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Dept. of Environmental Protection
Office of General Counsel

TO: Memo to File
FROM: Bruce Mitchell
DATE: November 13, 1998
SUBJECT: Comments Regarding the DRAFT Title V Operating Permit
0310045-002-AV
JEA: Northside Generating Station/St. Johns River Power Park

Based on a review of the above referenced permitting action, which is on Public Notice, and comments raised during phone conversations with JEA and its representatives and comments/objections raised by U.S.EPA Region 4 regarding FP&L's Cape Canaveral PROPOSED Title V permit, I am making the following comments, which are to be addressed in the PROPOSED Determination:

1. In Section III. Subsection D., specific condition D.13. cites the limits of the sulfur contents, by weight, for the various fuels allowed to be fired in the boilers. However, there was no testing requirements cited in the subsection's text. Therefore, new specific condition D.74. will be added as follows:

D.74. Fuel - Sulfur Content. (see specific condition D.13.)

a. Coal or Coal - Petroleum Coke Blend. The as-fired fuel sulfur content, percent by weight, for the coal or coal - petroleum coke blend shall be determined using ASTM D2013-72 and either ASTM D3177-75, ASTM D4239-85, ASTM D3176-74, or the latest edition, to analyze a representative sample of the fuel being fired; or, the operation of an inlet SO₂ analyzer with support provided from a vendor's supplied analysis for each shipment of fuel delivered shall be used to establish the sulfur content, percent by weight, of the fuel being fired.

b. No 2. Fuel Oil. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, ASTM D1552-95, both ASTM D4057-88 and ASTM D129-91, or the latest edition. The permittee shall have an as-fired sample analyzed after each fuel delivery or the vendor shall provide an analysis including sulfur content and heating value for each fuel delivery. However, if the No. 2 fuel oil being delivered has a sulfur content of 0.76 % or less, by weight, then the vendor's analysis is acceptable and no further analysis is required. [Rules 62-213.440 and 62-297.440, F.A.C.; 40 CFR 60.17; and, 40 CFR 60.47a]

In addition, specific condition D.13. will have a cross reference to specific condition D.74. added to it.

2. In Section III. Subsection D., specific condition D.50. contains the text of Rule 62-297.310(7)(a)2., F.A.C., which imposes a "soot blowing" test requirement and is a follow through from Rule 62-210.700(3), F.A.C., Excess Emissions. These emissions units are not existing fossil fuel steam generators and are not entitled to the Excess Emissions rule cited. Therefore, this rule text needs to be deleted since it is not applicable and is stated as follows (see the bolded text):

D.50. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid fuel for more than 400 hours other than during startup.

3. In Section III. Subsection D., specific condition D.60., a reference in the text was made to "40 CFR 60.49(a)" and should have been "40 CFR 60.49a".

Comments Regarding the DRAFT Title V Operating Permit

0310045-002-AV

JEA: Northside Generating Station/St. Johns River Power Park

Page 2 of 2

4. Based on objections and comments received from U.S. EPA Region 4 regarding the PROPOSED Title V permit for FP&L's Cape Canaveral plant, the following changes will be made:

a. In Section II., Facility-wide Conditions., Condition No. 12, "Operating Source Section" will be replaced with "Air & RPCRA Enforcement Branch, Air Compliance Section" and the complete address will read as follows:

United States Environmental Protection Agency

Region 4

Air, Pesticides & Toxics Management Division

Air & EPCRA Enforcement Branch

Air Compliance Section

61 Forsyth Street

Atlanta, Georgia 30303

Telephone: 404/562-9099

Fax: 404/562-9095

b. A request was made to link some specific conditions in order to see the ties between them. Therefore, the following specific conditions will include some linkage:

- (1) Linkage between specific conditions: A.31. with A.32. and A.33.
- (2) Linkage between specific conditions: B.18. with B.19.
- (3) Linkage between specific conditions: C.15. with C.16.
- (4) Linkage between specific conditions: D.50. with D.51.

RBM/bm

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