

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

September 13, 1990

William H. Green, Esquire
Hopping Boyd Green & Sams
P.O. Box 6526
Tallahassee, Florida 32314

Re: FPL Sanford Unit No. 4
Orimulsion Test Burn/Draft PSD Permit

Dear Mr. Green:

The Department has received your letter dated September 7, 1990. After reviewing your comments concerning the specific conditions in the proposed PSD permit, the following changes were made:

FROM: Specific Condition No. 3.a) Particulate Matter: Steady-state - 0.3 lb/MMBtu; Excess emissions, not to exceed 3 hours per 24-hour period, for soot-blowing and load changes - 0.6 lb/MMBtu; Excess emissions, not to exceed 2 hours per 24-hour period for startup, shutdown, and malfunction - 0.6 lb/MMBtu.

TO: Specific Condition No. 3.a) Particulate Matter: Steady-state - 0.3 lb/MMBtu; Excess emissions, not to exceed 3 hours per 24-hour period, for soot-blowing, startup, shutdown, and load changes - 0.6 lb/MMBtu; Excess emissions, not to exceed 2 hours per 24-hour period for malfunction - 0.6 lb/MMBtu.

FROM: Specific Condition No. 3.c) Visible Emissions: Steady-state - 60% opacity; Excess emissions, not to exceed 3 hours per 24-hour period, for soot-blowing and load changes - 100% opacity; Excess emissions, not to exceed 2 hours per 24-hour period, for start-up, shutdown, and malfunction - 100% opacity.

TO: Specific Condition No. 3.c) Visible Emissions: Steady-state - 60% opacity; Excess emissions, not to exceed 3 hours per 24-hour period, for soot-blowing, start-up, shutdown, and load changes - 100% opacity; Excess emissions, not to exceed 2 hours per 24-hour period, for malfunction - 100% opacity.

William H. Green, Esq.
September 13, 1990
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Other changes include:

- the removal of startup and shutdown from Specific Condition 4.d),
- requiring a sulfur analysis of the Orimulsion fuel from each barge shipment rather than once per month in Specific Condition 7.e), and
- requiring an ultimate analysis of the Orimulsion fuel in Specific Condition 8.g).

In addition, the phrase "Attachments are listed below" on page 2 of the draft permit has been changed to "The documents listed below are available from the Department upon request", and additional documents have been listed.

It is the opinion of the Department that the burning of an experimental fuel does not constitute "best operational practices". Also, Chapter 17-103.120, F.A.C., requires the Department to ensure that the federal ambient air quality standards and applicable PSD increments are not violated. As the air quality modeling used both a time limit and emission limitation for excess emissions to show compliance with the standards and, as the public was told that these limits would be in the permit, these limits should remain in the permit.

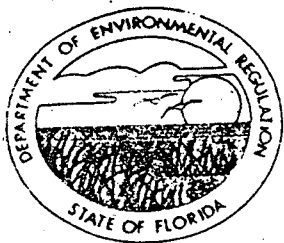
If you have any questions concerning this matter, please call me.

Sincerely,



Cindy L. Phillips
Engineer

c: D. Schwartz
C. Fancy



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September 13, 1990

Ms. Kay Prince
Chief
Southern Planning Unit
USEPA Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Ms. Prince:

Re: Florida Power & Light Co. Orimulsion Test Burn
PSD Construction Permit/SIP Revision

It is the practice of this Department to postpone issuing construction permits that involve SIP revisions until the SIP has been revised. However, Florida Power & Light Co. has requested that the Department issue the PSD construction permit for their test project before the SIP is revised so that they may begin the construction of equipment necessary for the testing of Orimulsion fuel. The construction permit would allow construction but would be conditioned to prohibit the firing of Orimulsion fuel until such time that the SIP is revised. FP&L is willing to accept exclusive financial risk should the SIP not be revised for some reason.

What is EPA's position on this request? May the Department issue the PSD construction permit before the SIP is revised? What specific conditions must be included in the permit to address the fact that the SIP has not been revised?

Attached is a copy of the specific conditions the Department proposes to include in the construction permit. Specific Condition No. 12 addresses the fact that the SIP has not been revised.

A quick (FAXed) response to these questions would be greatly appreciated. If you need additional information, please call me at (904)488-1344. Our FAX number is (904)922-6979.

Sincerely,

Cindy L. Phillips
Engineer
Bureau of Air Regulation

c: David Schwartz, Esq.

C. H. Fancy, P.E.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

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4APT/APB

Mr. C. H. Fancy, P.E.,
Bureau of Air Regulation
Air Resources Management Division
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

We received the letter of September 13, 1990, from Cindy Phillips of your staff regarding issuance of the PSD Construction Permit for Florida Power & Light Company which will address the testing of Orimulsion fuel. Region IV has no objection to Florida's issuing of the permit prior to approval of the SIP revision providing the permit contains Specific Condition No. 12 as written in the enclosure.

If any additional information or discussion is necessary, please do not hesitate to call Kay Prince of my staff at (404) 347-2864.

Sincerely,

Thomas J. Hansen, P.E., Chief
Southern Planning & Air
Toxics Section
Air Programs Branch
Air, Pesticides & Toxics
Management Division

Enclosure

cc: C. Phillips
B. Andrews
C. Collins, C. Dist
W. Walker

RECEIVED

SEP 20 1990

DER-BAQM