

# Florida Department of Environmental Protection

Bob Martinez Center 2600 Blair Stone Road Tallahassee, Florida 32399-2400 Governor

Charlie Crist

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

March 23, 2009

Electronically Sent - Received Receipt Requested.

Ms. Tracy Patterson, General Manager (tracypatterson@cogentrix.com) Cedar Bay Generating Company, L.P. Post Office Box 26324 9640 Eastport Road Jacksonville, Florida 32226

Re: DEP File No. 0310337-016-AV Title V Air Operation Permit Renewal Request for Additional Information

Dear Ms. Patterson:

The Florida Department of Environmental Protection has reviewed your application for a Title V Air Operation Permit Renewal for the Cedar Bay Cogeneration Facility. However, we must deem your application *incomplete*, because we need further information relative to the following items:

- 1. The requested change to Specific Condition A.8., removing the ammonia slip exhaust gas limit when burning fuel oil, will require an air construction permit modification to implement, since such a change cannot be implemented as a Title V air operation permit renewal.
- 2. The requested change to Specific Condition A.26., deleting a reference to sulfur dioxide spans on input and output devices, cites a Department authorization letter dated February 29, 2000. Please provide a copy of this letter.
- 3. The requested change to Specific Condition A.59., addressing recycle reject usage, mentions a Department authorization document dated July 2006. Please provide a copy of this authorization document.
- 4. The requested change to Specific Condition A.64., addressing the short fiber recycle rejects test burn protocol, removes the Department approval language from the condition. Please provide a copy of the Department approval letter to implement this supplemental fuel usage at the facility.

When we receive this information, we will continue processing your application. If you have any questions, please contact Project Engineer Tom Cascio at 850-921-9526. Rule 62-4.050(3), F.A.C., requires that all applications for a Department permit 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. Permit applicants are advised that Rule 62-4.055(1), F.A.C., requires applicants to respond to requests for information within 90 days, unless the applicant has requested in writing, and has been granted, additional time within 90 days.

Sincerely, Sonathan Wolton

Jonathan K. Holtom, P.E., CPM Program Administrator

Title V Section

Ms. Tracy Patterson, General Manager Cedar Bay Generating Company, L.P. Page 2 of 2

- Cc: Mr. Ebenezer S. Gujjarlapudi, P.E., City of Jacksonville: Ebenezer@coj.net
  - Mr. Kennard Kosky, P.E., Golder Associates Inc.: kkosky@golder.com
  - Mr. Chris Kirts, Northeast District Office: <a href="mailto:christopher.kirts@dep.state.fl.us">christopher.kirts@dep.state.fl.us</a>
  - Ms. Katy Forney, EPA Region 4: forney.kathleen@epa.gov
  - Ms. Ana Oquendo, US EPA Region 4: oquendo.ana@epa.gov
  - Ms. Barbara Friday, DEP BAR: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)
  - Ms. Victoria Gibson, DEP BAR: victoria.gibson@dep.state.fl.us (for reading file)

From:

Friday, Barbara

Sent:

Monday, March 23, 2009 11:30 AM

To:

'tracvpatterson@cogentrix.com'

Cc:

'Ebenezer@coj.net', 'KKosky@Golder.com', Kirts, Christopher, 'Forney.Kathleen@epamail.epa.gov', 'Oguendo.Ana@epamail.epa.gov', Gibson, Victoria;

Cascio, Tom

Subject:

Corrected E-mail for DEP File No.: 0310337-016-AV - Cedar Bay Generating Company, L.P.

Attachments:

TracyPattersonDEPFileNo0310337016AVCedarBayRAI.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <a href="http://www.adobe.com/products/acrobat/readstep.html">http://www.adobe.com/products/acrobat/readstep.html</a> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

Recipient		Delivery	Read
'tracypatter	son@cogentrix.com'		
'Ebenezer@	②coj.net'		
'KKosky@0	Golder.com'		
Kirts, Christopher		Delivered: 3/23/2009 11:30 AM	
'Forney.Kathleen@epamail.epa.gov'			
'Oquendo.A	Ana@epamail.epa.gov'		
Gibson, Vid	ctoria	Delivered: 3/23/2009 11:30 AM	Read: 3/23/2009 11:31 AM
Cascio, To	m	Delivered: 3/23/2009 11:30 AM	Read: 3/23/2009 11:30 AM

From:

**Exchange Administrator** 

Sent:

Monday, March 23, 2009 11:30 AM

To:

Friday, Barbara

Subject:

Delivery Status Notification (Relay)

Attachments:

ATT123256.txt; Corrected E-mail for DEP File No.: 0310337-016-AV - Cedar Bay Generating

Company, L.P.

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

tracypatterson@cogentrix.com

From:

Patterson, Tracy (Cedar Bay) [TracyPatterson@Cogentrix.com] undisclosed-recipients

To:

Sent:

Monday, March 23, 2009 11:31 AM

Subject:

Read: Corrected E-mail for DEP File No.: 0310337-016-AV - Cedar Bay Generating Company,

L.P.

Your message

TracyPatterson@cogentrix.com

Subject:

was read on 3/23/2009 11:31 AM.

From:

Patterson, Tracy (Cedar Bay) [TracyPatterson@Cogentrix.com]

Sent:

Monday, March 23, 2009 11:41 AM

To:

Friday, Barbara

Subject:

RE: Corrected E-mail for DEP File No.: 0310337-016-AV - Cedar Bay Generating Company,

L.P.

I have received the email indicated below.

Tracy L. Patterson II General Manager Cedar Bay Generating Co.

**From:** Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]

Sent: Monday, March 23, 2009 11:30 AM

**To:** Patterson, Tracy (Cedar Bay)

Cc: Ebenezer@coj.net; KKosky@Golder.com; Kirts, Christopher; Forney.Kathleen@epamail.epa.gov;

Oquendo.Ana@epamail.epa.gov; Gibson, Victoria; Cascio, Tom

Subject: Corrected E-mail for DEP File No.: 0310337-016-AV - Cedar Bay Generating Company, L.P.

#### Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: < http://www.adobe.com/products/acrobat/readstep.html > .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.

From:

Exchange Administrator

Sent:

Monday, March 23, 2009 11:30 AM

To:

Friday, Barbara

Subject:

Delivery Status Notification (Relay)

Attachments:

ATT123255.txt; Corrected E-mail for DEP File No.: 0310337-016-AV - Cedar Bay Generating

Company, L.P.

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

#### Ebenezer@coj.net

From:

Gujjarlapudi, Ebenezer [Ebenezer@coj.net]

To:

Sent:

Subject:

Friday, Barbara
Monday, March 23, 2009 11:30 AM
Read: Corrected E-mail for DEP File No.: 0310337-016-AV - Cedar Bay Generating Company,

L.P.

Your message

Ebenezer@coj.net

Subject:

was read on 3/23/2009 11:30 AM.

From:

Mail Delivery System [MAILER-DAEMON@mx1.golder.com]

Sent:

Monday, March 23, 2009 11:30 AM

To:

Friday, Barbara

Subject: Attachments:

Successful Mail Delivery Report Delivery report, Message Headers

This is the mail system at host mx1.golder.com.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<<u>KKosky@Golder.com</u>>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent 49C7AAE0\_17833\_1826001\_1 B804D718017

From:

System Administrator

To:

Cascio, Tom; Kirts, Christopher; Gibson, Victoria

Sent:

Monday, March 23, 2009 11:30 AM

Subject:

Delivered: Corrected E-mail for DEP File No.: 0310337-016-AV - Cedar Bay Generating

Company, L.P.

#### Your message

To: tracypatterson@cogentrix.com

Cc:

Ebenezer@coj.net; 'KKosky@Golder.com'; Kirts, Christopher;

Forney.Kathleen@epamail.epa.gov; Oquendo.Ana@epamail.epa.gov; Gibson, Victoria;

Cascio, Tom

Subject:

Corrected E-mail for DEP File No.: 0310337-016-AV - Cedar Bay Generating

Company, L.P.

Sent: 3/23/2009 11:30 AM

#### was delivered to the following recipient(s):

Cascio, Tom on 3/23/2009 11:30 AM Kirts, Christopher on 3/23/2009 11:30 AM Gibson, Victoria on 3/23/2009 11:30 AM

From:

Gibson, Victoria

To: Sent: Friday, Barbara

Seint.

Monday, March 23, 2009 11:31 AM

Subject:

Read: Corrected E-mail for DEP File No.: 0310337-016-AV - Cedar Bay Generating Company,

L.P.

#### Your message

To: tracypatterson@cogentrix.com

Cc:

Ebenezer@coj.net; 'KKosky@Golder.com'; Kirts, Christopher;

Forney.Kathleen@epamail.epa.gov; Oquendo.Ana@epamail.epa.gov; Gibson, Victoria;

Cascio, Tom

Subject:

Corrected E-mail for DEP File No.: 0310337-016-AV - Cedar Bay Generating

Company, L.P.

Sent: 3/23/2009 11:30 AM

was read on 3/23/2009 11:31 AM.

From:

Cascio, Tom

To:

Friday, Barbara

Sent:

Monday, March 23, 2009 11:30 AM

Subject:

Read: Corrected E-mail for DEP File No.: 0310337-016-AV - Cedar Bay Generating Company,

L.P.

#### Your message

To:

tracypatterson@cogentrix.com

Cc:

Ebenezer@coj.net; 'KKosky@Golder.com'; Kirts, Christopher;

Forney.Kathleen@epamail.epa.gov; Oquendo.Ana@epamail.epa.gov; Gibson, Victoria;

Cascio, Tom

Subject:

Corrected E-mail for DEP File No.: 0310337-016-AV - Cedar Bay Generating

Company, L.P.

Sent: 3/23/2009 11:30 AM

was read on 3/23/2009 11:30 AM.

From:

Mail Delivery System [MAILER-DAEMON@mseive01.rtp.epa.gov]

Sent:

Monday, March 23, 2009 11:30 AM

To:

Friday, Barbara

Subject: Attachments: Successful Mail Delivery Report Delivery report; Message Headers

This is the mail system at host mseive01.rtp.epa.gov.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<<u>Forney.Kathleen@epamail.epa.gov</u>>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent 49C7AAE3\_6156\_82497\_7 71204443FD

<Quendo.Ana@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent 49C7AAE3 6156 82497 7 71204443FD

From: To: Kirts, Christopher Friday, Barbara

Sent:

Thursday, March 26, 2009 12:00 PM

Subject:

Read: Corrected E-mail for DEP File No.: 0310337-016-AV - Cedar Bay Generating Company,

L.P.

#### Your message

To: tracypatterson@cogentrix.com

Cc:

Ebenezer@coj.net; 'KKosky@Golder.com'; Kirts, Christopher;

Forney.Kathleen@epamail.epa.gov; Oquendo.Ana@epamail.epa.gov; Gibson, Victoria;

Cascio, Tom

Subject:

Corrected E-mail for DEP File No.: 0310337-016-AV - Cedar Bay Generating

Company, L.P.

Sent: 3/23/2009 11:30 AM

was read on 3/26/2009 12:00 PM.