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February 27, 1991

**BY CERTIFIED MAIL**

Mr. Alex Alexander, P.E.  
Deputy Assistant Secretary  
Department of Environmental Regulation,  
Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, FL 32803-3767

RE: Florida Power & Light Company  
Orimulsion Test Burn  
Sanford Unit No. 4  
Warning Notices OWN-AP-91-193 and OWN-AP-91-194

Dear Mr. Alexander:

This letter responds, on behalf of Florida Power & Light Company (FPL), to the above-referenced warning notices. At the outset, FPL would like to thank the Department for the careful attention it has paid to this important test burn and for the role that your staff has played in our joint efforts to assure that the test is conducted in compliance with all applicable requirements. As you can appreciate, because Orimulsion has never been burned in a utility boiler in the United States or, in fact, in a boiler that is similar to the Sanford 4 boiler, anywhere in the world, we have out of necessity embarked to a certain extent upon uncharted waters. Nevertheless, FPL is very pleased that it has been able to achieve compliance with the mass emission limitations specified in the Department approvals for the test burn and, for the most part, it appears it has been able to maintain compliance with the original opacity limitations while enough information was gathered to allow the Department and the Environmental Protection Agency to consider granting a minor amendment to the permit to allow higher interim opacity limits. It is our understanding that Secretary Browner approved such higher limits on February 26, 1991.

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In response to the Department's warning notices, FPL and its consultants have carefully reviewed their operational and instrument data, and have continued to make every possible effort to operate within applicable permit limitation for Orimulsion. As is true for many research projects, fine operational details do not always work out as anticipated. FPL has had a few surprises with Orimulsion. We are pleased to advise that none of our information indicates any potential exceedances of applicable permit limits since January 23, 1991. In addition, FPL is confident that it has carefully evaluated all potential contributors to opacity and made the necessary minor adjustments to allow the proposed test to be completed in compliance with the recently revised opacity limitations. (See FPL's Request for Modification of Permit Conditions and Order Authorizing Research and Testing submitted to the Department on February 15, 1991.)

Specific Condition No. 6(c) of the Orimulsion test burn permit (No. AC-64-180842) provided that the compliance method for visible emissions is the continuous emissions monitor (CEM) for opacity, based on 6-minute averages. Our review has indicated that the excess visible emissions believed by the Department to exist on January 14 and January 23, 1991, were associated with soot blowing and load changes -- situations in which the permit allowed higher limits. In addition, we have examined the other steady-state excess emissions situations mentioned in the Department's warning notices are not able to verify the Department's readings based on our CEM data.

In cases where high visible emissions were recorded for longer periods than specifically allowed for excess emissions, FPL's engineers have determined that such cases were mostly related to abnormal equipment operations, particularly related to the difficulty of combusting Orimulsion. Those problems occurred in spite of FPL's attempts to bring the unit under optimum operating controls. Here are some examples: when soot blowing was utilized to decrease boiler fouling, emissions after soot blowing did not always return to acceptable levels, contrary to normal experience with residual oil; when the plant was operated under conditions suitable for particulate testing, it was not always possible to bring opacity levels down to the desired levels; cold-firing of the boiler resulted in

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higher opacity than is normally expected or observed. In spite of these difficulties, FPL operators have now gained more experience with this fuel and with the equipment that burns the fuel. FPL is confident that it can meet the new, higher opacity limitations.

Once again, we wish to thank the District for helping us work through these problems, especially in light of the major benefits to the environment and the public which we will be achieved if this project proves to be as successful as it appears that it might be.

We hope that this letter satisfactorily responds to your concerns. If further discussions would be helpful, of course, we will make ourselves available for that purpose.

Sincerely yours,



*for* William H. Green  
Attorney for Florida Power &  
Light Company

WHG/wrn:Alexander

cc: Steve Smallwood  
Clair Fancy  
Gary Smallridge, Esq.  
Charles Collins  
Caroline Shine