

46

INTEROFFICE MEMORANDUM

Date: 09-Apr-1999 06:28pm
From: Danois.Gracy
Danois.Gracy@epamail.epa.gov@PMDf@EPIC66
Dept:
Tel No:

To: cascio_t (cascio_t@A1@DER)
To: sheplak_s (sheplak_s@A1@DER)

Subject: Comments on FP&L-Sanford Plant

Attached are EPA's comments on FP&L Sanford. I'll be out of the office on Monday, but feel free to call me after that so we can discuss the comments. I think that all of them can be easily fixed.

Gracy

ELECTRONIC TRANSMISSION

Date: April 9, 1999

To: Tom Cascio, FDEP - Tallahassee
Scott Sheplak, FDEP - Tallahassee

From: Gracy R. Danois, EPA Region 4

Subject: Initial Comments on Proposed Title V Permit
FP&L - Sanford Plant
Permit no. 1270009-001-AV

Below are initial comments from EPA Region 4 on the above referenced source. Our comments are divided into two categories: 1) Significant Comments and 2) General Comments.

Significant comments are defined as those comments that would trigger an objection under 40 CFR Part 70. Given that EPA has several significant comments on this proposed permit, we would like to attempt resolution of all issues in order to avoid a formal objection on this permit. If resolution of our significant comments is not achieved, EPA Region 4 will issue an objection to the proposed permit pursuant to 40 CFR 70.8(c) on or before day-45 of the review period. For purposes of this permit review, day-45 is defined as **April 17, 1999**.

Another option available to you is withdrawal of the proposed permit from EPA review. If you choose to utilize this option, you must submit to EPA a written request that the permit be withdrawn including a statement that a proposed permit will be resubmitted for EPA review at a later date. Your written request to withdraw the proposed permit must be submitted to our office by no later than **April 17, 1999**.

- 1) Significant Comments
 - a. Periodic Monitoring: The permit does not require sufficient periodic monitoring to ensure compliance with the applicable particulate matter standard. Annual testing of particulate matter using Method 5 or 17 is required in conditions A.17 and A.27 of the permit. It has not been demonstrated that an annual emission test alone will constitute the basis for a credible certification of compliance with the particulate emission standard. If the State believes that no additional monitoring is warranted

to ensure compliance with the particulate standard, it must provide a technical demonstration in the statement of basis identifying the rationale for basing the compliance certification only on data from a short-term annual test. Otherwise, the permit must be revised to identify additional monitoring that will be conducted in order to ensure compliance with the particulate matter standard.

- b. Periodic Monitoring: Condition A.13 of the permit establishes that the facility is required to have a COM in each of the three units. However the permit fails to establish whether the data obtained from the COM will be the one used to report visible emissions above the 40% limit contained in the permit. We recommend that language be added to the permit to address the reporting of excess emissions during normal operation of the facility. Condition A.6(b) of the permit only covers the use of the COM data during periods of soot blowing and load changes.
- c. Periodic Monitoring: Condition A.24 appears to allow the source to use an alternate sampling method to demonstrate compliance with the sulfur dioxide limitation in the permit. However, we believe that this condition is meant to support the requirements contained in condition A.15 of the permit, which outlines the procedure that the facility must follow in the event that the CEM becomes inoperable. Furthermore, as currently written, condition A.15 would not allow the source to use an alternate compliance method, since it requires the use of the CEM. Please clarify the intent of these conditions.
- d. Fuel Sulfur Content Records: Condition A.28 requires the source to analyze a monthly composite sample of as-fired daily fuel samples to determine the percent sulfur of the oil and the appropriate testing requirements that apply to the source, as outlined in condition A.27 (Operating Conditions During Testing - PM and VE). As EPA has noted before, a 30-day composite sample does not offer reasonable assurance of the daily percent sulfur of the fuel being fired. Since the fuel records required in Condition A.28 need to be "of sufficient detail" to identify the testing requirements of Condition A.27, the permit needs to require the facility to take daily fuel samples and analyze on a daily basis. As an alternative, the source may analyze a representative sample of the fuel from each delivery, and label and store the fuels according to the sulfur content (e.g., less than 2.5 % by weight). In this way, the source will have better assurance of the percent sulfur by weight of the fuel being burned.
- e. Appropriate Averaging Times: In order for the emissions standard for

particulate matter to be practicably enforceable, the appropriate averaging time must be specified in the permit. An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission standards are tied to or based on the run time of the test method(s) used for determining compliance.

2) General Comments

- a. Section II, condition 1: It is our understanding that Appendix TV-1 has not been changed since 12/2/97. If there is a new Appendix TV-1, called Appendix TV-2, we need to receive a copy to review it.
- b. Section II, condition 12: Replace “Air Compliance Section” with “Air Enforcement Section” and add the following phone and fax numbers: 404/562-9055, Fax 404/562-9163 or 404/562-9164.
- c. Section III, subsection A, condition A.1: The State needs to make the hourly heat input calculation and recordkeeping requirements a separate condition. As currently written, this requirement may be mistaken as an informational item because of the permitting note that follows this condition.
- d. Section III, subsection A: The permit needs to include language similar to the language contained in condition A.15 to address the installation, calibration, operation and maintenance of the COM.
- e. Section III, subsection A, condition A.31: Please renumber the items listed under condition A.31(a)(2).
- f. Section III, subsection A, conditions A.17, A.18, and A.19: Based upon monitoring data submitted under the provisions of the acid rain continuous emission monitoring rule [Cost and Quality of Fuels for Electric Utility Plants 1997 Tables, DOE/EIA-0191(97)], it appears that the units at this facility burn fuel oil for substantially more than 400 hours per year. Therefore, unless it is likely that these units will burn fuel oil for less than 400 hours per year in the future, Region 4 recommends that these conditions which address testing waivers be removed from the permit for this facility.

E-MAIL
TO M. ARCHER

ELECTRONIC TRANSMISSION

Date: April 9, 1999

To: Tom Cascio, FDEP - Tallahassee
Scott Sheplak, FDEP - Tallahassee

From: Gracy R. Danois, EPA Region 4

Subject: Initial Comments on Proposed Title V Permit
FP&L - Sanford Plant
Permit no. 1270009-001-AV

Below are initial comments from EPA Region 4 on the above referenced source. Our comments are divided into two categories: 1) Significant Comments and 2) General Comments.

Significant comments are defined as those comments that would trigger an objection under 40 CFR Part 70. Given that EPA has several significant comments on this proposed permit, we would like to attempt resolution of all issues in order to avoid a formal objection on this permit. If resolution of our significant comments is not achieved, EPA Region 4 will issue an objection to the proposed permit pursuant to 40 CFR 70.8(c) on or before day-45 of the review period. For purposes of this permit review, day-45 is defined as **April 17, 1999**.

Another option available to you is withdrawal of the proposed permit from EPA review. If you choose to utilize this option, you must submit to EPA a written request that the permit be withdrawn including a statement that a proposed permit will be resubmitted for EPA review at a later date. Your written request to withdraw the proposed permit must be submitted to our office by no later than **April 17, 1999**.

- 1) Significant Comments
 - a. Periodic Monitoring: The permit does not require sufficient periodic monitoring to ensure compliance with the applicable particulate matter standard. Annual testing of particulate matter using Method 5 or 17 is required in conditions A.17 and A.27 of the permit. It has not been demonstrated that an annual emission test alone will constitute the basis for a credible certification of compliance with the particulate emission standard. If the State believes that no additional monitoring is warranted

to ensure compliance with the particulate standard, it must provide a technical demonstration in the statement of basis identifying the rationale for basing the compliance certification only on data from a short-term annual test. Otherwise, the permit must be revised to identify additional monitoring that will be conducted in order to ensure compliance with the particulate matter standard.

- b. Periodic Monitoring: Condition A.13 of the permit establishes that the facility is required to have a COM in each of the three units. However the permit fails to establish whether the data obtained from the COM will be the one used to report visible emissions above the 40% limit contained in the permit. We recommend that language be added to the permit to address the reporting of excess emissions during normal operation of the facility. Condition A.6(b) of the permit only covers the use of the COM data during periods of soot blowing and load changes.
- c. Periodic Monitoring: Condition A.24 appears to allow the source to use an alternate sampling method to demonstrate compliance with the sulfur dioxide limitation in the permit. However, we believe that this condition is meant to support the requirements contained in condition A.15 of the permit, which outlines the procedure that the facility must follow in the event that the CEM becomes inoperable. Furthermore, as currently written, condition A.15 would not allow the source to use an alternate compliance method, since it requires the use of the CEM. Please clarify the intent of these conditions.
- d. Fuel Sulfur Content Records: Condition A.28 requires the source to analyze a monthly composite sample of as-fired daily fuel samples to determine the percent sulfur of the oil and the appropriate testing requirements that apply to the source, as outlined in condition A.27 (Operating Conditions During Testing - PM and VE). As EPA has noted before, a 30-day composite sample does not offer reasonable assurance of the daily percent sulfur of the fuel being fired. Since the fuel records required in Condition A.28 need to be "of sufficient detail" to identify the testing requirements of Condition A.27, the permit needs to require the facility to take daily fuel samples and analyze on a daily basis. As an alternative, the source may analyze a representative sample of the fuel from each delivery, and label and store the fuels according to the sulfur content (e.g., less than 2.5 % by weight). In this way, the source will have better assurance of the percent sulfur by weight of the fuel being burned.
- e. Appropriate Averaging Times: In order for the emissions standard for

particulate matter to be practicably enforceable, the appropriate averaging time must be specified in the permit. An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission standards are tied to or based on the run time of the test method(s) used for determining compliance.

2) General Comments

- a. Section II, condition 1: It is our understanding that Appendix TV-1 has not been changed since 12/2/97. If there is a new Appendix TV-1, called Appendix TV-2, we need to receive a copy to review it.
- b. Section II, condition 12: Replace "Air Compliance Section" with "Air Enforcement Section" and add the following phone and fax numbers: 404/562-9055, Fax 404/562-9163 or 404/562-9164.
- c. Section III, subsection A, condition A.1: The State needs to make the hourly heat input calculation and recordkeeping requirements a separate condition. As currently written, this requirement may be mistaken as an informational item because of the permitting note that follows this condition.
- d. Section III, subsection A: The permit needs to include language similar to the language contained in condition A.15 to address the installation, calibration, operation and maintenance of the COM.
- e. Section III, subsection A, condition A.31: Please renumber the items listed under condition A.31(a)(2).
- f. Section III, subsection A, conditions A.17, A.18, and A.19: Based upon monitoring data submitted under the provisions of the acid rain continuous emission monitoring rule [Cost and Quality of Fuels for Electric Utility Plants 1997 Tables, DOE/EIA-0191(97)], it appears that the units at this facility burn fuel oil for substantially more than 400 hours per year. Therefore, unless it is likely that these units will burn fuel oil for less than 400 hours per year in the future, Region 4 recommends that these conditions which address testing waivers be removed from the permit for this facility.



FPL

March 29, 1999

RECEIVED

APR 06 1999

**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: Proposed Permit No. 1270009-001-AV
FPL Sanford Plant Proposed Title V Permit**

Dear Mr. Sheplak:

After reviewing the subject proposed Title V permit, FPL has identified several issues which need to be addressed. Please contact me at your earliest convenience to discuss them.

Section III
Page 5 Essential Potential to Emit Parameters (Specific Conditions)

Page 5, Specific Condition A.1. Permitted Capacity. This specific condition is different than that agreed to by the department as described below.

In the proposed permit determination under II. **Public Comments. Item 2. Comment #2** the Department response "The Department agrees with the suggested change to include the heat input capacity in the unit description areas of the Permit. The PROPOSED Permit will reflect this change." In review of the specific conditions of the Essential Potential to Emit Parameters the heat input is listed as **A.1. Permitted Capacity**. Please make this change as addressed by the Department. The proposed change addressed Oct. 27, 1998, (letter from FPL) is included below.

Proposed change from Oct. 27, 1998, letter from FPL.

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 – The paragraph following **A.3.(b.)** is not consistent with other FPL Title V permits, plus, certain requirements, i.e. using separate fuel meters for the LSFO and HSFO is not possible with the current equipment configuration. In addition FPL has chosen to demonstrate compliance for sulfur dioxide using the CEMs. We request the following language for **A.3.(b.)** and strike the remainder of the condition.

“b. Normal: The only fuels allowed to be burned are natural gas, No. 2 fuel oil, No. 6 residual fuel oil, or on-specification used oil from Florida Power and Light Company operations.

[Rule 62-213.410, F.A.C.; AO05-217321, Specific Condition No. 2; AO05-252219, Specific Condition No. 2]”

Section III
Monitoring of Operations

Page 7: Specific Condition A.13. CEMs Required: This condition is not consistent with other FPL Title V permits, plus, certain cited rules are not applicable to the Sanford Power Plant.

CEMs Required: On each of the three emissions units the owner or operator shall install, certify and operate a continuous monitoring system for SO₂, NO_x, and opacity in accordance with 40 CFR 75. Data shall be calculated and recorded in units of the applicable standard.

[Rule 62-210.700, F.A.C.; AO05-217321, 40 CFR 75, Specific Condition No. 9; AO05-252219, Specific Condition No. 9]

Page 8: Specific Condition A.15.b. Please strike the following as indicated.

In the event the CEMs become temporarily inoperable....., or the emissions units shall fuel switch and be fired with a fuel ~~oil~~ containing a maximum sulfur content of 2.5% by weight or less.

Page 12: Specific Condition A.28. Fuel Records: We recognize the Department proposed language based on previous FPL comments, since that time we have addressed more appropriate language for demonstration of compliance for a plant that has fuel co-fire capabilities. Suggested language is as follows:

The owner or operator shall create and maintain for each emission unit hourly records of the amount of each fuel fired, the ratio of fuel oil to natural gas if co-fired, and the heating

value and fuel oil sulfur content. These records must be of sufficient detail to identify the testing requirements of specific condition **A.27.(a) or (b)** and, when applicable, demonstrate compliance with the requirements of specific condition **A.15.(b)** of this permit. Fuel oil heating value and sulfur content shall be determined using as received or as fired fuel analysis. As fire fuel oil analysis, at a minimum, would consist of a daily grab sample composited over no longer than one month period. Analysis of a representative sample shall be performed using one of ASTM D2622-94, ASTM D4294-90(95), ASTM D1552-95, ASTM D1266-91, both ASTM D4057-88 and ASTM D129-95, or the latest edition(s). [Rules 62-4.070(3), 62-213.410, 62-213.440, and 62-296.405(1)(c)3., F.A.C.]

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

Item 13. Evaporation of non-hazardous used cleaning chemicals by injection: We request addition to the reference to (*citrosolv and ammonia*) to include the statement "*but not limited to*" as there are other non-hazardous cleaning chemicals that may be utilized.

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

4/7/99 cc: Scott Shepley
Tom Cassio