Title V Air Operation Permit Renewal
Permit No. 0770009-014-AV

APPLICANT

The applicant for this project is Telogia Power LLC. The applicant's responsible official and mailing address are: Mr. John Hanlon, Asset Manager, Telogia Power LLC, 20082 Telogia Power Road, Telogia, Florida 32360.

FACILITY DESCRIPTION

The applicant operates the existing Telogia Plant, which is located in Liberty County at 20082 Telogia Power Road in Telogia, Florida.

This facility consists of a 250 MMBtu/hr carbonaceous fuel boiler, manufactured by E. Keeler, which produces 150,000 pounds of steam per hour, used to generate 14.1 MW of electricity. Boiler fuel is primarily a combination of waste wood, paper, and a lessor amount of peanut hulls. Particulate emissions from the boiler are controlled by a multi-vane cyclone and a high efficiency electrostatic precipitator (ESP), Model 23R-1230-2712S, manufactured by PPC Industries. The removal efficiency of the ESP is approximate 99.97%. Particulate emissions from the boiler stack are monitored with a continuous opacity monitoring system (COMS).

Changes to the Current Title V Air Operation Permit

Permit No. 0770009-012-AC authorized Telogia Power to install two oxygen sensors in the stack to improve the operation of the ESP, and allows excess emissions during cold start for up to six hours in a 24-hour period.

The additional control provided by the O_2 monitors is needed to prevent damage to the ESP due to excessive carbon build up on the ESP plates when it is operated outside of the O_2 level's recommended operating range.

NSPS and NESHAP Rule Applicability

The boiler at this facility is regulated by 40 CFR 60 Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units because it was constructed in 1986 and has a maximum design heat input capacity of 250 MMBtu/hr)

The boiler at this facility is regulated by 40 CFR 63 Subpart JJJJJJ – NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources because it is an area source of HAP emissions as defined by 40 CFR 63.2 and operates an industrial boiler as defined in §63.11193.

The boiler at this facility is regulated by 40 CFR 64 – Compliance Assurance Monitoring because it uses control devices to meet federally-enforceable emission limits or standards and its pre-control emissions for PM are greater than "major" source thresholds.

Facility Potential Emissions

POLLUTANT	CO	NOx	PM	PM_{10}	SO_2	VOC
POTENTIAL EMISSIONS (TPY)	579.6	212.5	48.3	48.3	24.15	16.4

This facility has been determined to be a major source with respect to PSD, with potential emissions exceeding 250 tons per year of CO. Any future facility modifications or relaxation of requirements that will increase actual emissions may be subject to PSD, Rule 62-212.400, F.A.C.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the permit application received July 18, 2014, this facility is not a major source of hazardous air pollutants (HAP).

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V air operation permit for the above referenced facility and to incorporate the terms and conditions of Title V air construction permit No. 0770009-012-AC.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Title V Air Operation Permit No. 0770009-011-AV, effective March 2, 2010
Title V Air Construction Permit No. 0770009-012-AC issued October 26, 2010
Application for a Title V Air Operation Permit Renewal received July 18, 2014
Notice of Intent to Issue Air Permit issued August 22, 2014
Public Notice Published August 28, 2014

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is not a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major stationary source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) applies to Carbonaceous Boiler (EU-001).

PROJECT REVIEW

This project renews Title V air operation permit No. 0770009-011-AV, effective March 2, 2010, and incorporates the Title V air construction permit No. 0770009-012-AC, issued on October 26, 2010. Changes made as part of this renewal include use of the new Title V permit template, use of combined appendices, and reformatting and streamlining of EU sections by moving common conditions to the new appendices.

CONCLUSION

This project renews Title V air operation permit No. 0770009-011-AV, which was issued on March 2, 2010, and incorporates the Title V air construction permit No. 0770009-012-AC, issued on October 26, 2010. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.