



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

January 13, 1998

Mr. Vito Kaminskas
Plant General Manager
Florida Power & Light
P.O. Box 14000
Juno Beach, FL 33408

Re: PROPOSED Title V Permit No.: 0250003-002-AV
Turkey Point Nuclear Plant

Dear Mr. Kaminskas:

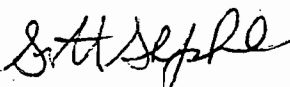
One copy of the PROPOSED Title V Air Operation Permit for the Turkey Point Nuclear Plant located 10 miles east of Florida City on SW 344 Street, Florida City, Palm Drive, 33035, Dade County, is enclosed. This letter is only a courtesy to inform you that the DRAFT permit has become a PROPOSED permit.

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permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.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,

for 
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)

1/16/98 cc: Reading File
Steve Welsh

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

PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 0250003-002-AV

I. Public Notice

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" for the Turkey Point Nuclear Plant located 10 miles east of Florida City on Palm Drive Florida City, Palm Drive, 33035, 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: 850/488-1344
Fax: 850/922-6979

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 letters dated October 7, and October 9, 1997. Their comments and the Department's response are given below.

Comment # 1: FPL stated that for emissions unit #2, they have one additional diesel generator.

Response: This additional diesel generator was added into the Proposed Permit.

Comment # 2: FPL's initial application requested a 1,400 hour limit for the five main diesel generators. In their October 7 letter, it was further requested that this limit be waived whenever the generators are required to "mitigate reactor damage or to protect the health and safety of the public from releases of radioactive material".

Response: It was mutually agreed that an operating limit of 8,760 hours would be acceptable.

Comment # 3: FPL requested that emissions unit #2 be limited to 400 hours and emissions unit #3 be given a fuel usage limit of 160,520 gallons per year; this fuel usage limitation would be considered equivalent to 400 hours per year.

Response: The Department denied this request. The Department and FPL mutually agreed to an operating limit of 8,760 hours per year.

Comment # 4: FPL requested that annual and permit renewal compliance testing for visible and NOx emissions not be required for units operating less than 400 hours.

Response: The Department agreed to this request.

Comment # 5: FPL requested that language be added to specific condition A.1. in order to address how compliance with the heat input limitation would be achieved.

Response: The Department agreed to this request. Therefore, the following sentence was added to specific condition A.1.: Heat input may be determined by using fuel flow meters in conjunction with the Btu content of the fired fuel.

Comment # 6: FPL requested that the following items be added to Appendix E-1, List of Exempt Emissions Units and/or Activities:

1. Bakery ovens;
2. Laundry dryers;
3. Portable air curtain incinerators;
4. Turbine lube oil system components; and,
5. Activities regulated under NRC rules.

Response: The Department agreed to this request.

Comment # 7: FPL requested that the following items be added to Appendix U-1, Unregulated Emissions Units and/or Activities:

1. Fugitive VOC & PM emissions;
2. Mineral acid (H₂SO₄) tank;
3. Slime sucker pumps;
4. Chemical addition tanks;
5. 70,000 & 40,400 gallon No. 2 oil (diesel) storage tank;
6. Four, 2,000 gallon diesel storage tanks;
7. 4,000 & 2,000 gallon unleaded storage tanks; and,
8. Unleaded gasoline dispensing facilities with monthly throughput of less than 2,000 gallons.

Response: The Department agreed to this request.

B. Documents on file with the permitting authority:

-Letters dated and received October 7 and October 9, 1997, from FPL.

III. Title V Permitting Formats

CHANGES TO TITLE V PERMITS ISSUED PRIOR TO 12/02/97

Title V permitting formats were updated due to recent rule changes and after considering comments received from the electric utilities. This permit reflects these changes. A brief summary of the changes is below.

1. Recent rule changes changed "exempt activities" to "insignificant activities." Rules 62-213.430(6), F.A.C. and 62-210, F.A.C., reflecting this change went into effect November 13, 1997.
 - a. The department inserted a condition in Appendix TV-1 clarifying that a Title V source can add an "insignificant activity" at its facility in accordance with the criteria under Rule 62-213.430(6), F.A.C., and include it in the Title V permit's list of "insignificant activities" at the next renewal, in accordance with Rule 62-213.430(6), F.A.C. See condition number 40.
 - b. Appendix E-1 has been changed to Appendix I-1, and the language of this appendix was revised to refer to insignificant emissions units where appropriate.
 - c. Appendix U-1 has been revised to refer to insignificant emissions units instead of exempt emissions units.
2. Several changes were made to Appendix TV-1 to reflect the rule changes discussed above, and to properly identify conditions that are not federally enforceable.
 - a. The following additional rules have been marked as "not federally enforceable":
 - 62-4.030, F.A.C., General Prohibition, (see condition number 1.)
 - 62-4.220, F.A.C., Operation Permit for New Sources, (see condition number 14.)
 - 62-210.300(5), F.A.C., Notification of Startup, (see condition number 19.)
 - b. Appendix TV-1, now carries a version date of "12/02/97".

IV. Conclusion

The permitting authority hereby issues the PROPOSED Permit No.: 0250003-002-AV, with the changes noted above.

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

Initial Title V Air Operation Permit
PROPOSED Permit No.: 0250003-002-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

January 13, 1998

Initial Title V Air Operation Permit
PROPOSED Permit No.: 0250003-002-AV

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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. 0250003-002-AV, addresses only the (non-nuclear) operations at the Nuclear Plant. The operations at the Fossil Plant are addressed in a separate Title V permit, No. 0250003-001-AV.

The Nuclear Plant consists of two nuclear generating units with a combined capacity of 1,332 megawatts, nine diesel emergency generators, miscellaneous diesel engines, and miscellaneous unregulated and insignificant emissions units and/or activities. This permit does not address the two nuclear generating units which are regulated by the Nuclear Regulatory Commission (NRC).

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 No.s and Brief Descriptions

E.U. ID

<u>No.</u>	<u>Brief Description</u>
-005	(4) 2.5 MW Diesel Emergency Generators
-006	(5) Other Diesel Emergency Generators
-007	Miscellaneous Diesel Plant Equipment
-008	Unregulated Emissions Units and/or Activities (See Appendix U-1)

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit ID No(s). on all test report submittals, applications, and other correspondence.

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

These documents are on file with the permitting authority:

Initial Title V Permit Application received June 13, 1996

{Permitting Note: These emissions units have no previous permits.}

Section II. Facility-wide Conditions

The following conditions apply facility-wide:

1. APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97), 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. **Insignificant Emissions Units and/or Activities.** Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.

[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]

7. **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)]

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. Use of thick poly-flaps over doorways to prevent any sandblasting material from leaving the sandblast facility. The facility also constructs temporary sandblasting enclosures when necessary in order to perform sandblasting on fixed plant equipment.
4. Maintenance of paved areas;
5. Regular mowing of grass and care of vegetation;
6. Limiting access to plant property by unnecessary vehicles;
7. 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.
8. 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. Any reports, data, notification, certifications, and requests required to be sent to 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

E.U. ID Brief Description

No.

-005	(4) 2.5 MW Diesel Emergency Generators
-006	(5) Other Diesel Emergency Generators
-007	Miscellaneous Diesel Plant Equipment

Emissions unit -005 consists of four Electro-Motive (GM) Model 20-645-E4 emergency diesel generators. The generators are referred to by facility personnel as units 3A, 3B, 4A, and 4B. The generators supply backup power to the nuclear power plant auxiliary equipment. These units fire low sulfur (0.5%) diesel fuel. Units 3A and 3B commenced operation in November, 1972, while units 4A and 4B commenced operation in 1991.

Emissions unit -006 consists of five other diesel emergency generators used for the plant's security system, wastewater treatment, and meteorological assessment. These generators also fire low sulfur (0.5%) diesel fuel.

Emissions unit -007, consists of the following miscellaneous diesel plant equipment:

- (6) Service Air compressor diesel engines;
- (3) hydrolazer diesel engines;
- (2) instrument air compressor diesel engines;
- (1) standby steam generator feed pump diesel engine;
- (1) service water diesel pump

{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. Note: these emissions units exceed the fuel usage limits to qualify for exemption under Rule 62-210.300(3)(a).20. and 21., F.A.C.}

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum heat input to each generator in emissions unit -001 shall not exceed 24.89 MMBtu per hour. Heat input may be determined by using fuel flow meters in conjunction with the Btu content of the fired fuel. The maximum heat input to each generator in emissions unit -002 shall not exceed 4.08 MMBtu per hour. Emissions unit -003 heat input shall not exceed 5.85 MMBtu per hour.

[Rules 62-4.160(2) & 62-210.200 (PTE), F.A.C., applicant requested per Title V application.]

A.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition A.13.
[Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation - Fuels. The only fuel authorized to be burned is new diesel fuel. 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.; applicant requested per Title V application.]

A.4. Annual Hours of Operation. The units may operate continuously, i.e., for 8,760 hours per 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.}

A.5. Nitrogen Oxides. NO_x 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.
[Rule 62-296.570(4)(b)7. and (c), F.A.C.]

Excess Emissions

A.6. 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 or DERM for longer duration.
[Rule 62-210.700(1), F.A.C.]

A.7. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.
[Rule 62-210.700(2), F.A.C.]

A.8. 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.]

Test Methods and Procedures

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

A.9. NO_x Emissions: For units that are not equipped with a continuous emissions monitoring system (CEMS) for NO_x, compliance with the emission limits shall be demonstrated by annual

emission testing in accordance with applicable EPA Reference Methods from Rule 62-297.401, F.A.C., or other methods approved by the Department in accordance with the requirements of Rule 62-297.620, F.A.C., except as otherwise provided in Rule 62-296.570(4)(b), F.A.C. Annual emission testing shall be conducted during each federal fiscal year (October 1 - September 30). ***Annual compliance testing while firing oil is unnecessary for units operating less than 400 hours in the current federal fiscal year.*** However, a compliance test that demonstrates compliance with the applicable emission limiting standard shall be conducted 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.

For small diesel engines (heat input less than 5 million Btu per hour) operating 400 hours per year or more, compliance shall be demonstrated by a stack test on at least one representative engine for each group of identical engines within the facility.

[Rule 62-296.570(4)(a)3., and 62-297.310(7)(a)3., F.A.C.]

A.10. The test method for NO_x 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.]

A.11. 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.]

A.12. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; ***provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate.*** The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic

mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

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

A.13. 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.]

A.14. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

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

A.15. 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. (Not applicable.)

(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) (Not applicable.)

(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.

(e) (Not applicable.)

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

A.16. 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. Additionally, the permittee of an emissions unit that is not required to conduct a compliance test on at least an annual basis may use permanent or temporary stack sampling facilities. If the permittee chooses to use temporary sampling facilities on an emissions unit, and DERM elects to test the unit, such temporary facilities shall be installed on the emissions unit within five days of a request by DERM and remain on the unit until the testing is complete.

[Rule 62-297.310(6), F.A.C.]

A.17. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

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 A.22.)
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 or DERM, 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 or DERM, 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]

A.18. By this permit, annual and permit renewal compliance testing for NO_x emissions is not required for these emissions units while burning diesel fuel for less than 400 hours in each generator or engine.

[Rules 62-297.310(7)(a)3. and 4., F.A.C.]

Recordkeeping and Reporting Requirements

A.19. 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.]

A.20. 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.]

A.21. 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. The test report, other than for an EPA or DEP Method 9 test, shall provide the following information, as appropriate:

1. The type, location, and designation of the emissions unit tested.

2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

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

A.22. The owner or operator shall notify the Department or DERM, 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.]

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

Florida Power & Light

PROPOSED Permit No.: 0250003-002-AV

Turkey Point Nuclear Station

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

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

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

-008	Lube oil vapor extractor system
	Turbine lube oil tank
	Sulfuric Acid Tank
	Open material stockpiles
	Wastewater treatment plant gases
	Paint building vents
	Hazardous waste storage building vents
	Aerosol can puncturing
	Miscellaneous Diesel Driven Pumps
	Chemical add tanks
	Gun Range
	70,000 gallon No. 2 light oil tank
	40,400 gallon No. 2 light oil tank
	4,000 gallon unleaded fuel tank
	(4) 2,000 gallon diesel fuel storage tanks
	(2) 4,000 gallon diesel oil storage tanks
	200 gallon unleaded fuel tank
	Unleaded gasoline dispensing facilities with monthly throughput of less than 2,000 gallons
	Fugitive emissions, Particulate matter and VOC's
	Slime Sucker pumps

[electronic file name: 0250003N.doc]

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

Florida Power & Light

PROPOSED Permit No.: 0250003-002-AV

Turkey Point Nuclear Station

Page 1 of 3

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

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

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

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

Florida Power & Light

PROPOSED Permit No.: 0250003-002-AV

Turkey Point Nuclear Station

Page 2 of 3

- 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.
 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.
 15. Bakery ovens and confection cookers when the products are edible and intended for human consumption.
 16. Laundry dryers, extractors or tumblers for fabrics cleaned with only water solutions of bleach or detergents.
 17. Portable air curtain incinerators except any air curtain incinerator intended to be continuously operated at one site for more than six months or at any Department- permitted landfill for any length of time; provided:
 - a. Only land clearing debris or clean dry wood is burned;
 - b. Pit width, length, and side walls are properly maintained so that combustion of the waste within the pit is maintained at an adequate temperature and with sufficient air recirculation to provide enough residence time and mixing for complete combustion and control of emissions. Pit width shall not exceed twelve (12) feet, and vertical side walls shall be maintained;
 - c. No waste is positioned to be burned above the level of the air curtain in the pit;
 - d. Visible emissions do not exceed 40 percent opacity except for up to 30 minutes during periods of startup and shutdown;
 - e. The air curtain incinerator is located at least 300 feet away from any occupied building if it has refractory- lined walls and forced underdraft air or otherwise at least 1,000 feet away from any occupied building; and
 - f. The burning is ignited after 9:00 a.m. and extinguished at least one hour before sunset, except that, in the case of an air curtain incinerator with refractory-lined walls and forced underdraft air which is located at least 1,000 feet away from any off-site occupied building, the burning may commence at sunrise, and the air curtain incinerator may be charged until sunset provided it does not create a nuisance.
 18. Turbine Lube Oil system components.
 19. Activities and/or emission sources regulated by the Nuclear Regulatory Commission pursuant to the Atomic Energy Act.

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

Florida Power & Light

PROPOSED Permit No.: 0250003-002-AV

Turkey Point Nuclear Station

Page 3 of 3

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.]

[electronic file name: 0250003i.doc]

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

Florida Power and Light
Turkey Point Station - Nuclear

PROPOSED Permit #: 0250003-002-AV
Facility ID #: 0250003

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

E.U. -005, -006, -007 All Diesel Generators and Engines

Pollutant/Parameter	Fuel	Hours/Year	Allowable Emissions			Equivalent Emissions *		Regulatory Citations	See Permit Condition
			Standard(s)	lbs/hour	TPY	lbs./hour	TPY		
VE	diesel		Facility-wide 20%					Rule 62-296.320(4)(b)1.	II.3.
NOx	diesel		4.75 lbs/MMBtu				135	Rule 62-296.570(4)(b)7	III.A.5.

Notes: * -- Equivalent Emissions provided for information only.

Table 2-1, Summary of Compliance Requirements

Florida Power & Light
 Turkey Point Station - Nuclear

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. -005, -006, -007 Diesel Engines & Generators

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

Notes:
 *Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.
 **CMS = continuous monitoring system

Enclosure 7

U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Florida Power & Light, Turkey Point Plant

EPA objects to the issuance of this permit due to the following reasons:

- (1) Periodic Monitoring - The permit does not require sufficient periodic monitoring to ensure compliance with the applicable opacity standard. The Turkey Point permit only requires an annual one hour Method 9 visible emissions reading. This does not constitute adequate periodic monitoring to ensure continuous compliance with the opacity standard. Since continuous opacity monitors (COMs) have been installed on the units in question, these monitors should be used to ensure compliance with the opacity standard. Requiring that the opacity monitors be used for conducting periodic monitoring imposes little or no additional burden on FP&L.
- (2) Periodic Monitoring - The permit does not require sufficient periodic monitoring to ensure compliance with the applicable particulate matter standard. The Turkey Point permit requires an annual emission test to verify compliance with the applicable three-hour particulate emission standard. It has not been demonstrated that an annual emission test alone will constitute the basis for a credible certification of compliance with the particulate emission standard for Units 1 and 2. If the State believes that no additional monitoring is warranted to ensure compliance with the particulate standard it must provide a technical demonstration in the statement of basis identifying the rationale for basing the compliance certification only on data from a short-term annual test. Otherwise, the permit must be revised to identify additional monitoring that will be conducted in order to ensure compliance with the particulate matter standard. We suggest the following approaches to periodic monitoring:
 - a) Correlate COM data to PM standard - this approach would not require additional monitoring equipment to be installed.
 - b) Correlate injection rate of specific compounds to ash content of the fuel and emission rate. Recordkeeping would consist of ash content and corresponding injection rate.
 - c) Other monitoring approach demonstrated by the permittee to be a valid method for assuring compliance with the applicable three-hour

particulate matter standard.

- (3) Exemptions from Permitting: Appendix E-1 - It is our understanding that the changes to F.A.C. rules 62-213.300, and 62-213.420-440 addressed in a preliminary draft dated June 2, 1997, were officially adopted by the State on November 13, 1997. Therefore, the State needs to revise the permit, specifically Section II, item 6 and Appendix E-1, to delete the term "exempted from permitting" and replace it with the language contained in rules 62-213.300, and 62-213.420-440. Additionally, as agreed in previous conversations between Regional staff and the State, the State needs to remove the reference to F.A.C. rule 62-4, since it is not related to activities that may be considered "insignificant" under the title V program.
- (4) Deviation from Applicable Requirement - Florida rule 62-296.405(1)(a) requires fossil fuel steam generators to comply with a 20 percent opacity standard, with the exception that sources electing to test for particulate matter emission compliance quarterly shall be allowed visible emissions of 40 percent opacity. The Turkey Point permit requires compliance with a 40 percent opacity standard; however, it only requires an annual compliance test for particulate matter emissions. We understand that this variance from the SIP's quarterly testing requirement was granted by a State Order. However, this variance was never submitted by the State of Florida as a SIP revision, and therefore, was never approved into the SIP. Therefore, the Turkey Point permit must ensure compliance with the requirements of the SIP as stated in rule 62-296.405(1)(a).
- (5) Periodic Monitoring - It is unclear how the permittee will show compliance with the heat input limitations in conditions A.1, and B.1 of the permit. The permit must require that the facility maintain fuel usage records to demonstrate compliance with the applicable heat input limit. Since this recordkeeping will be used to determine compliance with an hourly heat input rate limitation, the permit should contain an hourly fuel usage recordkeeping requirement in order to ensure that the facility remains in compliance with the hourly heat input limit.
- (6) Periodic Monitoring - Condition A.8 allows particulate matter emissions up to an average of 0.3 lbs. per million BTU heat input during a 3-hour period in any 24-hour period for soot blowing and load change. In addition, Condition A.6 allows visible emissions up to 60 percent opacity during soot blowing and load changes. A load change is defined to

occur 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. There does not, however, appear to be any conditions that require the source to record the time, date, and duration of these events. The permit must require that the facility keep records of these events to ensure compliance with this requirement.

In addition to the above objections, our review has identified the following concerns regarding the Turkey Point permit:

1. Section III, condition A.3 allows the use of magnesium hydroxide fuel additives. However, in the permit application, FP&L stated their "right to use other additives if they are suitable." If the State's intent is to limit the use of additives to only magnesium hydroxide, it should clearly establish that in the permit. However, the State may want to address the use of other additives via alternative operating scenarios, or another type of procedure.

2. Section II, Facility-Wide Conditions.

Condition 7 should be identified as "Not Federally Enforceable."

Condition 8, as written does not appear to be complete. It seems as though the language, "No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity without taking reasonable precautions to prevent such emissions." should be added as the first sentence in the paragraph.

3. Condition B.6 states that Unit-003 is subject to a NO_x standard such that "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." Condition B.8 requires infrequent testing, on the order of "Annual emission testing shall be conducted during each federal fiscal year (October 1 - September 30). In addition, testing is waived entirely during years in which units operate less than 400 hours." Because this requirement

entails infrequent sampling, we recommend that information justifying this frequency be added to the statement of basis. Such justification could include a demonstration that the unit is unlikely to exceed this limit.



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

December 18, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Doyle Beneby
Plant General Manager
FP&L Turkey Point Fossil Plant
Post Office Box 14000
Juno Beach, Florida 33408

Re: EPA Objection to PROPOSED Title V Permit No. 0250003-001-AV
Plant Name: FP&L - Turkey Point Fossil

Dear Mr. Beneby:

On December 12, the department received a timely written objection from the United States Environmental Protection Agency to the referenced proposed permit. A copy of EPA's objection is attached.

In accordance with Section 403.0872(8), Florida Statutes (F.S.), the department must not issue a final permit until the objection is resolved or withdrawn. Pursuant to Section 403.0872(8), F.S., the applicant may file a written reply to the objection within 45 days after the date on which the department serves the applicant with a copy of the objection. The written reply must include any supporting materials that the applicant desires to include in the record relevant to the issues raised by the objection. The written reply must be considered by the department in issuing a final permit to resolve the objection of EPA. Please submit any written comments you wish to have considered concerning the objection to Mr. Scott M. Sheplak, P.E., at the above letterhead address.

Pursuant to 40 CFR 70.8(c)(4) the department will have to resolve the objection by issuing a permit that satisfies EPA within 90 days of the objection, or EPA will assume authority for the permit. Since the department has been unable to resolve the issues associated with the objection, we recommend that you set up a meeting with EPA to resolve the objection. Please contact Mr. Douglas Neeley, Chief, Air & Radiation Technology Branch or Ms. Carla Pierce, Chief, Operating Source Section at 404/562-9105. Please advise us of the date and time of the meeting so that we can attend.

If you should have any other questions, please contact Mr. Scott M. Sheplak, P.E., at 850/921-9532.

Sincerely,

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

CHF/sms/k

Enclosures

cc: Rich Piper, FPL w/enclosures
Pat Comer, OGC w/enclosures
Douglas Neeley, USEPA w/o enclosures
Carla Pierce, USEPA w/o enclosures
Lynda Crum, USEPA w/o enclosures



Florida Power & Light Company, Environmental Services Dept., P.O. Box 14000, Juno Beach, FL 33408

Post-It® Fax Note	7671	Date	12/3	# of pages	2
To	Jeff Brown	From	RICH PIPER		
Co./Dept.		Co.			
Phone #		Phone #	561 691 7058		
Fax #	850 921 3000	Fax #	561 691 7070		

December 4, 1997

Mr. Jeff Brown, Esquire
 Assistant General Counsel
 Office of General Counsel
 State of Florida
 Department of Environmental Protection
 3900 Commonwealth Boulevard
 Tallahassee, Florida 32399-3000

**RE: Turkey Point Nuclear Plant
 Notice of Intent to Issue Proposed
 Permit No. 0250003-002-AV - Draft**

Dear Mr. Brown:

On September 12, 1997, Florida Power and Light Company (FPL) received the referenced Notice of Intent to Issue Proposed Permit for its Turkey Point Nuclear Plant located in Dade County, Florida. The Notice of Intent was issued by the Department's Tallahassee Office and was signed by C.L. Phillips, P.E., of the DEP Bureau of Air Regulation.

FPL has been working in good faith with the Department to identify and resolve outstanding permit issues regarding the referenced facility. The Department and FPL agree that more time is needed to complete the permitting process for this facility. FPL hereby requests, pursuant to Rule 62-103.070, F.A.C., an extension to and including December 10, 1997, in which to file a petition for administrative proceedings regarding the Notice of Intent to Issue the Proposed Air Construction and Air Operating permits. FPL does not request an extension of time in which to public notice the Notice of Intent to Issue the Permits as required under Section 403.815, F.S. and Rule 62-103.150, F.A.C. As good cause for granting the requests for extension of time for filing and public noticing, FPL states the following:

This request is filed simply as a protective measure to avoid waiver of FPL's right to challenge the permit as issued. Granting of this request will not prejudice either party, but will further their mutual interests and likely avoid the need to initiate formal administrative proceedings. FPL is committed to amicably resolving all outstanding issues related to this permit issuance so that the Department's Title V program objectives may be met.

I hereby certify that I have contacted Mr. Steve Welsh regarding this request, and he has agreed to this request for extension of time.

Page 2

Accordingly, I hereby request that you formally extend the time for filing of a petition for administrative proceedings to and including December 10, 1997.

Sincerely,

A handwritten signature in cursive script, appearing to read "Vito A. Kaminskas".

Vito A. Kaminskas
Services Manager
Florida Power & Light Company



December 4, 1997

Mr. Jeff Brown, Esquire
Assistant General Counsel
Office of General Counsel
State of Florida
Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

RECEIVED

DEC 09 1997

BUREAU OF
AIR REGULATION

**RE: Turkey Point Nuclear Plant
Notice of Intent to Issue Proposed
Permit No. 0250003-002-AV - Draft**

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Sincerely,

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Vito A. Kaminskas
Services Manager
Florida Power & Light Company

cc: Mr. Scott Sheplak, P.E., Tallahassee FDEP

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

RECEIVED

NOV 20 1997

BUREAU OF
AIR REGULATION

FLORIDA POWER & LIGHT
(TURKEY POINT POWER PLANT)

Petitioner,

vs.

OGC CASE NO. 97-1774

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, FLORIDA POWER & LIGHT, to grant an extension of time to file a petition for an administrative hearing on Permit Nos. 0250003-001-AV and 0250003-002-AV. See Exhibit 1.

Although Counsel for Petitioner has not discussed this request with counsel for the Respondent State of Florida Department of Environmental Protection, the Department has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until December 4, 1997, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Mail Station 35, Department of Environmental Protection,

3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 18th day of November 1997 in
Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Jack Chisolm, for
F. PERRY ODOM
General Counsel

Douglas Building, MS #35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314

CERTIFICATE OF SERVICE

I CERTIFY that a true copy of the foregoing was mailed to:

Vito A. Kaminkas
Services Manager
Florida Power & Light Company
PO Box 14000
Juno Beach, Florida 33408

on this 19 day of November 1997.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

J.A. Spjutowski, for

JEFFREY BROWN
Assistant General Counsel
Florida Bar No. 0843430

Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9730



Florida Power & Light Company, Environmental Services Dept., P.O. Box 14000, Juno Beach, FL 33408

Post-it® Fax Note	7671	Date 11 / 14	# of pages 2
To	Jeff Brown	From	RICH PIPER
Co./Dept.		Co.	
Phone #		Phone #	
Fax #	850 921 3000	Fax #	

November 14, 1997

Mr. Jeff Brown, Esquire
 Assistant General Counsel
 Office of General Counsel
 State of Florida
 Department of Environmental Protection
 3900 Commonwealth Boulevard
 Tallahassee, Florida 32399-3000

**RE: Turkey Point Nuclear Plant
 Notice of Intent to Issue Proposed
 Permit No. 0250003-002-AV - Draft**

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I hereby certify that I have contacted Mr. Steve Welsh regarding this request, and he has agreed to this request for extension of time.

EXHIBIT 1

Page 2

Accordingly, I hereby request that you formally extend the time for filing of a petition for administrative proceedings to and including December 4, 1997.

Sincerely,



Vito A. Kaminskas
Services Manager
Florida Power & Light Company

cc: Mr. Scott Sheplak, P.E., Tallahassee FDEP



November 14, 1997

RECEIVED

NOV 17 1997

**BUREAU OF
AIR REGULATION**

Mr. Jeff Brown, Esquire
Assistant General Counsel
Office of General Counsel
State of Florida
Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

**RE: Turkey Point Nuclear Plant
Notice of Intent to Issue Proposed
Permit No. 0250003-002-AV - Draft**

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On September 12, 1997, Florida Power and Light Company (FPL) received the referenced Notice of Intent to Issue Proposed Permit for its Turkey Point Nuclear Plant located in Dade County, Florida. The Notice of Intent was issued by the Department's Tallahassee Office and was signed by C.L. Phillips, P.E., of the DEP Bureau of Air Regulation.

FPL has been working in good faith with the Department to identify and resolve outstanding permit issues regarding the referenced facility. The Department and FPL agree that more time is needed to complete the permitting process for this facility. FPL hereby requests, pursuant to Rule 62-103.070, F.A.C., an extension to and including December 4, 1997, in which to file a petition for administrative proceedings regarding the Notice of Intent to Issue the Proposed Air Construction and Air Operating permits. FPL does not request an extension of time in which to public notice the Notice of Intent to Issue the Permits as required under Section 403.815, F.S. and Rule 62-103.150, F.A.C. As good cause for granting the requests for extension of time for filing and public noticing, FPL states the following:

This request is filed simply as a protective measure to avoid waiver of FPL's right to challenge the permit as issued. Granting of this request will not prejudice either party, but will further their mutual interests and likely avoid the need to initiate formal administrative proceedings. FPL is committed to amicably resolving all outstanding issues related to this permit issuance so that the Department's Title V program objectives may be met.

I hereby certify that I have contacted Mr. Steve Welsh regarding this request, and he has agreed to this request for extension of time.

Page 2

Accordingly, I hereby request that you formally extend the time for filing of a petition for administrative proceedings to and including December 4, 1997.

Sincerely,

Vito A. Kaminskas for

Vito A. Kaminskas
Services Manager
Florida Power & Light Company

11/18/97 cc: *Scott Sheplak*
Steve Wells

cc: Mr. Scott Sheplak, P.E., Tallahassee FDEP



October 29, 1997

RECEIVED

NOV 04 1997

BUREAU OF
AIR REGULATION

Mr. Jeff Brown, Esquire
Assistant General Counsel
Office of General Counsel
State of Florida
Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

**RE: Turkey Point Nuclear Plant
Notice of Intent to Issue Proposed
Permit No. 0250003-002-AV - Draft**

Dear Mr. Brown:

On September 12, 1997, Florida Power and Light Company (FPL) received the referenced Notice of Intent to Issue Proposed Permit for its Turkey Point Nuclear Plant located in Dade County, Florida. The Notice of Intent was issued by the Department's Tallahassee Office and was signed by C.L. Phillips, P.E., of the DEP Bureau of Air Regulation.

FPL has been working in good faith with the Department to identify and resolve outstanding permit issues regarding the referenced facility. The Department and FPL agree that more time is needed to complete the permitting process for this facility. FPL hereby requests, pursuant to Rule 62-103.070, F.A.C., an extension to and including November 14, 1997, in which to file a petition for administrative proceedings regarding the Notice of Intent to Issue the Proposed Air Construction and Air Operating permits. FPL does not request an extension of time in which to public notice the Notice of Intent to Issue the Permits as required under Section 403.815, F.S. and Rule 62-103.150, F.A.C. As good cause for granting the requests for extension of time for filing and public noticing, FPL states the following:


This request is filed simply as a protective measure to avoid waiver of FPL's right to challenge the permit as issued. Granting of this request will not prejudice either party, but will further their mutual interests and likely avoid the need to initiate formal administrative proceedings. FPL is committed to amicably resolving all outstanding issues related to this permit issuance so that the Department's Title V program objectives may be met.

I hereby certify that I have contacted Mr. Steve Welsh regarding this request, and he has agreed to this request for extension of time.

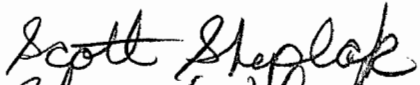

Page 2

Accordingly, I hereby request that you formally extend the time for filing of a petition for administrative proceedings to and including November 14, 1997.

Sincerely,


for

Vito A. Kaminskas
Services Manager
Florida Power & Light Company

11/4/97 cc = 


cc: Mr. Scott Sheplak, P.E., Tallahassee FDEP



October 17, 1997

Mr. Jeff Brown, Esquire
Assistant General Counsel
Office of General Counsel
State of Florida
Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

**RE: Turkey Point Nuclear Plant
Notice of Intent to Issue Proposed
Permit No. 0250003-002-AV - Draft**

Dear Mr. Brown:

On September 12, 1997, Florida Power and Light Company (FPL) received the referenced Notice of Intent to Issue Proposed Permit for its Turkey Point Nuclear Plant located in Dade County, Florida. The Notice of Intent was issued by the Department's Tallahassee Office and was signed by C.L. Phillips, P.E., of the DEP Bureau of Air Regulation.

FPL has been working in good faith with the Department to identify and resolve outstanding permit issues regarding the referenced facility. The Department and FPL agree that more time is needed to complete the permitting process for this facility. FPL hereby requests, pursuant to Rule 62-103.070, F.A.C., an extension to and including October 31, 1997, in which to file a petition for administrative proceedings regarding the Notice of Intent to Issue the Proposed Air Construction and Air Operating permits. FPL does not request an extension of time in which to public notice the Notice of Intent to Issue the Permits as required under Section 403.815, F.S. and Rule 62-103.150, F.A.C. As good cause for granting the requests for extension of time for filing and public noticing, FPL states the following:

This request is filed simply as a protective measure to avoid waiver of FPL's right to challenge the permit as issued. Granting of this request will not prejudice either party, but will further their mutual interests and likely avoid the need to initiate formal administrative proceedings. FPL is committed to amicably resolving all outstanding issues related to this permit issuance so that the Department's Title V program objectives may be met.

I hereby certify that I have contacted Mr. Steve Welsh regarding this request, and he has agreed to this request for extension of time.

Page 2

Accordingly, I hereby request that you formally extend the time for filing of a petition for administrative proceedings to and including October 31, 1997.

Sincerely,

Vito A. Kaminskas for

Vito A. Kaminskas
Services Manager
Florida Power & Light Company

10/21/97 cc: *Scott Sheplak*
Steve Walsh

cc: Mr. Scott Sheplak, P.E., Tallahassee FDEP

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

RECEIVED

FLORIDA POWER & LIGHT
(TURKEY POINT POWER PLANT)

OCT 15 1997

BUREAU OF
AIR REGULATION

Petitioner,

vs.

OGC CASE NO. 97-1774

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, FLORIDA POWER & LIGHT, to grant an extension of time to file a petition for an administrative hearing on Permit Nos. 0250003-001-AV and 0250003-002-AV. See Exhibit 1.

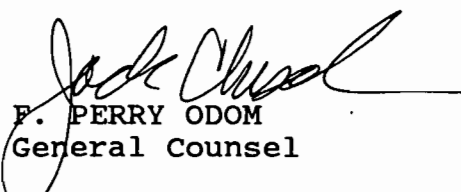
Although Counsel for Petitioner has not discussed this request with counsel for the Respondent State of Florida Department of Environmental Protection, the Department has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until October 20, 1997, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Mail Station 35, Department of Environmental Protection, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 14th day of October 1997 in
Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


F. PERRY ODOM
General Counsel

Douglas Building, MS #35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314

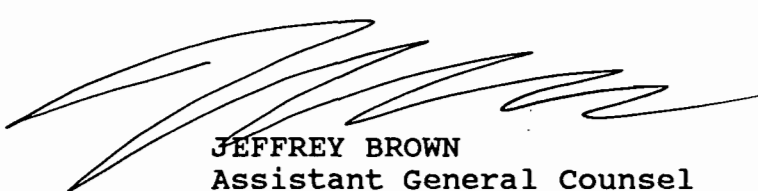
CERTIFICATE OF SERVICE

I CERTIFY that a true copy of the foregoing was mailed to:

Richard Piper
Senior Environmental Specialist
Florida Power & Light Company
PO Box 14000
Juno Beach, Florida 33408

on this 14 day of October 1997.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


JEFFREY BROWN
Assistant General Counsel
Florida Bar No. 0843430

Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9730



Florida Power & Light Company, Environmental Services Dept., P.O. Box 14000, Juno Beach, FL 33408

September 23, 1997

Post-It™ Fax Note	7671	Date	9/23	# of pages	2
To	DOUG BEASON	From	RICH PIPER		
Co./Dept.	FDEP	Co.	FPL		
Phone #		Phone #	561 691 7058		
Fax #	850 921 3000	Fax #	7070		

Mr. W. Douglas Beason, Esquire
 Assistant General Counsel
 Office of General Counsel
 State of Florida
 Department of Environmental Protection
 3900 Commonwealth Boulevard
 Tallahassee, Florida 32399-3000

**RE: Turkey Point Power Plant
 Notice of Intent to Issue Proposed
Title V DRAFT Permit No. 0250003-001-AV (Fossil Plant)
Title V DRAFT Permit No. 0250003-002-AV (Nuclear Plant)**

Dear Mr. Beason:

On September 12, 1997, Florida Power and Light Company (FPL) received the referenced Notice of Intent to Issue Proposed Permits for its Turkey Point Power Plants located in Dade County, Florida. The Notice of Intent was issued by the Department's Tallahassee Office and was signed by C.H. Fancy, P.E., Chief of Bureau of Air Regulation.

FPL has been working in good faith with the Department to identify and resolve outstanding permit issues regarding the referenced facilities. The Department and FPL agree that more time is needed to complete the permitting process for these facilities. FPL hereby requests, pursuant to Rule 62-103.070, F.A.C., an extension to and including October 10, 1997, in which to file a petition for administrative proceedings regarding the Notice of Intent to Issue the Proposed Air Construction and Air Operating permits. FPL does not request an extension of the deadline in which to publish the Public Notice of Intent to Issue the Permits as required under Section 403.815, F.S. and Rule 62-103.150, F.A.C. As good cause for granting the requests for extension of time for filing and public noticing, FPL states the following:

This request is filed simply as a protective measure to avoid waiver of FPL's right to challenge the permit as issued. Granting of this request will not prejudice either party, but will further their mutual interests and likely avoid the need to initiate formal administrative proceedings. FPL is committed to amicably resolving all outstanding issues related to this permit issuance so that the Department's Title V program objectives may be met.

I hereby certify that I have contacted Mr. Scott M. Sheplak, P.E., regarding this request, and he has no objection to this request for extension of time.

Page 2

Accordingly, I hereby request that you formally extend the time for filing of a petition for administrative proceedings to and including October 10, 1997.

Sincerely,



Richard Piper
Senior Environmental Specialist
Florida Power & Light Company

cc: Mr. Scott Sheplak, P.E., Tallahassee FDEP



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 Nuclear Plant
9760 S.W. 344th Street
Florida City, Florida 33035

PROPOSED Permit No.: 0250003-002-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 Nuclear Plant. This facility is located at 10 miles east of Florida City on Palm Drive, 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 Nuclear 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 U-1, List of Unregulated Emissions Units and/or Activities

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

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

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

APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97)

Effective Date: January 1, 1999

Renewal Application Due Date: August 1, 2002

Expiration Date: January 31, 2002

Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/clp/sw

RECEIVED

JAN 26 1998

BUREAU OF
AIR REGULATION

**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

FLORIDA POWER & LIGHT COMPANY,
(Turkey Point Power Plant),

Petitioner,

vs.

OGC CASE NO. 97-1774

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, FLORIDA POWER & LIGHT COMPANY, to grant an extension of time to file a petition for an administrative hearing on Application Nos. 0250003-001-AV and 0250003-002-AV. See Exhibit 1.

Although Petitioner's representative has not discussed this request with counsel for the Respondent State of Florida Department of Environmental Protection, the Department has no objection to it. Therefore,

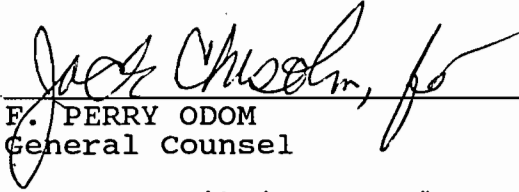
IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until January 14, 1998, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Mail Station 35, Department of

Environmental Protection, 3900 Commonwealth Boulevard,
Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 5th day of ~~December~~ ^{January} 1997 in
Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


F. PERRY ODOM
General Counsel

Douglas Building, MS #35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314

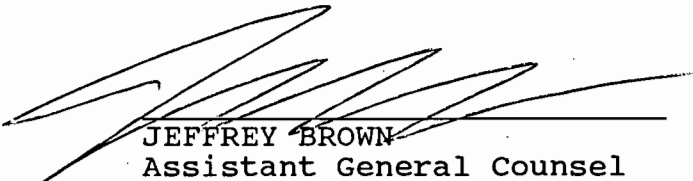
CERTIFICATE OF SERVICE

I CERTIFY that a true copy of the foregoing was mailed
to:

Vito A. Kaminskis
Services Manager
Florida Power & Light Company
Environmental Services Dept.
Post Office Box 14000
Juno Beach, FL 33408

on this 6 day of December 1997.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


JEFFREY BROWN
Assistant General Counsel
Florida Bar No. 0843430

Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9730

This was actually
mailed January 6, 1998,
NOT Dec. 6.

M. Monahan

Date: 1/26/98 1:34:07 PM
From: Mary Fillingim TAL
Subject: New Posting
To: See Below

There is a new posting in Florida's website.

0250003002AV
TURKEY POINT

Proposed

The notification letter is encoded and attached. Please let me know if you have any questions.

Thanks,
Mary

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., Tallahassee Title V Section
FROM: Steve Welsh, Permit Engineer
DATE: January 13, 1998
RE: U.S. EPA Region 4 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 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</u>
Florida Power & Light Nuclear Plant	Dade	INTERNET	0250003-002p.zip

This zipped file contains the following electronic files:

0250003-002.sob
0250003-002i.doc
0250003-002p.doc
0250003-002l.xls
0250003-002e.doc
0250003-002u.doc

fednot_d.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 Nuclear Plant
Facility ID No.: 0250003
Dade County

Initial Title V Air Operation Permit
PROPOSED Permit No.: 0250003-002-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. 0250003-002-AV, addresses only the (non-nuclear) operations at the Nuclear Plant. The operations at the Fossil Plant are addressed in a separate Title V permit, No. 0250003-001-AV.

The Nuclear Plant consists of two nuclear generating units with a combined capacity of 1,332 megawatts, nine diesel emergency generators, and miscellaneous diesel engines. The two nuclear generating units which are regulated by the Nuclear Regulatory Commission (NRC) are not included in this application.

Specifically, emissions unit -005 consists of four Electro-Motive (GM) Model 20-645-E4 emergency diesel generators. The generators are referred to by facility personnel as units 3A, 3B, 4A, and 4B. The generators supply backup power to the nuclear power plant auxiliary equipment. These units fire low sulfur (0.5%) diesel fuel. Units 3A and 3B commenced operation in November, 1972, while units 4A and 4B commenced operation in 1991.

Emissions unit -006 consists of five other diesel emergency generators used for the plant's security system, wastewater treatment and water supply, and meteorological assessment. These generators also fire low sulfur (0.5%) diesel fuel.

Emissions unit -008, consists of the following miscellaneous diesel plant equipment:

- (6) Service Air compressor diesel engines;
- (3) hydrolazer diesel engines;
- (2) instrument air compressor diesel engines;
- (1) standby steam generator feed pump diesel engine;
- (1) service water diesel pump

Also included in this permit are miscellaneous insignificant 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).