



Jeb Bush
Governor

Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

David B. Struhs
Secretary

FILE COPY

AIRS I.D. Number: 0650001
Air Permit Number: AO33-265694
Date of Issue: March 29, 1995
Amended: December 9, 1999
Expiration Date: March 1, 2000
County: Jefferson
Project: Carbonaceous Fuel Boiler

0650001-003-A0

Mitchell Larkins
Jefferson Power LC
Rt 3, Box 66M
Bristol Florida 32321

Dear Mr. Larkins:

This is in response to your request to transfer permit AO33-265694 to Jefferson Power LC. The request was received in our office on October 25, 1999, and your response to our request for additional information was received on November 15, 1999.

This letter transfers permit AO33-265694 from LFC No. 47 Corporation to Jefferson Power LC. You are authorized to operate the facility in compliance with the conditions stated in the permit.

Since the facility is now under new ownership and management, and due to the concerns expressed by the local citizens regarding the proper operation and maintenance of this facility, we are emphasizing the following aspects of the operations, which may have been a source of previous problems. The permit authorizes the burning of carbonaceous fuels. In accordance with Rule 62-210.200(60), Carbonaceous Fuel is defined as: "solid materials composed primarily of vegetative matter such as tree bark, wood waste, or bagasse". The word "primarily" means that other materials, also of a carbonaceous nature, may be included in addition to the three items noted in the definition. Paper is included as a carbonaceous fuel. Additionally, the permit specifies that the fuel shall exclude garbage, biological waste, and hazardous waste.

The permit states that "Paper with up to 3% non-halogenated plastic, by weight, is included within the foregoing definition of carbonaceous fuel". This phrase was explicitly included in the permit to account for those paper fuel supply sources that contain deminimus quantities of plastic as a natural byproduct of their paper production process. To provide assurance that the facility was in compliance with this condition, the previous operator had required suppliers of this material to certify the plastic to be non-halogenated, and that the content did not exceed 3%. We expect you to continue this practice if you accept paper commingled with plastic as a fuel. You are not authorized to blend additional plastic materials into the fuel or to modify the plastic content by mixing different batches in order to meet this 3% limitation.

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In order to provide reasonable assurance that the fuels accepted are in compliance with the permit terms, we request that the facility maintain a logbook (or equivalent recording) of all fuel deliveries. The following information shall be recorded: the date, time, source, type of fuel, quantity, initials of employee doing the inspecting, and disposition and quantity of any fuel found to be unacceptable. In addition, an initial inventory shall be conducted for the fuel already stored on site. This information should be readily available for inspection by Department personnel.

Since the permit limits the heat input to a maximum of 185 million Btu per hour, you are required to have operational controls that insure this limit is not exceeded. Your method for assuring this will be subject to verification upon inspection.

Due to the relatively long period of inactivity, we advise that you seek appropriate competent professional assistance in determining that the emissions control equipment will function properly prior to startup. Any modifications or changes to this equipment will require notification to the Department and possibly a construction permit.

The ash resulting from your operations requires proper disposal. Unless you advise in writing otherwise, the ash shall be routinely disposed of at a permitted landfill. Records of disposal as well as the frequency of disposal shall be made available for inspection by Department personnel upon request. Other methods of disposal shall require the approval of the Waste Management Program of the Northwest District Office of the Department.

All other specific conditions of this permit remain in effect. This letter shall be attached to and made part of permit AO33-265694.

If you have any questions, please contact Andy Allen of this office at (850) 595-8364, extension 1223.

Sincerely,



Ed K. Middleswart, P.E.
Air Program Administrator

EKM: omw

cc: Richard Stewart, LFC No. 47 Corporation, Radnor, PA
Dale Boatwright, Jefferson County Clerk of Court
T. Buckingham Bird, Esquire, Jefferson County Attorney
Scott Shirley, Esquire
Pradeep Raval, Koogler & Associates
Pat Comer, FDEP Office of General Counsel
Tom Lubozynski, FDEP Northwest District
Gerry Neubauer, FDEP Northwest District Branch Office, Tallahassee