

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

June 28, 1990

William H. Green, Esq.
Hopping Boyd Green & Sams
123 South Calhoun Street
P. O. Box 6526
Tallahassee, Florida 32314

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

Dear Mr. Green:

In response to your request, the Department has reviewed the list of activities which FPL desires to perform at the Sanford plant prior to obtaining a construction permit for the testing of Orimulsion.

Each activity is listed below, along with our decision as to whether or not it shall be allowed prior to obtaining a construction permit.

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.

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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.

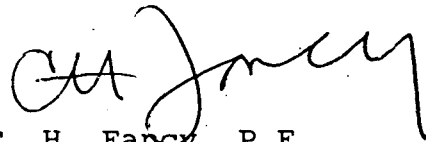
Burner-Related Activities:

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 have any questions concerning these decisions, please call me or Cindy Phillips of my staff at (904)488-1344.

Sincerely,



C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

cc: Bruce Miller, EPA
Chuck Collins, Central District
David Schwartz, Esq.