



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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From: _____	Date: _____

Interoffice Memorandum

TO: Dan Thompson
THRU: David Schwartz *DUS*
FROM: Cindy Phillips *CP*
DATE: June 26, 1990
SUBJECT: FP&L PSD Construction Permit Application -
Activities Allowed before Permit Issued

David S.
OK
[Signature]

FP&L has applied for a PSD construction permit application to perform testing of an alternate fuel in Unit #4 at their Sanford Plant. FP&L's attorney, Bill Green, has requested that the DER allow FP&L to perform some activities relating to the test burn before the permit is issued (see attachment).

I have listed these activities below and my opinions as to whether or not they should be allowed prior to obtaining a permit. Please let me know if my opinions conform to the legal interpretation of the rules.

Maintenance Activities (Repair and Replacement):

1. Refurbish the heat tracing lines in the fuel oil pipeline as needed. - Allowable; pipeline not a component of the air pollution source.
2. Close the access openings in Tank "C" and make any repairs as identified by inspection. - Allowable; tank is not a component of the air pollution source.
3. Remove the unused COM (Coal Oil Mixture) Test piping. - Allowable; maintenance.
4. Clean, desludge, and degas Tank "D". - Allowable; maintenance.
5. Replace the spool piece connecting the COM test burner pumps to the pipeline from the existing fuel oil burner pumps. - Allowable if "replace" means removal of existing spool piece to put in new identical unit (this would be maintenance) but not allowable if "replace" means installing a spool piece where there used to be one but no longer is, or if "replace" means replacing the existing spool piece with a different type. I believe the burner pumps to be a component of the air pollution source (the burners) and that connecting them to the fuel supply should await a construction permit.

Non-Boiler-Related Activities:

6. Install a bottom fill pipe in Tank "D"; pre-assemble piping and pipe supports for the new recirculation line from Tank "C" to the suction heaters of Tank "D". - Allowable; tanks are not components of the air pollution source.

7. Install cable trays and pull cable in the Tank "C" area; - Allowable; tank not a component of the air pollution source. Install fuel flow meter in boiler area. - Not allowable; fuel flow meter is a component of the air pollution source (boiler).

8. Install new pipeline/tank instrumentation. - Allowable; tank is not a component of the air pollution source.

9. Adapt the existing combustion control panel, associated wiring, and the annunciator board in the Control Room. - Not allowable; combustion controls are components of the air pollution source.

10. Excavate and install forms and rebar for concrete slabs or foundations needed for the following equipment:

skid-mounted hot water heat exchanger and pump package for tank suction heaters - Allowable; not components of the air pollution source.

reverse air/shaker baghouse pilot - Not allowable; component of the air pollution source.

booster fan - Not allowable; component of the air pollution source (no excavation allowed).

pilot FGD absorber - Not allowable; component of the air pollution source.

SOXAL pilot plant - Not allowable; component of the air pollution source.

reagent holdup tanks - Not allowable; components of the air pollution source.

spray dryer FGD pilot - Not allowable; component of the air pollution source.

pulse jet baghouse pilot - Not allowable; component of the air pollution source.

ash storage silo - Not allowable; possible air pollution source.

11. Clear a designated area for a landfill test cell and monitoring equipment as required (spray dryer solid waste). - Land clearing allowable, however, this is Solid Waste Program activity rather than an Air Program activity. John Reese has stated that the solid waste should be taken to a lined landfill with a leachate collection system.

12. Install spill containment devices as needed at unloading area. - This is Tanks Program activity rather than an Air Program activity.

13. Install valve in oil transfer line at Tank "B". - Allowable; this is not a component of the air pollution source.

14. Install hot water heat exchanger and circulation pump on tank heating system. - Allowable; these are not components of the air pollution source.

15. Add additional wiring, conduit and cable tray at #4 and #5 stacks. - Not allowable; these are components of the air pollution source.

Burner-Related Activities:

16. Install new burner pumps on existing foundations and connect existing piping; replace 18 existing burners with new steam atomizing burners. - Not allowable; these are components of the air pollution source.

17. Reconnect power cables to burner pumps. - Not possible because No. 16 is not allowable.

If you need additional information about any of these activities before giving an opinion, please call me. Your opinion by June 28th would be greatly appreciated.

cc: Clair Fancy

HOPPING BOYD GREEN & SAMS

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June 13, 1990

OF COUNSEL
/ W. ROBERT FOKES

BY HAND DELIVERY

Mr. Clair Fancy
Division of Air Resources Management
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: FPL Orimulsion Alternate Fuel Testing --
Sanford Unit #4

Dear Mr. Fancy:

As you are aware, Florida Power & Light Company has filed a Petition for Authorization to Conduct Testing and Research and a Prevention of Significant Deterioration (PSD) Permit Application with the Florida Department of Environmental Regulation (DER). Once the DER approves the Petition and grants the PSD permit, Florida Power & Light Company may commence construction.

Certain activities, listed in Rule 17-2.100(55), F.A.C., such as "land clearing and other site preparation activities," are permissible prior to permit issuance. Other activities, such as routine maintenance, repair, and replacement, also do not normally require a permit. Florida Power & Light Company seek the Department's concurrence that under applicable rules, the following activities may be undertaken by the Company prior to permit issuance.

The list of proposed pre-permit activities, other than clearing and site-preparation work, is as follows:

Maintenance Activities (Repair and Replacement):

1. Refurbish the heat tracing lines in the fuel oil pipeline as needed.
2. Close the access openings in Tank "C" and make any repairs as identified by inspection.
3. Remove the unused COM (Coal Oil Mixture) Test piping.
4. Clean, desludge, and degas Tank "D".
5. Replace the spool piece connecting the pipeline from the COM test burner pumps to the pipeline from the existing fuel oil burner pumps.

Non-Boiler-Related Activities:

6. Install a bottom fill pipe in Tank "D"; pre-assemble piping and pipe supports for the new recirculation line from Tank "C" to the suction heaters of Tank "D".
7. Install cable trays and pull cable in the Tank "C" area; install fuel flow meter in boiler area.
8. Install new pipeline/tank instrumentation.
9. Adapt the existing combustion control panel, associated wiring, and the annunciator board in the Control Room.
10. Excavate and install forms and rebar for concrete slabs or foundations (needed for the following equipment: Skid-mounted hot water heat exchanger and pump package for tank suction heaters, reverse air/shaker baghouse pilot, booster fan, pilot FGD absorber, SOXAL pilot plant, reagent holdup tanks, spray dryer FGD pilot, pulse jet baghouse pilot, and ash storage silo).
11. Clear a designated area for a landfill test cell and monitoring equipment as required (spray dryer solid waste).

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12. Install spill containment devices as needed at unloading area.
13. Install valve in oil transfer line at Tank "B".
14. Install hot water heat exchanger and circulation pump on tank heating system.
15. Add additional wiring, conduit and cable tray at #4 and #5 stacks.

Burner-Related Activities:

16. Install new burner pumps on existing foundations and connect existing piping; replace 18 existing burners with new steam atomizing burners.
17. Reconnect power cables to burner pumps.

Please note that the above-listed activities do not include the pouring of foundations or the erection of permanent structures. If you have any questions or need additional information, please let me know. We look forward to hearing from you soon. Thank you for your continued assistance in this matter.

Sincerely,



William H. Green

ARM:derconstr

cc: Steve Smallwood
Cindy Phillips
David Schwartz, Esq.