

Enclosure 6

U.S. EPA Region 4 Objections Proposed Part 70 Operating Permit Florida Power & Light, Riviera Plant

EPA objects to the issuance of this permit due to the following reasons:

- (1) Periodic Monitoring - The permit does not require sufficient periodic monitoring to ensure compliance with the applicable opacity standard. The Riviera permit only requires an annual one hour Method 9 visible emissions reading. This does not constitute adequate periodic monitoring to ensure continuous compliance with the opacity standard. Since continuous opacity monitors (COMs) have been installed on the units in question, these monitors should be used to ensure compliance with the opacity standard. Requiring that the opacity monitors be used for conducting periodic monitoring imposes little or no additional burden on FP&L.
- (2) Periodic Monitoring - The permit does not require sufficient periodic monitoring to ensure compliance with the applicable particulate matter standard. The Riviera permit requires an annual emission test to verify compliance with the applicable three-hour particulate emission standard. It has not been demonstrated that an annual emission test alone will constitute the basis for a credible certification of compliance with the particulate emission standard for Units 1 and 2. If the State believes that no additional monitoring is warranted to ensure compliance with the particulate standard it must provide a technical demonstration in the statement of basis identifying the rationale for basing the compliance certification only on data from a short-term annual test. Otherwise, the permit must be revised to identify additional monitoring that will be conducted in order to ensure compliance with the particulate matter standard. We suggest the following approaches to periodic monitoring:
 - a) Correlate COM data to PM standard - this approach would not require additional monitoring equipment to be installed.
 - b) Correlate injection rate of specific compounds to ash content of the fuel and emission rate. Recordkeeping would consist of ash content and corresponding injection rate.
 - c) Other monitoring approach demonstrated by the permittee to be a valid method for assuring compliance with the applicable three-hour particulate matter standard.

In addition, the Riviera permit states that magnesium oxide, magnesium hydroxide and related compounds may be injected into each boiler. Information provided to EPA indicates that these injected compounds (additives) are used to control both particulate matter and nitrogen oxide emissions and that the amount of additive is dependent upon the ash content of the fuel. No provision exists within the permit which addresses the approval and use of additives. The units should be required to operate during compliance tests at an injection rate consistent with normal operations. This could be corrected by adding to the particulate compliance language: "the tests shall be conducted under both sootblowing and non-sootblowing conditions, and shall be conducted while injecting approved additives consistent with normal operating practices approved by the Department."

- (3) Deviation from Applicable Requirement - Florida rule 62-296.405(1)(f) 1.a, requires all emissions units to install continuous monitoring systems for monitoring opacity. The only exemption appears to be for units that do not use emission control equipment. Since emissions from these units are controlled with multiple cyclones, it appears that Florida regulations would require the use of COMs to determine compliance with the opacity standard. This applicable requirement must be included in the permit, or clarification must be provided in the statement of basis as to why this requirement does not apply.
- (4) Deviation from Applicable Requirement - Florida rule 62-296.405(1)(a) requires fossil fuel steam generators to comply with a 20 percent opacity standard, with the exception that sources electing to test for particulate matter emission compliance quarterly shall be allowed visible emissions of 40 percent opacity. The Riviera permit requires compliance with a 40 percent opacity standard; however, it only requires an annual compliance test for particulate matter emissions. We understand that this variance from the SIP's quarterly testing requirement was granted by a State Order. However, this variance was never submitted by the State of Florida as a SIP revision, and therefore, was never approved into the SIP. Therefore, the Manatee permit must ensure compliance with the requirements of the SIP as stated in rule 62-296.405(1)(a).
- (5) Deviation from Applicable Requirement - Condition A.9 states that 'The sulfur dioxide emission limitation shall apply at all times including startup, shutdown, and load change, but shall not apply during malfunction provided best operational practices to minimize emissions are adhered to and the duration of excess emissions are minimized and does not exceed two hours in any 24-hour period.' These units do not have sulfur dioxide controls. Please provide a definition

of what constitutes a malfunction as used in this permit condition for the Riviera Plant. The SIP rules (62-296.405(1)(c) and 62-296.405(1)(c)) do not provide for a relaxation of the SIP limit during a malfunction. This condition should be revised to be consistent with the applicable regulations.

- (6) Exemptions from Permitting: Appendix E-1- It is our understanding that the changes to F.A.C. rules 62-213.300, and 62-213.420-440 addressed in a preliminary draft dated June 2, 1997, were officially adopted by the State on November 13, 1997. Therefore, the State needs to revise the permit, specifically Section II, item 6 and Appendix E-1, to delete the term "exempted from permitting" and replace it with the language contained in rules 62-213.300, and 62-213.420-440. Additionally, as agreed in previous conversations between Regional staff and the State, the State needs to remove the reference to F.A.C. rule 62-4, since it is not related to activities that may be considered "insignificant" under the title V program.
- (7) Periodic Monitoring - Condition A.8 allows particulate matter emissions up to an average of 0.3 lbs. per million BTU heat input during a 3-hour period in any 24-hour period for soot blowing and load change. In addition, Condition A.6 allows visible emissions up to 60 percent opacity during soot blowing and load changes. A load change is defined to occur when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more. There does not, however, appear to be any conditions that require the source to record the time, date, and duration of these events. The permit must require that the facility keep records of these events to ensure compliance with this requirement.

In addition to the above objections, our review has identified the following concerns regarding the Riviera permit:

1. Section II, Facility-Wide Conditions.

Condition 7 should be identified as "Not Federally Enforceable."

2. Conditions A.15 and A.23 indicate that the permittee shall demonstrate compliance with the sulfur dioxide limit using CEMs. Condition A.23 also appears to offer the source the opportunity to use EPA test methods 6, 6A, 6B, 6C for demonstrating compliance with the applicable SO₂ standard. If the source is required to use CEMs as a method of

demonstrating compliance, it is unclear why Condition A.23 indicates alternative test methods. The Region recommends that the language in A.23, which allows the above test methods for measuring sulfur dioxide emissions, be removed from Condition A.23 in order to avoid confusion.

Condition A.23 also allows the source to obtain an alternate procedure under the provisions of Rule 62-297.620, F.A.C.. Rule 62-297.620 (Exceptions and Approval of Alternate Procedures and Requirements) does not allow the source to obtain an alternative to continuous monitoring requirements. Therefore, it appears that the language in Condition A.23 which suggests that the source has the option of obtaining an alternative procedure to CEMs for demonstrating compliance with the SO₂ limit should be removed to avoid confusion. Please, refer to the Turkey Point permit which contains requirements for CEMs in conditions A.9 and A.13, but does not include the confusing language mentioned above.