

Governor

Barbara / Cile Department of **Environmental Protection**

Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Certified Mail -- Return Receipt Requested

December 20, 2000

David B. Struhs Secretary

Mr. Chalmous Beechem Operations Manager Montenay Bay LLC 6510 Bayline Drive Panama City, Florida 32404

Re:

Revision to FINAL Title V Permit No. 0050031-002-AV

Bay Resource Management Center

Dear Mr. Beechem:

Your letter to Al Linero on this subject was referred to this section for response. The requested change of auxiliary fuel use from distillate fuel oil to natural gas will require an air construction permit (AC) to implement. However, we must deem your application incomplete due to the following reasons:

- 1. Please submit your application using the proper Department form No. 62-210.900(1). The form is available on the Department's Internet web site: www.dep.state.fl.us/air. Only those pages reflecting the changes to your original Title V application need to be submitted. However, the submission needs to include the certification page with the signature of the Responsible Official of the facility.
- 2. Rule 62-4.050(3), F.A.C., requires that all original applications for a Department permit and requests for permit revision must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please ensure that the completed application is so certified. Please also include documentation describing the affect of the requested change on air pollution emissions at the facility, due to the switch to natural gas for auxiliary firing in the startup burners.

Please also note that we are advising applicants that Rule 62-4.055(1), F.A.C., requires a response to requests for information within 90 days. When we receive the above mentioned items, we will continue processing your application. If you have questions, please contact Tom Cascio at 850/921-9526.

Sincerely,

Scott M. Sheplak, P.E. Administrator

Title V Section

cc: Andy Allen, NWD

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 1. Article Addressed to: ■ MR CHALMOUS BEECHEM OPERATIONS MANAGER MONTENAY BAY LLC 6510 BAYLINE DR. PANAMA CITY, FL 32404	A. Received by (Please Print Clearly) C. Signature X
2. Article Number (Copy from service label) 4 49	
PS Form 3811, July 1999 Domestic Re	turn Receipt 102595-99-M-1789

Z 210 660 449

US Postal Service

Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

MR CHALMOUS BEECHEM OPERATIONS MANAGER MONTENAY BAY LLC 6510 BAYLINE DR. PANAMA CITY, FL 32404

	Certified Fee	
300, April 1995	Special Delivery Fee	
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PS Form 3800 ,	Postmark or Date)-00 5g/

Sensitivity: COMPANY CONFIDENTIAL Date: 15-Aug-2000 09:52am

From: Tom Cascio TAL

CASCIO_T

Dept: Air Resources Management

Tel No: 850/488-1344

To: vikingsword@juno.com

CC: Scott Sheplak TAL (SHEPLAK S)

CC: Andy Allen PEN (ALLEN_A @ A1 @ DEPPNS)

Subject: BAY COUNTY INCINERATOR DERATING

General Peterson:

Please see the attached response to your recent inquiry on this subject.

Tom Cascio

DRAFT

Mr. Carl D. Peterson Major General USAF Retd. Panama City, Florida

Dear Mr. Peterson:

The following comments are responses to the questions in your recent e-memorandum to Mr. Bobby Cooley, concerning the Bay Resource Management Center facility. The document was forwarded to our office for reply.

1. What is the final permit rating and when was it issued?

The FINAL Title V Air Operation Permit for the Bay Resource Management Center was issued on August 2, 2000. It contains the following Specific Condition concerning the final permit rating:

A.3.1. Capacity.

- (a) The maximum charging rate of each of the two MWC's shall not exceed 245 tons of municipal solid waste (MSW) per day (a total of 490 tons per day for the facility). The maximum heat input rate shall not exceed 91.875 MMBtu per hour, assuming a heating value of 4,500 Btu per pound. Steam flow rate shall not exceed an average of 65,333 lbs/hr over any 24-hour rolling average period for each unit. Steam flow shall not exceed an average of 66,667 lbs/hr over any 4-hour block arithmetic averaging period for each unit. A seven-day average, as of 8 a.m., Monday, shall be maintained as a weekly record. To determine compliance with the maximum charging capacity, the steam flow meter shall be calibrated, maintained, and operated to measure steam flow in pounds per hour on a continuous basis, and record the output of the monitor. The normal operating range of the of the MWCs shall be 80% to 100% of the design rated capacity. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, PSD-FL-129]
- 2. Were the certifications tests completed with the installed equipment needed, as I understand it, to achieve the new downrating requested by the BOCC?

In a letter dated August 3, 2000 from the Solid Waste Management Department of Bay County, we were provided the following status report:

- Physical modification of the forced draft fan wheel on MWC Unit No. 1 and MWC Unit No. 2 is scheduled to occur during the periods September 5, 2000 and September 6, 2000, respectively. Both units will be operating at the derated capacity by September 12, 2000.
- The demonstration test for each unit is scheduled to occur during the period November 6 12,2000.
- Final compliance with all operating restrictions and monitoring requirements for the derated units shall be achieved by December 19, 2000.
- 3. Are there any deadlines that have not been met? If so, what are they, and what is the last date for meeting such an unmet deadline.

It is our understanding that all deadlines, to date, have been met. Please note that the FINAL permit contains the following compliance plan requirements:

A.3.2.1. Compliance Plan.

After the physical modifications are completed, the maximum charging rate of each municipal waste combustor shall be 245 tons of municipal solid waste per day (a total of 490 tons per day for the facility); 91.875 MMBtu heat input per hour, assuming a heating value of 4500 Btu per pound; and a steam production rate of 65,333 lbs/hr.

- **A.3.2.2.** A demonstration test shall be performed to verify the hourly steam flow rate at full load and establish the maximum demonstrated MWC unit load. As approved, Bay County is required to submit a protocol for testing which includes: (1) testing occurring over a 72-hour period; (2) testing conducted in accordance with the applicable requirements of 40 CFR 60.8 (performance tests); and (3) and opportunity for a Department and/or an U.S. EPA observer to be present at the demonstration test. Bay County shall achieve final compliance with all operating restrictions and monitoring requirements for the derated units by December 19, 2000.
- **A.3.2.3.** The owner or operator shall install, calibrate, maintain, and operate a steam flow meter, measure steam flow in pounds per hour on a continuous basis, and record the output of the monitor.

- **A.3.2.4.** Steam flow shall be calculated in 24-hour rolling averaging periods, calculated from six consecutive 4-hour block arithmetic averaging periods for each unit.
- A.3.2.5. Steam flow shall not exceed an average of 65,333 lbs/hr over any 24-hour rolling average period for each unit (provided the demonstrated full load steam flow rate/maximum demonstrated MWC unit load is less than or equal to 65,333 lbs/hr; otherwise, the full load steam flow rate determined from the demonstration test will be used).
- **A.3.2.6.** Steam flow shall not exceed an average of 66,667 lbs/hr over any 4-hour block arithmetic averaging period for each unit.
- A.3.2.7. The monitoring data must be maintained for periodic inspections by the Department and U.S. EPA, Region 4
- **A.3.2.8.** Any 24-hour average steam flow in excess of 65,333 lbs/hr for each unit (or the full load steam flow rate determined from the demonstration test) must be reported within seven calendar days to the Department and the U.S. EPA, Region 4.
- **A.3.2.9.** Any 4-hour block arithmetic average steam flow rate in excess of 66,667 lbs/hr for each unit must be reported within seven calendar days to the Department and U.S. EPA, Region 4.

[Rules 62-4.070(3) and 62-213.440(1), F.A.C.]

4. If there are unmet deadlines what are the consequences?

If the facility exceeds the steam output level corresponding to 250 tons per day (equivalent to a steam flow of 66,667 lbs/hr over any 4-hour block arithmetic averaging period for each unit) after completing the modification to the forced draft fan wheel, the facility will be required to be in compliance with all applicable federal and state municipal waste combustor (MWC) requirements for large MWC units on schedule. The requirements for large MWC's are found in 40 CFR 60, Subpart Cb.

We trust that this letter answers your concerns. If you need further information, please contact Tom Cascio at 850/921-9526.

Scott M. Sheplak, P.E. Adminstrator
Title V Section

Sensitivity: COMPANY CONFIDENTIAL Date: 08-Aug-2000 07:24pm

From: Alvaro Linero TAL

LINERO_A

Dept: Air Resources Management

Tel No: 850/921-9523

To: Scott Sheplak TAL (SHEPLAK_S)

CC: Tom Cascio TAL (CASCIO_T)

CC: Bruce Mitchell TAL (MITCHELL_B)

Subject: Re: Bay County Incinerator Derating

Scott. This relates to my earlier E-Mail on this subject. Please handle Bobby Cooley's referrel regarding the Derating of Bay County. Bobby copied someone named "Mantay" at Bay County on the referrel to me as well as David Struhs and Alan Bense (at the legislature).

I recommend preparing a reply much like those that come to us on Pink Sheets and letting Clair see your response first.

Thank you. Al.

Please drust response

for my review a Classic.

to the General's Grestians.

Sensitivity: COMPANY CONFIDENTIAL Date: 08-Aug-2000 07:14pm

From: Alvaro Linero TAL

LINERO_A

Dept: Air Resources Management

Tel No: 850/921-9523

To: Bobby Cooley PEN 850/595-8300 (COOLEY_B@al.deppns.dep.state.fl.us)

CC: Andy Allen PEN (ALLEN_A @ A1 @ DEPPNS)

CC: Scott Sheplak TAL (SHEPLAK_S)

CC: Tom Cascio TAL (CASCIO_T)
CC: Bruce Mitchell TAL (MITCHELL_B)

Subject: Re: Bay County Incinerator Derating

Mr. Cooley: I received your E-Mail Re: Bay County derating. I forwarded it to Scott Sheplak, Administrator of the Title V Section. They included the derating conditions developed by EPA Region IV as federally-enforceable requirements in the Title V permit and referenced the derating in the Public Notice for the Draft Title V Permit.

Scott and his engineer(s) on this matter will respond to the General's questions.

Thanks. Al Linero.

08-Aug-2000 05:51pm Date:

Bobby Cooley PEN 850/595-8300 From:

COOLEY_B@al.deppns.dep.state.fl.us

Dept: Tel No:

Carl D Peterson To:

Alvaro Linero TAL

CC:

(vikingsword@juno.com)

(LINERO A@A1)

Subject: Re: Bay County Incinerator Derating

General Peterson. I am forwarding your email to a Mr. Al Linero in the Division of Air Management in Tallahassee who has been handling this permit. He should be able to answer your questions. Let me know if you need anything else. Thanks for your concern. bc

Mr.Cooley: I'm not familiar with the individual in charge of the DEPs involvement with the derating of the Bay County incinerator, hence this message is directed to you.

Today it was announced by Commissioner Atkinson at the BOCC meeting that the county had finally received the derating certification for the county's incinerator after four years of negotiations. It was not made clear what DEP approved and I would appreciate a response to the following questions in order to clear the air on this issue. No pun intended.

- 1. What is the final permit rating and when was it issued?
- 2. Were the certifications tests completed with the installed equipment needed, As I understand it, to achieve the new downrating requested by the BOCC?
- 3. Are there any deadlines that have not been met? If so, what are they and what is the last date for meeting such an unmet deadline.
- 4. If there are unmet deadlines what are the consequences?

Carl D. Peterson Major General USAF Retd. (850) 871-1575

BAR STAFF

Date: 11-Jan-2000 11:34am

From: Shari Naftzinger TAL 850/487-2

NAFTZINGER S@al.epic5.dep.state.fl.us

Dept: Tel No:

To: See Below

Subject: Reminder re: contacts with legislators, committee and staff

It is very important for our legislative and governmental affairs team to be aware of contacts between DEP and legislative office, congressional offices, and committees.

So please heed this gentle reminder to make this office aware of any phone, mail, e-mail or personal contact you or your staff have with members of the Legislature, Congress, their personal staff, and committee staff.

We ask that by e—mail, you let us know in advance of scheduled appointments, the topic, attendees, time and location; and then an after—the—fact e—mail with what took place and if any follow up is necessary.

Also by e-mail, please alert us of any phone contacts.

Please "Co:" this office on correspondence. (See distribution below.)

It is always appropriate to include Legislative & Governmental Affairs staff at a meeting with members (or their staff) of the legislature. Congress or committee staff. Please CALL to schedule. (See distribution below, or ask for the assigned lobbyist.)

This is the recommended distribution:

STATE: Mike Joyner & Stephanie Leeds, cc: Shari Naftzinger (487-2917, sc 277-2916) FEDERAL: Sally Mann & Leslie Palmer, cc: Mike Joyner (487-2231, sc 277-2231)

Thank you in advance for your cooperation and assistance.

Distribution:

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To:
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                                              ( MALONEY_PGA1 )
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BOARD OF COUNTY COMMISSIONERS

Solid Waste Management Department Mr. Wm. G. Hudson, Director 3410 Transmitter Road Panama City, Florida 32404 (850) 784-4028

August 3, 2000



AUG 0 7 2000

Mr. Howard L. Rhodes, Director
Department of Environmental Protection
Division of Air Resources Management
Mail Station 5500
2600 Blair Stone Road

Subject: Bay County Resource Recovery Facility

Tallahassee, Florida 32399-2400

Demonstration Test Protocol

Dear Mr. Rhodes:

Enclosed is a copy Bay County's test protocol for demonstrating the maximum steam load of each MWC unit at the Bay County Resource Recovery Facility (Facility). This demonstration test protocol is submitted in accordance with Item A.3:2.2 of the Facility's Title V Permit and the September 30, 1999 letter from USEPA Region IV approving the derating of the MWC units.

Physical modification of the forced draft (FD) fan wheel on MWC Unit No. 1 and MWC Unit No. 2 is scheduled to occur during the periods September 5, 2000 and September 6, 2000, respectively. Both units will be operating at the derated capacity by September 12, 2000 in accordance with the Increment 4 (completion of on-site construction or installation of emission control equipment or process change) milestone date for the Facility specified in the FLDEP State Plan.

The Demonstration Test for each unit is scheduled to occur during the period November 6 -12, 2000 following scheduled maintenance outages that will be conducted on each MWC unit in October. Final compliance with all operating restrictions and monitoring requirements for the derated units shall be achieved by December 19, 2000 in accordance with Item A.3.2.2 of the Facility's Title V Permit and the September 30, 1999 letter from USEPA Region IV approving the derating of the MWC units.

Representatives of the Department and/or USEPA Region IV are invited to observe the physical modification work to the FD fans and the Demonstration Test program. We will notify you of any changes to the schedule outlined above.

POST OFFICE BOX 1818
PANAMA CITY, FLORIDA 32402

COMMISSIONERS:

CAROL ATKINSON DISTRICT I

RICHARD STEWART DISTRICT II

ROBERT WRIGHT
DISTRICT III

DANNY SPARKS DISTRICT IV

MARC NOLEN DISTRICT V

JONATHAN A. MANTAY, CGFM COUNTY MANAGER Mr. Howard L. Rhodes Page 2 August 3, 2000

Please contact me at (850) 784-4028 should you have any questions.

Very truly yours,

William Hudson, Director

Bay County Solid Waste Management Department

WGH/wgh

cc: C. H. Fancy, FLDEP

Jon Mantay, County Administrator

Clifton "Travis" Windham, Director, Utility Services Department

Nevin Zimmerman, Burke & Blue

Jerry Gross, Plant Manager Montenay Bay

Tony LoRe, Camp Dresser & McKee

BAY COUNTY RESOURCE RECOVERY FACILITY CAPACITY DEMONSTRATION TEST PROTOCOL

1.0 Background

Bay County owns the Bay County Resource Recovery Facility (BCRRF) located in Panama City, Florida. The BCRRF consists of two independent municipal waste combustor (MWC) units, each of which was originally designed to process to 255 tonsper-day (TPD) of municipal solid waste (MSW) with a higher heating value of 4500 Btu/lb. The BCRRF is operated by Montenay Bay LLC, under a service agreement with Bay County and provides solid waste disposal services to Bay County and to five surrounding counties in Florida.

In June 1999 Bay County requested formal approval from the United States Department of Environmental Protection (USEPA) Region IV and the Florida Department of Environmental Protection (FLDEP) to de-rate the processing capacity of each MWC to 245 tons per day of MSW having a higher heating value of 4500 Btu/lb. The USEPA approved Bay County's request in a letter to Mr. Howard Rhodes of the Florida DEP dated September 30, 1999.

The approval to de-rate required that a capacity demonstration test be performed after physical modification was completed to each unit. The approved physical modification involves altering the forced draft (FD) fan wheel on each MWC to reduce the available combustion air and thus the heat release capacity as measured by steam flow. The demonstration test is intended to show that the unit capacity of each MWC does not exceed 245tpd after the physical modification is made. The purpose of this document is to outline the procedures to be used to conduct the capacity Demonstration Test in accordance with the USEPA Region IV approval letter dated September 30, 1999.

2.0 Facility Description

The BCRRF consists of two Westinghouse O'Connor water-walled rotary combustor and boiler trains, a turbine-generator, two truck scales, a scale house, an enclosed tipping floor, two conveyor systems to charge MSW into the combustors, two electrostatic precipitators for particulate control, an ash handling system, a stack, a control room, and associated ancillary equipment. The facility also has administration offices, change rooms, parking areas, roadways, and security fencing.

Municipal solid waste to be processed is delivered to the facility and unloaded on the tipping floor. Front-end loaders are used to move the waste onto conveyors that transport the waste to the combustor feed chutes. The waste is then combusted in the water-cooled rotary combustors.

Each combustor has a forced draft (FD) fan to supply combustion air to the combustor barrel. The heat released from the combustion process is

recovered as the hot gases flow from the combustor barrel through the radiant, superheater, evaporator, economizer and air heater sections of the boiler. Superheated steam is produced from the recovered heat and is used to drive a turbine-generator that produces electricity for sale.

Each MWC unit has an electrostatic precipitator (ESP) following the boiler to remove particulate matter from the flue gas. Each ESP is followed by an induced draft (ID) fan used to discharge the flue gas to atmosphere through separate flues contained within the common stack. The BCRRF continuously monitors oxygen and carbon monoxide levels in order to control the combustion process. Opacity levels after the ESPs are also monitored on a continuous basis.

3.0 Demonstration Test Procedures

3.1 Test Objectives

The objectives of the test program is to demonstrate that the maximum 24-hour average steam flow for each MWC unit does not exceed 65,333 lb./hr (245 tpd) and the maximum 4-hour average steam flow for each MWC unit does not exceed 66,667 lb./hr (250 tpd). The 24-hour average shall be calculated using six consecutive 4-hour block averages on a rolling basis throughout the test period. The 4-hour average shall be calculated using four consecutive 1-hour averages on a block basis throughout the test period.

3.2 Test Duration

The Demonstration Test shall be conducted over a continuous 168-hour period. This extended duration, while more stringent the 72 hour test outlined in the USEPA Region IV approval letter dated September 30, 1999, it will allow the test to be more representative of normal operation. The test will be conducted with both combustion units operating at full load.

3.3 Notification Requirements

The BCRRF will provide written notification of the schedule dates for the Demonstration Test to the FLDEP representatives at least two weeks prior to commencing the Demonstration Test.

3.4 Steam Flow Measurement

Steam flow shall be continuously monitored and recorded in accordance with §60.58b(6)(i) and (ii) that specifies the requirements for steam flow monitors installed on MWCs.

3.5 Operating Conditions

The Demonstration Test shall be conducted with each of the MWC units operating under designed conditions at the de-rated design capacity. The BCRRF shall be operated in accordance with normal day-to-day procedures. For example, MSW that is on the tipping floor shall be loaded onto the conveyors by the front-end loaders and fed into the respective feed chutes. Non-combustible materials shall be removed from the MSW piles. However, no deviations from normal tipping floor operating procedures shall be made (such as segregating a particular type or load of waste for processing). Waste in the feed chute shall be fed into the combustor barrel using the hydraulic ram feeding system. The hydraulic ram speed rate and the combustion air control system (used to supply combustion air to the various windbox sections) shall be modulated to maintain designed parameters to ensure complete combustion of the MSW. The continuous emission monitoring (CEM) system shall be used to record and store the hourly steam flow rate for each unit. The recorded hourly steam flow rates will be used to calculate the highest 24-hour rolling average steam flow to demonstrate compliance with the de-rated load capacity of 65,333lb/hr.

3.6 Sample Calculations

4-hr block average steam flows shall be calculated as follows:

```
4-hr average = (1HRSF<sub>N-3</sub> + 1HRSF<sub>N-2</sub> + 1HRSF<sub>N-1</sub> + 1HRSF<sub>N</sub>)/4
Where: 1HRSF<sub>N</sub> = 1 Hr Average Steam Flow For Hour N
1HRSF<sub>N-1</sub> = 1 Hr Average Steam Flow For Hour N-1
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1HRSF_{N-2} = 1 Hr Average Steam Flow For Hour N-2 1HRSF_{N-3} = 1 Hr Average Steam Flow For Hour N-3

24-hr rolling average steam flows shall be calculated as follows:

```
24-hour average = (4HRSF<sub>n-5</sub> + 4HRSF<sub>n-4</sub> + 4HRSF<sub>n-3</sub> + 4HRSF<sub>n-1</sub> + 4HRSF<sub>n-1</sub> + 4HRSF<sub>n-1</sub>)/6
```

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Where: 4HRSFn = 4 Hr Average Steam Flow For 4 Hr Period N
4HRSFn-1 = 4 Hr Average Steam Flow For 4 Hr Period N-1
4HRSFn-2 = 4 Hr Average Steam Flow For 4 Hr Period N-2
4HRSFn-3 = 4 Hr Average Steam Flow For 4 Hr Period N-3
4HRSFn-4 = 4 Hr Average Steam Flow For 4 Hr Period N-4
4HRSFn-5 = 4 Hr Average Steam Flow For 4 Hr Period N-5
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3.7 Test Exclusions

If an equipment failure or upset condition occurs that prevents either or both of the MWC units from operating normally, the Demonstration Test shall be temporarily suspended for that unit(s)until normal operations can be re-established. If normal operations can not be re-established within a reasonable period of time, the Demonstration Test shall be stopped and repeated in its entirety once the problem can be corrected.

If insufficient waste is available to operated both units at full load, the test shall be rescheduled to another date when sufficient MSW is available or alternatively, the BCRRF shall obtain FLDEP approval to demonstrate the capacity of each MWC unit at separate times.

4.0 Test Report

Within 30 days following completion of the Demonstration Test, the BCRRF shall submit a summary report containing the 24-hour rolling average steam flows and the 4-hour block average steam flows calculated for each unit during the Demonstration Test period. The maximum 24-hour average steam flow achieved during the performance test will be the maximum demonstrated unit load level for each combustor. The test report shall certify that the maximum demonstrated steam flow for each MWC unit did not exceed 65,333 lb./hr on a 24-hour rolling average basis and 66,667 lb./hr on a 4-hour block basis. The test report shall be submitted to the FLDEP for review and approval that each MWC unit has been de-rated to a capacity 245 tpd or less.

SAMPLE STEAM FLOW SUMMARY SHEET

Unit	nit Date Time		Average Steam Flow (lb/hr)		
			1-Hr	4-Hr	24-Hr
			Block	Block	Rolling
					•
1	10/1/00	0000-0100	65,300		
		0100-0200	65,400		
		0200-0300	65,300		
		0300-0400	64,000	65,000	
		0400-0500	62,000		
		0500-0600	61,000		
		0600-0700	66,000		
		0700-0800	65,000	63,500	
		0800-0900	63,000		
		0900-1000	64,000		
		1000-1100	65,000		
		1100-1200	64,000	64,000	
		1200-1300	65,300	·	
		1300-1400	65,400		
		1400-1500	65,300		
		1500-1600	64,000	65,000	
		1600-1700	62,000	•	
		1700-1800	61,000		
		1800-1900	66,000		
	,	1900-2000	65,000	63,500	
		2000-2100	63,000	,	
		2100-2200	64,000		
		2200-2300	65,000		
		2300-2400	64,000	64,000	64,100

1	10/2/00	0000-0100	65,000			
		0100-0200	64,500			
		0200-0300	65,300			
		0300-0400	64,800	64,900	64,150	
		0400-0500	64,500			
		0500-0600	64,000			
		0600-0700	66,000			
		0700-0800	65,500	65,000	64,400	
			·	·	-	

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