



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 307-94-05

May 8, 1995

RECEIVED
MAY 11 1995
Bureau of
Air Regulation

Mr. A. A. Linero
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: CPL Permit Application
PA 82-17, PSD-FL-090D

Dear Mr. Linero:

This is in response to the U.S. Department of the Interior's (NPS) letter to FDEP dated April 20, 1995, regarding the above referenced project. It is our understanding from conversations with FDEP staff that CPL may respond to the issues raised by the NPS even though the comments were submitted to FDEP. It is anticipated that by addressing these issues, CPL will be able to expedite the permit application review. The responses are in the same order as the NPS comments. Pertinent aspects of the comments are presented below.

1. We understand that another PSD application has been submitted, by Florida Crushed Stone, for a new cement kiln at the same location. Both CP&L and Florida Crushed Stone are under common ownership/control, and constitute one industrial facility. Therefore emissions from both proposed projects should be considered together for PSD review.

RESPONSE:

FCS and CPL are under different ownership and under different SIC codes. Therefore, in accordance with PSD review guidelines, the two projects can/should be evaluated separately. Also, the two projects are stand-alone and independent of each other. Although CPL does not feel that a PSD application is justified for the power plant permit modification request, such an application was submitted in accordance with FDEP's suggestion in an effort to expedite the permit modification request. It should be noted that there will be a net decrease in the allowable air emissions from the power plant as result of the permit modification request.

2. The applicant should perform an air quality analysis based on this 135 TPY increase to address Class I PM-10 increment impacts at Chassahowitzka WA. The analysis should apply to same meteorological data base and receptors used in the Florida Crushed Stone cement kiln #2 permit application, since they are at the same location.

RESPONSE:

An ambient air quality impact analysis was conducted for the project. Based on the results of the ambient air impact analysis for PM10 emissions from the power plant, submitted to the FDEP on April 24, 1995, the maximum predicted Class I area impacts are less than significant. The Class I area receptors used in the air dispersion modeling analysis were consistent with those identified by FDEP for use in numerous previous permit applications reviewed by FDEP, EPA and NPS.

3. A visibility analysis for coherent plume impact should also be performed using the Environmental Protection Agency (EPA) VISCREEN model. A background visual range of 65 km should be used in the visibility analysis. The analysis should not use "wind speed profile" adjustments to the meteorological data. The EPA document on VISCREEN, Workbook for Plume Visual Impact Screening and Analysis EPA-450/4-88-015 September 1988, does not indicate that compensation to wind speeds, using wind speed profile adjustments calculations, should be applied.

RESPONSE:

CPL is currently permitted, based on FDEP, EPA and the National Park Service approval, to emit 37 pounds per hour of particulate matter (PM) when the power plant is operating alone. Presently, CPL is proposing a more restrictive PM emission rate (suggested by FDEP staff) of 25 pounds per hour (see letter to FDEP dated 4-24-95). A lower PM emission rate, given unchanged stack characteristics, would result in a lower ambient air impact and, consequently, a lower visibility impact. Therefore, a visibility analysis (such as VISCREEN) is not justified for this project. The NPS is aware of the fact that CPL has a greater potential for visibility impacts at the currently permitted emission levels than at the proposed emission levels. Thus, we are certain that NPS will favor this project, which reduces the potential visibility impacts from current levels.



4. The applicant did not perform an Air Quality Related Values (AQRV) analysis, contending that the proposed project would result in no increases over allowable emissions. As we note above, increases should be based on actual emissions. In addition, for an AQRV analysis, we are concerned not only with impacts from the proposed source, but cumulative impacts for all area sources. In this case, we will not require CP&L to perform a detailed AQRV analysis. PM-10 is the only pollutant increasing in significant amounts because of this project, and we have limited information on the effects of PM-10 on AQRVs.

RESPONSE:

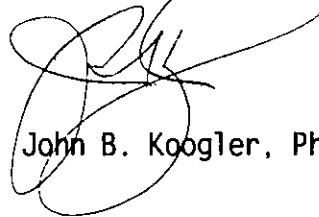
CPL concurs with the NPS comment that an AQRV analysis for PM10 is not warranted for this project. This approach is both reasonable and practical considering that the project will result in a decrease in the maximum allowable (potential) emission rate of PM10.

It is anticipated that the above responses will help expedite the technical review of this application. We look forward to a prompt FDEP review and permit issuance.

If you have any further questions, please immediately call Pradeep Raval or me.

Very truly yours,

KOOGLER & ASSOCIATES

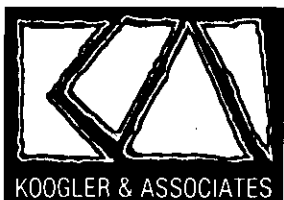


John B. Koogler, Ph.D., P.E.

JBK:par
Enc.

c: C. Fancy, BAR
J. Reynolds, BAR
C. Holladay, BAR
T. Mountain, CPL
L. Curtin, Holland & Knight





KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 307-94-05

April 24, 1995

RECEIVED

APR 26 1995

Bureau of
Air Regulation

Mr. A. A. Linero
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: CPL Permit Application
PA 82-17, PSD-FL-090D

Dear Mr. Linero:

This is a follow up to your telephone conversation with Pradeep Raval on April 20, regarding FDEP's request for additional information dated April 13, 1995. The responses are in the same order as FDEP's questions.

1. Based upon our preliminary review, it appears that a BACT particulate emissions limit less than the presently-allowed value of 37 lbs/hr is feasible. This was demonstrated by the emissions ranging roughly between 6 and 10 lbs/hr during tests conducted in October 1994. We plan to consider an emissions rate closer to 20 lbs/hr which reflects what has been demonstrated with an adequate margin of safety. Please provide any additional information you may have to support maintaining the present emission limit.

RESPONSE:

Historical emission data reflects the simultaneous operation of the cement plant and the power plant. It was for this reason that Mr. Clair Fancy recommended the recent performance testing to obtain data for the power plant operating alone. It is recognized that there is very limited particulate matter emission data on the power plant, and that normal fluctuations in emissions should be accounted for in selecting emission limitations for the permit. We do feel that the current permit limit should remain unchanged. However, in order to expedite the permit application review, CPL is willing to accept the particulate matter emission limit, of 25 pounds per hour, as suggested by Mr. Fancy in a conversation last week with Mr. Tom Mountain. We agree with Mr. Fancy that this emission rate includes an adequate margin of safety, taking into consideration the normal deterioration in process and air pollution control equipment efficiency.

2. The October 1994 testing showed that increased SO₂ generation from the higher fuel consumption can be controlled below the current allowable limit by tripling the limestone injection rate to about 19 tons per hour. A condition of the new permit will require a minimum verifiable rate of limestone injection at all times while operating at the increased heat input rate. Please explain how CPL proposes to measure and record the limestone injection rate.

RESPONSE:

It is our understanding, based on Pradeep Raval's telephone conversation with Mr. Bruce Mitchell at the time of preparing the permit application, that only particulate matter emissions were to be addressed in the permit application and subsequent permit. This approach would be consistent with the approach used recently for permitting several major sources where "baseline" and "proposed" operation scenarios formed the basis of the project review. For the sake of consistency in FDEP's assessment of operation data, we request that the existing permitting protocol be followed for this project.

To answer FDEP's question, it should be noted that the limestone injection rate is not necessarily proportional to the power generation rate. The limestone injection rate is dependent upon many variables, some of which are fuel type; fuel heat content; sulfur content of fuel; relative materials alkalinity; temperature and quantity of combustion air; combustion air and fuel distribution; condition of boiler tubes for heat transfer efficiency; boiler feed water rate, quality and inlet temperature; ambient air temperature; steam quality; operating conditions on the low and high pressure turbines; turbine efficiency; etc. Due to the number of variables involved, it would be erroneous to assume a constant relationship between the lime injection rate and the power generation rate. An imposition of restrictions on the lime injection rate relative to the power generation rate would result in non-compliance with sulfur dioxide emission limits under certain circumstances, and, result in over use of limestone under other circumstances.

Given the complexity of the power plant system, CPL is able to maintain compliance with the permitted sulfur dioxide emission limit by continuous emission monitoring. The baseline test data submitted to FDEP indicate emissions of sulfur dioxide within 10 percent of the allowable emission rate. It is important to note that the power plant will seldom operate alone, given CPL's ongoing effort to keep both the cement and power plants on line for optimum operations. Also, from a practical aspect, CPL cannot allow significant increases in sulfur dioxide emission rates beyond those documented during baseline tests as that emission level would threaten operation out of compliance with permitted sulfur dioxide emission limits.



For the reasons discussed above, it is requested that the existing continuous emission monitoring system be considered a practical tool for demonstrating compliance with the current permit limitations and any other issue of concern to FDEP regarding sulfur dioxide emissions.

3. An ambient impact analysis for PM10 was not done. This analysis is required. In addition, as stated above, the Department has reason to believe, based on test results, that 37.0 lbs/hr is not representative of the current actual PM/PM10 emission rate for input into the short term or long term significant impact analysis (SIA). The SIA is required in order to determine whether or not a full impact PM10 analysis including impacts of nearby sources is necessary. Based on test results, the Department has determined that 10.17 lbs/hr is a reasonable upper limit to the short-term emission rate representative of current actual emissions, and that 6.22 lbs/hr is a reasonable long term emission rate representative of current actual emissions. These emission rates should be used as input into the PM10 significant impact analysis and should represent the current emission rate of the power plant. If you do not believe these emission rates are representative of actual conditions, you must provide us with documentation reasonably substantiating higher values.

RESPONSE:

As discussed with Mr. Cleve Holladay, the significant impact analysis (SIA) was conducted using the ISC2 model with a particulate matter emission rate of 25 pounds per hour, an emission rate suggested by Mr. Fancy. No emission rate (negative input) was used to represent actual emissions. Five years of Tampa meteorological data were used in the modeling. Discrete receptors were located at the property boundary and at the Class I Area (Chassahowitzka National Wildlife Refuge) boundary. Additional receptors were located in a polar grid at 10 degree intervals from 10 to 360 degrees, and downwind distances from the plant boundary to 10 kilometers. An additional modeling run was conducted at an emission rate of 37 pounds per hour (current permit limit), using the most recent meteorological data (1991). The resulting ambient air impacts, presented in Table 1, indicate that the predicted impacts are less than significant at both the Class I Area and the Class II Area.

Based on the modeling results, it can be concluded that even at a particulate matter emission rate of 37 pound per hour, the maximum predicted ambient air quality impacts are less than significant. The modeling output is provided on disk.



Mr. A. A. Linero
Florida Department of
Environmental Protection

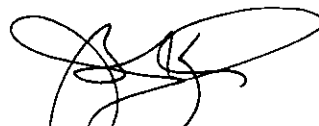
April 24, 1995
Page 4

It is our understanding that the above responses will help complete the technical review of this application. We look forward to a prompt FDEP review and permit issuance.

If you have any further questions, please immediately call Pradeep Raval or me.

Very truly yours,

KOOGLER & ASSOCIATES



John B. Koogler, Ph.D., P.E.

JBK:par
Enc.

c: C. Fancy, BAR
J. Reynolds, BAR
C. Holladay, BAR
T. Mountain, CPL
L. Curtin, Holland & Knight



TABLE 1

SUMMARY OF MODELING RESULTS
CPL PM10 EMISSIONS

MET DATA	PARTICULATE MATTER IMPACT ($\mu\text{g}/\text{m}^3$) (1)			
	CLASS II AREA		CLASS I AREA	
	24-HOUR	ANNUAL	24-HOUR	ANNUAL
@ PM emission rate of 25 lbs/hr				
1987	0.196	0.019	0.0007	0.00002
1988	0.173	0.012	0.0009	0.00003
1989	0.258	0.019	0.001	0.00005
1990	0.187	0.018	0.0009	0.00003
1991	0.211	0.016	0.0009	0.00002
@ PM emission rate of 37 lbs/hr				
1991	0.312	0.023	0.001	0.00003
SIGNIFICANT IMPACT (FDEP Rule for CII; NPS Guideline for CI)	5	1	0.27	0.08

NOTE:

- (1) The predicted impacts represent the highest-high impact for the annual period and the highest second-high for the 24-hour period.



United States Department of the Interior

FISH AND WILDLIFE SERVICE

1875 Century Boulevard
Atlanta, Georgia 30345

April 20, 1995

IN REPLY REFER TO:

RECEIVED
APR 24 1995
Bureau of
Air Regulation

Mr. Clair H. Fancy
Chief, Bureau of Air Regulation
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399

Dear Mr. Fancy:

We have reviewed the information you provided us regarding Central Power and Lime Company's (CP&L - formerly Florida Crushed Stone) proposed power plant modification. The CP&L facility is located 20 km southeast of Chassahowitzka Wilderness Area (WA), a Class I air quality area, administered by the Fish and Wildlife Service. The modification would result in a significant increase over actual PM-10 emissions of 135 tons per year (TPY).

We understand that another PSD application has been submitted, by Florida Crushed Stone, for a new cement kiln at the same location. Both CP&L and Florida Crushed Stone are under common ownership/control, and constitute one industrial facility. Therefore emissions from both proposed projects should be considered together for PSD review.

The application is incomplete regarding the air quality modeling analysis for the reasons given below.

Air Quality Modeling Analysis

CP&L did not perform a Class I air quality impact analysis for the proposed project. We disagree with the applicant's assertion that no analyses are required because there will be no increase over allowable emissions. As your department has noted, the modification will result in an increase of 135 TPY of PM-10 over actual emissions. The applicant should perform an air quality analysis based on this 135 TPY increase to address Class I PM-10 increment impacts at Chassahowitzka WA. The analysis should apply the same meteorological data base and receptors used in the Florida Crushed Stone cement kiln #2 permit application, since they are at the same location.

A visibility analysis for coherent plume impact should also be performed using the Environmental Protection Agency (EPA) VISCREEN model. A background visual range of 65 km should be

used in the visibility analysis. The analysis should not use "wind speed profile" adjustments to the meteorological data. The EPA document on VISCREEN, Workbook for Plume Visual Impact Screening and Analysis EPA-450/4-88-015 September 1988, does not indicate that compensation to wind speeds, using wind speed profile adjustments calculations, should be applied.

Best Available Control Technology

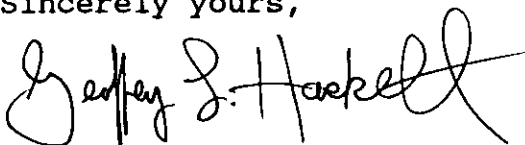
The Best Available Control Technology analysis appears to be complete.

Air Quality Related Values Analysis

The applicant did not perform an Air Quality Related Values (AQRV) analysis, contending that the proposed project would result in no increases over allowable emissions. As we note above, increases should be based on actual emissions. In addition, for an AQRV analysis, we are concerned not only with impacts from the proposed source, but cumulative impacts from all area sources. In this case, we will not require CP&L to perform a detailed AQRV analysis. PM-10 is the only pollutant increasing in significant amounts because of this project, and we have limited information on the effects of PM-10 on AQRVs.

Thank you for giving us the opportunity to comment on this permit application. We appreciate your cooperation in notifying us of proposed projects with the potential to impact the air quality and related resources of our Class I air quality areas. If you have questions, please contact Ms. Ellen Porter of our Air Quality Branch in Denver at telephone number 303/969-2617.

Sincerely yours,

for 
Noreen K. Clough
Regional Director

cc: G. Reynolds
C. Halladay
D. Owen
G. Kissel, SW Dist
J. Koopler, K&A
G. Harper, EPA
Fernando Co. (5-23-95)



United States Department of the Interior

FISH AND WILDLIFE SERVICE

1875 Century Boulevard
Atlanta, Georgia 30345

IN REPLY REFER TO:

Mr. Clair H. Fancy
Chief, Bureau of Air Regulation
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399

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Best Available Control Technology

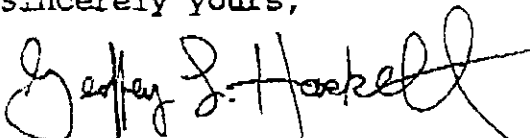
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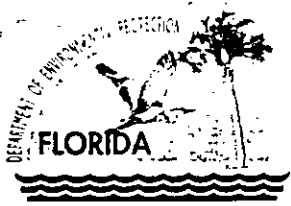
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Thank you for giving us the opportunity to comment on this permit application. We appreciate your cooperation in notifying us of proposed projects with the potential to impact the air quality and related resources of our Class I air quality areas. If you have questions, please contact Ms. Ellen Porter of our Air Quality Branch in Denver at telephone number 303/969-2617.

Sincerely yours,

for 
Noreen K. Clough
Regional Director



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

April 13, 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: CPL Permit Application for 1,850 MMBTU/HR Heat Input Rate
(PA 82-17/PSD-FL-090D)

On March 15, 1995, the Department received a permit application requesting a 46 percent increase in boiler fuel consumption over the originally permitted level of 1,000 MMBTU/HR. The Department requires additional information on the BACT analysis and modeling before the above permit application can be deemed complete:

1. Based upon our preliminary review, it appears that a BACT particulate emissions limit less than the presently-allowed value of 37 lbs/hr is feasible. This was demonstrated by the emissions ranging roughly between 6 and 10 lbs/hr during tests conducted in October, 1994. We plan to consider an emissions rate closer to 20 lbs/hr which reflects what has been demonstrated with an adequate margin of safety. Please provide any additional information you may have to support maintaining the present emission limit.

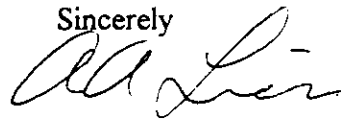
2. The October, 1994 testing showed that increased SO₂ generation from the higher fuel consumption can be controlled below the current allowable limit by tripling the limestone injection rate to about 19 tons per hour. A condition of the new permit will require a minimum verifiable rate of limestone injection at all times while operating at the increased heat input rate. Please explain how CPL proposes to measure and record the limestone injection rate.

Mr. Piermatteo
April 13, 1995
Page Two

3. An ambient impact analysis for PM₁₀ was not done. This analysis is required. In addition, as stated above, the Department has reason to believe, based on test results, that 37.0 lbs/hr is not representative of the current actual PM/PM₁₀ emission rate for input into the short term or long term significant impact analysis (SIA). The SIA is required in order to determine whether or not a full impact PM₁₀ analysis including impacts of nearby sources is necessary. Based on test results, the Department has determined that 10.17 lbs/hr is a reasonable upper limit to the short-term emission rate representative of current actual emissions, and that 6.22 lbs/hr is a reasonable long term emission rate representative of current actual emissions. These emission rates should be used as input into the PM₁₀ significant impact analysis and should represent the current emission rate of the power plant. If you do not believe these emission rates are representative of actual conditions, you must provide us with documentation reasonably substantiating higher values.

The Department will resume processing the application after receipt of the requested information. If you have any questions on this matter, please write to me or call John Reynolds or Cleve Holladay at (904) 488-1344.

Sincerely



A. A. Linero, P.E.
Administrator
New Source Review Section

CHF/CH/h

cc: W. Thomas, SWD
B. Proses, SWD
H. Oven, PPS
C. Hetrick, HCBCC
J. Harper, EPA
J. Bunyak, NPS
A. Cleveland, OHF&C
L. Curtin, H&K
J. Koogler, K&A

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Joe J. Piermattio
 Sr. Vice President
 Central Power & Line
 10311 Cement Plant
 Brooksville, FL 34601

4a. Article Number
 Z 311 902 939

- 4b. Service Type
- Registered Insured
 - Certified COD
 - Express Mail Return Receipt for Merchandise

7. Date of Delivery
 4-17-95

5. Signature (Addressee)
 (Signature)

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

6. Signature (Agent)
 (Signature)

Thank you for using Return Receipt Service.

Z 311 902 939



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

PS Form 3800, March 1993

Name and Address of Addressee	
Joe Piermattio	
Central Power & Line	
Brooksville, FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark & Date	4-13-95
PA 82-17/PSD-FI-0920	



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

March 16, 1995

Ms. Jewell A. Harper, Chief
Air Enforcement Branch
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30308

RE: Central Power & Lime, Inc.
Power Plant Modification
Hernando County, PSD-FL-090D

Dear Ms. Harper:

Enclosed for your review and comment is the above referenced PSD application. Please forward your comments to the Department's Bureau of Air Regulation as soon as possible. The Bureau's FAX number is (904)922-6979.

If you have any questions, please contact John Reynolds or Cleve Holladay at (904)488-1344 or write to me at the above address.

Sincerely,

Patricia G. Adams
for C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/pa

Enclosures

cc: John Reynolds
Cleve Holladay



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

March 16, 1995

Mr. Charles B. Hetrick
County Administrator
Hernando County Government Center
20 N. Main Street, Room 461
Brooksville, FL 34601

RE: Central Power & Lime, Inc.
Power Plant Modification
Hernando County, PSD-FL-090D

Dear Mr. Hetrick:

Enclosed for your review and comment is the above referenced PSD application. Please forward your comments to the Department's Bureau of Air Regulation as soon as possible. The Bureau's FAX number is (904)922-6979.

If you have any questions, please contact John Reynolds or Cleve Holladay at (904)488-1344 or write to me at the above address.

Sincerely,

for C. H. Fancy, P.E.

Chief
Bureau of Air Regulation

CHF/pa

Enclosures

cc: John Reynolds
Cleve Holladay