



December 2, 1997

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

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BUREAU OF
AIR REGULATION

**Re: Removal of Opacity Strip Charts
FPL Title V Permits**

Dear Mr. Sheplak:

Pursuant to my recent telephone conversation with you last week, this letter is to inform the Department that FPL intends to remove the opacity stripchart recorders from our units across the state, in lieu of storing the opacity data electronically, as required by 40 CFR 75.

As we discussed, FPL has maintained opacity strip chart recorders at many of our facilities for many years, even though in some cases there was no requirement to do so. We currently maintain continuous opacity monitors at Cape Canaveral, Sanford, Manatee, Martin, Ft. Myers, Riviera, Port Everglades, Putnam and Turkey Point plants. With the advent of the Acid Rain requirements, and with an eye toward cost savings, we believe that it is unnecessary and duplicative to maintain and operate two data collection systems for the same information.

Following is a brief rule review and summary of the situation at each FPL facility, and a suggestion as to how to address changes to the Title V permits:

Rule Review

FDEP Rule 62-210.700(3) states:

"Visible emissions above 60 percent opacity shall be allowed for not more than four, six (6)-minute periods, during the three-hour period of excess emissions allowed by this subparagraph, for boiler cleaning and load changes, at units which have installed and are operating, or have committed to install or operate, continuous opacity monitors."

FPL's desire to remove the strip chart recorders will in no way contravene this language; continuous opacity monitors will remain at all those facilities to which this rule applies.

Another rule which applies is FDEP Rule 62-297.310(5) which states:

"Determination of Process Variables

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10 percent of its true value."

Again, the removal of the opacity strip chart recorders will in no way contradict this rule; opacity will still be continuously monitored and recorded; the recordkeeping for opacity will simply be electronic in nature rather than both electronic and hard-copy.

Title V General Condition 14

General Condition (14)(b) states:

The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five (5) years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

I would assert that this language, while it does refer to strip charts by name, can be interpreted to allow for electronic recordkeeping. The phrase "required by the permit" means that there must be a specific condition that requires strip chart data to be kept (which, as you will see below, is not the case). Please note that this same language appears in some of FPL's AO permits which are several years old - the existence of electronic data storage was probably not considered when it was drafted - it was probably just incorporated into the Title V general conditions when they were developed.

Cape Canaveral

Specific Condition A.17 requires FPL to operate, calibrate and maintain a continuous opacity monitoring system. It does not mention a stripchart recorder. In the Recordkeeping and Reporting section of the permit (beginning at Specific Condition A.33) no mention is made of stripchart recorder data.

Ft. Myers

Specific Condition A.17 requires FPL to operate, calibrate and maintain a continuous opacity monitoring system. It does not mention a stripchart recorder. In the Recordkeeping and Reporting section of the permit (beginning at Specific Condition A.31) no mention is made of stripchart recorder data.

Martin

Specific Condition A.22 requires FPL to operate, calibrate and maintain a continuous opacity monitoring system. It does not mention a stripchart recorder. Specific Condition A.24. requires performance evaluations of the Continuous Opacity Monitoring system (COMs) if FPL elects to utilize this data for compliance purposes. When such performance evaluations are conducted, they do not include any reference to strip chart recorders. Specific Condition A.25. essentially requires

FPL to continue using COMs data for compliance if and when we start doing so, until and unless we notify the Department to the contrary. Again, no mention is made of a requirement for a stripchart recorder. Specific Conditions A.26, 27, 28, 29, 30, 31, and 34 all deal with continuous monitoring requirements, but do not mention strip chart recorders.

In the Recordkeeping and Reporting section of the permit (beginning at Specific Condition A.40) no mention is made of stripchart recorder data.

Riviera

Specific Condition A.6 states that the boilers have continuous opacity monitors. It does not mention a stripchart recorder. Specific Condition A.20 mentions that a transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C.. It also does not mention an opacity strip chart recorder. Specific Condition A.32. requires the maintenance of "recorded data" for a period of 5 years. These data could be electronic in nature.

Sanford (draft)

Specific Condition A.6 allows for emissions up to 60 percent opacity during certain soot blowing events in accordance with Rule 62-210.700 as long as a continuous opacity monitor is used to report excess emissions. Certainly electronic data can be utilized for this purpose. Specific Condition A.13. requires a COM for each boiler - no mention is made of any requirement for a strip chart recorder. Specific Condition A.32. requires the maintenance of "recorded data" for a period of 5 years. These data could be electronic in nature.

Port Everglades

Specific Conditions A.5 and B.5. allow for emissions up to 60 percent opacity during certain soot blowing events in accordance with Rule 62-210.700 as long as a continuous opacity monitor is used to report excess emissions. Certainly electronic data can be utilized for this purpose.

Putnam

Specific Condition B.11. requires the installation, calibration and operation of a continuous monitoring system for opacity; and requires FPL to record the output of the system. Certainly electronic data would be sufficient to satisfy this requirement. Specific Condition E.1. contains language that refers to the quarterly opacity excess emission and monitoring system performance sheet, but once again, no mention is made of strip chart requirements.

Turkey Point Fossil

Specific Condition A.11. mentions that a transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C.. It also does not mention an opacity strip chart recorder. Specific Condition C.12. requires the maintenance of "recorded data" for a period of 5 years. These data could be electronic in nature.

In order to clarify that electronic data are equivalent to strip chart data, I suggest that the easiest thing for the Department to do is to issue a guidance document to that effect. Certainly it would not be appealing to change the general conditions at this stage (perhaps during the renewal cycle). Since FPL's permits are not final yet (except for Cutler), if possible I'd like to see some language inserted such as:

"For the purposes of recordkeeping for opacity, electronic data are equivalent to, and may be used in place of strip chart data".

I would be pleased to discuss this matter further with you at your convenience. Please do not hesitate to contact me at (561) 691-7058 if I may be of further assistance.

Very truly yours,



Richard Piper
Sr. Environmental Specialist
Florida Power & Light Company

12/8/97 cc- Scott Sheplak
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cc:

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FDEP / DARM