FPL

February 20, 1999

Reply by March 22

Soft 3h

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

admin permit correction farmet is on the "V: "driver

Re:

Permit No. 025003-001-AV

FPL Turkey Point Plant Final Title V Permit Administrative Revisions for Consistency

Dear Mr. Sheplak:

The following is a list of issues with the permit that FPL believes to be administrative changes. To maintain consistency with the other Final Title V Permits received, we are requesting following changes be made to the Title V Permit for Turkey Point. Please contact me at your earliest convenience to discuss them.

Section III - Emissions Limitations and Standards

Page 6: Permitting Note: The permit note refers to Table 1-1 which is the "Summary of Air Pollutant Standards and Terms". This table was not provided in the Final Title V Permit.

Section III - Monitoring and Testing Requirements

Page 7: Permitting Note: The permit note refers to Table 2-1 which is the "Summary of Air Compliance Requirements". This table was not provided in the Final Title V Permit.

Section III - Recordkeeping and Reporting Requirements

Page 10: Specific Condition A.20.b. <u>Sampling Protocol</u> - The second sentence in this paragraph should read as follows striking daily & replacing it with monthly. The specific condition should read:

"b. Sampling Protocol. A fuel oil sample shall be collected hourly, by taking a small portion of the fuel fired. On a monthly basis the fuel oil from the container shall be analyzed for heating value and sulfur content. Analysis for sulfur content shall be perfromed by using one of the following: ASTM D1266-91, both ASTM D2622-94 and ASTM D129-95, or the latest editions(s)."

TO

Turkey Point Title V Page 2

Appendix I-1 List of Exempt Emissions Units and Activities

Brief Description of Emissions Units and Activities: The list of activities does not include the Evaporation of Boiler Chemical Cleaning Waste. Pursuant to the FDEP memorandum DARM-SS/CE-07, FPL requests that this specific activity be listed in the Final Title V Permit as:

13. Evaporation of Non-Hazardous Boiler Chemical Cleaning Waste

SER HATINE.

Thank you for your prompt attention to the issues raised in this correspondence. Please do not hesitate to contact me at (561) 691-2894 if I may be of further assistance.

Sincerely,

John C. Hampp

Sr. Environmental Specialist Florida Power & Light Company

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WKTH BY