

# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

May 23, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Joseph J. Piermatteo  
Senior Vice President  
Central Power and Lime, Inc.  
10311 Cement Plant Road  
Brooksville, Florida 34601

Dear Mr. Piermatteo:

Enclosed is a proposed amendment and Public Notice for PSD-FL-090 for the Brooksville facility. The Department requires a public notice for this modification. All comments during the public notice period should be addressed to Mr. A. A. Linero at the Department's Tallahassee address.

If there are additional questions on the above, please call Mr. John Reynolds at (904) 488-1344.

Sincerely,

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/jr/t

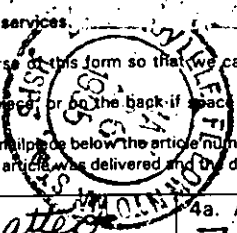
Enclosures

cc: B. Thomas, SWD  
J. Harper, EPA  
J. Bunyak, NPS  
H. Oven, PPS  
C. Hetrick, HCBCC

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
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- Print your name and address on the reverse of this form so that we can return this card to you.
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- Write "Return Receipt Requested" on the mailpiece below the article number.
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- Addressee's Address
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3. Article Addressed to:  
 Joseph J. Piematteo  
 Central Power & Line Inc  
 10311 Cement Plant Rd  
 Brooksville, FL 34601

4a. Article Number  
 2311 902 894

4b. Service Type

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<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD
<input type="checkbox"/> Express Mail	<input type="checkbox"/> Return Receipt for Merchandise

7. Date of Delivery  
 5-23-95

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

PS Form 3811, December 1991 U.S. GPO: 1993-352-714 **DOMESTIC RETURN RECEIPT**

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PS Form 3800, March 1993

Sent to: Joe Piematteo	
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City, State and ZIP Code: Brooksville, FL	
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PSD-F1-0920	

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an  
Application for Permit Amendment

DEP File No. PSD-FL-090(D)  
Hernando Co.

Mr. Joseph J. Piermatteo  
Senior Vice President  
Central Power & Lime, Inc.  
10311 Cement Plant Road  
Brooksville, Florida 34601

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INTENT TO ISSUE

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit amendment for a modification (copy attached) to the applicant's facility as detailed in the application/request specified, above, for the reasons stated in the application/request.

The applicant, Central Power & Lime, Inc., applied on March 15, 1995, to the Department for an amendment of their PSD permit to increase the maximum heat input to the power boiler. The facility is located in Hernando County.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-212 and 62-4, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that a permit amendment is required for the proposed work.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit Amendment. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit amendment.

The Department will issue the permit amendment with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF INTENT TO ISSUE PERMIT AMENDMENT

PSD-FL-090

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit amendment to Central Power & Lime, Inc., 10311 Cement Plant Road, Brooksville, Florida 34601. This company operates a Portland Cement plant and power cogeneration facility capable of generating a total of 150 megawatts of power. The amendment increases the allowable heat input rate while reducing the allowable particulate matter emissions. Additional control measures will prevent significant increases in actual sulfur dioxide and nitrogen oxides emissions. Therefore, this change will not cause or contribute to a violation of any air pollution standard or adversely affect the environment.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and, (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application/request is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Department of Environmental Protection  
Southwest District  
8407 Laurel Fair Circle  
Tampa, Florida 33619

Any person may send written comments on the proposed action to Mr. Al Linero at the Department's Tallahassee address. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

Further, a public hearing can be requested by any person(s). Such requests must be submitted within 30 days of this notice.

request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399  
904-488-1344

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE PERMIT AMENDMENT all copies were mailed by certified mail before the close of business on 5-23-95 to the listed persons.

Clerk Stamp

**FILING AND ACKNOWLEDGMENT**

FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



Clerk

5/23/95  
Date

Copies furnished to:

- B. Thomas, SWD
- J. Harper, EPA
- J. Bunyak, NPS
- H. Oven, PPS
- C. Hetrick, HCBC

Technical Evaluation  
and  
Preliminary Determination

Central Power & Lime, Inc.  
Power Plant/Cement Plant Cogeneration Facility  
Hernando County  
Brooksville, Florida

Federal Permit Number  
PSD-FL-090  
State Permit Amendment  
PSD-FL-090(D)

Florida Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation

May 23, 1995



## I. Application Information

### A. Applicant

Mr. Joseph J. Piermatteo  
Senior Vice President  
Central Power & Lime, Inc.  
10311 Cement Plant Road  
Brooksville, Florida 34601

### B. Request

The Department received a complete application on April 26, 1995, to allow an increase in the boiler heat input so that 150 megawatts can be generated to meet increased power demand.

### C. Classification

The applicant's facility (SIC 3241) is located on Cement Plant Road, Brooksville, Hernando County, Florida. UTM coordinates of the site are: Zone 17, 360.0 km E and 3,162.4 km N.

## II. Project Description/Emissions

This cement plant/power cogeneration facility was originally permitted in 1983 under the Power Plant Site Certification Rule (PA 82-17) and two federal air construction permits (Power Plant/PSD-FL-090, Cement Plant/PSD-FL-091). The facility was permitted to produce 600,000 tons per year of portland cement and 125 megawatts of power when both plants were operating (25 megawatts for internal use and 100 megawatts for export). The design called for the power plant gases to be used for material drying in the cement plant, which resulted in the absorption of about 20% of the power plant's SO<sub>2</sub> emissions in the calcium component of the cement. So that the SO<sub>2</sub> emission limit for normal operation would not be exceeded when the cement plant was down (no absorption of SO<sub>2</sub>), the power plant heat input was limited to 1,000 MMBTU/hr (sufficient to produce 100 megawatts) when the power plant was operating alone. The purpose of the capacity reduction was to make up for the lost SO<sub>2</sub> absorption when the cement plant was down, while allowing the same power export rate of 100 megawatts.

The current amendment is based on the need to meet increased power demand. The applicant proposes producing a maximum of 150 megawatts while increasing boiler heat input to 1,850 MMBTU/hr. The increases in heat input and power output appear out of proportion because the applicant used the worst-case summer conditions when the cooling water is at its maximum temperature and the unit operates less efficiently. However, the emission limits are not being increased. Limestone injection will be used to control additional SO<sub>2</sub> emitted while NO<sub>x</sub> will be controlled by combustion adjustments. It is assumed that none of the added power will be used by the new cement kiln at the same location covered under another PSD permit (PSD-FL-227).

With the Department's approval, a power plant test program was conducted by the applicant in October 1994 with the goal of showing that the above control measures would result in no emission increases at higher heat input rates. The power plant was tested at slightly above the permitted rate of 100 megawatts (with the cement plant down) and at rates closer to the requested maximum of 150 megawatts. Both manual stack testing and continuous emission monitors (CEMS) were used for SO<sub>2</sub> and NO<sub>x</sub> emissions. Opacity and stack gas flow rate were continuously measured by stack monitors. Particulate matter emissions were obtained by manual stack sampling. Pertinent results are briefly summarized below along with the Department's proposed limits:

	MMBTU/hr Heat Input	Tons/hr Limestone Injection	Emissions (lb/hr)			%Opacity V.E.
			PM/PM10	SO <sub>2</sub>	NO <sub>x</sub>	
Permitted	1,000	-	37	770	846	20
Tested@106MW	1,179	6	6	734	720	5
Tested@137MW	1,516	19	8	683	657	5
Proposed@150MW	1,850	(monitored)	25	770	846	10

The applicant contends that the PM/PM10 results show no increase when analyzed statistically according to the "Student-t" significance test and therefore PSD review does not apply. The Department's position is that PSD applies due a change in a federally enforceable permit limit on heat input which will result in an increase in actual emissions. It is reasonable to assume that an 85% increase in permitted fuel firing rate will result in an increase in actual PM/PM10 emissions. Therefore, actual boiler emissions at the 100 megawatt net output baseline must be compared with future allowable emissions to determine if a PSD-significant increase will occur  $((25 - 6) \times 8760/2000 = 83 \text{ tons/yr})$ . This PM/PM10 increase exceeds the significant emissions rate of 15 tons/yr listed in Table 212.400-2 of Chapter 62-212, Florida Administrative Code (F.A.C.).

### III. Rule Applicability

The construction permit application is subject to review under Chapter 403, Florida Statutes (F.S.), and Chapters 62-209 through 62-297 and 62-4, F.A.C. The facility is located in an area designated as attainment for all criteria pollutants (Rule 62-275.400, F.A.C.). The proposed project is subject to the preconstruction review requirements of Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD). The proposed

increase in PM/PM<sub>10</sub> emissions exceeds the significant level set forth in Table 212.400-2 of Chapter 62-212, F.A.C. Preconstruction review must include a determination of Best Available Control Technology (BACT), good engineering practice stack height, ambient impact analysis, impact on soils, vegetation, and visibility. Rules 62-212.400(2)(g), 62-296.800, Table 296.800-1, Section 60.220, and 62-297.300, Table 297.330-1, apply to this permit amendment.

#### IV. Air Quality Analysis

##### A. Requirements

The proposed project will emit only PM/PM<sub>10</sub> in a PSD-significant amount. The air quality impact analyses required by the PSD regulations for this pollutant include:

- \* An analysis of existing air quality;
- \* A PSD increment analysis;
- \* An Ambient Air Quality Standards (AAQS) analysis;
- \* An analysis of impacts on soils, vegetation, wildlife, visibility and of growth-related air quality modeling impacts; and
- \* A "Good Engineering Practice" (GEP) stack height determination.

The analysis of existing air quality generally relies on preconstruction monitoring data collected with EPA-approved methods. The PSD and AAQS analyses depend on air quality dispersion modeling carried out in accordance with EPA guidelines.

Based on the required analyses, the Department has reasonable assurance that the proposed project, as described in this report and subject to the conditions of approval proposed herein, will not cause or contribute to a violation of any AAQS or PSD increment. However, the following EPA-directed stack height language is included: "In approving this permit, the Florida Department of Environmental Protection has determined that the application complies with the applicable provisions of the stack height regulations as revised by EPA on July 8, 1985 (50 FR 27892). Portions of the regulations have been remanded by a panel of the U.S. Court of Appeals for the D.C. Circuit in NRDC v. Thomas, 838 F. 2d 1224 (D.C. Cir. 1988). Consequently, this permit may be subject to modification if and when EPA revises the regulation in response to the court decision. This may result in revised emission limitations or may affect other actions taken by the source owners or operators." A discussion of the modeling procedure and required analyses follows.

##### B. Existing Air Quality

Preconstruction ambient air quality monitoring is required for all pollutants subject to PSD NSR. However, an exemption to the monitoring requirement can be obtained if the maximum air quality

impact resulting from the projected emissions increase, as determined by air quality modeling, is less than a pollutant-specific de minimis concentration. Pollutants which do not have a specified de minimis level may also be exempt from preconstruction monitoring requirements. In addition, if an acceptable ambient monitoring method for the pollutant has not been established by EPA, monitoring is not required.

Maximum PM/PM<sub>10</sub> impacts from the project are predicted to be 0.26 ug/m<sup>3</sup> for the 24-hour averaging time, which is less than the applicable de minimis level of 10 ug/m<sup>3</sup>. Therefore, preconstruction ambient air quality monitoring is not required for this project.

### C. Modeling Method

#### 1. Model Selection

The EPA-approved Industrial Source Complex (ISC2) dispersion model was used to evaluate pollutant emissions from the proposed project. The model determines ground-level concentrations of inert gases or small particles emitted into the atmosphere by point, area and volume sources. The model incorporates elements for plume rise, transport by the mean wind, Gaussian dispersion, and pollutant removal mechanisms such as deposition. This model allows for the separation of sources, building wake downwash, and various other input and output features. A series of specific model features, recommended by the EPA, are referred to as the regulatory options. The applicant used the EPA recommended regulatory options in each modeling scenario. Direction-specific downwash parameters were used because the stacks were less than the good engineering practice (GEP) stack height.

#### 2. Meteorological Data

Meteorological data used in the ISC2 model to determine air quality impacts consisted of a concurrent five year period (1987-1991) of hourly surface weather observations and twice-daily upper air soundings from the National Weather Service (NWS) station at Tampa, Florida. These data from the NWS station at Tampa were selected for use in the model because this station is the closest primary weather station to the project site. The surface observations included wind direction, wind speed, temperature, cloud cover and cloud ceiling.

#### 3. Receptor Network

To determine the significant impact area, if any, concentrations were predicted for a total of 239 receptors located at the fenced property and at distances from the power plant of 3.0, 5.0, 7.0, and 10.0 km along 36 radials with each radial spaced at 10-degree intervals.

The Chassahowitzka National Wilderness Area is a PSD Class I area. The nearest boundary is located approximately 15 km from the project site. Maximum impacts for this Class I area were predicted at thirteen discrete receptors located along its boundaries.

#### D. Results

##### 1. Significant Impact Analysis

The maximum predicted PM/PM<sub>10</sub> air quality impacts due to the project are 0.26 ug/m<sup>3</sup> for the 24-hour averaging time and 0.02 ug/m<sup>3</sup> for the annual averaging time. These predicted values are less than the applicable significant impact levels of 5 ug/m<sup>3</sup>, 24-hour average and 1 ug/m<sup>3</sup>, annual average. Therefore, there are no significant impact areas associated with this project, and no further AAQS or PSD Class II modeling for this project is required.

##### 2. Class I Area

Maximum PM/PM<sub>10</sub> impacts predicted at the nearby PSD Class I area for comparison to the National Park Service (NPS)-recommended Class I significant impact levels are 0.001 ug/m<sup>3</sup> for the 24-hour averaging time and 0.00005 ug/m<sup>3</sup> for the annual averaging time. These values are less than the NPS-recommended Class I significant levels of 0.27 ug/m<sup>3</sup>, 24-hour average and 0.07 ug/m<sup>3</sup>, annual average. Therefore, no further Class I modeling analysis is required.

#### E. Additional Impacts Analysis

##### 1. Impacts on Soils, Vegetation, Wildlife, and Visibility

Because the predicted impacts for PM/PM<sub>10</sub> are less than the significant impacts, the project is not expected to have a significant adverse effect on regional or Class I area vegetation, soils, wildlife, and visibility.

##### 2. Growth-Related Air Quality Impacts

No growth-related air quality impacts are expected with the completion of this project.

#### V. Conclusion

Based on the information provided by Central Power and Lime, Inc., the Department has reasonable assurance that the proposed project, as proposed herein, will not cause or contribute to a violation of an ambient air quality standard, PSD increment, or any other technical provisions of Chapters 62-209 through 62-297 of the Florida Administrative Code.



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

June XX, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Joseph J. Piermatteo  
Senior Vice President  
Central Power & Lime, Inc.  
10311 Cement Plant Road  
Brooksville, Florida 34601

Dear Mr. Piermatteo:

Re: Amendments to PSD-FL-090  
Boiler Heat Input Increase From 1000 to 1,850 MMBTU/hr

The Department received your application on March 15, 1995, for amendment of the subject air construction permit allowing an increase to 1,850 MMBTU/hr in the boiler firing rate. The permit is amended as shown:

Specific Condition A.1.c.:

- FROM: c. Particulates - 0.03 lb. per million Btu heat input, averaging time per 40 CFR 60.46.
- TO: c. PM/PM10 - 0.0135 lb per MMBTU (25.0 lbs per hour at 1,850 MMBTU/hr), averaging time per 40 CFR 60.46.

Specific Condition A.1.d.:

- FROM: d. Visible emissions - 20% opacity, 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.
- TO: d. Visible emissions - 10% opacity, 6-minute average, except for one 6-minute period per hour of not more than 17% opacity.

Specific Condition A.2.c.:

- FROM: c. Particulates - 0.03 lb. per million Btu heat input plus 0.3 lb from the cement kiln and 0.1 lb from the clinker cooler per ton of kiln feed (dry basis), averaging time per 40 CFR 60.46.

Mr. Joseph J. Piermatteo  
June XX, 1995  
PSD-FL-090 - Page Two

**DRAFT**

TO: c. PM/PM10 - 0.0135 lb per MMBTU (25.0 lbs per hour at 1,850 MMBTU/hr) plus 0.3 lb from the cement kiln and 0.1 lb from the clinker cooler per ton of kiln feed (dry basis), averaging time per 40 CFR 60.46.

Specific Condition C.6.:

FROM: 6. Instruments shall be installed, calibrated, and maintained to continuously measure the amounts of coal used, material fed to the kiln, and clinker produced. The records of fuel usage with the fuel analysis, daily kiln feed and clinker produced shall be reported quarterly to the Florida Department of Environmental Regulation Southwest District office.

TO: 6. Instruments shall be installed, calibrated, and maintained to continuously measure the amounts of coal and limestone used in the boiler, material fed to the kiln, and clinker produced. The records of coal and limestone used in the boiler, fuel analysis, daily kiln feed and clinker produced shall be reported quarterly to the Department's Southwest District office.

Specific Condition G.1.:

FROM: 1. When the power plant boiler is operating alone and the cement plant is not in operation, the maximum heat input rate of the boiler shall not exceed the site specific limit of 1,000 million Btu per hour, maximum three-hour average.

TO: 1. The heat input rate of the boiler, with or without the cement plant operating, shall not exceed the maximum necessary to produce 150 MW of power and shall in no case exceed 1,850 MMBTU/hr, maximum three-hour average.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

DRAFT

The Petition shall contain the following information:

- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the amendment request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

A copy of this amendment letter shall be attached to and shall become a part of Air Construction Permit PSD-FL-090.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

Virginia B. Wetherell, Secretary



Mr. Joseph J. Piermatteo  
June XX, 1995  
PSD-FL-090 - Page Four

DRAFT

CERTIFICATE OF SERVICE

This is to certify that this Permit Amendment and all copies were mailed to the listed persons before the close of business on June XX, 1995.

FILING AND ACKNOWLEDGEMENT FILED,  
on this date, pursuant to Chapter  
120.52(9), Florida Statutes, with  
with the designated Deputy Clerk,  
receipt of which is hereby  
acknowledged.

\_\_\_\_\_  
(Clerk)

\_\_\_\_\_  
(Date)

cc: B. Thomas, SWD  
J. Harper, EPA  
J. Bunyak, NPS  
H. Oven, PPS  
C. Hetrick, HCBCC

Best Available Control Technology (BACT) Determination  
Central Power and Lime, Inc.  
Hernando County  
PSD-FL-090(D)  
PA 82-17

The applicant proposes to increase boiler fuel consumption by 85 percent over the originally permitted level of 1,000 MMBTU/hr in order to increase power generation from 100 MW to 150 MW. The proposed project for the Brooksville facility will result in a significant increase in emissions of particulate matter (PM/PM10). The project is, therefore, subject to Prevention of Significant Deterioration (PSD) review in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.). The BACT determination is part of the review required by Rule 62.212.410, F.A.C.

Date of Receipt of BACT Application: March 15, 1995

BACT Determination Proposed by Applicant:

Emission Limit: 0.02 lb PM/PM10 per MMBTU heat input to the boiler with a maximum of 37.0 lbs PM/PM10 per hour at 1,850 MMBTU per hour heat input.

Control Technology: Existing baghouse.

BACT Determination Procedure:

In accordance with F.A.C. Chapter 62-212, this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department, on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, Rule 62-212.410(1), F.A.C., states that in making the BACT determination the Department shall give consideration to:

- (a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).
- (b) All scientific, engineering, and technical material and other information available to the Department.
- (c) The emission limiting standards or BACT determinations of any other state.

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- (d) The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine for the emission source in question the most stringent control available for a similar or identical source or source category. If it is shown that this level of control is technically or economically infeasible for the source, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

BACT Determined by DEP:

Emission Limit: 0.0135 lb PM/PM<sub>10</sub> per MMBTU (25.0 lbs PM/PM<sub>10</sub> per hour at 1,850 MMBTU/hr)  
Visible emissions - 10% opacity, 6-minute average, except for one 6-minute period per hour of not more than 17% opacity.

Control Technology: Existing baghouse with improved bag maintenance/replacement

BACT Determination Rationale:

Recent test results for the boiler operating alone at 137.2 megawatts show that PM/PM<sub>10</sub> emissions averaged 7.65 lbs per hour (with new filter bags) while the continuously monitored opacity averaged 5.0 per cent. The tighter limits are based on the Department's assessment of what is achievable with the existing baghouse if bags are replaced on a more frequent basis than before. The Department believes that the permittee will be able to comply consistently with the tighter limits. The additional cost of more frequent bag replacement is not expected to have a significant impact on the permittee's production costs.

Environmental Impact Analysis:

The maximum predicted PM/PM<sub>10</sub> air quality impacts due to the project are 0.26 ug/m<sup>3</sup> for the 24-hour averaging time and 0.02 ug/m<sup>3</sup> for the annual averaging time. These predicted values are less than the applicable significant impact levels of 5 ug/m<sup>3</sup>, 24-hour average and 1 ug/m<sup>3</sup>, annual average.

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Conclusion:

The ambient air quality impact from PM/PM10 emissions due to the proposed modification is in compliance with all applicable requirements and reflects a reduction in allowable emissions. Therefore, the Department concludes that the emission control technology for the proposed increase in power output represents BACT.

BACT Analysis Details Available From:

A. A. Linero, P.E., Administrator  
New Source Review Section  
Bureau of Air Regulation  
111 South Magnolia Drive  
Tallahassee, Florida 32399-2400

Recommended by:

Approved by:

\_\_\_\_\_  
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation

\_\_\_\_\_  
Virginia B. Wetherell, Secretary  
Dept. of Environmental Protection

\_\_\_\_\_, 1995  
Date

\_\_\_\_\_, 1995  
Date

Memorandum

Florida Department of  
Environmental Protection

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TO: C. H. Fancy  
FROM: A. A. Linero  
DATE: May 23, 1995  
SUBJ: Central Power & Lime, Inc. - Brooksville  
Permit Amendment - PSD-FL-090D

Attached for your review and approval is a permit amendment providing for an increase in boiler heat input to 1,850 MMBTU/hr from the originally permitted level of 1,000 MMBTU/hr. As you recall, Tom Mountain agreed to our proposed PM/PM<sub>10</sub> emission limit of 25 lb/hr, so we shouldn't get any static from them on that. However, they probably will complain about the limestone monitoring requirement. We believe this is needed to verify SO<sub>2</sub> absorption when the CEMS goes down. The equipment can be installed at reasonable cost.

If you have any questions, we will be glad to discuss the details.

AAL/jr/t