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July 10, 2009

BUREAU OF AIR REGULATION

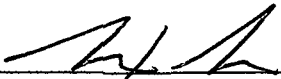
Mr. Jeffery Koerner
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Response to RAI dated April 2, 2009
CAIR Electric Generating Unit, Central Power and Lime, Inc.
Submission of Air Construction Permit Application
Project No. 0530021-019-AC

Dear Mr. Koerner:

Enclosed is the response to your letter requesting additional information dated April 2, 2009 for the subject project at Central Power and Lime (CPL). I appreciate your allowance for additional time to respond by July 10, 2009. The information is provided in the format of the itemized requested information of your letter. In accordance with Rule 62-4.050(3), I have sealed this letter with enclosure as certification by a professional engineer. Enclosed please find four (4) copies of this RAI response. If you have any questions concerning the application, please call me at (352) 377-5822 or mlee@kooglerassociates.com.

Sincerely,



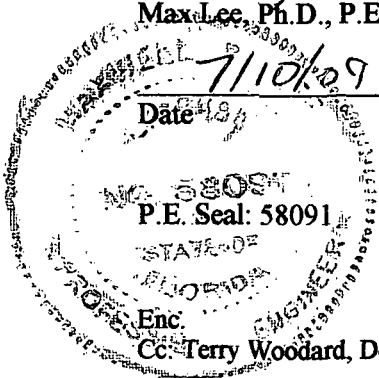
Max Lee, Ph.D., P.E.

Date

P.E. Seal: 58091

Enc.

CC: Terry Woodard, Designated Rep., CPL



1. Please estimate the emissions increases expected from the new burner installation. Compare the projected actual emissions to baseline actual emissions as defined in Rules 62-210.200, 62-210.370, and 62-212.300, F.A.C. Baseline actual emissions must be calculated following the hierarchy and methods in Rule 62-210.370, F.A.C. Will the predicted increases exceed the significant emissions rate and subject the project to Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality?

Answer: The CPL boiler emissions are monitored and recorded for NO_x, SO₂, flow rate, and CO₂ per 40 CFR part 75 requirements. These monitors were installed in the last two years and are operated for compliance to the Clean Air Interstate Rule (CAIR).

The proposed project impacts NO_x and CO emissions. Given NO_x emissions are decreased, the impact of the project on CO emissions is analyzed. Current air permits for CPL do not include a limitation of CO emissions. The permits do not require continuous monitoring or periodic testing of CO. Annual operating report data of CO emissions provided to FDEP have been calculated based on AP-42 emission factors. As such, the CO emissions have been calculated based on AP-42 emission factors in Attachment A.

2. Provide the manufacturer's guaranteed nitrogen oxides (NO_x) and carbon monoxide (CO) emissions for coal firing.

Answer: The manufacturer and installer of the low-NO_x burner retrofit system, Babcock Power, Inc., provided an estimated level of NO_x control of 0.30 lb NO_x/mmbtu and no estimate of CO emissions. As this installation is a retrofit of an older boiler system, the manufacturer did not provide a guarantee.

3. Submit corrected emissions unit pollutant detail information forms for each PSD pollutant. The completed forms must include baseline actual emissions, projected actual emissions, the baseline 24-month period and the projected monitoring period.

Answer: Attachment A provides a netting analysis.

ATTACHMENT A

PSD Determination – Carbon Monoxide

TABLE 1 - BASELINE ACTUAL EMISSIONS
 CENTRAL POWER AND LIME, INC. - BROOKSVILLE POWER PLANT

YEAR	Actual coal usage Rate	Actual Hours of Operation	AP-42 factor Tbl 1.1-3 (1)	Baseline Actual Emission Rate (2) CO
	tpy	hrs	lb/ton coal	tpy
2004	322730	5980		
2005	281571	5127		
2006	368553	6790	0.5	92.1
2007	359674	6573	0.5	89.9
2008	358036	6804		
Baseline 2-yr period	2006-7	2006-7		2006-7
2-yr avg.	364114	6681		91.0

Notes:

- (1) AP-42, Table 1.1-3, dry bottom, wall-fired bitum., pre-NSPS (boiler determined pre-NSPS, see 0530021-011-AV, SC. I.41) CO emission factor 0.5 lb/ton coal
- (2) 2006-2007 2-year (24-month) period selected for CO baseline actual emissions (defined per 62-210.200(34), F.A.C.)

TABLE 2 - NETTING ANALYSIS, CARBON MONOXIDE EMISSIONS
 CENTRAL POWER AND LIME, INC. - BROOKSVILLE POWER PLANT

EMISSIONS DESCRIPTION	CO tpy
Baseline Actual Emissions (2-yr avg., 2006-7) (1)	91.0
Projected Actual Emissions (2)	91.0
Exclusion for Demand Growth (10% of baseline actual)	9.1
Five Year Period Future Actual Emissions (baseline + 10% growth)	100.1
Maximum Emissions (3)	155.8
Net Emissions Increase	0.00
PSD Significant Level	100
PSD Review Required?	NO

NOTES:

- (1) 2006-2007 2-year (24-month) period selected for CO baseline actual emissions (defined per 62-210.200(34), F.A.C.)
- (2) No change in operation capacity expected. Project Actual Emissions (defined per 62-210.200(215), F.A.C.) will remain unchanged.
 AP-42, Table 1.1-3, dry bottom, wall-fired bitum., pre-NSPS with low-NOx burners, CO emission factor 0.5 lb/ton coal.
- (3) based on maximum allowed coal usage for 1850 mmbtu/hr output = 71.2 tons coal/hr or 623307 ton coal/yr (based on 26 mmbtu/ton coal and 8760 hr/yr)