

DRAFT

February 11, 1991

Martin A. Smith, Ph.D., Manager
Environmental Permitting Programs
Florida Power & Light Company
P.O. Box 078768
West Palm Beach, Florida 33407-0768

Dear Dr. Smith:

Re: Air Construction Permit Amendment
Volusia County, AC 64-180842, PSD-FL-150
Sanford Plant Unit #4 , Orimulsion Fuel Test Burn

In order to allow the continued testing of Orimulsion fuel at a higher opacity, the referenced permit is hereby amended with the following changes:

- FROM: SPECIFIC CONDITION 3.c) Visible Emissions: Steady-state - 60% opacity; Excess emissions, not to exceed 3 hours per 24-hour period, for soot-blowing, startup, shutdown and load changes - 100% opacity; Excess emissions, not to exceed 2 hours per 24-hour period, for malfunction - 100% opacity.
- TO: SPECIFIC CONDITION 3.c) Visible Emissions: Steady-state - 80% opacity; Excess emissions, not to exceed 3 hours per 24-hour period, for soot-blowing, startup, shutdown and load changes - 100% opacity; Excess emissions, not to exceed 2 hours per 24-hour period, for malfunction - 100% opacity.
- FROM: SPECIFIC CONDITION 10. Test Length: The testing of Orimulsion fuel shall be allowed for 90 full-capacity equivalent burn days. With permission from the Department, an additional 30 full-capacity equivalent burn days may be allowed to complete testing if necessary.
- TO: SPECIFIC CONDITION 10. Test Length: The testing of Orimulsion fuel shall be allowed for 75 full-capacity equivalent burn days. With permission from the Department, an additional 30 full-capacity equivalent burn days may be allowed to complete testing if necessary. A full-capacity burn day is equivalent to 97,200 MMBtu heat input (24 hours x 4050 MMBtu/hour heat input), and 75 full-capacity equivalent burn days shall have elapsed when 7.29×10^6 MMBtu of heat have been input using Orimulsion fuel.

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FROM: SPECIFIC CONDITION 2. Permitted Fuels: Unit 4 shall be fired with Orimulsion Fuel, No. 6. Residual Oil, No. 2 Fuel Oil, or Natural Gas only. By separate permit amendments, the Department has temporarily restricted Units 3 and 5 to be fired only with Natural Gas and/or Fuel Oil with a sulfur content limit equivalent to 1.1 lb SO₂/MMBtu.

TO: SPECIFIC CONDITION 2. Permitted Fuels: Unit 4 shall be fired with Orimulsion Fuel, No. 6. Residual Oil, No. 2 Fuel Oil, or Natural Gas only. By separate permit amendments, the Department has temporarily restricted Unit 3 to be fired only with Natural Gas and/or Fuel Oil with a sulfur content limit equivalent to 1.1 lb SO₂/MMBtu, and restricted Unit 5 from operating at all, during such times as Orimulsion is combusted in Unit 4.

FROM: SPECIFIC CONDITION 5.c) The CEMs shall be maintained, calibrated, and evaluated by the respective Performance Specification Test of 40 CFR Part 60, Appendix B.

TO: SPECIFIC CONDITION 5.c) The CEMs shall be maintained, calibrated, evaluated, and quality assured by the respective Performance Specification Test of 40 CFR Part 60, Appendix B and 40 CFR Part 60.13. If repairs are made to a CEM, performance certification shall be retested. Performance Specification Tests and recalibrations shall be scheduled with the Department's Central District Office prior to testing.

FROM: SPECIFIC CONDITION 6.c) Visible Emissions: Opacity CEM with six minute averages.

TO: SPECIFIC CONDITION 6.c) Visible Emissions: Opacity CEM with six minute averages. In addition, while each one of the one-hour particulate stack tests is performed, visible emissions are to be tested simultaneously by DER Method 9.

ADD: SPECIFIC CONDITION 8.h) In addition to the monthly requirements of Specific Condition 8.e)v., a weekly summary of opacity readings, including a daily log of excess opacity emissions, shall be submitted within 5 days following the end of the week.

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ADD: SPECIFIC CONDITION 8.i) In order to meet the Orimulsion fuel usage reporting requirement of Specific Condition 8.e)i., a fuel flow meter shall immediately be installed; or FP&L shall immediately submit a plan, for Department approval, for an alternate method of quantifying Orimulsion fuel usage.

A person whose substantial interests are affected by this permit amendment may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of receipt of this permit amendment. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the amendment have the right to petition to become a party to the proceeding. The petition must conform to the days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

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This permit amendment is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for an extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit amendment will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, F.S., by filing a Notice of Appeal pursuant to Rule 9.110, Florida Rules of the Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate district Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Tallahassee, Florida

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Carol M. Browner, Secretary

c: Chuck Collins, P.E., CD

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT AMENDMENT and all copies were mailed before the close of business on _____ to the listed persons.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
Section 120.52, Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.

Clerk

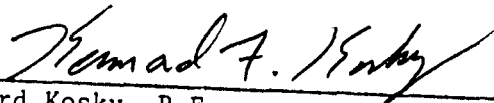
Date

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Table 4. Refined PM Modeling Results for the FPL Sanford Orimulsion Burn

Averaging Time	Maximum Predicted Concentration ($\mu\text{g}/\text{m}^3$)		Allowable PSD Class II Increment for PM-TSP ^a (ug/m^3)	State of Florida AAQS for PM ₁₀ ^b ($\mu\text{g}/\text{m}^3$)
	PSD (PM-TSP)	AAQS ^{a, d} (PM ₁₀)		
Annual	0.4 (0.43) ^d	34.1 (34.3) ^d	19	50
24-hour ^b	6.2 (6.7) ^d	53.2 (53.7) ^d	37	150

- a. Includes PM₁₀ background concentrations of 32 and 40 ug/m^3 for the annual and 24-hour averaging times, respectively.
- b. Short-term values reported are highest, second-highest concentrations
- c. Note: Proposed Class II PSD Increments for PM₁₀ are 17 and 30 ug/m^3 , for the annual and 24-hour averaging times, respectively.
- d. Assumes 5 hours at 0.6 lb/10⁶ BTU and 19 hours at 0.315/10⁶ BTU


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