



FPL

October 27, 1998

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BUREAU OF
AIR REGULATION

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: **Draft Permit No. 1270009-001-AV**
FPL Sanford Plant Initial Title V Permit
And Notice of Voluntary Dismissal by Hidden Harbor.

Dear Mr. Sheplak:

The Notice of Voluntary Dismissal by Hidden Harbor Marina is attached. It is our understanding that the Title V permitting process may now proceed. The following is a list of issues with the permit, many which have been discussed, but are restated here, since so much time has passed. Please contact me at your earliest convenience to discuss them.

Section I - Facility Information

Page 2: **Subsection A. Facility Description:** The facility description contains a number of inaccuracies, FPL request this item be rewritten as follows:

This facility contains three fossil fuel steam generators: Unit 3 a Babcock & Wilcox wall fired boiler with a generator nameplate rating of 156 megawatts (MW), and Units 4 & 5, each are Foster Wheeler wall fired boilers with generator nameplate ratings of 490 MW (limited to 436 MW by boiler steam capacity). The steam generators each burn natural gas, No. 6 fuel oil, No. 2 fuel oil, and used oil from FPL operations. Air pollutants are discharged through a 302 foot stack on Unit 3 and 400 foot stacks on each of Units 4 & 5. Unit 3 has a flue gas recirculation to improve unit performance and efficiency. Units 4 & 5 have multicyclone dust collectors and eight hoppers on each unit. Each boiler operates a Westinghouse tandem compound, reheat type extraction turbine. Each boiler has an automated fuel additive system to aid in removal of boiler tube deposits. There is an emergency diesel generator and 10 pre NSPS fuel oil storage tanks ranging in size from 275 gallons to 268,000 barrels. There are two propane tanks on site.

The earlier version of the description included the following information concerning the Unit 1 & 2 building. This building is set for demolition prior to January, 1999. Would it be appropriate to delete this from the description prior to permit issuance?

The building remains which housed Units 1 & 2. The boilers have been removed from the site.

Section III - Essential Potential to Emit Parameters

Page 6: Specific Condition A.1. Permitted Capacity:

In responding to the EPA interventions into the FPL permits FDEP addressed the heat input parameter did not require periodic monitoring. This was discussed further at a meeting with you on September 23, 1998. Our understanding was the heat input parameter was placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions

testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. This allows the heat input to be limited by the latest performance test. We request the heat input capacity be included in the unit description area of the permit and the heat input limitation be addressed in Specific Condition A-26.

Page 6: Specific Condition A.3.a. - Startup: The only fuels allowed to be burned in the startup process are propane, natural gas or No. 2 fuel oil for the ignition cycle followed by any combination(s) of natural gas, No. 2 fuel oil or No. 6 fuel oil. During the startup process best operating practices are utilized to minimize emissions.

Page 6: Specific Condition A.3.b. - Normal: The only fuels allowed to be burned are any combination of natural gas, No. 2 fuel oil, No. 6 fuel oil and/or on-specification used oil from FPL operations.

Page 7: Specific Condition A.5. - The language in this specific condition appears to have been taken from the Administrative Orders allowing for 40% opacity and annual testing. We suggest the following language derived from previously issued Title V permits:

Visible emissions shall not exceed 40 percent opacity. Emissions units governed by this visible emission standard shall conduct compliance tests for particulate matter emissions at least annually, in accordance with Specific Condition A.27. [Rule 62-296.405(1)(a), F.A.C.; OGC Case 92-0890 (Unit 3), OGC Case 85-1420 (Unit 5), OGC Case 89-1454 (Unit 4).]

Page 7: Specific Condition A.6.(c) - The facility does not have a distributed control system, and therefore does not have the capability to automatically record the data requested. The facility can manually record data.

Page 8: Specific Condition A.14. - We request this specific condition be modified to reflect the following. FPL shall perform the annual testing during the fiscal year (October 1 - September 30), with not less than 90 days between the successive tests.

Page 8: Specific Condition A.15. - The Department has not utilized all of the language that we agreed upon in the negotiations for the Cape Canaveral permit, and has instead attempted to use other language in Specific Condition 23. FPL negotiated the language in good faith as the settlement of the Petition For Administrative Hearing on the Cape Canaveral plant (which carries forward to this plant and several others). Accordingly, we request that the following language should be inserted in this specific condition:

b. In the event that the CEMs becomes temporarily inoperable or interrupted, the fuel oil sulfur concentration and the maximum fuel oil to natural gas firing ratio that shall be used is limited to that which was last used to demonstrate compliance prior to the loss of the CEMs, or the emission units shall fuel switch and be fired with a fuel oil containing a maximum sulfur content of 2.5%, by weight, or less.

Page 9: Specific Condition A.17.3.b. and 3.c. - We understand from our conversation on March 20, 1998, that Specific Conditions A.17.3.b. and 3.c. will be stricken.

Page 11: Specific Condition A.23. - The Department has inserted language in this condition that is inconsistent with the language agreed upon in the Cape Canaveral negotiations (please see our comment on specific condition A.15., above). FPL negotiated the conditions at Cape Canaveral with the understanding that they would carry forward into several other permits, including Sanford's. Accordingly, we request that the proposed language be stricken and that the analogous condition in the Cape Canaveral permit relating to Sulfur Dioxide be inserted herein as follows:

*The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedences of the sulfur dioxide emissions limiting standard are occurring. The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, as an alternate sampling procedure authorized by permit, **the permittee elected to demonstrate compliance using CEMS for sulfur dioxide. See specific condition A.15 of this permit.***

[Rules 62-213.440 and 62-296.405(1)(c)3. and (1)(e)3., F.A.C.; proposed by applicant 09/18/97]

Page 13: Specific Condition A.27.b. - As above, the Department has utilized language in this specific condition that is inconsistent with the agreed-upon language from the Cape Canaveral negotiations in settlement of FPL's Petition for Administrative Hearing. Accordingly, we respectfully request that the Department honor the agreement, and use the agreed-upon language as follows:

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

a. When Burning Fuel Oil Up To 2.5% Sulfur. When only fuel oil containing less than or equal to 2.5% sulfur, by weight, is fired (or co-fired with natural gas) in an emissions unit, particulate matter and visible emissions tests during soot blowing and steady-state operation shall be performed on such emissions unit while firing solely fuel oil containing at least 90% of the average sulfur content of the fuel oils fired in the previous 12 month period, except that such test shall not be required to be performed during any year that testing is performed in accordance with specific conditions A.27.b.

b. When Burning Fuel Oil Greater Than 2.5% Sulfur. If fuel oil containing greater than 2.5% sulfur, by weight, is co-fired with natural gas in an emissions unit, particulate matter and visible emissions tests during soot blowing and steady-state operation shall be performed as soon as practicable, but in no event more than 60 days after firing such fuel oil, while co-firing such oil with the appropriate proportion of natural gas required to maintain SO₂ emissions between 90 to 100% of the SO₂ emission limit (corresponding to 2.475 and 2.75 lb/mmBtu, respectively). Following successful completion of such particulate matter and visible emissions testing, further particulate matter and visible emissions testing shall not be required during the remaining federal fiscal year unless fuel oil is fired that contains greater than 0.2% sulfur above the percentage sulfur concentration fired during the most recent co-firing test. If fuel oil is co-fired containing greater than 0.20% sulfur above the percentage sulfur concentration fired during the most recent co-firing test, additional particulate matter and visible emissions tests shall be performed as described above as soon as practicable, but in no event more than 60 days after firing such higher sulfur fuel oil. If any additional particulate matter and visible emissions tests are imposed after completion of any required annual compliance tests, then the frequency testing base date shall be reset to 12-months after the date of completion of the last tests.

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

Page 13: Specific Condition A.27.c. Fuel Records: The last sentence in this paragraph should read as follows striking daily & replacing it with monthly. "Comparison of the monthly as-fired fuel oil sulfur content shall be made with that of the most recent PM and VE compliance test, and recorded monthly upon receipt of each monthly composite analysis."

Page 16: Specific Condition A.34. - FPL understands that this specific condition is meant to provide the Department with notification of excess emission events associated with SO₂ emissions. We do not expect to ever need to report an excess emission event, and therefore request the following sentence be added to the end of the specific condition:

In the event that no 3-hour rolling average periods of sulfur dioxide emission exceed the limit of 2.75 lb/mmBtu, no report is required to be submitted to the DEP Central District Office.

Page 19: Comments, notes and justifications: Please note that The legal Designated Representative was changed from William M. Reichel to David W. Knutson by legal notice published on February 12-17, 1997.

Page E1(of 1) In previously issued permits this appendix was deleted and replaced with Appendix I which listed Insignificant emissions/activities. We request that be done for this permit and add an Appendix I comparable to the one attached.

Page U1 (of 1) Please add bead (glass) blasting to the list of unregulated emissions/activities.

Page S3 (of 3) The emissions units descriptions are incorrect. Also, please delete the test date for annual compliance testing. A copy of the Table is attached with marked changes.

Sanford Plant has also had a change of address. Please revise appropriate records.

**FPL – Sanford Plant
950 South Highway 17-92
Debary, Florida 32713**

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,



Mary J. Archer
Sr. Environmental Specialist
Florida Power & Light Company

Attachments (3)

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

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.

	<u>Brief Description of Emissions Units and/or Activities</u>
1	Gas metering area relief valves
2	Hydrazine mixing tank and relief valves
3	Fuel oil storage tanks and related equipment
4	Lube oil tank vents and extraction vents
5	Oil/water separators and related equipment
6	Evaporation of Boiler Chemical Cleaning Waste

Appendix S
Permit Summary Tables

Table 2-1, Summary of Compliance Requirements

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

Emissions Unit	Brief Description						
001	Fossil Fuel Steam Generator, Unit Y 3						
002	Fossil Fuel Steam Generator, Unit Z 4						
003	" " " " " 5						
Pollutant or Parameter	Fuel(s)	Compliance Method	Testing Frequency	Frequency Base Date ¹	Minimum Compliance Test Duration	CMS ²	See Permit Condition(s)
SO ₂	Oil	CEMS along with Method 19 or fuel sampling & analysis and a fuel sulfur limit of 2.5%, or Method 6C if required by the Department	fuel sampling of the delivered fuel upon each shipment, Conditon A.27 may require additional fuel sampling for PM/VE testing purposes.	Not Applicable	three hour averages when using CEMS or one hour runs for Method 6C stack tests	Yes	A.9, A.13, A.15, A.23 & A.24
NO _x						Yes	A.13
PM	Oil	Method 5 or Method 17	Annual	August 1	1 hour	No	A.22, A.26 & A.27
VE	Oil	DEP Method 9	Annual	August 1	1 hour (annual test, concurrent with PM) 12 minutes (M9 at other times)	Yes	A.20, A.18, A.21 & A.27
On-spec. Used Oil		Record Keeping and Analysis	batch testing of representative sample				A.35

Notes: ¹ Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.

² CMS = continuous monitoring system

→ Refer to specific cond. 14

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

QUINN PROPERTIES, INC. d/b/a
HIDDEN HARBOR MARINA,

Petitioner,

DOAH CASE NO. 98-001297
OGC CAS NO 97-1842

v.

FLORIDA POWER AND LIGHT
CORPORATION; and STATE OF
FLORIDA, DEPARTMENT OF
ENVIRONMENTAL PROTECTION,

Respondents.

NOTICE OF VOLUNTARY DISMISSAL

QUINN PROPERTIES, INC. d/b/a HIDDEN HARBOR MARINA, Petitioner and
FLORIDA POWER AND LIGHT CORPORATION, Respondent have entered into a Settlement
Agreement resolving differences between these parties.

Therefore, Petitioner hereby files this Notice of Voluntary Dismissal and request that this
matter be referred back to Florida Department of Environmental Protection for final disposition.
Petitioner and Respondent, FLORIDA POWER AND LIGHT agreed that each party shall bear
their own costs and attorneys' fees.

Respectfully submitted,



Thomas K. Maurer, Esq.
Florida Bar No. 03311447
Foley & Lardner
111 N. Orange Avenue, Suite 1800
Orlando, Florida 32801
(407) 423-7656
Attorney for Petitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of October, 1998, an original and a copy of the foregoing was sent via Federal Express to: Larry J. Sartin, Division of Administrative Hearings, the DeSoto Building, 1230 Apalachee Parkway, Tallahassee, FL 32399-3060 and a copy was sent via facsimile and regular mail to:

Robert B. Bergstrom, Esq.,
Florida Power & Light, Law Department
700 Universe Boulevard
Juno Beach, Florida 33408

Dan Brodersen, Esq.
Parker, Burke, Landerman, et al.
108 E. Hillcrest Street
Orlando, Florida 32801

Reed Zars, Esq.
2020 Grand Avenue Suite 522
Laramie, Wyoming 82070

W. Douglas Beason
Assistant General Counsel
Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000



Thomas K. Maurer, Esq.