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September 5, 1990

Ms. Cindy Phillips  
Bureau of Air Regulation  
Department of Environmental Regulation  
2600 Blair Stone Road, Third Floor  
Tallahassee, FL 32399-2400

RECEIVED

SEP 05 1990

RE: FPL Sanford Unit No. 4  
Orimulsion Test Burn  
Draft PSD Permit

DER-BAQM

Dear Cindy:

The following are the comments of Florida Power & Light Company (FPL) concerning the draft PSD Permit No. AC64-180842, which was faxed to FPL on August 31, 1990.

1. Specific Condition 2 - FPL proposes the following change:

2. Permitted Fuels:

Unit 4 shall be fired with Orimulsion Fuel, No. 6 Residual Oil, No. 2 Fuel Oil, and/or Natural Gas only. By separate permit amendments, the Department has temporarily restricted Units 3 and 5 to be fired with Natural Gas and/or Fuel Oil with one percent a sulfur content limit (by weight) or less only which is equivalent to 1.1 lb SO<sub>2</sub>/MMBtu.

### Rationale

FPL requests this change to make it clear that a 1% sulfur content by weight limit is not imposed; rather, a limit equivalent to 1.1 lb/mmBtu sulfur content is imposed.

2. Specific Condition 3(a) - FPL proposes the following change:

Particulate Matter: Steady-state - 0.3 lb/MMBtu; Excess emissions, not to exceed 3 hours per 24-hour period, for soot-blowing and load changes - 0.6 lb/MMBtu; Excess emissions, not to exceed 2 hours per 24-hour period, for startup, shutdown, and malfunction - 0.6 lb/MMBtu. Excess emissions for malfunctions shall meet the requirements of Rule 17-2.250(1), F.A.C., and excess emissions for startup and shutdown shall meet the requirements of Rule 17-2.250(2), F.A.C.

#### Rationale

This proposed change is requested to be consistent with Rules 17-2.250(1), (2), and (3), F.A.C., which provide, for existing fossil fuel steam generators, that excess emissions resulting from malfunctions shall not exceed 2 hours in a 24-hour period (but which does not set an emission limit), that excess emissions associated with startup and shutdown are not limited in time or amount, and that excess emissions associated with boiler cleaning (soot blowing) and load changes have a 3-hour per 24-hour limit with specific opacity and particulate matter limits. This is why, in its Petition, FPL only requested relief from Rule 17-2.250(3), F.A.C., "boiler cleaning (soot blowing) and load changes." The limit of 0.6 lb/mmBtu limit for particulate matter excess emissions should therefore only apply to boiler cleaning (soot blowing) and load changes, not startup, shutdown, and malfunctions.

*modeling based on limit*

3. Specific Condition 3(c) - FPL proposes the following change:

- c) Visible Emissions: Steady-state - 60% opacity; Excess emissions, not to exceed 3 hours per 24-hour period, for soot-blowing and load changes - 100% opacity; Excess emissions, not to exceed 2 hours per 24-hour period, for startup, shutdown, and malfunction - 100% opacity. Excess emissions for malfunctions shall meet the requirements of Rule 17-2.250(1), F.A.C., and excess emissions for

startup and shutdown shall meet the requirements of Rule 17-2.250(2), F.A.C.

Rationale

This proposed change is requested to be consistent with Rules 17-2.250(1), (2), and (3), F.A.C., which provide, for existing fossil fuel steam generators, that excess emissions resulting from malfunctions shall not exceed 2 hours in a 24-hour period (but which does not set an emission limit), that excess emissions associated with startup and shutdown are not limited in time or amount, and that excess emissions associated with boiler cleaning (soot blowing) and load changes have a 3-hour per 24-hour limit with specific opacity and particulate matter limits. This is why, in its Petition, FPL only requested relief from Rule 17-2.250(3), F.A.C., "boiler cleaning (soot blowing) and load changes."

4. Specific Condition 4(d) - FPL proposes the following change:

- d) Excess emissions resulting from ~~startup, shutdown or~~ malfunction shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period unless specifically authorized by the Department for longer duration.

Rationale

FPL requests this change because startup and shutdown excess emissions at fossil fuel generating plants are not limited in time to two hours. Additionally, startup and shutdown excess emissions are covered in Specific Condition 4(e).

5. Specific Condition 8(e)(iv) and the second paragraph of Specific Condition 8(e)(vii) - FPL proposes the following change:

Ms. Cindy Phillips  
September 5, 1990  
Page 4

- ~~iv. Copies of stack emission test results.~~
- iv. A monthly summary of the hourly averages of NO<sub>x</sub> and CO CEM data.
- vi. A monthly summary of opacity readings, including a daily log of excess opacity emissions, and
- vii. Frequency of excess emissions. Exceedances for opacity shall be any 6-minute average above the opacity limit and for SO<sub>2</sub>, any hourly average above the SO<sub>2</sub> limit.

Monthly reports shall be submitted to the Bureau of Air Regulation and the Central Florida District Office within 21 days following the end of the month. ~~Stack emission test results shall be submitted no later than 45 days after the last run when a 3-run test is completed.~~

(g) Copies of stack emission test results shall be submitted no later than 45 days after the last run when a 3-run test is completed.

#### Rationale

FPL requests that the stack emission test results reporting requirement be placed in a separate category to make it clear that such results need only be submitted 45 days after the last run, rather than monthly.

Thank you for sending FPL a copy of the draft permit as soon as it became available, and thank you for allowing FPL this opportunity to comment on the permit. Your cooperation and assistance are truly appreciated.

Sincerely,



William H. Green  
Attorney for Florida  
Power & Light Company