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September 5, 1990

OF COUNSEL
W. ROBERT FOKES

Ms. Cindy Phillips
Bureau of Air Regulation
Department of Environmental Regulation
2600 Blair Stone Road, Third Floor
Tallahassee, FL 32399-2400

RECEIVED

SEP 05 1990

DER-BAQM

Re: Orimulsion Test Burn
FPL Sanford Unit No. 4

Dear Cindy:

This letter is to confirm our understanding of the discussions at our meeting on Wednesday, August 29, 1990, concerning the Environmental Protection Agency's (EPA's) draft comment letter (faxed to Elsa Bishop on August 28, 1990), relating to the "prehearing submittal for the proposed SIP revision."

EPA Comment:

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.

FPL Response:

1.a. Florida Power & Light Company (FPL) and the Department of Environmental Regulation (DER) agree with EPA that the relaxed SO₂ and opacity limits apply only during the burning of Orimulsion.

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1.b. Although we understand EPA's desire to "clean up" the relaxed SIP limits for particulate matter that were connected with the 1980 DER multiple-source variance, a revision to Florida's SIP cannot be made in the current proceedings, whose public notices and scope are limited to Sanford Unit No. 4. The relaxed particulate matter limit for Sanford Unit No. 4 must be dealt with by DER in a completely separate SIP revision.

EPA Comment:

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.

FPL Response:

2. DER proposes to modify Specific Condition No. 2 of the air operating permits for Units 3 and 5, to provide that:

Unit Nos. 3 and 5 may burn "Natural Gas, No. 2 Fuel Oil and/or No. 6 Fuel Oil with a maximum equivalent sulfur content (by weight) of one percent (1%) only," during the test burn of Orimulsion (unless the burning of Orimulsion ceases for more than 7 days).

EPA Comment:

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.

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FPL Response:

3. FPL does not concur with the suggestion of EPA that NO_x and CO emission limits should be imposed during the test, because of the absence of specific data on such emissions. BACT does not apply to the proposal, and DER rules do not require such limits. FPL agrees to continuously monitor NO_x and CO as suggested by EPA.

EPA Comment:

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.

FPL Response:

4. Rather than require FPL to submit all hourly averages of NO_x and CO CEM, FPL recommends that it record and retain hourly averages of emissions monitoring data, and submit monthly reports of such.

EPA Comment:

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.

FPL Response:

5. DER and EPA have suggested, and FPL concurs, that a specific condition should be added requiring compliance with 40 C.F.R. Part 60, Appendix B, for CEM evaluations.

EPA Comment:

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.

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FPL Response:

6. FPL requested, and DER agreed, that FPL be allowed to use Method 19 or an equivalent approved method.

EPA Comment:

7. Specific Condition 5 should state that the average of three test runs will be used to determine compliance.

FPL Response:

7. FPL and DER concur.

EPA Comment:

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.

FPL Response:

8. DER agreed with FPL that no CO compliance tests would be required, and, again, that no CO or NO_x limits would be established in the permit. (See also, response to Comment 3.)

EPA Comment:

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.

FPL Response:

9. The suggestion by EPA was as agreed between FPL's consultant, Entropy Environmentalists, Inc., and Cindy Phillips of DER.

EPA Comment:

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.

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FPL Response:

10. FPL and DER concur.

Sincerely,



William H. Green

WHG/bjh

cc: Bruce P. Miller, Chief
Air Programs Branch, EPA