



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

November 9, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Tom Mountain  
Environmental Manager  
Central Power & Lime, Inc.  
P. O. Box 1508  
Brooksville, Florida 34605-1508

Dear Mr. Mountain:

This is in response to the November 1, 1994, letter from Koogler & Associates regarding the October 6-14 emission test results and Central Power & Lime, Inc.'s, request for a letter amendment of PSD-FL-090A that would increase the net power plant output from 100 MW to 150 MW while eliminating heat-based emission limits.

Since the test results showed a slight increase in actual particulate matter emissions at the higher production rate, a modification permit application and fee will be required pursuant to Rules 62-210.200(39) and 62-210.300(1), Florida Administrative Code, to increase the net power plant output to 150 MW.

Regarding the request to remove the heat input restrictions, this would be counter to the EPA's historical practice of limiting a fuel-burning source's potential emissions by limiting the fuel consumed. For this reason, fuel consumption limits and heat-based emission limits must be included in all construction permits issued by the Department for fuel-burning sources.

Sincerely,

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

CHF/JR/bjb

cc: W. Thomas, SWD  
B. Oven, DEP  
J. Pennington, DEP  
D. Beason, DEP  
C. Hetrick, Hernando County  
J. Koogler, K&A  
L. Curtin, H&K  
J. Harper, EPA  
J. Bunyat, UPS

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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3. Article Addressed to:  
 Mr. Tom Mountain  
 Environmental Manager  
 Central Power & Lime, Inc.  
 P. O. Box 1508  
 Brooksville, FL 34605

4a. Article Number  
 P 872 563 691

4b. Service Type:  
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 Certified       COD  
 Express Mail       Return Receipt for Merchandise

7. Date of Delivery  
 11-14-94

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

5. Signature (Addressee)  
*[Signature]*

6. Signature (Agent)  
*[Signature]*

PS Form 3811, December 1991      U.S. GPO: 1992-323-402      DOMESTIC RETURN RECEIPT

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PS Form 3800, JUNE 1991



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

RECEIVED

KA 308-94-05

NOV 2 1994

November 1, 1994

Bureau of  
Air Regulation

Mr. C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation  
Florida Department of  
Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Mr. Hamilton Oven, P.E.  
Administrator  
Siting Coordination Office  
Florida Department of  
Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: Central Power & Lime, Inc.  
Hernando County, Florida

Dear Mr. Fancy and Mr. Oven:

Attached is a copy of the test report documenting particulate matter, sulfur dioxide and nitrogen oxides emissions and the opacity of emissions from the Central Power & Lime, Inc. (CPL) power plant in Hernando County, Florida, while the power plant was operating alone (without the cement plant) at net power generating rates of 106 and 137 megawatts. These tests were conducted during the period October 6-14, 1994, in accordance with approval granted by the Department by letter dated October 6, 1994.

The test results from both continuous monitors and reference test methods demonstrate that the net generating rate of the power plant can increase from 106 megawatts to 137 megawatts with no increase in sulfur dioxide and nitrogen oxides emissions, with no significant increase in particulate matter emissions and with only a slight increase in the opacity of emissions (from 4.8 percent to 5.0 percent). The test results also demonstrate that there is no relationship between the emission rates of particulate matter, sulfur dioxide or nitrogen oxides *and ?* in the heat input rate to the power plant and demonstrate that the power plant can operate within 90 to 100 percent of 150 megawatts, net, without exceeding the present mass emission limits for the three regulated pollutants.

Based on the results of the tests conducted during the period October 6-14, 1994, and the fact that there is no consistent relationship between the heat input rate to the power plant and the electric power generating rate, Central Power & Lime, Inc. is requesting that the air permits and the power plant certification be amended to remove the heat input-based emission limits (pounds per MMBtu), to remove the heat input limits to the

Mr. C. H. Fancy and  
Mr. Hamilton Owen  
Florida Department of  
Environmental Protection

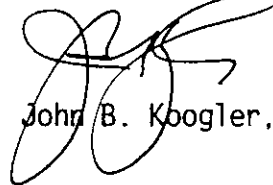
November 1, 1994  
Page 2

power plant (MMBtu per hour), and to increase the maximum electric power generating rate to 150 megawatts, net. The 150 megawatt generating rate is to apply whether or not the cement plant operates.

We appreciate your consideration of this matter and will provide any additional information that may be required to expedite your review.

Very truly yours,

KOGLER & ASSOCIATES



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

JBK:wa  
Enc.

c: Mr. John Brown, FDEP  
Mr. Bruce Mitchell, FDEP, w/report  
Mr. Tom Mountain, FCS, w/reports  
Mr. Larry Curtin, Holland & Knight, w/report



LAW OFFICES

# HOLLAND & KNIGHT

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P.O. DRAWER 810 (ZIP 32302-0810)  
TALLAHASSEE, FLORIDA 32301  
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SPECIAL COUNSEL  
SHAW, LICITRA,  
PARENTE, ESERNIO  
& SCHWARTZ, P.C.  
GARDEN CITY, NY  
NEW YORK, NY

MEMORANDUM

RECEIVED

OCT 17 1994

TO: Clair Fancy  
FROM: Lawrence N. Curtin  
DATE: October 13, 1994  
RE: Condition No. 11 -- Letter of October 6, 1994 from Howard Rhodes

Bureau of  
Air Regulation

In the letter from Howard Rhodes to Tom Mountain dated October 6, 1994, authorizing the test program at the Central Power & Lime, Inc. cogeneration facility, there is a condition designated as number 11 that is of concern. The condition states that "Any operation above the 100 MW net output level after the last performance test run . . . will be deemed a violation of the Site Certification No. PA 82-17; and PSD-FL-090."

As you are aware, both the PSD permit and the site certification conditions contain limitations on the heat input rate of the facility. Although the heat input rate limitations that were placed in the permits by the Department were an attempt to approximate the heat input that would equal the projected power output, these limitations were never intended to be absolute permit conditions. The projections that the company made concerning the net output that was to be expected from the facility were simply estimates based on the name plate capacity and expected operation. These were not intended to be production rate limitations, and are not stated as such in the site certification or the PSD permit.

Based upon the foregoing, we believe that condition no. 11 is in error and we request that it be modified to reflect that the 100 MW output stated in the letter is not a permit condition.

Let us know if you have any questions.

cc: Tom Mountain

LNC/mrh  
TAL-51564

## LAW OFFICES

**HOLLAND & KNIGHT**

316 SOUTH CALHOUN STREET  
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SPECIAL COUNSEL  
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 SHAW, LICHTA, PARENTE,  
 EBERNIO & SCHWARTZ, P.C.

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 (516) 742-0810 FAX (516) 742-2870  
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TO: Clair Fancy

FROM: Lawrence N. Curtin

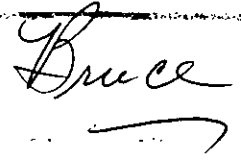
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SPECIAL COUNSEL  
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 PARENTE, ESERNIO  
 & SCHWARTZ, P.C.  
 GARDEN CITY, NY  
 NEW YORK, NY

## MEMORANDUM

TO: Clair Fancy

FROM: Lawrence N. Curtin

DATE: October 13, 1994

RE: Condition No. 11 -- Letter of October 6, 1994 from Howard Rhodes

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As you are aware, both the PSD permit and the site certification conditions contain limitations on the heat input rate of the facility. Although the heat input rate limitations that were placed in the permits by the Department were an attempt to approximate the heat input that would equal the projected power output, these limitations were never intended to be absolute permit conditions. The projections that the company made concerning the net output that was to be expected from the facility were simply estimates based on the name plate capacity and expected operation. These were not intended to be production rate limitations, and are not stated as such in the site certification or the PSD permit.

Based upon the foregoing, we believe that condition no. 11 is in error and we request that it be modified to reflect that the 100 MW output stated in the letter is not a permit condition.

Let us know if you have any questions.

CC: Tom Mountain



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

October 6, 1994

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

Mr. Tom Mountain  
Environmental Manager  
Central Power & Lime, Inc.  
Post Office Box 1508  
Brooksville, Florida 34605-1508

Dear Mr. Mountain:

Re: Amendment to the Construction Permit, PSD-FL-090(A), to Allow Central Power & Lime, Inc.'s (CPLI) Power Plant to be Tested at 133 MW Net Output to Establish Actual Pollutant Emission Levels

The Department has reviewed the request that you provided on October 3, 1994 (enclosed). We have also considered the Department's legal authority to allow CPLI to conduct the performance tests. Paragraph 403.061(15), Florida Statutes (F.S.), authorizes the Department to consult with any person proposing to construct, install, or otherwise acquire a pollution control device or system concerning the efficacy of such device or system, or the pollution problem which may be related to the source, device, or system. Paragraph 403.061(16), F.S., authorizes the Department to encourage voluntary cooperation by persons in order to achieve the purposes of the state environmental control act. Paragraph 403.061(18), F.S., authorizes the Department to encourage and conduct studies, investigations, and research relating to the causes and control of pollution. Rule 62-210.700(5), Florida Administrative Code (F.A.C.), authorizes the Department to consider variations in industrial equipment and make allowances for excess emissions that provide practical regulatory controls consistent with the public interest.

In accordance with the provisions of Paragraphs 403.061(15), (16), (18), and 403.516(1), F.S., you are hereby authorized to conduct performance tests for pollutant emissions on CPLI's Power Plant while operating at 133 MW (megawatts). The CPLI's Power Plant was permitted under Site Certification, No. PA 82-17 (PSD-FL-090), and was permitted for 100 MW net output to the grid.



The emissions tests are being proposed in order to gather data regarding actual pollutant emissions while firing coal and with only the Power Plant operating at the permitted net output of 100 MW and at a net output 133 MW. Screening to determine whether this change results in a modification or to determine Prevention of Significant Deterioration (PSD) applicability shall be in accordance with Chapter 403, F.S.; Chapters 62-210 thru 62-297 and 62-4, F.A.C.; and, Title 40 Code of Federal Regulations (CFR; July 1, 1993 version), which will compare the actual pollutant emissions of the permitted net output tests of 100 MW to the actual pollutant emissions of the performance tests while operating at 133 MW net output. The performance test results will be reviewed by the Department's Bureau of Air Regulation (BAR) and involved agencies/parties (i.e., Hernando County, U.S. EPA, National Park Service, etc.).

The performance tests shall be subject to the following conditions:

1. A written test result report shall be submitted to these offices within 45 days upon completion of the last test run.
2. The performance tests shall be conducted from October 6 thru 9, 1994, for the 100 MW net output level and October 10 thru 13, 1994, for the 133 MW net output level.
3. Sulfur dioxide, nitrogen oxides, and opacity emissions and stack gas flow rate data shall be recorded using continuous emissions monitors (CEMS) during all tests. If the plant CEMS are used for these tests, these systems shall be quality assured pursuant to 40 CFR 60, Appendix F requirements. The data assessment report from 40 CFR 60, Appendix F, for the most recent relative accuracy test audit (RATA) and most recent cylinder gas audit (CGA), shall be submitted with the test report. In addition, two sets of emission measurements (two sets of three one-hour runs) shall be conducted for the pollutants particulate matter (PM; assume that all of PM is PM10; EPA Method 5), sulfur dioxide (EPA Method 6 or 6C), and nitrogen oxides (EPA Method 7E).
4. Any performance tests shall be conducted using EPA Reference Methods, as contained in 40 CFR 60 (Standards of Performance for New Stationary Sources), or any other method approved by the Department, in writing, in accordance with Rule 62-297.620, F.A.C.

5. Daily records (i.e., heat input, steam production, pressure, temperature, total and net MW outputs, fuel input rates, etc.) of boiler operations during the tests shall be required. Also, daily record keeping of the control equipment parameters shall be required and any alteration of the control equipment operational parameters between the 100 MW and the 133 MW net output tests shall be documented and summarized in the final report.
6. A Type I or II stack audit may be conducted by the Department's Southwest District office.
7. During the tests, no permitted emission limitation shall be exceeded.
8. The authorized performance tests shall not result in the release of objectionable odors pursuant to Rule 62-296.320(2), F.A.C.
9. Performance testing shall immediately cease if operations are not in accordance with the conditions in the air section of Site Certification No. PA 82-17; PSD-FL-090; and, this authorization protocol. Performance testing shall not resume until appropriate measures to correct the problem(s) have been implemented.
10. The performance tests for pollutant emissions shall be conducted under the direct supervision and responsible charge of a professional engineer registered in Florida.
11. This Department action is only to authorize the performance tests described above and in the request letter. Any operation above the 100 MW net output level after the last performance test run or the consecutive 96-hours of CEMS data collection is completed will be deemed a violation of the Site Certification No. PA 82-17; and, PSD-FL-090.
12. The Department's Bureau of Air Regulation and Southwest District shall be notified, in writing, on the date of the last test run completion and the CEMS data collection.
13. The tests shall be conducted at 98-100% of the 100 MW and 133 MW net outputs. Any variation from these levels may invalidate the data for assessment purposes.

Site Certification No. PA 82-17 and PSD-FL-090(A)

October 6, 1994

Page 4

14. Any federally enforceable limitation contained in the permit will have to be addressed as a permitting action in accordance with the appropriate regulations if any of these limitations are to be changed.
15. Enclosures to be incorporated:
  - o Lawrence N. Curtin's October 3, 1994 letter.
  - o Conditions of Approval: PSD-FL-090 Emission Limitations.

This letter amendment must be attached to the federal construction permit, No. PSD-FL-090 (PSD-FL-090A), and shall become a part of the permit.

Sincerely,



Howard L. Rhodes  
Director

Division of Air Resources Management

HLR/rbm

Enclosures

cc: B. Thomas, SWD  
B. Proses, SWD  
H. Oven, PPS  
J. Harper, EPA  
J. Bunyak, NPS  
D. Beason, Esq., DEP  
C. Hetrick, HCBCC  
A. Cleveland, Esq., OHF&C

Conditions of Approval  
PSD-FL-090

The construction and operation of the Florida Crushed Stone Company (FCS) steam electric power plant shall be in accordance with the attached general conditions and all applicable provisions of 40 CFR 52.21. In addition to the foregoing, the permittee shall comply with the following specific conditions of approval:

A. Emission Limitations

1. Stack emissions from the power plant boiler only shall not exceed the following site specific limitations when burning coal:

- a. SO<sub>2</sub> - the lesser of these: 1.2 lb. per million Btu heat input, maximum two-hour average; 0.9 lb. per million Btu heat input, maximum three-hour average; and 915 lb. per hour, maximum three-hour average.
- b. NO<sub>x</sub> - 0.7 lb. per million Btu heat input, averaging time per 40 CFR 60.46.
- c. Particulates - 0.03 lb. per million Btu heat input, averaging time per 40 CFR 60.46.
- d. Visible emissions - 20% opacity, 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

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Consult postmaster for fee.

3. Article Addressed to:

Mr. Tom Mountain  
 Environmental Mgr.  
 Central Power & Lime, Inc.  
 PO Box 1508  
 Brooksville FL 34605-1508

4a. Article Number

Z 751 859 996

4b. Service Type

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5. Signature (Addressee)

6. Signature (Agent)

*Tom Mountain*  
*Tom Mountain*

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

PS Form 3811, December 1991

U.S. GPO: 1992-323-402

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PS Form 3800, March 1993

# OERTEL, HOFFMAN, FERNANDEZ & COLE, P. A.

ATTORNEYS AT LAW

TIMOTHY P. ATKINSON  
M. CHRISTOPHER BRYANT  
R. L. CALEEN, JR.  
C. ANTHONY CLEVELAND  
TERRY COLE  
ROBERT C. DOWNIE, II  
SEGUNDO J. FERNANDEZ  
KENNETH F. HOFFMAN  
KENNETH G. OERTEL  
PATRICIA A. RENOVITCH  
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W. DAVID WATKINS

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NORMAN H. HORTON, JR.  
OF COUNSEL

JOHN H. MILLICAN  
ENVIRONMENTAL CONSULTANT  
(NOT A MEMBER OF THE FLORIDA BAR)

J. P. SUBRAMANI, PH. D., P. E.  
ENVIRONMENTAL CONSULTANT  
(NOT A MEMBER OF THE FLORIDA BAR)

HAND-DELIVERY

October 6, 1994

RECEIVED

OCT 06 1994

Mr. Bruce Mitchell  
Bureau of Air Regulation  
Florida Department of  
Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Bureau of  
Air Regulation

Dear Mr. Mitchell:

With respect to the proposed DEP amendment to Florida Crushed Stone Company's Permit AC27-222095 and PSD-FL-091(E), Florida Crushed Stone has agreed that the following language may be utilized for new Specific Condition No. 20, in place of the language originally proposed for this new condition:

Specific Condition No. 20.: (New)

The federal regulations contained in 40 CFR 761 prohibit the burning of used oil containing greater than or equal to 2 ppm of polychlorinated biphenyls (PCBs) for energy recovery in startup or shutdown conditions. Within thirty days from the date this condition becomes final, the permittee shall conduct a one-time test (EPA 8080) of a representative sample of the on-site generated on-specification used oil to confirm that the used oil being utilized for the purposes identified within this permit does not contain quantifiable levels (> 2ppm) of PCBs.

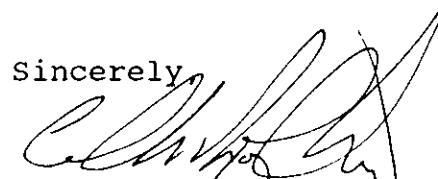
This language appears to appropriate, since, as noted in my correspondence to you dated September 15, 1994, Florida Crushed Stone is restricted to utilizing on-specification used oil as a start-up fuel only. Since both Florida Crushed Stone and Hernando County agree that the above-quoted language may appropriately

Mr. Bruce Mitchell  
October 6, 1994  
2

constitute Specific Condition No. 20, Hernando County is requesting that this language be substituted for the original proposed new condition No. 20. This change will address any concerns Hernando County has regarding the proposed amendment to Florida Crushed Stone's permit.

Thank you for your assistance in this regard. Please do not hesitate to telephone me if you have any questions regarding this matter.

Sincerely,



C. Anthony Cleveland

CAC/dg/1579  
C:\Work1\Mitch5Lt.CAC

xc: Ms. Lizanne Garcia  
Mr. Tom Mountain



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

October 5, 1994

Mr. Lawrence N. Curtin  
Holland and Knight  
P. O. Drawer 810  
Tallahassee, Florida 32302-0810

RE: Central Power & Lime, Inc., Hernando County  
Request for Permit Amendment, PSD-FL-090

Dear Mr. Curtin:

We received your October 3, 1994, request for the above referenced project which included a processing fee of \$250. Since this project was permitted under Power Plant Siting, a fee is not required to amend the PSD permit. You will find your check No. TL 414625 for \$250 enclosed. If you have any further questions, please let me know.

Sincerely,

A handwritten signature in cursive script that reads "Patricia G. Adams".

Patricia G. Adams  
Planner  
Bureau of Air Regulation

/pa

Enclosure

cc: Bruce Mitchell



LAW OFFICES

# HOLLAND & KNIGHT

RECEIVED  
OCT 3 1994

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SPECIAL COUNSEL  
Bureau of  
Air Regulation  
SHAW, LICITRA,  
PARENTE, ESERNIO  
& SCHWARTZ, P.C.  
GARDEN CITY, NY  
NEW YORK, NY

October 3, 1994

**VIA HAND DELIVERY**

Mr. C. H. Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental  
Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: Central Power & Lime, Inc.; Hernando County,  
Florida

Dear Mr. Fancy:

We appreciated the opportunity to meet with you and your staff today, to discuss a test program designed to demonstrate that there will be no increase in regulated emissions (particulate matter, sulfur dioxide and nitrogen oxides) from the Central Power & Lime, Inc. (CPL) power plant as the net generating rate is increased from 100 mega watts to 183 megawatts.

The purpose of this letter is to request approval to operate the power plant at a rate of up to 133 megawatts, net, for a four day period while these tests are conducted and to establish a protocol for the tests. During the test period, no permitted emission limitation (particulate matter, sulfur dioxide or nitrogen oxide) will be exceeded. The tests are scheduled during the period October 6-13, 1994, and, as we discussed, the Florida Crushed Stone cement plant will be taken off line for these tests as both the power plant and cement plant are exhausted through a common stack.

During the period of October 6-9, 1994, the power plant will operate at a nominal rate of 100 megawatts, net. Beginning at approximately 0800 on October 6, and continuing through approximately 2400 on October 9, 1994 (Thursday-Sunday), the sulfur dioxide and nitrogen oxide concentrations of the stack gas and the stack gas flow rate, as monitored by continuous monitors, will be recorded on an hourly basis. These data will be combined to calculate hourly average sulfur dioxide and nitrogen oxides mass emission rates. The opacity of emissions will also be reported hourly from continuous emission monitor records. Additionally, two

Mr. C. H. Fancy, P.E.  
October 3, 1994  
Page 2

sets of emission measurements (two sets of three one-hour tests) will be conducted during the period for particulate matter (EPA Method 5), sulfur dioxide (EPA Method 6) and nitrogen oxides (EPA Method 7E). The emission measurements will be conducted on two separate days, tentatively October 7 and 9, 1994.

During the period October 7-13, 1994, the power plant will operate at a nominal rate of 133 megawatts, net. Sulfur dioxide and nitrogen oxides mass emissions rate (calculated from CEM data as at the 100 megawatt rate) will be reported hourly and the opacity of emissions will be reported hourly. Again, two sets of emission measurements will be conducted for particulate matter, sulfur dioxide and nitrogen oxides. These are tentatively set for October 10 and 11, 1994.

The purpose of the compliance testing is to confirm the data generated by the CEMs even though the monitors for sulfur dioxide, nitrogen oxides and flow have been certified. As we discussed, the data from the CEMs will be most heavily weighted.

The two sets of emission data (100 and 133 megawatts) will be compared by the standard statistical "t" test. The statistical procedure will be as described in 40 C.F.R., Part 60, Appendix C. If the statistical analyses demonstrate there is no increase in particulate matter, sulfur dioxide and nitrogen oxide emissions as the generating rate is increased from 100 to 133 megawatts, the Department will, through the required permitting process, amend the CPL power plant permit to authorize operation at 133 megawatts, net, with or without operation of the cement plant. The heat input rate to the power plant, will be monitored and reported for the test period but will not be a permit condition as the efficiency of the power plant varies with several factors. In other words, there is not a direct relationship between heat input and the net generating rate of the power plant.

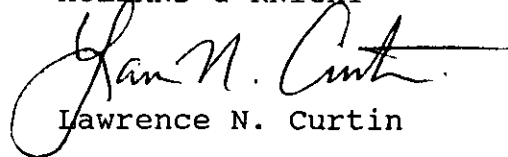
As you requested, in accordance with Department rules, attached is a check in the amount of \$250 for the permit amendment to allow the requested testing.

Mr. C. H. Fancy, P.E.  
October 3, 1994  
Page 3

We certainly appreciate your cooperation in this matter and will keep your office informed of any changes in schedule. Please let us know if anything further is required at this time.

Sincerely,

HOLLAND & KNIGHT

A handwritten signature in cursive script, reading "Lawrence N. Curtin". The signature is written in black ink and is positioned above the printed name.

Lawrence N. Curtin

Enclosure

cc: Mr. Joe Piermatteo  
Mr. Tom Mountain  
Dr. John Koogler

LNC/mrh  
TAL-51034



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

September 8, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Tom Mountain  
Central Power & Lime, Inc.  
P. O. Box 1508  
Brooksville, Florida 34605-1508

Dear Mr. Mountain:

This is in reply to the August 4, 1994, letter from Koogler & Associates regarding a requested modification of permit conditions (PSD-FL-090 and -091 and Site Certification PA 82-17) to increase the net power plant output to 150 MW while eliminating emission limits based on heat input.

After reviewing the information submitted and considering the comments from the Department's Southwest District and Hernando County concerning PSD rule applicability, the Department requires a PSD construction permit application for this request. The reasons are discussed below.

The construction permit specified a 125 MW cogeneration power plant integrated with a 600,000 TPY Portland cement plant to be constructed on the site of an existing aggregate and lime plant. Although the maximum design output was 125 MW, the permitted net power output with the cement plant not operating was 100 MW by virtue of the 1,000 MMBTU/hr boiler heat input limit. Therefore, 100 MW must be considered as the "baseline" permitted output for evaluating PSD applicability for an increase in net power output. This means that actual boiler emissions at 100 MW net output must be compared with the future allowable emissions (no increase in allowables) to determine if a PSD-significant increase will occur.


From the data in Attachment 1, it appears that the power plant may have been operating above the "baseline" permitted net output. Assuming that "net MW delivered" means "before deducting internal consumption and after deducting line loss", if the net power delivered was 142 MW and the line loss was 3.5 MW with 25 MW consumed by the cement plant, then the power exported would be about 120.5 MW, or about 21% above the net output of 100 MW when the cement plant is not operating.

Mr. Tom Mountain  
September 8, 1994  
Page Two

Analysis of data in Attachment 1, 3 and 4, shows that a difference in actual vs. allowable emissions of slightly over 1% for NO<sub>x</sub> and for SO<sub>2</sub> would exceed the PSD-significant level of 40 TPY, while a 7% increase over actual PM/PM<sub>10</sub> emissions would exceed the significant level of 15 TPY. To conclude that a 21% increase in net power output would not carry with it an increase in actual emissions of at least these magnitudes would be unlikely. Viewed another way, if the three SO<sub>2</sub> stack test measurements are averaged and compared with the allowable (691 vs. 770 lbs/hr with the cement plant down) and the difference is then multiplied by the 1993 operating hours, the increase would be  $(770-691)(1/2000)(7353) = 290$  TPY. The actual difference would be higher because the 691 lbs/hr average is based on operation at rates higher than the 100 MW "baseline" rate.

Regarding the issue of whether the increased rate constitutes a change in the method of operation, both the Department's Southwest District and Hernando County pointed out that a change in a federally enforceable permit limit on capacity (i.e., 1,000 MMBTU/hr), which also results in an increase in actual emissions, must be done by way of a construction permit application. The only way that this can be avoided is to revise the allowable emissions downward such that the allowable vs. actual emissions are less than significant, but this would leave very little margin for compliance.

Sincerely,



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

CHF/JB/bjb

cc: W. Thomas, SWD  
B. Owen, DEP  
J. Pennington, DEP  
D. Beason, DEP  
C. Cleveland, OHF&C  
J. Koogler, K&A  
D. Buff, KBN

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:  
 Mr. Tom Mountain  
 Central Power & Lime, Inc.  
 P. O. Box 1508  
 Brooksville, Florida 34605-1508

4a. Article Number  
 P 872 562 700

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

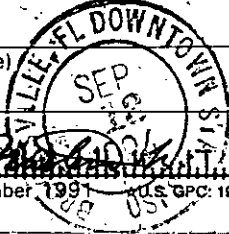
7. Date of Delivery  
 9-13-94

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

5. Signature (Addressee)

6. Signature (Agent)

*[Handwritten Signature]*



PS Form 3811, December 1991 U.S. GPO: 1992-323-402

**DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

P 872 562 700



**Receipt for Certified Mail**

No Insurance Coverage Provided  
 Do not use for International Mail  
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Sent to Mr. Tom Mountain	
Street and No. P. O. Box 1508	
P. O., State and ZIP Code Brooksville, FL 34605-1508	
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 or Date Mailed: 9/8/94	

PS Form 3800, JUNE 1991



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

KA 307-93-12

August 4, 1994

RECEIVED  
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AUG 5 1994  
AUG 1 1994  
Bureau of  
Air Regulation  
Bureau of  
Air Regulation

Mr. John C. Brown, Jr.  
Florida Department of  
Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Subject: Submittal of Additional Information  
Central Power & Lime, Inc.  
Modification of Permit Conditions  
Permit No. PSD-FL-90

Dear Mr. Brown:

This is in response to your letters dated February 25 and July 7, 1994, requesting additional information on the above project. Issues raised in your February letter are addressed first. The responses below will replace/update information submitted to FDEP on June 17, 1994.

Letter of 2/25/94:

1. All changes to the air pollution control system and other equipment must be described in sufficient detail for the Department to confirm that the actual emissions will not increase. Provide schematic drawings showing all physical changes and flow quantities and provide emission calculations for each pollutant.

RESPONSE:

No changes to the air pollution control or other equipment are proposed for this project. The existing equipment is capable of generating up to 150 MW (net delivered) with the currently permitted fuel usage, as indicated by the power plant operation information in Attachment 1. Power generation can be improved by various means, which include increasing the frequency of boiler tube cleaning to maintain high heat transfer efficiency; utilizing, when possible, coal with a greater heating value; maintaining optimum operating conditions on the low and high pressure turbines; and, maintaining tight control on combustion air to the boiler so that less air must be heated to higher temperatures for improved heat recovery. These and other measures have been, and will continue to be implemented to increase the process efficiency.

No schematic drawings are attached as no changes are proposed for any existing equipment or process. No changes to the currently permitted emissions are proposed.

**Letter of 2/25/94:**

2. Provide the maximum hourly heat input requested for delivering the maximum hourly power production called for under the current contract.

RESPONSE:

The current contract, approved by the Public Service Commission (PSC), calls for a maximum of 150 MW, net delivered. The heat input necessary to generate 150 MW, net delivered, can vary significantly depending on the power generating system efficiency and the line loss. The power generating system efficiency is dependent upon factors such as boiler efficiency, cooling water temperature, turbine efficiency, and cement plant operations.

After reviewing the information available in our Site Certification and permit files, we have come to the conclusion that the limitations on heat input were originally incorporated to limit the allowable mass emissions, as most of the emission limits were stated in terms of "lb/MMBtu". As there is no direct correlation between heat input and mass emission rate of the pollutants from the cement/power plant system, Central Power & Lime (CPL) requests that specific conditions with limitations on the heat input (surrogate parameter) be replaced with limitations on maximum allowable mass emission rates (key parameter).

To provide FDEP with reasonable assurance of compliance with the mass emission limits, CPL will operate continuous emission monitors for visible emissions (opacity monitor), sulfur dioxide, nitrogen oxides and stack gas flow. The signals from the CEMs for concentration and the CEM for stack gas flow rate can be combined to determine mass emissions.

**Letter of 2/25/94:**

3. Please address the comments in KBN Engineering's February 25, 1994, letter to Tony Cleveland of Oertel, Hoffman, Fernandez and Cole, who represent Hernando County.

RESPONSE:

KBN requested FDEP to determine if PSD review would be required for the proposed permit modification by evaluating any physical modification to the power plant boiler; change in the method of operation; current federally enforceable limitations; any significant increase in emissions; and, to conduct an ambient air impact analysis for the Class I and II areas.



A PSD review is triggered only if any physical changes or changes in the method of operation result in a significant increase in actual emissions as defined in Rule 17-212, Florida Administrative Code (FAC). This project does not involve any physical changes or changes in the method of operation. Furthermore, the project will not result in any increase in actual emissions, as defined in Rule 17-212.200(2)(b), FAC. Pursuant to this rule, the emission rates permitted under PSD-FL-90 and PA 82-17 are federally enforceable and can be considered as actual emissions by the Department.

As the proposed project will not result in changes in emissions or stack characteristics, an ambient air impacts analysis would simply indicate "no change" in air impacts.

**Letter of 7/7/94:**

1. The actual tons per year of pollutant emissions for the past 5 years.

RESPONSE:

The annual operating hours for the power plant are presented in Attachment 2. Summaries of the emission rates for the past five years are presented in Attachments 3 and 4. The learning curve associated with keeping the power plant complex on-line is evident in Attachment 2. It is also clear that none of the past annual operating hours can be considered representative of normal operations for the power plant. Consequently, the annual power plant emissions in Attachment 4 cannot be considered "representative" for review purposes. A typical power plant is on line at least 90 percent of the time. CPL is working towards that objective through a better understanding of the complex variables involved in the combined cement plant and power plant operation. Based on 1993 operating hours, it should be noted that CPL is within 10 percent of that objective. In this situation, the PSD provision for considering federally enforceable allowable emissions as actual emissions is appropriate.

**Letter of 7/7/94:**

2. The heating value of the coal which was used in the original construction application.

RESPONSE:

In looking through our files, it has not been possible to locate the original construction application which was filed more than a decade ago (possibly in 1979). Also, the information submitted with the original construction application was subject to numerous revisions; some proposed by FCS, others imposed by FDEP or third parties.



Mr. John C. Brown, Jr.  
Florida Department of  
Environmental Protection

August 4, 1994  
Page 4

The coal heating value, however, can be estimated based on the heat input limitation and the coal firing rate. In the modification of PA 82-17 in 1984, which involved the integration of the lime system with the power plant, the conditions were changed to allow input of up to 50 tons per hour (tph) of lime and to allow an increase in the coal input from 50 tph to 62.5 tons per hour (nominal input) with the lime injection in the power plant. Using the value of 50 tph coal to represent the original configuration, and the heat input value of 1,234 MMBtu/hr in the permit, the heat value of coal that would correspond to the original construction application can be estimated at 12,340 Btu/lb.

By comparison, CPL logs of the average heat content of coal received, indicate a value around 12,600 Btu/lb (1991-1993).

**Letter of 7/7/94:**

3. Explanation of the variation of SO<sub>2</sub> limits (PSD permit states 0.9 lbs/MMBtu vs. Site Certification limit of 1.2 lbs/MMBtu).

**RESPONSE:**

As indicated earlier, the information submitted with the original construction application has been subject to numerous revisions. In reviewing some of the permit changes documented in our files, it seems likely that the sulfur dioxide emissions information relating to each revision was not incorporated into both the Conditions of Certification and PSD permit conditions in a consistent manner.

The current sulfur dioxide emission limits for the power plant can be traced through revisions of permit conditions. Initially, FCS proposed a sulfur dioxide emission limit for the power plant of 1.2 pounds per million Btu (lb/MMBtu) at a heat input rate of 1234 MMBtu/hr; or 1480 lbs/hr. To reduce the impact on Chassahowitzka National Wildlife Refuge (a PSD Class I area), FCS agreed to reduce sulfur dioxide emissions from the power plant to 1200 lbs/hr. This revised mass emission rate and the original heat input based emission rate (1.2 lb/MMBtu) were incorporated in the original Condition of Certification (PA 82-17, 1983 - See Attachment 5). Further along in the permitting process, FCS agreed to another reduction in sulfur dioxide emissions. The PSD permit (PSD-FL-90 & 91) issued in March of 1984 (see Attachment 6) reflected this reduction in an emission limit of 0.9 lb/MMBtu and 915 lbs/hr.



While the Conditions of Certification were revised to correspond to the PSD permit at a later time, only the mass emission limits from the PSD permit were incorporated into PA 82-17 leaving the "lb/MMBtu" limit unchanged. It is likely that FDEP did not revise the "lb/MMBtu" sulfur dioxide emission limits in view of the fact that the more stringent mass emission limitation would dictate allowable emissions anyway.

PA 82-17 conditions were revised again in 1986 (see Attachment 7) to incorporate the lime injection system in the power plant. The sulfur dioxide mass emission limit was further reduced to 770 lbs/hr and again the "lb/MMBtu" limit remained unchanged.

It should be noted that during the 1986 modification, the conditions addressing heat input to the power plant remained unchanged despite an increase in allowable coal input rate from 50 tph to 62.5 tph (nominal input). The maximum allowable power plant coal firing rate of 68.8 tph is determined by multiplying the nominal input rate by 10 percent.

**Letter of 7/7/94:**

- 4. Transcripts of the Site Certification Hearing relating to the BACT rationale.**

**RESPONSE:**

The transcript of the proceedings on final approval of the cogeneration facility by the Governor and Cabinet sitting as the Siting Board, that took place on March 6, 1984, is enclosed. As can be seen from a review of the transcript, there was extensive discussion about the limits on sulfur dioxide emissions and the impacts of the construction and operation of the Florida Crushed Stone (FCS) facility on the future prospects of Florida Mining and Materials (FM&M) to construct and operate a similar cogeneration facility. The matter was resolved by inclusion in the final Conditions of Certification of a paragraph that recognized that FM&M may, in the future, request that the FCS emissions be reduced to accommodate a FM&M project. The Governor and Cabinet did not indicate that such a request for a reduction in emissions would either be granted or denied, but included the language only as recognition that such a claim could be made in the future and would be subject to appropriate proof at the time it was made. Of course, FM&M has not proposed a cogeneration facility in the Brooksville area and it is doubtful that the conditions imposed by the Governor and the Cabinet will ever be implemented.

Mr. John C. Brown, Jr.  
Florida Department of  
Environmental Protection

August 4, 1994  
Page 6

The primary issue of concern in the site certification process, after FM&M and Florida Rock Industries intervened was the potential impact of the FCS facility on the Class I area and the effect that the FCS impact would have on future cogeneration projects in the area. This was addressed by a series of negotiations that resulted in reductions in sulfur dioxide emission limitations and the condition described in the attached transcript.

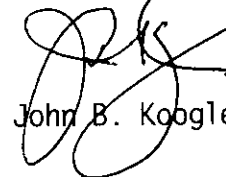
The 100 MW limitation that was proposed through a limitation on the heat input was not directly related to air quality. At the time the facility was certified, it was contemplated that approximately 100 MW would be available for sale when the cogeneration facility, with a nominal 125 MW output, was operating with the cement plant. This was because the ultimate internal FCS consumption was projected to be 25 MW. When the facility was operating without the cement plant, the limitation would enable FCS to deliver approximately the same net output to the power grid. Operating experience has indicated that there is no direct correlation between heat input and the mass emission rate of the pollutants from the cement/power plant system. Therefore, heat input limitations are not necessary for any purpose related to air quality or any other aspect of the cogeneration project. ←

If these responses adequately address the issues raised by you and your staff, it is requested that our compliance demonstration commitments stated in this letter be incorporated into the amended Conditions of Certification and into the amended PSD permit conditions. Suggested wording for the amended conditions is presented in Attachment 8.

If you have any questions, please do not hesitate to call me.

Very truly yours,

KOGLER & ASSOCIATES



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

JBK:PAR:wa

c: Mr. Tom Mountain, CPL  
Mr. Fred Salzmann, CPL  
Mr. Larry Curtin, Holland & Knight



# ATTACHMENT 1

## HIGH LOAD OPERATING DATA

CENTRAL POWER & LIME, INC.  
BROOKSVILLE, FLORIDA

PARAMETER	DATE OF OPERATION		
	1/6/94	6/4/93	5/6/93
NET MW DELIVERED	134	142	136
SULFUR DIOXIDE EMISSIONS	693	704	677
PERMIT LIMIT (lb/hr)	781	781	781
NITROGEN OXIDES EMISSIONS	855	578	502
PERMIT LIMIT (lb/hr)	1205	1205	1205
POWER PLANT COAL USE	58.0	55.3	52.4
PERMIT LIMIT (TPH)	68.8	68.8	68.8
POWER PLANT HEAT INPUT (MMBtu/hr)	1409.4	1406.3	1356.8
CEMENT PLANT COAL USE	8.8	8.3	8.6
PERMIT LIMIT (TPH)	10.3	10.3	10.3
CEMENT PLANT TIRE USE	1.06	0.95	0.80
PERMIT LIMIT (TPH)	1.33	1.33	1.33
LIME PLANT	NOT OPERATING	NOT OPERATING	NOT OPERATING
(Including Shipping/Storage Silos/Screening etc).			

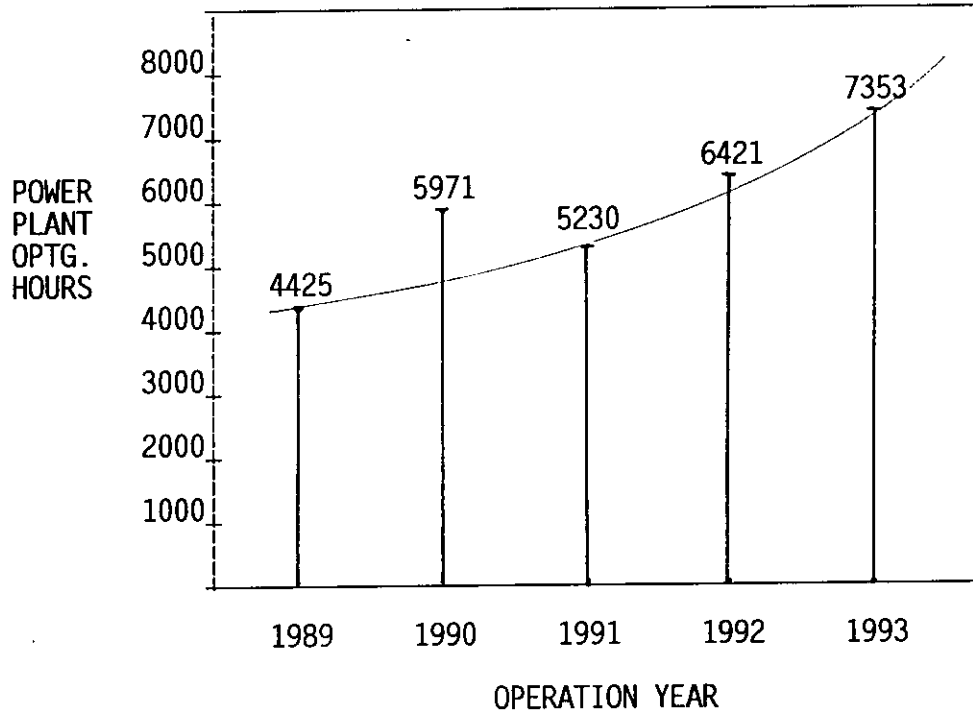
- NOTE: (1) Net delivered MW is determined after taking into account the line loss. Typically the net MW at the plant would be about 3.5 MW higher.
- (2) The maximum allowed coal use for the power plant is determined by multiplying the nominal use of 62.5 tons per hour (TPH) by 10 percent, or 68.8 TPH.
- (3) It should be noted that the above documented operation rate is within 10% of the requested certification limit of 150 MW net delivered.
- (4) Although there is no direct/simple correlation between the coal use, heat input, power generation rate, and emission rates, the demonstration of compliance with emission limits is possible with continuous monitors.



ATTACHMENT 2

POWER PLANT OPERATING HOURS

CENTRAL POWER AND LIME, INC.  
BROOKSVILLE, FLORIDA



NOTES:

- (1) In view of the above information, it can be seen how FCS has increased control over the complex variables involved in keeping the power plant on-line.
- (2) It can be seen that none of the above years' operating hours can be considered representative of normal operations for the power plant (90+ percent on-line).



### ATTACHMENT 3

#### POWER PLANT EMISSIONS DATA

CENTRAL POWER & LIME, INC.  
BROOKSVILLE, FLORIDA

DATE	CEMENT & POWER PLANT STACK EMISSION RATE (lbs/hr) (1)		
	PART. MATTER	SULFUR DIOXIDE	NITROGEN OXIDES
11/22/89	53.4	750.3	296.5
09/18/90	56.8	595.0	(2)
02/28/91	54.5	757.8	969.8
07/28/92	62.7	615.3 (3)	696.0
08/24/93	7.6 (4)	684.0	848.0
01/06/94 (5)	(5)	693.0	855.0
PERMIT LIMIT	86.5	781.0	1205.0

#### NOTES:

- (1) Both the cement plant and power plant exhaust through the same stack.
- (2) NO<sub>x</sub> measurement not conducted.
- (3) SO<sub>2</sub> measurements conducted on 12/08/92.
- (4) This measurement is suspect.
- (5) This entry represents information from Attachment 1. PM measurements have not been conducted yet in 1994.



## ATTACHMENT 4

### ESTIMATED ANNUAL EMISSIONS FOR POWER PLANT

CENTRAL POWER & LIME, INC.  
BROOKSVILLE, FLORIDA

YEAR	ESTIMATED POWER PLANT ANNUAL EMISSION RATE (TPY) (1)		
	PART. MATTER	SULFUR DIOXIDE	NITROGEN OXIDES
1989	118.1	1660.0	656.0
1990	169.6	1776.4	(2)
1991	142.5	1981.6	2536.0
1992	201.3	1975.4	2234.5
1993	27.9 (3)	2514.7	3117.7
1994 (4)	(5)	3035.3	3744.9

#### NOTES:

- (1) Based on emission measurements presented in Attachment 2.
- (2) NOx measurement not conducted.
- (3) The emission measurement is suspect.
- (4) This entry represents information from Attachment 1, and allowable annual operating hours of 8760.
- (5) PM measurements have not been conducted yet in 1994.





**ATTACHMENT 5**

CONDITIONS OF CERTIFICATION  
FOR POWER PLANT  
SULFUR DIOXIDE EMISSION LIMITS  
PA 82-17, 1983

CENTRAL POWER & LIME, INC.  
BROOKSVILLE, FLORIDA



State of Florida Department of Environmental Regulation  
Florida Crushed Stone Company  
Case No. PA 82-17

CONDITIONS OF CERTIFICATION

I. Air

The construction and operation of the Florida Crushed Stone Company (FCS) steam electric power plant site shall be in accordance with all applicable provisions of Chapters 17-2, 17-5 and 17-7, Florida Administrative Code (FAC). In addition to the foregoing, the permittee shall comply with the following specific conditions of certification:

A. Emission Limitations

1. Stack emissions from the power plant boiler only shall not exceed the following site specific limitations when burning coal:

- a. SO<sub>2</sub> - 1.2 lb. per million Btu heat input, maximum daily average, and 1,200 lb. per hour, maximum three-hour average.
- b. NO<sub>x</sub> - 0.7 lb. per million Btu heat input, averaging time per Rule 17-2.700, FAC.
- c. Particulates - 0.1 lb. per million Btu heat input, averaging time per Rule 17-2.700, FAC.
- d. Visible emissions - 20% opacity, 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

2. Stack emissions from the combined cement plant and power plant boiler shall not exceed the following site specific limits:

- a. SO<sub>2</sub> - 1.2 lb. per million Btu heat input, maximum daily average, and 1,250 lb. per hour, maximum three-hour average.
- b. NO<sub>x</sub> - 0.7 lb. per million Btu heat input plus 2.9 lb. per ton of kiln feed (dry basis), averaging time per Rule 17-2.700, FAC.

**ATTACHMENT 6**

PSD PERMIT CONDITIONS  
FOR POWER PLANT  
SULFUR DIOXIDE EMISSION LIMITS  
PSD-FL-90 & 91, 1984

CENTRAL POWER & LIME, INC.  
BROOKSVILLE, FLORIDA



PART I

Specific Conditions

The construction and operation of the Florida Crushed Stone Company (FCS) steam electric power plant and cement plant shall be in accordance with the attached general conditions and all applicable provisions of 40 CFR 52.21. In addition to the foregoing, the permittee shall comply with the following specific conditions of approval:

A. Emission Limitations

1. Stack emissions from the power plant boiler only shall not exceed the following site specific limitations when burning coal:
  - a. SO<sub>2</sub> - 0.9 lb. per million Btu heat input, maximum three-hour average (not to exceed 915 lb. per hour, maximum three-hour average).
  - b. NO<sub>x</sub> - 0.7 lb. per million Btu heat input, averaging time per 40 CFR 60.46.
  - c. Particulates - 0.03 lb. per million Btu heat input, averaging time per 40 CFR 60.46.
  - d. Visible emissions - 20% opacity, 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.
2. Stack emissions from the combined cement plant and power plant boiler shall not exceed the following site specific limits:
  - a. SO<sub>2</sub> - 50 lb. per hour plus 0.74 lb. per million Btu boiler heat input, maximum three-hour average (not to exceed 965 lb/hr maximum three-hour average).
  - b. NO<sub>x</sub> - 0.7 lb. per million Btu heat input plus 2.9 lb. per ton of kiln feed (dry basis), averaging time per 40 CFR 60.46.
  - 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.

**ATTACHMENT 7**

MODIFIED CONDITIONS OF CERTIFICATION  
FOR POWER PLANT  
SULFUR DIOXIDE EMISSION LIMITS  
PA 82-17, 1986

CENTRAL POWER & LIME, INC.  
BROOKSVILLE, FLORIDA



a. Condition I.A. shall be changed to read:

A. Emission Limitations

1. Stack emissions from the power plant boiler only or power boiler and lime plant shall not exceed the following site specific limitations when burning coal:

- a. SO<sub>2</sub> - 1.2 lb. per million Btu heat input, maximum two-hour average, and ~~915~~ 770 lb. per hour, maximum three-hour average.
- b. NO<sub>x</sub> - 0.7 lb. per million Btu heat input, averaging time per Rule 17-2.700, FAC, not to exceed 846 lb/hr.
- c. Particulates - 0.03 lb. per million Btu heat input, averaging time per Rule 17-2.700, FAC.
- d. Visible emissions - 20% opacity, 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

2. Stack emission from the combined cement plant, lime plant and power plant boiler shall not exceed the following site specific limitations:

- a. SO<sub>2</sub> - 1.2 lb. per million Btu heat input, maximum two-hour average, and ~~965~~ 781 lb. per hour, maximum three-hour average.
- b. NO<sub>x</sub> - 0.7 lb. per million Btu heat input plus 2.9 lb. per ton of kiln feed (dry basis), averaging time per Rule 17-2.700, FAC, not to exceed 1205 lb/hr.

b. Condition I.A.5. shall be changed to read:

5. Particulate emissions from bag filter exhausts from the coal and fly ash handling systems (excluding those facilities covered by Condition I.A.4.c. above) shall be limited to 0.02 gr/acf. Emissions from lime and limestone handling and storage handling facilities shall not exceed 0.015 gr/acf. A visible

ATTACHMENT 8

SUGGESTED WORDING FOR POWER PLANT  
CONDITIONS OF CERTIFICATION (PA 82-17)  
AND PSD-FL-90 & 91

ITEM 1 - Replace conditions I.A.1.a., I.A.1.b., I.A.1.c., I.A.2.a., I.A.2.b., I.A.2.c. in both PA 82-17 and PSD-FL-90 & 91 with the following:

I.A. Emission Limitations

I.A.1. The stack emissions shall not exceed the following:

Pollutant	Emission Limitation (lb/hr, 3-hr avg)	
	Power & Lime Plants	Power & Lime & Cement Plants
Sulfur Dioxide	770	781
Nitrogen Oxides	846	1205
Particulate Matter	37	86

ITEM 2 - Replace condition I.A.3. in PA 82-17 and parallel condition I.G.1 in PSD-FL-090 & 091 with the following:

The power plant is permitted for a net delivered power production rate of 150 MW.

ITEM 3 - Replace condition I.B.1. in PA 82-17 and parallel condition I.C.1 in PSD-FL-90 & 91 with the following:

A flue gas oxygen meter shall be installed for the unit to continuously monitor a representative sample of the boiler flue gas. The oxygen monitor shall be used with automatic feedback or manual controls to continuously maintain air/fuel ratio parameters at an optimum. Performance tests shall be conducted and operating procedures established. The document "Use of Flue Gas Oxygen Meter as BACT for Combustion Controls" may be used as a guide. The permittee shall install and operate continuous monitoring devices for stack exhaust for sulfur dioxide, nitrogen oxides, gas flow rate and opacity to demonstrate compliance with the mass emission limits and the visible emission limits in Conditions I.A.1 and I.A.2. The monitoring devices shall meet the applicable requirements of Rule 17-297.500, FAC, and 40 CFR 60.45 and 40 CFR 60.13 including certification of each device. The Department shall be provided 30 days notice on each certification.



ITEM 4 - Replace I.C.1. in PA 82-17 and parallel condition I.B.1 in PSD-FL-90 & 91 with the following:

Within 60 calendar days after achieving the maximum capacity at which each unit will be operated (but no later than 180 operating days after initial startup) and annually thereafter, the permittee shall conduct performance tests for particulate matter, SO<sub>2</sub>, NO<sub>x</sub>, and visible emissions while operating at 90-100% of the maximum allowable net deliverable power production rate and shall conduct visible emission tests on all coal handling and flyash baghouses. The Department shall be furnished a written report of the results of such performance tests within 45 days of completion of the tests. The performance tests will be conducted in accordance with the provisions of 40 CFR 60.46.







# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

July 7, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

John B. Koogler, Ph.D., P.E.  
Koogler & Associates  
4014 N.W. Thirteenth Street  
Gainesville, Florida 32609

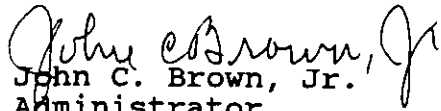
Dear Dr. Koogler:

This is pursuant to the meeting held on June 30, 1994, regarding Florida Crushed Stone. It is requested that Florida Crushed Stone provide all additional information requested in our 2/25/94 letter and discussed in the above meeting. This would include the following specific requirements:

1. The actual tons per year of pollutant emissions for the past 5 years.
2. The heating value of the coal which was used in the original construction application.
3. Explanation of the variation of SO<sub>2</sub> limits (PSD permit states 0.9 lbs/MMBtu vs. Site Certification limit of 1.2 lbs/MMBtu).
4. Transcripts of the Site Certification Hearing relating to the BACT rationale.

If you have any questions, please call John Reynolds at (904) 488-1344 or myself.

Sincerely,

  
John C. Brown, Jr.  
Administrator  
Permitting and Standards

JCB/JR/bjb

cc: W. Thomas, SWD  
B. Oven, DEP  
R. Donelan, DEP  
J. Harper, EPA  
J. Bunyak, NPS  
T. Cleveland, OHF&C  
C. Hetrick, Hernando County

Is your RETURN ADDRESS completed on the reverse side?

<b>SENDER:</b> • 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. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: John B. Koogler, Ph.D., P.E. Koogler & Associates 4014 N.W. Thirteenth Street Gainesville, Florida 32609		4a. Article Number P 872 562 696	
		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <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 7/11/94	
5. Signature (Addressee) <i>John B. Koogler</i>		8. Addressee's Address (Only if requested and fee is paid)	
6. Signature (Agent)			

Thank you for using Return Receipt Service.

PS Form 3811, December, 1991 \*U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

P 872 562 696



**Receipt for Certified Mail**  
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 (See Reverse)

Sent to		John B. Koogler
Street and No.		4014 N.W. Thirteenth St.
P.O., State and ZIP Code		Gainesville, FL 32609
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 or Date		Mailed: 7/7/94

PS Form 3800, JUNE 1991



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

*Modification  
Actual to Allowable:*

KA 307-93-12

June 17, 1994

Mr. John C. Brown, Jr.  
Florida Department of  
Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Subject: Submittal of Additional Information  
Florida Crushed Stone Company  
Modification of Permit Conditions  
Permit No. PSD-FL-90

Dear Mr. Brown:

This is in response to your letter dated February 25, 1994, requesting additional information on the above project.

1. All changes to the air pollution control system and other equipment must be described in sufficient detail for the Department to confirm that the actual emissions will not increase. Provide schematic drawings showing all physical changes and flow quantities and provide emission calculations for each pollutant.

RESPONSE:

No changes to the air pollution control or other equipment are proposed for this project. The existing equipment is capable of generating up to 150 MW (net delivered) with the currently permitted fuel usage, as indicated by the power plant operation information in Table 1 (attached). Power generation can be improved by various means which include increasing the frequency of boiler tube cleaning to maintain high heat transfer efficiency; utilizing, when possible, coal with a greater heating value; maintaining optimum operating conditions on the low and high pressure turbines; and, maintaining tight control on combustion air to the boiler so that less air can be heated to higher temperatures for improved heat recovery.

No schematic drawings are attached as no changes are proposed for any existing equipment or process. No changes to the currently permitted emissions are proposed.

2. Provide the maximum hourly heat input requested for delivering the maximum hourly power production called for under the current contract.

RESPONSE:

The current contract, approved by the Public Service Commission (PSC), calls for a maximum of 150 MW, net delivered. The heat input necessary to generate 150 MW, net delivered, can vary significantly depending on the system efficiency. The system efficiency, in turn varies with factors such as boiler efficiency, cooling water temperature, turbine efficiency, and cement plant operations. Accordingly, for the purposes of this project, specific conditions with limitation on the heat input should be replaced with limitations on maximum allowable mass emission rates (existing limits) and the maximum power generation rate (150 MW, net delivered). The amount of power generated is continuously monitored and so are visible emissions (opacity monitor) and mass emissions of sulfur dioxide, and nitrogen oxides (combining the signals from the CEMs for concentration and flow rate).

3. Please address the comments in KBN Engineering's February 25, 1994, letter to Tony Cleveland of Oertel, Hoffman, Fernandez and Cole, who represent Hernando County.

RESPONSE:

KBN requested FDEP to determine if PSD review would be required for the proposed permit modification by evaluating any physical modification to the power plant boiler; change in the method of operation; current federally enforceable limitations; any significant increase in emissions; and, to conduct an ambient air impact analysis for the Class I and II areas.

A PSD review is triggered only if any physical changes or changes in the method of operation result in a significant increase in actual emissions, as defined in Rule 17-212, Florida Administrative Code (FAC). This project does not involve any physical changes or changes in the method of operation. Furthermore, the project will not result in any increase in actual emissions, as defined in Rule 17-212, Florida Administrative Code (FAC). In this case, the emission rates permitted under PSD-FL-90 and PA 82-17 are federally enforceable and are considered actual emissions, in accordance with Rule 17-212, FAC.

As the proposed project will not result in changes in emissions or stack characteristics, an ambient air impacts analysis would simply indicate "no change" in air impacts.



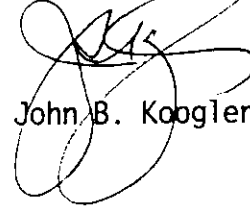
Mr. John C. Brown, Jr.  
Florida Department of  
Environmental Protection

June 17, 1994  
Page 3

If you have any questions, please do not hesitate to call me.

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK:PAR:wa

c: Mr. Tom Mountain, FCS  
Mr. Fred Salzmann, FCS  
Mr. Larry Curtin, Holland & Knight



Provide  
1. Actual Annual Emissions

TABLE 1

HIGH LOAD OPERATING DATA  
CENTRAL POWER AND LIME, INC.  
BROOKSVILLE, FLORIDA

PARAMETER	DATE OF OPERATION		
	1/6/94	6/4/93	5/6/93
NET MW DELIVERED	134	142	136
SULFUR DIOXIDE EMISSIONS PERMIT LIMIT (lb/hr)	693 781	704 781	677 781
NITROGEN OXIDES EMISSIONS PERMIT LIMIT (lb/hr)	855 1205	578 1205	502 1205
POWER PLANT COAL USE PERMIT LIMIT (TPH)	58.0 68.8	55.3 68.8	52.4 68.8
POWER PLANT HEAT INPUT (MMBtu/hr)	1409.4	1406.3	1356.8
CEMENT PLANT COAL USE PERMIT LIMIT (TPH)	8.8 10.3	8.3 10.3	8.6 10.3
CEMENT PLANT TIRE USE PERMIT LIMIT (TPH)	1.06 1.33	0.95 1.33	0.80 1.33
LIME PLANT	NOT OPERATING	NOT OPERATING	NOT OPERATING

- NOTE: (1) Net delivered MW is determined after taking into account the line loss. Typically the net MW at the plant would be about 3.5 MW higher.
- (2) The maximum allowed coal use for the power plant is determined by multiplying the nominal use of 62.5 tons per hour (TPH) by 10 percent, or 68.8 TPH.
- (3) It should be noted that the above documented operation rate is within 10% of the requested certification limit of 150 MW net delivered.
- (4) Although there is no direct/simple correlation between the coal use, heat input, power generation rate, and emission rates, the demonstration of compliance with permit limits is possible with continuous monitors.





# Florida Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

February 25, 1994

## CERTIFIED MAIL-RETURN RECEIPT REQUESTED

John B. Koogler, Ph.D., P.E.  
Koogler & Associates  
4014 N.W. Thirteenth Street  
Gainesville, Florida 32609

Dear Dr. Koogler:


Additional information will be required to evaluate the permit modification requested in your letter dated January 25, 1994 (Central Power and Lime - formerly Florida Crushed Stone Company, PSD-FL-090). Proposed changes to the permit include increasing boiler heat input when the cement plant is down, providing for physical and operational changes to the pollution control equipment and modifying operating rates during compliance testing. Equipment must be described in sufficient detail for the Department to confirm that the actual emissions will not increase. Provide schematic drawings showing all physical changes and flow quantities and provide emission calculations for each pollutant.

1. All changes to the air pollution control system and other equipment must be described in sufficient detail for the Department to confirm that the actual emissions will not increase. Provide schematic drawings showing all physical changes and flow quantities and provide emission calculations for each pollutant.
2. Provide the maximum hourly heat input requested for delivering the maximum hourly power production called for under the current contract.
3. Please address the comments in KBN Engineering's February 25, 1994, letter to Tony Cleveland of Oertel Hoffman, Fernandez and Cole, who represent Hernando County.

John B. Koogler, Ph.D., P.E.  
February 25, 1994  
Page 2 of 2

If there are questions on the above, please contact John Reynolds  
at 904/488-1344.

Sincerely,

  
John C. Brown, Jr., P.E.  
Administrator  
Permitting and Standards

JCB/JR/pa

cc: W. Thomas, SWD  
B. Oven, DEP  
R. Donelan, DEP  
J. Harper, EPA  
J. Bunyak, NPS  
T. Cleveland, OHF&C  
C. Hetrick, Hernando County



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- 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.

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1.  Addressee's Address

2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
John B. Koogler, Ph.D., P.E.  
Koogler & Associates  
4014 N.W. 13th Street  
Gainesville, FL 32609

4a. Article Number  
P 872 562 609

4b. Service Type

Registered  Insured

Certified  COD

Express Mail  Return Receipt for Merchandise

5. Signature (Addressee)

6. Signature (Agent)  
*Shawn Bryant*

7. Date of Delivery  
*2/28/94*

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

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PS Form 3811, December 1991 \*U.S. GPO: 1992-323-402

**DOMESTIC RETURN RECEIPT**

P 872 562 609



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Sent to John B. Koogler, K&A	
Street and No. 4014 NW 13th Street	
P.O., State and ZIP Code Gainesville, FL 32609	
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 or Date Mailed: 2-25-94 Permit: PSD-FL-090	

PS Form 3800, JUNE 1991

OERTEL, HOFFMAN, FERNANDEZ & COLE, P. A.

ATTORNEYS AT LAW

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R. L. CALEEN, JR.  
C. ANTHONY CLEVELAND  
TERRY COLE  
ROBERT C. DOWNIE, II  
SEGUNDO J. FERNANDEZ  
KENNETH F. HOFFMAN  
KENNETH G. OERTEL  
PATRICIA A. RENOVITCH  
SCOTT SHIRLEY  
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TALLAHASSEE, FLORIDA 32301

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TALLAHASSEE, FLORIDA 32314-6507

TELEPHONE (904) 877-0099  
FACSIMILE (904) 877-0981

NORMAN H. HORTON, JR.  
OF COUNSEL

JOHN H. MILLICAN  
ENVIRONMENTAL CONSULTANT  
(NOT A MEMBER OF THE FLORIDA BAR)

J. P. SUBRAMANI, PH. D., P. E.  
ENVIRONMENTAL CONSULTANT  
(NOT A MEMBER OF THE FLORIDA BAR)

February 25, 1994

HAND DELIVERY

Clair H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Florida Department of Environmental Regulation  
111 South Magnolia Avenue  
Tallahassee, FL 32301

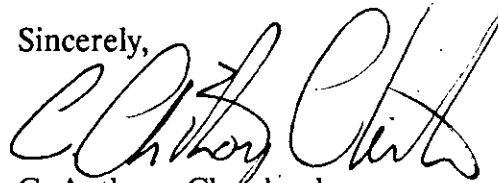
Re: Florida Crushed Stone Request for Modifications

Dear Clair:

Enclosed please find comments by Hernando County's consultants regarding the above-referenced matter. Hernando County requests that these comments be included in the Department's request for additional information being directed to Florida Crushed Stone.

Please call me if you have any questions in this matter.

Sincerely,



C. Anthony Cleveland

CAC:cjb/

Enclosure



February 25, 1994

Mr. Tony Cleveland  
Oertel, Hoffman, Fernandez and Cole, P.A.  
2700 Blair Stone Road, Suite C  
Tallahassee, FL 32301

RE: Review of Florida Crushed Stone (FCS) Request For Modification

Dear Mr. Cleveland:

I have reviewed the materials sent by fax to me this morning regarding the FCS proposal to modify their site certification conditions and PSD permit. Based upon my review, I have the following questions and comments which the FDEP may consider in their incompleteness letter to FCS:

1. FDEP PSD rules define a modification as "any physical change in, change in the method of operation of, or addition to a stationary source or facility which increases the actual emissions of any air pollutant regulated under...". An increase in the production rate is excluded from this definition unless the change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975. Therefore, information should be requested to factually determine if:
  - a. There are any physical modifications to the source (power plant boiler) to achieve the requested increase in power production rate.
  - b. The requested changes would constitute a "change in the method of operation" of the facility (it appears this may be the case).
  - c. The change is for a change in the "production rate" of the facility (i.e., 1,000 MMBtu/hr), which is prohibited under a federally enforceable permit condition (i.e., PSD permit).
  - d. If either a., b. or c. above are affirmative, it must be determined if there is an increase in actual emissions of any regulated pollutant. Existing actual emissions are defined as the actual average emissions from the last two years of operation. These must be compared to the requested future maximum emissions. If the increase in any pollutant is significant, then PSD review would be required.

13076A1/11

KBN ENGINEERING AND APPLIED SCIENCES, INC.

1034 Newmans Ferry Road  
Jacksonville, Florida 32209  
904/381-5800  
FAX 904/274-4100

1400 West Lake Street, Suite 210  
Tampa, Florida 33607  
813/251-1717 FAX 813/251-1717

1400 Old Moore Road, Suite 205  
Boca Raton, Florida 33487  
407/992-9100  
FAX 407/994-9300

6921 Southport Drive North,  
Suite 218  
Jacksonville, Florida 32218  
904/296-8800 FAX 904/296-0145

One Church Street, Suite 801  
Rockville, Maryland 20850  
301/738-1100  
FAX 301-738-1105

Mr. Tony Cleveland  
February 25, 1994  
Page 2



2. The original air quality impact analysis for this facility was performed in the early 1980's. Since that time, the air dispersion models have changed significantly, meteorological data bases have changed, and the inventory of other sources has changed significantly. FCS is now requesting changes in their operation, which may affect emissions and/or stack parameters. Due to these developments, and the proximity and sensitivity of the Chassahowitzka Class I area, the FDEP should consider requesting an updated air dispersion modeling analysis.

Please call if you have any questions concerning this matter.

Sincerely,

David A. Buff, P.E.  
Principal Engineer

cc: Larry Jennings



# Florida Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

February 17, 1994

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

Dear Ms. Harper:

RE: Florida Crushed Stone Company  
Power Boiler Modification: PSD-FL-090A  
Hernando County

The Department has received the above referenced site certification modification request package. The Department's Bureau of Air Regulation (Bureau) will be processing the request as an amendment (PSD-FL-090A) to the original PSD project (PSD-FL-090). As additional data is received, we will forward it to you for review. We will notify you as to the due date for comments once the Bureau has received some requested information regarding the proposed project.

If you have any questions, please contact John Reynolds or Cleve Holladay at (904)488-1344 or write to me at the above address. The Bureau's FAX number is (904)922-6979.

Sincerely,

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

CHF/pa

Enclosure

cc: B. Thomas, SWD  
J. Koogler, Ph.D., P.E., K&A  
J. Reynolds, DEP  
B. Oven, DEP  
D. Beason, Esq., DEP



# Florida Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

February 17, 1994

Mr. John Bunyak, Chief  
Policy, Planning and Permit Review Branch  
National Park Service-Air Quality Division  
P. O. Box 25287  
Denver, CO 80225

Dear Mr. Bunyak:

RE: Florida Crushed Stone Company  
Power Boiler Modification: PSD-FL-090A  
Hernando County

The Department has received the above referenced site certification modification request package. The Department's Bureau of Air Regulation (Bureau) will be processing the request as an amendment (PSD-FL-090A) to the original PSD project (PSD-FL-090). As additional data is received, such as modelling and supplemental information, we will forward it to you for review. We will notify you as to the due date for comments once the Bureau has received some requested information regarding the proposed project.

If you have any questions, please contact John Reynolds or Cleve Holladay at (904)488-1344 or write to me at the above address. The Bureau's FAX number is (904)922-6979.

Sincerely,

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

CHF/pa

Enclosure

cc: B. Thomas, SWD  
J. Koogler, Ph.D., P.E., K&A  
J. Reynolds, DEP  
B. Oven, DEP  
D. Beason, Esq., DEP



# Florida Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

February 17, 1994

Mr. Bill Thomas  
District Air Permitting Administrator  
DEP Southwest District  
3804 Cocanut Palm Drive  
Tampa, FL 33619-8218

Dear Mr. Thomas:

RE: Florida Crushed Stone Company  
Power Boiler Modification: PSD-FL-090A  
Hernando County

The Department has received the above referenced site certification modification request package. The Department's Bureau of Air Regulation (Bureau) will be processing the request as an amendment (PSD-FL-090A) to the original PSD project (PSD-FL-090). As additional data is received, such as modelling and supplemental information, we will forward it to you for review. We will notify you as to the due date for comments once the Bureau has received some requested information regarding the proposed project.

If there are any questions, please contact John Reynolds or Cleve Holladay at (904)488-1344 or write to me at the above address. The Bureau's FAX number is (904)922-6979.

Sincerely,

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

CHF/pa

Enclosure

cc: J. Koogler, Ph.D, P.E., K&A  
J. Reynolds, DEP  
B. Oven, DEP  
D. Beason, Esq., DEP



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

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

Virginia B. Wetherell  
Secretary

February 17, 1994

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

Dear Mr. Hetrick:

RE: Florida Crushed Stone Company  
Power Boiler Modification: PSD-FL-090A  
Hernando County

The Department has received the above referenced site certification modification request package. The Department's Bureau of Air Regulation (Bureau) will be processing the request as an amendment (PSD-FL-090A) to the original PSD project (PSD-FL-090). As additional data is received, such as modelling and supplemental information, we will forward it to you for review. We will notify you as to the due date for comments once the Bureau has received some requested information regarding the proposed project.

If there are any questions, please contact John Reynolds or Cleve Holladay at (904)488-1344 or write to me at the above address. The Bureau's FAX number is (904)922-6979.

Sincerely,

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

CHF/pa

Enclosure

cc: B. Thomas, SWD  
J. Koogler, Ph.D, P.E., K&A  
J. Reynolds, DEP  
B. Oven, DEP  
D. Beason, Esq., DEP





KOOGLER & ASSOCIATES  
ENVIRONMENTAL SERVICES  
4014 NW THIRTEENTH STREET  
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January 25, 1994

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Bureau of  
Air Regulation

Mr. C. H. Fancy  
Mr. Hamilton S. Oven  
Florida Department of  
Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: Request for Modification of  
Permit Conditions  
Florida Crushed Stone Company  
Hernando County, Florida  
File No. PA 82-17 and PSD-FL-90

Gentlemen:

This letter is to follow-up the meeting that Larry Curtin and I had with Mr. Fancy on November 29, 1993, regarding the generating capacity of the Florida Crushed Stone Company (now operating as Central Power and Lime - CPL) power plant. To allow CPL to fully satisfy the terms of their electric power sales contract (See Attachment 1), it is requested that the following Conditions of Certification in PA 82-17, and Specific Conditions in PSD-FL-90, be modified as follows:

1. Modify Condition of Certification No. I.A.3, in PA 82-17, and the identical Specific Condition No. G.1, in PSD-FL-90, as follows (see Attachment 2 for background information):

FROM: 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: The power plant boiler is permitted for the following net delivered power production in accordance with the following schedule:

<u>Maximum Allowable Net Delivered Power Production Rate</u>	<u>Effective Date</u>
110 MW	Present
121 MW	1/1/94
133 MW	1/1/95
146 MW	1/1/96
150 MW	1/1/97

Note that the proposed condition eliminates the necessity to reduce the electric power generating capacity when the cement plant is not operating. See Attachment 2 for background information. Also, as the increased generating rates will be achieved with no increase in emissions, the existing emission limits (for particulate matter, SO<sub>2</sub> and NO<sub>x</sub>) stated in terms of heat input rate, become meaningless and have been deleted from the proposed permit condition.

2. Modify Condition of Certification No. I.C.1, in PA 82-17, and the parallel Specific Condition No. B.1 in PSD-FL-90, as follows:

FROM: Within 60 calendar days after achieving the maximum capacity at which each unit will be operated (but no later than 180 operating days after initial startup) and annually thereafter, the permittee shall conduct performance tests for particulates, SO<sub>2</sub>, NO<sub>x</sub>, and visible emissions during normal operations near ( $\pm 3\%$ ) 1,234 million Btu per hour heat input when the power plant and cement plant are operating in combination, and 1,000 million Btu per hour when the power plant is operating alone, and visible emission tests on all coal handling and flyash baghouses. The Department shall be furnished a written report of the results of such performance tests within 45 days of completion of the tests. The performance tests will be conducted in accordance with the provisions of 40 CFR 60.46.

TO: Within 60 calendar days after achieving the maximum capacity at which the power plant will be operated (but no later than 180 operating days after initial startup at the maximum allowable capacity) and annually thereafter, the permittee shall conduct performance tests for particulate matter, SO<sub>2</sub>, NO<sub>x</sub>, and visible emissions while operating at 90-100% of the maximum allowable net deliverable power production rate and shall conduct visible emission tests on all coal handling and flyash baghouses. The Department shall be furnished a written report of the results of such performance tests within 45 days of completion of the tests. The performance tests will be conducted in accordance with the provisions of 40 CFR 60.46.



It is anticipated that FDEP will grant the modification to the specific conditions concerning the power plant operation given the following facts:

A. No Increase in Hours of Operation

The power plant is currently permitted to operate at all times (8760 hours per year); either with or without the cement plant operating. No increase to these operating hours is being requested.

B. No Increase in Allowable Emissions

No increase in the allowable emissions from the power plant are being requested. Emissions will be maintained within the permitted emission limits by increasing lime injection and improving process operations, as necessary.

C. No Increase in Allowable Air Quality Impacts

The emissions and the impacts on air quality from the operation of the power plant boiler by itself are less than the facility maximums which result from the simultaneous operation of the power plant boiler and the cement plant (as evaluated in the original project review). As a result, the requested modification (to allow the power plant to operate above 1000 MMBTU per hour heat input when the cement plant is not operating) will result in lower impacts than those allowed when the two plants are operating together.

D. Consistency with PSC Approval

The requested modification will allow consistency of permitted power production rates with the Public Service Commission approved power sales contract (copy of the PSC correspondence is presented in Attachment 1).

E. Operating Flexibility

The requested modification will enable unhindered operation of the power plant and the cement plant regardless of the any individual plant ownership changes.



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F. Rule Applicability

As the requested change will result in no physical changes to the facility, no increase in the hours of operation, and no increase in allowable emissions or air quality impacts, no source modification is involved (as defined in Chapter 17-210, Florida Administrative Code), and no modification review is required.

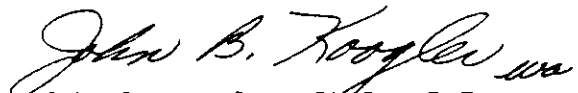
Copies of the existing Conditions of Certification for PA 82-17 and Specific Conditions of Permit PSD-FL-090 are presented in Attachments 3 and 4, respectively.

It is anticipated that the fee for the permit modification will be \$250.00 (a Minor Modification). Once this is confirmed, a check will be forwarded.

If you have questions, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:PAR:wa  
Enc.

c: Mr. Fred Salzmann, FCS, Brooksville  
Mr. Tom Mountain, FCS, Brooksville  
Mr. Larry Curtin, Holland & Knight

