



P.O. Box 078768, West Palm Beach, FL 33407-0768
5500 Village Blvd.

FEDERAL EXPRESS

RECEIVED
MAY 17 1991
Division of Air
Resources Management

May 16, 1991

Ms. Cindy Phillips
State of Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

RE: **Sanford Plant, Unit No. 4**
Orimulsion Test Burn
Weekly Compliance Reports - May 6 - 12, 1991

Dear Ms. Phillips:

As required by the specific conditions of the Department's permit and Order authorizing the Orimulsion Test Burn, enclosed please find the compliance reports for the week of May 6 - 12, 1991 as follows:

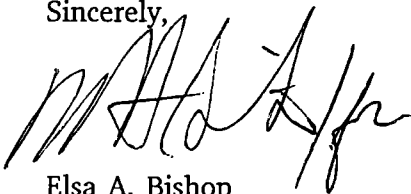
<u>Required in</u> <u>Specific Condition No.</u>	<u>Report Title</u>
8h & 8i (Order Condition No. 15)	Burn Schedule/Fuel Usage/Full Power Burn Days
8j (Order Condition No. 15)	Daily Opacity Logs
8j (Order Condition No. 15)	Summary - Opacity CEM 6-min. Averages
(Order Condition No. 18)	Opacity Research Status Report

Sanford Plant, Unit No. 4
Orimulsion Test Burn
Weekly Compliance Reports
Page 2

For your convenience, we have compiled all the above reports into one booklet. This format will be repeated for each reporting cycle throughout the Orimulsion Test Burn.

If you have any questions, please call me at (407) 697-6926.

Sincerely,

A handwritten signature in black ink, appearing to read 'E.A. Bishop', written over a faint, larger version of the same signature.

Elsa A. Bishop
Senior Environmental Coordinator
Florida Power & Light Company

EAB:jm

Enclosure

cc: Mr. A. Alexander - DER/Orlando (w/o encl.)



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FEDERAL EXPRESS

May 16, 1991

Mr. A. Alexander, Deputy Assistant Secretary
State of Florida Department of Environmental Regulation
Central Florida District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32802

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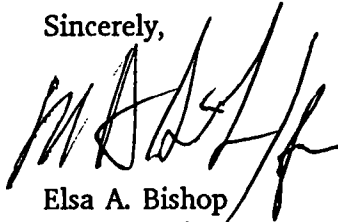
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Sincerely,



Elsa A. Bishop
Senior Environmental Coordinator
Florida Power & Light Company

EAB:jm

Enclosure

cc: Cindy Phillips - DER/Tall (w/o encl.)

80% Orimulston

Sanford PLANT
 DAILY OPACITY EMISSIONS REPORT
 Form 4954 (Non-Stocked) Rev. 2/84

UNIT NO. DATE
 WED MAY 8 1991
 4 (80% Orimulsion)

SIX MINUTE INTERVALS											SIX Minute Intervals 80% COMMENTS	
Time	1	2	3	4	5	6	7	8	9	10	This Hour	Last 24 Hours
12MN											12MN	
1AM											1AM	
2											2	
3		B182	B183	B184	B185						3	4
4											4	
5											5	
6											6	
7											7	
8											8	
9											9	
10											10	
11											11	
12N											12N	
1P											1P	
2											2	
3											3	
4											4	
5											5	
6											6	
7											7	
8	87C2	81C2			89C2					82C2	8	8
9	88C2	86C2	81C2								9	11
10	83C2	86C2	85C2	83C2	87C2	87C2	93C2	84C2			10	19
11				82C2							11	20

<p>A MALFUNCTION</p> <p>MALFUNCTION</p> <ul style="list-style-type: none"> * 1 Monitor Out of Service * 2 Burner Problem * 3 Control Problem * 4 Other 	<p>B START-UP/SHUT-DOWN</p> <ul style="list-style-type: none"> 1 Start-Up 2 Shut-Down <p>Lab will provide code</p>	<p>C LOAD CHANGE/SOOT-BLOWING</p> <ul style="list-style-type: none"> *1 Rapid Load Change *2 Soot-blowing *3 Liming Boiler *4 Cleaning Air Pre-heater <p>A rapid load change is defined as a change that occurs at the rate of 0.5% per minute or more and exceeds 10% of the units rated capacity and occurs when the unit is operating at greater than 10% of rated capacity, excluding startup and shutdown.</p>	<p>INSTRUCTIONS</p> <p>Fill in the opacity and reason code or codes in the appropriate box whenever the opacity exceeds 20% for any 6 minute period on the recorder. Example: 50A3 indicates an opacity reading of 50% attributed to control problems.</p> <p>Use the comment column where additional explanation is appropriate.</p>
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60% Orimulsion

Sanford PLANT
 DAILY OPACITY EMISSIONS REPORT
 Form 4954 (Non-Stocked) Rev. 2/84

THURSDAY 9 1991
 UNIT NO. DATE
 4 (60% Orimulsion)

Time	SIX MINUTE INTERVALS										Six Minute Intervals >60%			
	1	2	3	4	5	6	7	8	9	10	COMMENTS	This Hour	Last 24 Hours	
12MN	62A2	52A2	52A2		61A2	62A2	62A2	61A2				12MN	7	7
1AM												1AM		
2												2		
3												3		
4												4		
5												5		
6												6		
7												7		
8												8		
9												9		
10												10		
11												11		
12N												12N		
1P												1P		
2												2		
3												3		
4												4		
5												5		
6												6		
7												7		
8												8		
9												9		
10		71 ^{c2}	97 ^{c2}	95 ^{c2}	96 ^{c2}	97 ^{c2}	93 ^{c2}	79 ^{c2}	81 ^{c2}	80 ^{c2}		10	9	16
11	84 ^{c2}	65 ^{c2}	91 ^{c2}	77 ^{c2}	86 ^{c2}	88 ^{c2}	93 ^{c2}	95 ^{c2}	90 ^{c2}	95 ^{c2}		11	10	26

A MALFUNCTION
 MALFUNCTION
 * 1 Monitor Out of Service
 * 2 Burner Problem
 * 3 Control Problem
 * 4 Other

B START-UP/SHUT-DOWN
 1 Start-Up
 2 Shut-Down
 Lab will provide code

C LOAD CHANGE/SOOT-BLOWING
 *1 Rapid Load Change
 2 Soot-blowing
 3 Liming Boiler
 4 Cleaning Air Pre-heater
 A rapid load change is defined as a change that occurs at the rate of 0.5% per minute or more and exceeds 10% of the units rated capacity and occurs when the unit is operating at greater than 10% of rated capacity, excluding startup and shutdown.

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 Use the comment column where additional explanation is appropriate.

60% Opimulsion

Sanford PLANT
DAILY OPACITY EMISSIONS REPORT
 Form 4954 (Non-Stocked) Rev. 2/84

UNIT NO. **FR** DATE **MAY 10 1991**
 4 (60% Opimulsion)

Time	SIX MINUTE INTERVALS										Six Minute Intervals >60%		
	1	2	3	4	5	6	7	8	9	10	COMMENTS	This Hour	Last 24 Hours
12MN	cr 83	cr 92	cr 15	93cr	92cr	98cr	89cr		73cr	71cr	12MN	9	9
1AM	cr 73	cr 78	cr 81	65cr	60cr						1AM	5	14
2											2		
3											3		
4											4		
5											5		
6											6		
7											7		
8											8		
9		61A4									9	1	15
10											10		
11							61A4	60A4			11	2	17
12N							62C3	72C3			12N	2	19
1P						60A4	60A4				1P	2	21
2											2		
3											3		
4											4		
5											5		
6											6		
7											7		
8											8		
9											9		
10											10		
11			67cr	87cr	91cr	71cr	67cr	98cr	92cr	68cr	11	8	29

A MALFUNCTION
 MALFUNCTION
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 1 Start-Up
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60% Orimulsion

Sanford PLANT
DAILY OPACITY EMISSIONS REPORT
 Form 4954 (Non-Stocked) Rev. 2/84

UNIT NO. **SAT** DATE **MAY 11 1991**
 4 (60% Orimulsion)

SIX MINUTE INTERVALS											Six Minute Intervals >60%			
Time	1	2	3	4	5	6	7	8	9	10	COMMENTS	This Hour	Last 24 Hours	
12MN	cr70	cr79		cr96	90cr	86cr	93cr	85cr	7cr	cr71		12MN	9	9
1AM	cr70	cr94	cr96	cr97	78cr	67cr	64cr	64cr	64cr	cr61		1AM	10	19
2	cr62	cr62	cr61					61cr				2	4	23
3												3		
4												4		
5												5		
6												6		
7												7		
8												8		
9												9		
10												10		
11												11		
12N												12N		
1P												1P		
2												2		
3												3		
4												4		
5												5		
6												6		
7												7		
8												8		
9												9		
10												10		
11									86cr	94cr		11	2	25

A MALFUNCTION
 MALFUNCTION
 * 1 Monitor Out of Service
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 1 Start-Up
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60% Orimulsion

Sanford PLANT
 DAILY OPACITY EMISSIONS REPORT
 Form 4954 (Non-Stocked) Rev. 2/84

UNIT NO. SUN MAY 12 1991
 4 (60% Orimulsion)

Time	SIX MINUTE INTERVALS										Six Minute Intervals >60%		
	1	2	3	4	5	6	7	8	9	10	COMMENTS	This Hour	Last 24 Hours
12MN	0299	0299	0297	0298	0294	0299	0299	0295	0299	0299	12MN	10	10
1AM	0297	0293	0298	0297	0299	0296	0297	0269	0262	0260	1AM	10	20
2											2		
3											3		
4											4		
5											5		
6											6		
7											7		
8											8		
9											9		
10											10		
11											11		
12N											12N		
1P											1P		
2											2		
3											3		
4											4		
5											5		
6											6		
7											7		
8											8		
9											9		
10											10		
11			0277	0870	0900	0970	0990	0830	0650	0740	11	0	28

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**CONTINUOUS EMISSIONS MONITORING REPORT
FLORIDA POWER AND LIGHT
SANFORD PLANT
UNIT FOUR
OPACITY MONITOR
ORIMULSION TEST BURN PROJECT
MAY 6-12, 1991**

**DATA COMPILED BY
SPECTRUM SYSTEMS INC.
PENSACOLA, FL**

SECTION 1
SIX MINUTE OPACITY AVERAGES

The following data was compiled from a copy of the original strip chart recordings provided to Spectrum Systems Inc. by Florida Power and Light for unit four at the Sanford Plant. Hourly averages were obtained by taking the sum of the valid six minute averages and dividing by the number of valid averages. This gives a real average based on known good minutes. The squares on the data table that are blacked in are the six minute averages that were deemed invalid due to calibrations happening, or any reason causing the integrated output from the opacity monitor to go to zero while the unit is on-line.

Opacity Monitor Six Minute Averages, May 8, 1991.

SIX MINUTE PERIOD	:00-:06	:06-:12	:12-:18	:18-:24	:24-:30	:30-:36	:36-:42	:42-:48	:48-:54	:54-:60	
HOUR OF DAY											HOUR AVERAGE
12: A.M.	0	3.5	3.5	1	6	2	1	16.5	2	5	4.05
1: A.M.	13	8	9	10	15	35	56	28.5	38.5	45	25.80
2: A.M.	45	49	49.5	49	46	38	28	31	30.5	44	41.00
3: A.M.	69	82.5	83.5	89	84.5	70.5	67	64	69	72.5	75.15
4: A.M.	71	60	53		44	48	50	51	49	47	52.56
5: A.M.	47	47	47	47.5	48	50.5	55	59	60	60	52.10
6: A.M.	59	59	59.5	60	61	58	56	59	62	62	59.55
7: A.M.	62	62.5	65	60	58	59.5	60	59	59	60	60.50
8: A.M.	58	56	55	54.5	54.5	54	54.5	54	54	54	54.85
9: A.M.	54	54	54	55	55	56	56	56	61	59	56.00
10: A.M.	60	60	58	59	59.5	77	58	58.5	58.5	58	60.65
11: A.M.	58	58	58	59	59	59.5	59	60	59	60	58.95
12: NOON	59	59	58		52	57	57	57	57	58	57.11
1: P.M.	58	58	59.5	59	60	58	58	57	56.5	56.5	58.05
2: P.M.	57.5	58	59	60	60.5	62	63	64	65	62	61.10
3: P.M.	61	62.5	62.5	61.5	60	59	59	59	59	56	59.95
4: P.M.	57.5	57	57	57	56.5	56	56	55	55	55	56.20
5: P.M.	54	54	54.5	54	54	54	54	53	52	51.5	53.50
6: P.M.	51.5	51.5	51.5	52	52	51.5	51	51	51	51	51.40
7: P.M.	52	52	52	52	52	52	52	52	52	71	53.90
8: P.M.	77	87	80.5		76	89	72	71	64	72.5	76.56
9: P.M.	82	88	86	81	65	61	62.5	72.5	77	72	74.70
10: P.M.	72	83.5	85.5	84.5	83.5	87	87	93	84	78.5	83.85
11: P.M.	77	76	71.5	72	82	64	64	63.5	63.5	63	69.65

Blackened squares indicate invalid or no data obtained for that time period.

Opacity Monitor Six Minute Averages, May 9, 1991.

SIX MINUTE PERIOD	:00-:06	:06-:12	:12-:18	:18-:24	:24-:30	:30-:36	:36-:42	:42-:48	:48-:54	:54-:60	
HOUR OF DAY											HOUR AVERAGE
12: A.M.	63	63	62		61	62	62	61	59	59	61.33
1: A.M.	59	59	59	59	59	59	59	59	59	59	59.00
2: A.M.	59	59.8	59.8	59.8	59.8	59.5	59	59	59	59	59.37
3: A.M.	59	59	59	59	59	59	59	59	59	59	59.00
4: A.M.	59	59		54	59	59	59	59	59	59	58.44
5: A.M.	59	59	59	59.5	59	59				59	59.07
6: A.M.	59	59		59	59.5	59.5	59.5	59.5	59.5	59.5	59.33
7: A.M.	59.5	59.5	59.5	59.5	59.5						59.50
8: A.M.								59	58	58	58.33
9: A.M.	58	58	58	58	58	58	58	58	58	58	58.00
10: A.M.	58	58	58	58	58	58	58	58	58	58	58.00
11: A.M.	58	58.2	58.4	58.5	58.5	58.5	58.5	59	59	59	58.56
12: NOON	59	59		53.5	58	58	58	58	58	58.5	57.78
1: P.M.	58.5	58.5	58.5	58.5	58.5	58.5	58.5	58.5	58.5	58.5	58.50
2: P.M.	58.5	58.5	58.5	58.5	58.5	58.5	58.5	58.5	58.5	58.5	58.50
3: P.M.	58.5	58.6	58.8	59	59	59	59	59	59.5	60	59.04
4: P.M.	59.9	59	58.5	58.5	58.5	58.5	58	57.5	57.5	57.5	58.34
5: P.M.	57.5	57.5	57.5	57.5	57.5	57.5	58	58	58	58	57.70
6: P.M.	58	58	59	58.5	58.5	58.5	58.5	58.5	58.5	58.5	58.45
7: P.M.	58.5	58.5	58.5	59	59	59	59	59	59	59	58.85
8: P.M.	59.5	59.8	59.5		54	59	59.8	59	59	59	58.73
9: P.M.	59	59	59.5	59	59	59	59	59	59.5	59	59.10
10: P.M.	59	71	97	95	96	97	93	79	81	80	84.80
11: P.M.	84	65	91	77	86	88	93	95	90	94	86.30

Blackened squares indicate invalid or no data obtained for that time period.

Opacity Monitor Six Minute Averages, May 10, 1991.

SIX MINUTE PERIOD	:00-:06	:06-:12	:12-18	:18-:24	:24-:30	:30-:36	:36-:42	:42-:48	:48-:54	:54-:60	
HOUR OF DAY											HOUR AVERAGE
12: A.M.	83	92	95	93	92	97	89		73	71	87.22
1: A.M.	73	78	81	65	60	59	59	59	59	59	65.20
2: A.M.	58.5	58.5	58	58	58.5	58.5	58.5	59	59	59	58.55
3: A.M.	58.5	58	58	58	58	58	58	58	58	58	58.05
4: A.M.	58		53	57.5	58	58	58	58	58	58	57.39
5: A.M.	58	58	58	58	58	58	58	58	58	58	58.00
6: A.M.	58	58	58	58	58	58	58	58	58	58	58.00
7: A.M.	58	58	58	58	58	58	58	58	58.5	59	58.15
8: A.M.	58.5	58.5	58	58	57.5	57.5	57.5	57.5	58	58	57.90
9: A.M.	58	61	59	58.5	58	58	58	58	58	59	58.55
10: A.M.	59.8	59.8	59.5	59.5	59.5	60	59.5	59	59	59	59.46
11: A.M.	59	59	59	59	59	59	61	60.2	59.8	59	59.40
12: NOON	59		54.5	59	59	59	59	62	72	59	60.28
1: P.M.	59.5	59.8	59	59	59.5	60	60	59.8	59.8	59	59.54
2: P.M.	59	59	59	58.5	58.5	59	59	59	58.5	58.5	58.80
3: P.M.	58	58	58	58	58	58	58	58	58	58	58.00
4: P.M.	58	58	58	58	58	58	58	58	58	58	58.00
5: P.M.	58	57.5	57.5	57.5	57.5	57.5	57.5	57.5	57.5	57.5	57.55
6: P.M.	57.5	57.5	57.5	57.5	57.5	57.5	57.5	57.5	57.5	57.5	57.50
7: P.M.	57	57	57	57.5	57.5	57.5	57.5	57.5	57.5	57.5	57.35
8: P.M.	57.5		53	57.5	57.5	57.5	57.5	57.5	57.5	57.5	57.00
9: P.M.	57.5	57.5	57.5	57.5	57.5	58	58	58	58	58	57.75
10: P.M.	58	58	58	58	58	58	58	58	58	59	58.10
11: P.M.	59		67	87	91	71	62	98	92	68	77.22

Blackened squares indicate invalid or no data obtained for that time period.

Opacity Monitor Six Minute Averages, May 11, 1991.

SIX-MINUTE PERIOD	:00-:06	:06-:12	:12-:18	:18-:24	:24-:30	:30-:36	:36-:42	:42-:48	:48-:54	:54-:60	
HOUR OF DAY											HOUR AVERAGE
12: A.M.	70	79		96	90	86	93	85	70	71	82.22
1: A.M.	70	94	96	97	78	67	64	64	64	61	75.50
2: A.M.	62	62	61	60	59.5	59.5	59	59.5	61	57	60.05
3: A.M.	57	57	57	57	57	57	57	57	57	57	57.00
4: A.M.	56.5	56.5	56.5		53	57	56	56	56	56	55.94
5: A.M.	56	56.5	56	56	56	56	57	57	57	57	56.45
6: A.M.	57	57	57	57	57	57	57	57	57	57	57.00
7: A.M.	57	57	57	58	58	58	58	58	58	58	57.70
8: A.M.	58	58	57.5	57	57	57	57	57	58	58	57.45
9: A.M.	58	59	58	58	58	58	58	59	58	58	58.20
10: A.M.	58	58	58.5	59	58.5	58.5	58.5	58.5	58.5	58.5	58.45
11: A.M.	58.5	58.5	58.5	58.5	58.5	59	58.5	58.5	58.5	58.5	58.55
12: NOON	58.5	58.5		54	58	58	58	58	58	59	57.78
1: P.M.	59	59	59	59	59	59	59.5	59	59	59	59.05
2: P.M.	59	59	59	59	59	59	59	59	59	59	59.00
3: P.M.	59.5	59.5	59	59	59	59	59	59	59	59	59.10
4: P.M.	59	59	59	59	59	59	59	59	59	59	59.00
5: P.M.	59	59	59	59	59	59	59	59	59	59	59.00
6: P.M.	59	59	59	59	59	58.5	58.5	58.5	58.5	58.5	58.75
7: P.M.	59	59	59	59	59	59	59.5	59	59	59	59.05
8: P.M.	59	59		54	58	58	58.5	58.5	59	59	58.11
9: P.M.	59	59	59	59	59	59	59	59	59	59	59.00
10: P.M.	59.5	59	59	59	59	59	59	59	59	59	59.05
11: P.M.	59	59	59.5	59.5	60	58	58	58	86	94	65.10

Blackened squares indicate invalid or no data obtained for that time period.

Opacity Monitor Six Minute Averages, May 12, 1991.

SIX MINUTE PERIOD	:00-:06	:06-:12	:12-:18	:18-:24	:24-:30	:30-:36	:36-:42	:42-:48	:48-:54	:54-:60	
HOUR OF DAY											HOUR AVERAGE
12: A.M.	99	99	97	98	94	99	99	95	99	99	97.80
1: A.M.	97	93	98	97	99	96	97	69	62	60	86.80
2: A.M.		58.5	58.5	58.5	58	58	58	58	58.5	59	58.33
3: A.M.	59	59	59	59	59	59	59	59	59	59	59.00
4: A.M.	59	59		56	59	59	59	59	59	59	58.67
5: A.M.	59	59	59	59	59	59	59	59	59	59	59.00
6: A.M.	59	59	59	59	59	59	59	59	59	59	59.00
7: A.M.	59	59	59	59	59	59	59	59	59	59	59.00
8: A.M.	59	59	59.5	59.5	59.5	59.5	59.5	59.5	59.5	59	59.35
9: A.M.	59	59	59	59	59	59	59	58.5	58.5	58.5	58.85
10: A.M.	59	58.5	58.5	58.5	58.5	59	59	59	59	59	58.80
11: A.M.	59	59	59	59	59	58.5	58.5	58.5	59	59	58.85
12: NOON	59		55	59	59	59	59	59	58.5	59	58.50
1: P.M.	59	59	59	59	59	59	59	59	59	59	59.00
2: P.M.	59	59	59	59	59	59	59	59	59	59	59.00
3: P.M.	59	59	59	59	59	58.5	58	58	58	58	58.55
4: P.M.	58.5	58.5	58	58	58	58	58	58	58	58	58.10
5: P.M.	58	58	58.5	58	58	58	58	58	58.5	58	58.10
6: P.M.	58	58	58	58	58.5	58	58	58	58	57	57.95
7: P.M.	57	55	54	53	53	53	53	53	54	53	53.80
8: P.M.	51		47	50	51	52.5	52.5	52	52	54	51.33
9: P.M.	55	54	53.5	51	49	46.5	48	49	47	47	50.00
10: P.M.	48.5	48.5	48.5	50.5	49.5	50.5	50.5	51	51	52	50.05
11: P.M.	53	54.5	77	87	90	97	99	83	65	74	77.95

Blackened squares indicate invalid or no data obtained for that time period.



Inter-Office Correspondence

To: M.A. Smith JEN/EDO

Date: May 14, 1991

From: M.P. Halpin

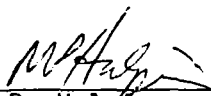
Department: PSN/PLT

Subject: WEEKLY OPACITY REPORT

During the past week we were able to operate for a few days on orimulsion.

On one of those days, Sanford Unit 5 did not operate and we were able to run Unit 4 on orimulsion up to full load. Data was collected on opacity to validate that improvements have been made as discussed in previous weekly reports. It is noteworthy to mention that we still are not combusting orimulsion from shipment #7 which was the one "specifically requested" to be a low magnesium cargo. Therefore, it is expected that further improvements will be measured soon. However, I am able to report that at 390 megawatts gross (near 100% on output) opacity was measured at 62% on the CEM. This represents an approximate 10-15% improvement over earlier data.

Based upon the above, we feel reasonably confident that when we begin burning orimulsion from shipment #7, maximum output will be attainable with opacity values less than or equal to 60%.



M.P. Halpin
Operations Supt.

MPH/t