



# Florida Department of Environmental Protection

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

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

July 29, 2009

*Electronic Mail – Received Receipt Requested*

Terry Woodard, Power Plant Manager  
Central Power and Lime, Inc.  
10311 Cement Plant Road  
Brooksville, Florida 34601

Re: **Request for Additional Information**  
Project No. 0530021-023-AC  
Central Power and Lime Power Plant  
Request to Co-fire Wood Pellets with Coal in the Power Plant Boiler

Dear Mr. Woodard:

On June 30, 2009, we received your application and sufficient fee for an air construction permit to do a trial burn of wood pellets to be co-fired with coal in the power plant boiler (Unit 18) at the Central Power and Lime power plant. The facility is located in Hernando County at 10311 Cement Plant Road in Brooksville, Florida. The application indicates that the project is subject to general preconstruction review pursuant to rule 62-212.300 of the Florida Administrative Code (F.A.C.). Based on our review of the application, the project may also be subject to preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality for particulate matter emissions less than 10 microns (PM<sub>10</sub>) pursuant to Rule 62-212.400 F.A.C. The application is incomplete. In order to continue processing your application, please provide the additional information requested below. Should your response to any of the requested items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. In your application, you stated that a study to determine system performance when co-firing pelletized wood material would be finished at the end of July, 2009. If this study is complete, please provide the results of this study. The application is based upon general information on wood combustion and is not specific to pelletized wood.
2. According to the information provided, if particulate matter emissions less than 10 microns (PM<sub>10</sub>) are identical to particulate matter (PM) emissions, the project will be subject to PSD review and all of its requirements for PM<sub>10</sub>, since the PM emissions are projected to be greater than the PSD applicability rate of 15 tons per year. Please provide PM<sub>10</sub> information to show whether the facility is subject to PSD. In addition, the carbon monoxide (CO) emissions are very near the 100 ton per year PSD significance threshold. Please provide the active Excel spreadsheets showing all calculations in the proposed trial burn tables in Attachment 2. The values in the trial burn tables appear to be based on four periods of trial burns instead of five as mentioned in the Air Construction Description in Attachment 03. Please clarify the discrepancy.
3. Provide justification for the proposed trial burn of six months. Identify operational data that will be collected to determine feasibility of co-firing wood pellets with coal.
4. Provide nitrogen oxides (NO<sub>x</sub>) and sulfur dioxide (SO<sub>2</sub>) continuous emissions monitoring (CEMS) data for the past five years to establish baseline data for emissions due to coal firing. In addition, provide any

## REQUEST FOR ADDITIONAL INFORMATION

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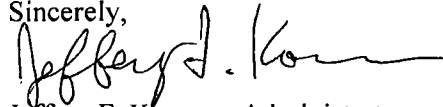
available test information for volatile organic compounds (VOC), PM<sub>10</sub> and CO emissions from the power plant boiler to establish baseline emissions for these pollutants.

5. NO<sub>x</sub> and SO<sub>2</sub> emissions are continuously monitored for the coal-fired boiler. The Department will likely require stack tests for PM (at highest expected pellet firing rate) and CO (at low, medium and high pellet firing rates). The Department will also require CO and PM tests for coal firing to determine baseline levels. Please comment.

The above information is requested pursuant to the following F.A.C. regulations: Rule 62-4.050 (Procedures to Obtain Permits and Other Authorizations; Applications); 62-4.055 (Permit Processing); 62-4.070 (Standards for Issuing or Denying Permits; Issuance; Denial); 62-4.120 (Construction Permits); 62-204.800 (Federal Regulations Adopted by Reference); 62-212.300 (Permits Required); 62-210.370 (Emissions Computations and Reporting); 62-210.900 (Forms and Instructions); 62-212.300 (General Preconstruction Review); and 62-212.400 (Prevention of Significant Deterioration). All applications for a Department permit must be certified by a professional engineer registered in the State of Florida pursuant to Rule 62-4.050(3), F.A.C. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official.

We will resume processing your application after receipt of the requested information. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or to provide a written request for an additional period of time to submit the information. If you have any questions regarding this matter, please contact the project engineer, Cleve Holladay, at 850/921-8986.

Sincerely,



Jeffery F. Koerner, Administrator  
New Source Review Section

This letter was sent to the following people by electronic mail with received receipt requested.

Mr. Terry Woodard: [wwoodard@deltapowerservices.com](mailto:wwoodard@deltapowerservices.com)  
Mr. Max Lee, Koogler and Associates: [MLee@kooglerassociates.com](mailto:MLee@kooglerassociates.com)  
Ms. Mara Nasca, DEP SWD: [mara.nasca@dep.state.fl.us](mailto:mara.nasca@dep.state.fl.us)  
Mr. Mike Halpin, DEP Siting Office: [mike.halpin@dep.state.fl.us](mailto:mike.halpin@dep.state.fl.us)  
Administrator, Hernando County: [CountyAdministrator@hernandocounty.us](mailto:CountyAdministrator@hernandocounty.us)  
Ms. Kathleen Forney, EPA Region 4: [forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov)  
Ms Heather Abrams, EPA Region 4: [abrams.heather@epa.gov](mailto:abrams.heather@epa.gov)  
Ms. Vickie Gibson, DEP BAR Reading File: [victoria.gibson@dep.state.fl.us](mailto:victoria.gibson@dep.state.fl.us)

JFK/cgh

## Livingston, Sylvia

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**From:** Livingston, Sylvia  
**Sent:** Wednesday, July 29, 2009 4:17 PM  
**To:** 'wwoodard@deltapowerservices.com'  
**Cc:** 'mlee@kooglerassociates.com'; Nasca, Mara; Halpin, Mike;  
'CountyAdministrator@hernandocounty.us'; 'forney.kathleen@epa.gov';  
'abrams.heather@epa.gov'; Gibson, Victoria; Zhang-Torres; Koerner, Jeff; Walker, Elizabeth  
(AIR); Holladay, Cleve  
**Subject:** RAI - 0530021-023-AC (Central Power & Lime Power Plant)  
**Attachments:** RAI 0530021-023-AC.pdf

Dear Sir/Madam:

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

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

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

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

Thank you,

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

Tracking:

## Livingston, Sylvia

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**From:** Woodard, Willis T [WWoodard@deltapowerservices.com]  
**Sent:** Tuesday, August 04, 2009 2:24 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: RAI - 0530021-023-AC (Central Power & Lime Power Plant)

I can view the documents.

Thanks

Terry Woodard  
[wwoodard@deltapowerservices.com](mailto:wwoodard@deltapowerservices.com)  
Power Plant Manager  
DPS Florida  
352-799-7881  
Fax 352-799-3508

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**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Wednesday, July 29, 2009 4:17 PM  
**To:** Woodard, Willis T  
**Cc:** mlee@kooglerassociates.com; Nasca, Mara; Halpin, Mike; CountyAdministrator@hernandocounty.us; forney.kathleen@epa.gov; abrams.heather@epa.gov; Gibson, Victoria; Zhang-Torres; Koerner, Jeff; Walker, Elizabeth (AIR); Holladay, Cleve  
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Thank you,

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

## Livingston, Sylvia

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**From:** Max Lee [mlee@kooglerassociates.com]  
**Sent:** Friday, July 31, 2009 5:17 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: RAI - 0530021-023-AC (Central Power & Lime Power Plant)

Sylvia,  
received.

thank you

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**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Wednesday, July 29, 2009 4:17 PM  
**To:** wwoodard@deltapowerservices.com  
**Cc:** mlee@kooglerassociates.com; Nasca, Mara; Halpin, Mike; CountyAdministrator@hernandocounty.us; forney.kathleen@epa.gov; abrams.heather@epa.gov; Gibson, Victoria; Zhang-Torres; Koerner, Jeff; Walker, Elizabeth (AIR); Holladay, Cleve  
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Thank you,

Sylvia Livingston  
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Division of Air Resource Management (DARM)  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

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