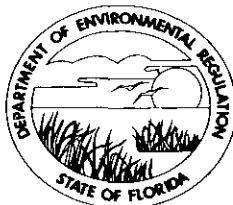


TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR
JACOB D. VARN
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

MEMORANDUM

CERTIFIED MAIL

TO: Alex Senkevich, Manager
St. Johns River District, FDER
County Court Clerk, Seminole County

FROM: Steve Smallwood, Acting Bureau Chief
Bureau of Air Quality Management, FDER

DATE: December 26, 1979

SUBJ: Proposed Department Action regarding an application for construction of a Coal Pulverizing and Coal-Oil mixing facility, to be constructed by the Florida Power and Light Company, FP&L at the Sanford Power Plant, near Sanford, in Volusia County, Florida.

Attached please find one copy of the proposed Construction Permit drafted by the BAQM in response to the aforementioned application submitted by FP&L. Also attached please find one copy of the Technical Evaluation, original application and pertinent correspondence.

Pursuant to 17-2.091 and 40 CFR 51.18, this information is to be maintained, on file, for public review for 30 days following issuance of public notice.

Comments are to be submitted in writing to Mr. Bill Thomas, of the Bureau of Air Quality Management.

SS:caa

ENCLOSURES: 1

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DEPARTMENT OF ENVIRONMENTAL REGULATION

MEMORANDUM

CERTIFIED MAIL

TO: W. J. Barrow, Jr., Assistant Manager
Environmental Affairs
Florida Power and Light Company

FROM: Steve Smallwood, *SS* Acting Bureau Chief
Bureau of Air Quality Management, FDER

DATE: December 26, 1979

SUBJ: Proposed Department Action regarding an application for
construction of a Coal Pulverizing and Coal-Oil mixing
facility, to be constructed by the Florida Power and Light
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Comments are to be submitted, in writing, to Bill Thomas of the Bureau of Air Quality Management.

SS:caa

ENCLOSURES:caa

TO: Buzz Barrow

FROM: Mark Hodges, Bureau of Air Quality Management
Department of Environmental Regulation

Please return an affidavit of publication to me at the following address:

M.G. Hodges
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Public Notice
Construction Permit

The Florida Department of Environmental Regulation (DER) has received an application from and intends to issue a Construction Permit to the Florida Power and Light Company for the construction of a coal pulverizer at the Sanford Power Plant located on Barwick Road, ^{NEAR} Sanford, Volusia County, Florida. No determination of Best Available Control Technology was required. Copies of the application, Technical Evaluation and Proposed Construction Permit are available for inspection at the following locations:

St. Johns River District
Office, FDER
3319 Maguire Blvd, Suite 232
Orlando, Florida 32803

Seminole Co. Courthouse
N. Park Avenue
Sanford, Florida 32711

Bureau of Air Quality Management, FDER
2600 Blair Stone Road
Tallahassee, Florida 32301

Persons wishing to comment on this action shall submit comments to Mr. Bill Thomas, of the Tallahassee Office within 30 days of this notice.

To appear on or before
December 28, 1979

1. Sanford Newspaper
2. Orlando Newspaper

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

FLORIDA POWER AND LIGHT COMPANY

MIAMI, FLORIDA

(COAL PULVERIZER, COAL-OIL MIXING
FACILITY, SANFORD POWER PLANT,
VOLUSIA COUNTY, FLORIDA)

CONSTRUCTION PERMIT

APPLICATION NUMBER:

AC 64-25610

FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

BUREAU OF AIR QUALITY MANAGEMENT

CENTRAL AIR PERMITTING

December 21, 1979

I. PROPOSED DEPARTMENT ACTION

The Department intends to issue the requested construction permit to the Florida Power and Light Company to construct a coal pulverizer and coal-oil mixing facility at the Sanford Power Plant, near Sanford, in Volusia County, Florida. Issuance thereof is subject to public comment received in response to required public notice.

Any person wishing to file comments on this proposed action may do so by submitting such comments, in writing, to:

Mr. William Thomas
Florida Department of Environmental
Regulation
Bureau of Air Quality Management
Twin Towers Office Building
Tallahassee, Florida 32301

Comments received within 30 days after publication of this notice will be considered and noted in the Departments Final Determination.

Any person whose substantial interest would be affected by the issuance or denial of this permit may request an administrative hearing by filing a petition for hearing in accordance with Chapter 28-51.15, Florida Administrative Code (copy attached). Such petition must be filed within 14 days of the date of this notice. Such petition is to be filed with:

Mary Clark, Esq.
Office of General Counsel
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

II. SUMMARY OF EMISSION AND AIR QUALITY ANALYSIS:

a. The proposed construction is located in Volusia County, Florida, at the Florida Power and Light Sanford Power Plant. Volusia County and the immediately adjacent Seminole County are currently in "attainment" status as regards all criteria air pollutants, as monitored for determination of compliance with ambient air quality standards.

b. The emissions for this project are listed below:

Process: Pulverizer air heating.

Fuel: Natural Gas (Approximately 370 CFM (18 MMBTU/HR)).

| Pollutant | lbs./hr | lbs./yr* |
|-------------|---------|----------|
| Particulate | 0.00037 | 1.036 |

Process: Coal Pulverizer and Coal-oil mixing (Maximum)
(Input Rate, 96,000 lb/hr)

Fuel: None

| Pollutant | lbs/hr. | tons/yr.* |
|-------------|---------|-----------|
| Particulate | 7.7 | 11.09 |

 **

* Total operation not to exceed 120 days

** Emissions based on AP-42 factors

III. SYNOPSIS OF APPLICATION:

a. Name and address of applicant:

Florida Power and Light Company
P. O. Box 529100
Miami, Florida 33152

b. Description of project and controls:

This project involves the construction of a coal unloading, storage and reclamation system; coal pulverizer, coal-oil mixing, transportation and storage system; burner fuel supply system; ash handling system; and fugitive particulate control system.

A detailed description of the individual processes, proposed process rates and emissions follows, in the testimony of George Bastien of the Bechtel Power Corporation. The testimony is entitled "Sanford Unit Number 4 COM (Coal-oil mixture) test facility".

Raw material input; process rates; pollutants emitted (estimated, allowable and potential); and control device efficiencies are to be found in Section III, Parts A, B, C and D of the attached permit application.

IV. RULE APPLICABILITY

The proposed construction is located in Volusia County. Volusia County and adjoining Seminole County are both in an "attainment" status as regards the criteria air pollutants. The project is therefore subject to the Prevention of Significant Deterioration Requirements of 17-2.04. However, as the emissions are de minimus, no monitoring or modeling will be requested.

This project is also subject to 17-4.23, which requires the use of Best and Latest Technology on new sources, as well as 17-4.07, which authorizes imposition by the Department, of reasonable permit conditions to assure a minimization of air pollutants discharged into the atmosphere.

V. FINDINGS

1. Based upon the combined emissions of the coal pulverizer and natural gas fired heater. ($7.7 \text{ \#/hr} + 0.00036 \text{ lbs./hr} = 7.7 \text{ lbs./hr. and } 11.09 \text{ tons/yr.}^* = 11.09 \text{ tons/yr}$), total emissions will be de minimus.

The de minimus determination, however, is based upon 120 days (2880 hours) of operation. Should an extended period of operation be desired it will be deemed a modification to the operation permit, and most likely subject the pulverizer/mixing facility to the full requirements of 17-2.04, i.e., monitoring and emissions modeling for the purposes of PSD.

*Year meaning 120 days, as applied for and utilized in applicants' computations.

2. Construction should commence and be completed within a reasonable time, as noted in the draft permit.

3. Construction should reasonably conform with the plans submitted.

4. The applicant should report any material deviation from the projected construction progress.

VI. PROPOSED ALLOWABLE EMISSIONS AND PERMIT CONDITIONS

See Draft Permits.

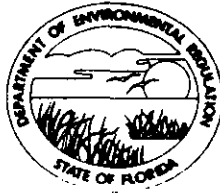
Attachment: 28-5.15 FAC, Requests for Formal and Informal Proceedings.

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

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 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
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STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: Florida Power & Light Company
P. O. Box 529100
Miami, Florida 33152

PERMIT/CERTIFICATION
NO. AC 64-25610

COUNTY: Volusia

PROJECT: Coal Pulverizer,
Coal-oil mixer
Florida Statutes, and Chapter 17-2

This permit is issued under the provisions of Chapter 403
and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

The installation of a coal handling and pulverizing facility and at Sanford Unit #4, Barwick road, near Sanford, in Volusia County, Florida. This facility is being constructed to provide a coal-oil mixture for an initial 120 day test burn period at Sanford unit #4.

The universal transverse mercators and latitude and longitude coordinates are 468.340 Easting by 3190.380 Northing, and 28°50'40" North by 81°33'11" West, respectively.

Construction shall be in accordance with the attached permit application, attached plans, documents and drawings except as otherwise noted on page 3, "Specific Conditions".

Attachments are as follows:

1. "Application to Construct Air Pollution Sources" DER Form 17-1.122(16).
2. "Limitation of prepermit Construction letter, Nov. 24, 1979, Mary Clark, to W.J. Barrow.
3. Testimony of George Bastien, Nov. 29, 1979.
4. "Answers to Supplementary Questions from DER". (Given to Bechtel by W. J. Barrow at the conclusion of the 11/30/79 Hearing)

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions", and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed

PERMIT NO.: AC 64-25610
APPLICANT: Florida Power & Light Company
P. O. Box 529100

on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.

3. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

6. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.

7. In the case of an operation permit, permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

13. This permit also constitutes:

- Determination of Best Available Control Technology (BACT)
- Determination of Prevention of Significant Deterioration (PSD)
- Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

SPECIFIC CONDITIONS:

PERMIT NO.: AC 64-25610
APPLICANT: Florida Power & Light Company
P. O. Box 529100

SPECIFIC CONDITIONS

1. The maximum allowable emissions from the pulverizing operation shall be:

| Pollutants | Pounds/hr. | Tons/yr. |
|-------------|------------|----------|
| Particulate | 7.7 | 11.09 |

2. The maximum allowable emissions from the gas fired air heater serving the pulverizer shall be:

| Pollutants | Pounds/hr. | Tons/yr. |
|--------------|------------|------------|
| Particulates | Negligible | Negligible |

3. The maximum hours of operation shall be 24 hours/day, for a total of 2880 hours, the tolling of which shall commence upon issuance of the operation permit.
4. The maximum fuel consumption shall be 400 CFM of natural gas to the pulverizer air heaters,
5. The maximum coal input to the pulverizer shall be 96,000 pounds per hour.
6. Any material deviation in construction or the modes of operation as specified to the Bureau of Air Quality Management (BAQM) immediately.
7. The operating permit shall require maintenance of records reflecting hours of operation, coal and oil inputted to the pulverizer and mixer amount of coal-oil mixture produced and amounts of fuel consumed, by fuel type. Said records shall be submitted to the BAQM immediately following the 120 day test period.

PERMIT NO.: AC 64-25610
APPLICANT: Florida Power and Light Company

8. After initial testing and prior to expiration of this permit or any operational usage of the aforementioned coal pulverizer, the applicant shall submit an application for an operation permit, to the St. Johns River FDER District Office.

Expiration Date: August 31, 1980

Issued this _____ day of _____, 19 _____.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION