



June 23, 1998

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

Re: Permit No. 0810010-001-AV
FPL Manatee Plant Final Title V Permit

Dear Mr. Sheplak:

As we discussed in our phone conversation of 6/23/98, a copy of the communication between Joe Kahn of FDEP and Vito Giarrusso of FPL is attached. It indicates the SO₂ reporting requirement was recognized by the Department as an incorrect version of Specific Condition A.36 prior to the EPA intervention.

FPL has identified several issues in the June 9, 1998, letter also enclosed, which need to be addressed.

Thank you for your attention to the issues raised in this correspondence. Please do not hesitate to contact me at (561) 691-7057 if I may be of further assistance.

Sincerely,

Mary Archer
Sr. Environmental Specialist
Florida Power & Light Company

RECEIVED

JUN 24 1998

**BUREAU OF
AIR REGULATION**

Memorandum

To: Vito Giarrusso, FPL
Sent Via Fax: 561/691-7070

From: Joe Kahn, DEP, Title V Section

Date: December 10, 1997

Re: FPL Manatee Proposed Permit Comments
Proposed Permit No. 0810010-001-AV

Per our memorandum dated December 9, 1997, we included the incorrect version of specific condition A.34., Sulfur Dioxide Emission Report. Pursuant to your request, we will change specific condition A.34. as follows:

A.34. Sulfur Dioxide Emission Report. The owner or operator shall, by the thirtieth day following each calendar quarter, submit to the Department's Southwest District, Air Section, a report of the monthly averages of sulfur dioxide emissions in pounds per million Btu, for each month of the preceding calendar quarter. The report shall include the quantities of each fuel fired and document the heating value, density or specific gravity, and the percent sulfur content of the fuel fired, based on the monthly analyses. [Rule 62-4.070(3) and 62-213.440, F.A.C., AO 41-204804 Specific Condition 6, AO 41-219341 Specific Condition 6]

As we discussed, if EPA files a formal objection to this permit, this change may not be made, or other changes may be required to resolve that objection. If you have any questions, please feel free to call me with any questions at 850/ 488-1344.



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

June 12, 1998

Mr. J. Michael Kennedy, Chair
Florida Electric Power Coordinating
Group (FCG), Incorporated
405 Reo Street, Suite 100
Tampa, Florida 33609-1094

Re: Title V Permits

Dear Mr. Kennedy:

The purpose of this letter is to address several commonly recurring issues regarding the content of Title V permits. Many of these issues were identified in the FCG's letter dated December 17, 1997. Resolution of these issues will expedite the processing of Title V permits.

1. Capacity and Load Change Determinations

There are three primary reasons for capacity determinations: 1) 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 rate); 2) to establish appropriate emission limitations; and, 3) to aid in determining rule applicability. Rule 62-297.310(5), F.A.C., included in Title V permits, requires the measurement of process variables such as heat input. Heat input is defined in Rule 62-210.200, F.A.C., as *"The product, expressed in million British thermal units per time (mmBtu/time), of the gross calorific value of the fuel, expressed in British thermal units per pound (Btu/lb), and the fuel feed rate into the combustion device, expressed in mass of fuel/unit of time, and not including the heat derived from preheated combustion air, recirculated flue gases, or exhaust from other sources."* The department realizes certain types of fossil fuels have highly variable heat content. On a case-by-case basis, Title V permits can be clarified as to how the capacity determination is made by the plant operations. The department understands many applicants have been concerned that the acid rain flow continuous emission monitors (CEMs), when used to calculate actual heat input, will produce a result indicating an exceedence of the maximum heat input limit listed in the permit. To alleviate this concern, the department is willing to add the following to the permit condition related to capacity - *"The acid rain CEMs will not be a method of compliance for the determination of the heat input rate."*

Load change determinations are needed for existing fossil fuel steam generators regulated under Rule 62-296.405, F.A.C., because different visible emission and particulate matter standards apply under load change. As defined in Rule 62-210.700(3), F.A.C., 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." The department understands that most electrical generating sources continuously measure and record fuel feed rates, i.e., gallons/hour, cubic feet/hour, lbs/hour, in addition to megawatt production, but, may not be continuously measuring and recording gross calorific value (Btu/lb). Title V permits for electrical generating sources reference the nameplate generating capacity (nominal megawatt output), heat input (mmBtu/hr), and emission limiting standards in terms of lb/mmBtu. Therefore, to be consistent with regulatory requirements, the change in heat input (mmBtu/hr) should be used to determine load change.

2. Opacity Monitoring Data Averaging

Opacity monitoring data must be averaged in accordance with the compliance test method specified. For units equipped with opacity monitors used to demonstrate compliance with emission limiting standards, the monitor must be properly maintained and calibrated on a frequent basis. The USEPA Method 9 and DEP Method 9 are acceptable compliance test methods for opacity. These compliance test methods utilize a rolling six minute average versus a block average. Data from opacity monitors can be calculated based on a rolling six minute average. Rolling average data may prove to be more useful to plant operations.

The department understands that many emissions units have installed and currently operate continuous opacity monitoring systems (COMs) to meet acid rain program requirements. Obviously, COMs data can be used to demonstrate compliance with opacity standards. COMs data can be used to demonstrate compliance more frequently than a once per year Method 9 test. The COMs provisions referenced in 40 CFR 75 require data to be reduced to a six minute average. The acid rain regulation does not clarify whether this is a rolling average or a block average.

A few sources have inquired about opacity monitoring data recordkeeping. Due to the voluminous data recorded and accumulated, electronic storage of the data is acceptable provided the data remains accessible by the department and can be displayed in a similar fashion as the strip charts. All recorded data must be maintained on file for a period of five years.

3. Excess Emissions

Emissions units must comply with the applicable federal and/or state excess emissions requirements. Excess emissions requirements exist for emissions units regulated under the Acid Rain Program, Standards of Performance for New Stationary Sources (NSPS), National Emissions Standards for Hazardous Air Pollutants (NESHAPs), and State Implementation Plan (SIP). Confusion during the processing of Title V permits has primarily resulted from a lack of a statement of applicability to emissions units regulated under the SIP. The SIP contains definitions for "excess

emissions", "existing" emissions unit, "new" emissions unit, "malfunction", "load change", "startup", and "shutdown". Excess emission requirements can be found in Rule 62-204, F.A.C., Rule 62-210.700, F.A.C., and Rule 62-4.130, F.A.C.

Some confusion results from the references or lack thereof to "new" and/or "existing" in Rule 62-210.700, F.A.C. Subsection (1) of Rule 62-210.700, F.A.C., references "any" emissions unit. Subsections (2) and (3) references "existing" emissions units. An existing emissions unit is defined in Rule 62-210.200, F.A.C., as *"An emissions unit which was in existence, in operation, or under construction, or had received a permit to begin construction prior to January 18, 1972. However, 'existing emissions unit' for the purposes of Rules 62-296.700 through 62-296.712 and 62-212.500, F.A.C., shall mean any emissions unit which is not defined as a new emissions unit with respect to a specific rule or provision of any of those sections. For the purpose of Rules 62-296.500 through 62-296.512, F.A.C., existing emissions units are those emissions units which were constructed or for which a construction permit was issued prior to July 1, 1979."* Subsections (4), (5) and (6) do not reference "existing" or "new" emissions units. Rule 62-4.130, F.A.C., also does not reference "new" or "existing". Recently, it has been clarified that the SIP excess emissions requirements apply to SIP emission limits. The SIP excess emissions requirements do not apply to Acid Rain Program provisions or NSPS and NESHAP emission limits. The department is not authorized to vary or waive any federal Acid Rain Program, NSPS, or NESHAP requirements.

Rule 62-210.700(1), F.A.C., states that excess emissions resulting from malfunction are 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(6), F.A.C., requires that in the case of excess emissions resulting from malfunctions, each owner or operator shall notify the department or the appropriate local program in accordance with Rule 62-4.130, F.A.C. The department rules require immediate notification of plant operation problems. For purposes of the notification to the department under Rule 62-4.130, F.A.C., *Plant Operation-Problems*, immediate means the same day, if during a workday (i.e., 8:00 a.m. - 5:00 p.m.), or the first business day after the incident, excluding weekends and holidays. Notification to the department or local program of every malfunction that results in excess emissions may not be warranted. Good judgment should be exercised. Permittees should consider the magnitude and duration of the excess emissions.

In accordance with Rule 62-296.405(1)(g), F.A.C., the permittee is required to submit to the department or the appropriate local program a written report of emissions in excess of the emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The department does not require a form or a standard format for this written report. {Note that a form does exist for NSPS emissions units and the acid rain provision contained in 40 CFR 75.65 requires excess emissions of opacity to be reported in a format specified by the state or local air pollution control agency.} The nature and cause of the excess emissions must be explained in the quarterly report. The

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FCG letter
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report does not relieve the owner or operator of the legal liability for violations. All recorded data must be maintained on file by the source for a period of five years.

4. Methods of Operation

A Title V source may change among those alternative methods of operation allowed by permit provided the source maintains source logs or records to verify periods of operation in each alternative method of operation (See Rule 62-213.410, F.A.C.). Each Title V permit is required to include the approved methods of operation. Fuels such as natural gas, fuel oil, on-specification used oil, and coal have been listed in Title V permits as approved methods of operation. The plant logs or records maintained to verify periods of operation in each method of operation are required to be kept for a period of five years. The period of operation and the quantity of on-specification used oil burned is needed for these purposes. Recordkeeping of the quantity of on-specification used oil generated is not necessary.

If you should have any questions or comments, please contact Scott M. Sheplak at 850/921-9532.

Sincerely,



C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

CHF/sms/k

copy to: Larry George
Pat Comer



June 9, 1998

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

Re: Permit No. 0810010-001-AV
FPL Manatee Plant Final Title V Permit

Dear Mr. Sheplak:

After reviewing the subject Title V permit, FPL has identified several issues which need to be addressed. Each issue is described as follows:

Page 5 of 17 Specific Condition A.1. Permitted Capacity: The new basis of the permit describes heat input regular record keeping is not required and we understand this is not a permit limit, but may be used to set other emission limits. To make this information clearer to an operator we suggest the following language in the permitting note. "The heat input limitations.....(..), to establish other appropriate emission limits and to aid in determining future rule applicability. Regular record keeping is not required for heat input.}"

Page 11 of 17 Specific Condition A.27. Operating Conditions During Testing - PM and VE. We request this language reflect the language of the basis changes to the permit. The following language is recommended. "When required..... Particulate and visible emissions shall be conducted....., and shall be conducted while injecting ~~the maximum quantity additives approved by the Department consistent with normal operating practices.~~"

Page 14 of 17 Specific Condition A.36. Sulfur Dioxide Emission Report. FPL requests this report be deleted. It is unduly burdensome. Sulfur dioxide is controlled or monitored in conditions A.9., A.15., A.23., A.24., plus the Annual Air Operating Report includes totals of sulfur dioxide. Sulfur dioxide data is also submitted to EPA quarterly. This requirement does not appear in approved FPL Title V permits which are in effect. We ask this report be replaced with a fuel sulfur report which would list all deliveries for the month, similar to that discussed with Vito Giarrusso of FPL for the draft Riviera Title V permit. We suggest the following language:

Fuel Analysis Report: The owner or operator shall by the fifteenth day of each month, submit to the (appropriate agency), a report of fuel analyses that are representative of each fuel fired in the preceding month. The report shall document the heating value, the density or specific gravity and the percent sulfur content by weight of each fuel fired.

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Manatee Plant Title V
6/9/98

Appendix S Table 1-1 Please change the brief description to eliminate the heat input. Marked up tables are attached.

Appendix S Table 2-1 Pollutant Parameter SO2 the testing frequency should be As received and the CMS column should be blank. Marked up table is attached.

Thank you for your prompt attention to the issues raised in this correspondence. Please do not hesitate to contact me at (561) 691-7057 if I may be of further assistance.

Sincerely,

A handwritten signature in cursive script, appearing to read "Richard R. Archer".

Mary Archer^{for}
Sr. Environmental Specialist
Florida Power & Light Company