



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

RECEIVED

SEP 05 1990

DER-BAQ

AUG 30 1990

4APT/APB

Mr. Steve Smallwood, P.E., Director
Air Resources Management Division
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Smallwood:

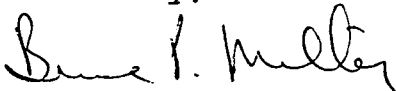
We have completed our review of the prehearing submittal for the proposed SIP revision for the test of Orimulsion fuel at the Florida Power & Light Sanford #4 unit. Our comments are as follows:

- 1) The SIP revision and Specific Condition 3 of the draft permit must explicitly state that the relaxed emission limits for SO₂ and opacity only apply during the firing of Orimulsion. The relaxed limit for particulate matter was approved in 1980 (see 45 FR 13455, February 29, 1980) and is still in effect (see 48 FR 33866, July 26, 1983). The relaxed limits were approved due to the shortage of low-sulfur oil which existed at that time. Since this shortage no longer exists, the Region feels that the State of Florida should consider revocation of the variance and a return to the SIP limits for this unit once the test burn period has expired.
- 2) The SIP revision must reflect the SO₂ emission limitation of 1.1 lb SO₂/mmBTU for Units 3 and 5 during the firing of Orimulsion as the ambient air modeling assumed this limit as the maximum for SO₂ emissions from those units. In addition, the draft construction permit in Specific Condition 2 states that Units 3 and 5 can only be fired with natural gas or fuel oil with one percent sulfur content (by weight) which is equivalent to 1.1 lb SO₂/mmBTU.
- 3) Specific Condition 3 of the draft permit should include a NO_x emission limit of 0.7 lb NO_x (as NO₂)/mmBTU in order to report the frequency of excess emissions as required by Specific Condition 7(e)vi. This recommended NO_x emission limit was utilized by FPL in the document entitled "Description of Orimulsion Test Burn at FPL Sanford Unit 4." A CO emission limit of 0.03 lb CO/mmBTU should also be considered for the same reasons as the NO_x limit.

- 4) If the emission limits recommended in comment 3 above are not incorporated into the final permit, then a requirement to report all hourly averages of NO_x and CO CEM data should be incorporated into Specific Condition 7(e) of the draft permit.
- 5) Specific Condition 4 of the draft permit requires that CEMs for the various pollutants be operating at the start-up of the Orimulsion fuel test burn and remain so throughout the test burn period. It should also require the calibration and maintenance of the CEMs. These CEMs should be required to be evaluated by the respective Performance Specification Test of 40 C.F.R. Part 60, Appendix B.
- 6) A requirement for fuel sampling and analysis of the fuel oil to be burned in Units 3 and 5 should be specified in Specific Condition 4 and the procedures in Method 19 of 40 C.F.R. Part 60, Appendix A should be followed.
- 7) Specific Condition 5 should state that the average of three tests runs will be used to determine compliance.
- 8) In Specific Condition 6, tests for CO by Method 10 should be specified. If CO and NO_x limits are established (see Comment 3), then the recommended CO test and NO_x test requirements should be part of Specific Condition 5.
- 9) Instead of utilizing both Method 101 and the EMTIC metals test procedures for trace elements and metals (Specific Condition 6(d)), a single test procedure, the Multiple Metals Train developed for RCRA could be utilized.
- 10) In Specific Condition 7(e)vi, a time period for averaging CEM data to report exceedances should be specified. Exceedances for opacity should be any 6 minute average above the opacity limit and for SO₂, any hourly average above the SO₂ limit.

We hope these comments will be helpful to you as you finalize the package for submittal as a source-specific SIP revision. If you have any questions or comments, please do not hesitate to call Kay Prince of my staff at (404) 347-2864.

Sincerely,



Bruce P. Miller, Chief
Air Programs Branch