and the proceeds of transactions involving allowances will be deemed to be held or distributed in accordance with the contract.

NA The agreement by which I was selected as the alternate designated representative includes a procedure for the owners and operators of the source and affected units at the source to authorize the alternate designated representative to act in lieu of the designated representative.

Turkey Point Power Plant
Plant Name (from Step 1)

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

<i>William H. Kelly</i> Signature (designated representative)	Date Oct. 29, 1993
<i>Cal Bridges</i> Signature (alternate)	Date Nov. 2, 1993

STEP 5
Provide the name of every owner and operator of the source and each affected unit at the source. Identify the units they own and/or operate by boiler ID# from NADB. For owners only, identify each state or local utility regulatory authority with jurisdiction over each owner

Name Florida Power & Light Company						<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
ID# PTP 1	ID# PTP 2	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#	ID#
Regulatory Authorities							

Name						<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#	ID#
Regulatory Authorities							

Name						<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#	ID#
Regulatory Authorities							

Name						<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#	ID#
Regulatory Authorities							

The Miami Herald

A Knight-Ridder Newspaper

PUBLISHED DAILY
MIAMI-DADE-FLORIDA

STATE OF FLORIDA
COUNTY OF DADE

Before the undersigned authority
personally appeared:

ANN MARTULA

who on oath says that he/she is:

CUSTODIAN OF RECORDS

of The Miami Herald, a daily news-
paper published at Miami in Dade
County, Florida; that the attached
copy of advertisement was published
in said newspaper in the issues of:

NOVEMBER 3, 4, 5, 6, 7, 8 AND 9, 1993

Affiant further says that the said
The Miami Herald is a newspaper
published at Miami, in the said
Dade County, Florida and that the
said newspaper has heretofore been
continuously published in said Dade
County, Florida each day and has
been entered as second class mail
matter at the post office in Miami,
in said Dade County, Florida, for a
period of one year next preceding
the first publication of the at-
tached copy of advertisement; and
affiant further says that he has
neither paid nor promised any per-
son, firm or corporation any dis-
count, rebate, commission or refund
for the purpose of securing this
advertisement for publication in
the said newspaper(s).

Ann Martula

Sworn to and subscribed before me
this 10TH day of NOVEMBER A.D. 1993

My Commission
expires:

Silvia Acosta

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXP. MAR. 18, 1998
BONDED THRU GENERAL INS. CO.



NOTICE

Notice is hereby given that Florida Power & Light Company has appointed William M. Reichel as the Designated Representative for Turkey Point Power Plant, replacing John M. Lindsay. As the Designated Representative, William M. Reichel has all the necessary authority to carry out the responsibilities of Designated Representative on behalf of Florida Power & Light Company, pursuant to the acid rain program of the Clean Air Act Amendments of 1990.

This notice was made in accordance with the Clean Air Act Amendments of 1990, 42 USC Section 7401 et. seq., and applicable regulations of the United States Environmental Protection Agency.