



308-04-01
308-07-03
April 30, 2008

CENTRAL POWER & LIME, INC.

Russell Wider
DEP Bureau of Air Regulation
MS 5505
2600 Blair Stone Rd
Tallahassee, FL 32399-2400

RECEIVED

MAY 02 2008

BUREAU OF AIR REGULATION

SUBJECT: Application for TV revision to incorporate CAIR and SO2 Opt-In Programs

Dear Mr. Wider

Project No. : 0530021-013-AV

Enclosed are 4 copies of an application that request to incorporate CAIR and SO2 Opt-In programs to the Central Power and Lime boiler (EU 018) of facility 0530021 located in Brooksville, Florida. The Title V revision includes attachments of the CAIR and Acid Rain Applications

Please contact Max Lee at (352) 377 5822 or mlee@kooglerassociates.com if you have any questions.

Sincerely,

Terry Woodard, DPS Florida LLC

Cc: Max Lee, Koogler & Associates, Inc.

Enc:



Department of Environmental Protection

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MAY 02 2008

Division of Air Resource Management

BUREAU OF AIR REGULATION

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: DPC Florida LLC/Rinker Materials of Florida/Florida	
2. Site Name: Brooksville Plant	
3. Facility Identification Number: 0530021	
4. Facility Location... Street Address or Other Locator: 10311 Cement Plant Road City: Brooksville County: Hernando Zip Code: 34605	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Max Lee	
2. Application Contact Mailing Address... Organization/Firm: Koogler & Associates, Inc. Street Address: 4014 NW 13 th Street City: Gainesville State: Florida Zip Code: 32609	
3. Application Contact Telephone Numbers... Telephone: (352) 377 5822 ext. Fax: (352) 377 -7158	
4. Application Contact E-mail Address: mlee@kooglerassociates.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	3. PSD Number (if applicable):
2. Project Number(s):	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

This application is to incorporate CAIR and SO₂ Opt-In applicability to the power plant boiler, EU 018. Note the EPA-CAMD identifies the boiler as unit 1, not EU018.

TV revision is submitted per 62-213.420(1)(a)4.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
018	Power Plant Boiler	TV revision AVMM ?	NA

Application Processing Fee

Check one: Attached - Amount: \$_____ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

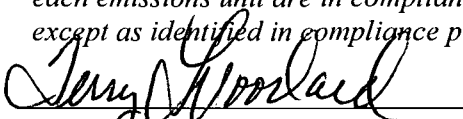
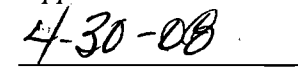
Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers... Telephone: (352) 799 -7881 ext. Fax: (352) 799 -6088
4. Owner/Authorized Representative E-mail Address:
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i> _____ Signature _____ Date

APPLICATION INFORMATION

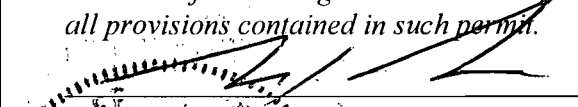
Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Terry Woodard
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.
3. Application Responsible Official Mailing Address... Organization/Firm: DPS Florida LLC Street Address: 10311 Cement Plant Road City: Brooksville State: FL Zip Code: 34605
4. Application Responsible Official Telephone Numbers... Telephone: (352) 799-7881 ext. Fax: (352) 799-6088
5. Application Responsible Official E-mail Address: twoodard@deltapowerservices.com
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature  Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Max Lee Registration Number: 58091
2. Professional Engineer Mailing Address... Organization/Firm: Koogler & Associates, Inc. Street Address: 40140 NW 13 th St City: Gainesville State: FL Zip Code: 32609
3. Professional Engineer Telephone Numbers... Telephone: (352) 377 - 5822 ext. Fax: (352) 377 -7158
4. Professional Engineer E-mail Address: <u>mlee@kooglerassociates.com</u>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature _____ Date <u>4/29/08</u> (seal)

* Attach any exception to certification statement.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone 17 East (km) 360.00 North (km) 3162.50		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) 28/35/00 Longitude (DD/MM/SS) 82/25/53	
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 32/49	6. Facility SIC(s): 3241/4911
7. Facility Comment :			

Facility Contact

1. Facility Contact Name: Larry Roberts, DPS Florida LLC
2. Facility Contact Mailing Address... Organization/Firm: DPS Florida LLC Street Address: 10311 Cement Plant Road City: Brooksville State: FL Zip Code: 34605
3. Facility Contact Telephone Numbers: Telephone: (352) 799-7881 ext. Fax: (352) 799-6088
4. Facility Contact E-mail Address: lroberts@deltapowerservices.com

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name: Jim Daniel, Cement Plant Manager
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Rinker Materials of Florida, Inc. / Florida Crushed Stone Company Street Address: 10311 Cement Plant Road City: Brooksville State: FL Zip Code: 34605
3. Facility Primary Responsible Official Telephone Numbers... Telephone: (352) 799 -7881 ext. Fax: (352) 799 -6088
4. Facility Primary Responsible Official E-mail Address: jdaniel@cemexusa.com

FACILITY INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1.	<input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2.	<input type="checkbox"/> Synthetic Non-Title V Source	
3.	<input checked="" type="checkbox"/> Title V Source	
4.	<input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5.	<input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6.	<input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7.	<input type="checkbox"/> Synthetic Minor Source of HAPs	
8.	<input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9.	<input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10.	<input checked="" type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11.	<input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12.	<p>Facility Regulatory Classifications Comment:</p> <p>The Brooksville Cement and Power Plants are subject to 40 CFR 60, Subpart F: Standards of Performance for Portland Cement Plants (superceded by 40 CFR 63, Subpart LLL); 40 CFR 60, Subpart Y: Standards of Performance for Coal Preparation Plants; and 40 CFR 63, Subpart LLL: National Emission Standards for Hazardous Air Pollutants from the Portland Cement Industry.</p> <p>This permit revision is submitted per 62-213.420(1)(a)4 to incorporate CAIR and SO2 Opt-In per 62-214.320(1)(h).</p> <p>Note: The list of facility pollutants includes cement operations. Pollutants addressed in this permit for the boilers are NOx, SO2 and opacity.</p>	

FACILITY INFORMATION

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
PM	A	N
PM ₁₀	A	N
SO ₂	A	N
NO _x	A	N
CO	A	N
Hazardous Air Pollutants (HAPs)	A	N
DIOX	B	N
H114	B	N
SAM	B	N
FL	B	N
PM	A	N
PM ₁₀	A	N
SO ₂	A	N

FACILITY INFORMATION

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility-Wide Cap [Y or N]? (all units)	3. Emissions Unit ID's Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

EU 018: NOx and SO2 caps to be determined through CAIR and SO2 Opt-In programs.

FACILITY INFORMATION

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>011-AV app.</u>
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: Att. 1 _____ <input type="checkbox"/> Previously Submitted, Date: _____
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>011-AV App.</u>

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input type="checkbox"/> Attached, Document ID: _____
3. Rule Applicability Analysis: <input type="checkbox"/> Attached, Document ID: _____
4. List of Exempt Emissions Units: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

FACILITY INFORMATION

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for FESOP Applications

- | |
|---|
| 1. List of Exempt Emissions Units:
<input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (no exempt units at facility) |
|---|

Additional Requirements for Title V Air Operation Permit Applications

- | |
|--|
| 1. List of Insignificant Activities: (Required for initial/renewal applications only)
<input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (revision application) |
| 2. Identification of Applicable Requirements: (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought)
<input type="checkbox"/> Attached, Document ID: _____
<input type="checkbox"/> Not Applicable (revision application with no change in applicable requirements) |
| 3. Compliance Report and Plan: (Required for all initial/revision/renewal applications)
<input type="checkbox"/> Attached, Document ID: _____
Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing. |
| 4. List of Equipment/Activities Regulated under Title VI: (If applicable, required for initial/renewal applications only)
<input type="checkbox"/> Attached, Document ID: _____
<input type="checkbox"/> Equipment/Activities Onsite but Not Required to be Individually Listed
<input type="checkbox"/> Not Applicable |
| 5. Verification of Risk Management Plan Submission to EPA: (If applicable, required for initial/renewal applications only)
<input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable |
| 6. Requested Changes to Current Title V Air Operation Permit:
<input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable |

FACILITY INFORMATION

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Facilities Subject to Acid Rain, CAIR, or Hg Budget Program

1. Acid Rain Program Forms:

Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)):

Attached, Document ID: Att. 2 Previously Submitted, Date: _____

Not Applicable (not an Acid Rain source)

Phase II NO_x Averaging Plan (DEP Form No. 62-210.900(1)(a)1.):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable

New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable

2. CAIR Part (DEP Form No. 62-210.900(1)(b)):

Attached, Document ID: Att 3 _____ Previously Submitted, Date: _____

Not Applicable (not a CAIR source)

3. Hg Budget Part (DEP Form No. 62-210.900(1)(c)):

Attached, Document ID: NA? _____ Previously Submitted, Date: _____

Not Applicable (not a Hg Budget unit)

Additional Requirements Comment

EMISSIONS UNIT INFORMATION

Section [1] of [1]

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [1] of [1]

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)
- The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
- The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)
- This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
- This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
- This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section: Power Plant Boiler

3. Emissions Unit Identification Number: 018

4. Emissions Unit Status Code: A	5. Commence Construction Date:	6. Initial Startup Date: 6/29/1988	7. Emissions Unit Major Group SIC Code: 4911
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8. Federal Program Applicability: (Check all that apply)
- Acid Rain Unit (SO2 Opt-In under review by EPA and through this permitting)
- CAIR Unit
- Hg Budget Unit (rule vacated, thus application for CAMR not submitted)

9. Package Unit:
Manufacturer: _____ Model Number: _____

10. Generator Nameplate Rating: MW 150 (net delivered)

11. Emissions Unit Comment: Current AV limitations of power plant NOx and SO2 emissions should be adjusted such that the CEM system emissions will determine compliance via CAIR and SO2 Opt-In/Acid Rain. Note: SO2 opt-in credits will roll into CAIR SO2 program in 1/1/2010.

EMISSIONS UNIT INFORMATION

Section [1] of [1]

Emissions Unit Control Equipment/Method: Control 1_ of _2

- | |
|---|
| 1. Control Equipment/Method Description:
041 – Dry Limestone Injection Scrubbing |
| 2. Control Device or Method Code: 041 |

Emissions Unit Control Equipment/Method: Control 2_ of 2_

- | |
|--|
| 1. Control Equipment/Method Description:
016 – Baghouse |
| 2. Control Device or Method Code: 016 |

Emissions Unit Control Equipment/Method: Control ___ of ___

- | |
|--|
| 1. Control Equipment/Method Description: |
| 2. Control Device or Method Code: |

Emissions Unit Control Equipment/Method: Control ___ of ___

- | |
|--|
| 1. Control Equipment/Method Description: |
| 2. Control Device or Method Code: |

EMISSIONS UNIT INFORMATION

Section [1] of [1]

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:
2. Maximum Production Rate:
3. Maximum Heat Input Rate: million Btu/hr 1850
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: 24 hours/day 7 days/week 52 weeks/year 8760 hours/year
6. Operating Capacity/Schedule Comment: *The maximum heat input rate of the Power Plant Boiler, with or without the Cement Kiln I operating, is the maximum necessary to produce 150 MW (net delivered) of power or 1,850 MMBtu/hr as a 3-hour average

EMISSIONS UNIT INFORMATION

Section [1] of [1]

C. EMISSION POINT (STACK/VENT) INFORMATION**(Optional for unregulated emissions units.)****Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram: Power Plant		2. Emission Point Type Code: 2	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: CAIR /SO2 Opt-In CEM monitoring location is prior to cement plant exhaust combining with power plant. Att 1 provides location details.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: EU 020 – Cement Kiln I, In-Line Kiln/Raw Mill and Clinker Cooler I (note the CEM for the power plant samples prior to combining of exhaust gases). Main stack exhausts both plants.			
5. Discharge Type Code: V	6. Stack Height: 320 Feet	7. Exit Diameter: 16 feet	
8. Exit Temperature: 300 °F	9. Actual Volumetric Flow Rate: 840,000acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment:			

EMISSIONS UNIT INFORMATION

Section [1] of [1]

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type): External Combustion Boilers; Electric Generation; Bituminous/Subbituminous Coal; Pulverized Coal: Dry Bottom (bituminous coal)		
2. Source Classification Code (SCC): 1-01-002-02		3. SCC Units: Tons Burned
4. Maximum Hourly Rate: 72	5. Maximum Annual Rate: 630,720	6. Estimated Annual Activity Factor:
7. Maximum Typical % Sulfur: 0.7	8. Maximum Typical % Ash: 7.9	9. Million Btu per SCC Unit: 26
10. Segment Comment: Maximum hourly rate based on the maximum heat input rate of 1,850 MMBtu/hr and a coal heating value of 12,850 Btu/lb. Typical percent sulfur, typical percent ash, and MMBtu/ton are based on average values from actual coal analysis data for the last 4 years. The annual rate is based on the hourly rate and 8,760 hr/yr.		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type): External Combustion Boilers; Electric Generation; Distillate Oil; Grades 1 and 2 Oil		
2. Source Classification Code (SCC): 1-01-005-01		3. SCC Units: 1,000 Gallons Burned
4. Maximum Hourly Rate: 13.2	5. Maximum Annual Rate: 115,632	6. Estimated Annual Activity Factor:
7. Maximum Typical % Sulfur: 0.2 – 1.0	8. Maximum % Ash:	9. Million Btu per SCC Unit: 140
10. Segment Comment: Maximum hourly rate is based on the maximum heat input rate of 1,850 MMBtu/hr and a No. 2 fuel oil heating value of 140,000 Btu/gal. Typical percent sulfur and MMBtu/1,000 gallons are based on AP-42 Appendix A.		

EMISSIONS UNIT INFORMATION

Section [1] of [1]

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	016		EL
PM₁₀	016		EL
SO₂	041		EL
NO_x	∥		EL
FL	∥		EL
SAM	∥		EL

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**
 (Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: SO₂		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 2,220 lb/hour 3,372.6 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 1.2 lb/MMBtu (2-hr average) Reference: Permit No. 0530021-011-AV		7. Emissions Method Code: 0	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: 2-Hour Average: 1.2 lb/MMBtu x 1,850 MMBtu/hr = 2,220 lb/hr Annual: 770 lb/hr (3-hour average) x 8,760 hr/yr x 1 ton/2,000 lb = 3,372.6 TPY			
11. Potential, Fugitive, and Actual Emissions Comment:			

EMISSIONS UNIT INFORMATION

Section [1] of [1]

POLLUTANT DETAIL INFORMATION

Page [1] of [1]

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: NO_x		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 846 lb/hour 3,705.5 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 846 lb/hr Reference: Permit No. 0530021-011-AV		7. Emissions Method Code: 0	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: 846 lb/hr x 8,760 hr/yr x 1 ton/2,000 lb = 3,705.5 TPY			
11. Potential, Fugitive, and Actual Emissions Comment:			

EMISSIONS UNIT INFORMATION

Section [1] of [1]

POLLUTANT DETAIL INFORMATION

Page [1] of [2]

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS****Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.****Allowable Emissions** Allowable Emissions 1_ of 2__

1. Basis for Allowable Emissions Code: SO2	2. Future Effective Date of Allowable Emissions: *
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance: Part 75 CEM	
6. Allowable Emissions Comment (Description of Operating Method): * SO2 Opt-in emissions credits to be determined. CAIR SO2 program credits to begin 1/1/2010.	

Allowable Emissions Allowable Emissions __2 of 2__

1. Basis for Allowable Emissions Code: NOx	2. Future Effective Date of Allowable Emissions: 1/1/2009
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour * tons/year
5. Method of Compliance: Part 75 CEM	
6. Allowable Emissions Comment (Description of Operating Method): *NOx credits 702 annual tpy and 321 tons per ozone season.	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

Section [1] of [1]

G. VISIBLE EMISSIONS INFORMATION**Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.****Visible Emissions Limitation:** Visible Emissions Limitation 1 of 2

1. Visible Emissions Subtype: VE10	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 10% Exceptional Conditions: 17% Maximum Period of Excess Opacity Allowed: 6 min/hour	
4. Method of Compliance: EPA Method 9 test annually.	
5. Visible Emissions Comment: Based on Permit No. 0530021-007-AV. VE testing is required on the main stack: 1) during normal operation when the Power Plant and Cement Plant I are operating in combination, and 2) at or near 1,850 MMBtu/hr heat input when the Power Plant is operating alone. Applies to coal firing.	

Visible Emissions Limitation: Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 20% Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: EPA Method 9 test annually.	
5. Visible Emissions Comment: Based on Permit No. 0530021-007-AV. Applies to No. 2 fuel oil firing.	

EMISSIONS UNIT INFORMATION

Section [1] of [1]

H. CONTINUOUS MONITOR INFORMATION**Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.****Continuous Monitoring System:** Continuous Monitor **1** of **9**

1. Parameter Code: Fuel	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
4. Monitor Information... Manufacturer: Merrick Model Number: 2480 Serial Number: 18034	
5. Installation Date: 1988 (upgrade in 1996)	6. Performance Specification Test Date: 3/31/05
7. Continuous Monitor Comment: Coal feeder weigh belt A that measures the amounts of coal used in the boiler.	

Continuous Monitoring System: Continuous Monitor **2** of **9**

1. Parameter Code: Fuel	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
4. Monitor Information... Manufacturer: Merrick Model Number: 2480 Serial Number: 18033	
5. Installation Date: 1988 (upgrade in 1996)	6. Performance Specification Test Date: 3/31/05
7. Continuous Monitor Comment: Coal feeder weigh belt B that measures the amounts of coal used in the boiler.	

EMISSIONS UNIT INFORMATION

Section [1] of [1]

Power Plant Boiler

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor **3** of **9**

1. Parameter Code: Fuel	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
4. Monitor Information... Manufacturer: Merrick Model Number: 2480 Serial Number: 18032	
5. Installation Date: 1988 (upgrade in 1996)	6. Performance Specification Test Date: 3/31/05
7. Continuous Monitor Comment: Coal feeder weigh belt C that measures the amounts of coal used in the boiler.	

Continuous Monitoring System: Continuous Monitor **4** of **9**

1. Parameter Code: Fuel	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
4. Monitor Information... Manufacturer: Merrick Model Number: 2480 Serial Number: 18035	
5. Installation Date: 1988 (upgrade in 1996)	6. Performance Specification Test Date: 3/31/05
7. Continuous Monitor Comment: Coal feeder weigh belt D that measures the amounts of coal used in the boiler.	

EMISSIONS UNIT INFORMATION

Section [1] of 1]

Power Plant Boiler

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor 5 of 9

1. Parameter Code: EM	2. Pollutant(s): SO₂
3. CMS Requirement:	<input checked="" type="checkbox"/> Rule Other
4. Monitor Information... Manufacturer: ThermoElectron Model Number: 43I Serial Number: 0734726457	
5. Installation Date: 2/20/2008	6. Performance Specification Test Date: 2/21/2008
7. Continuous Monitor Comment: Measures SO₂ emissions prior in the ductwork of the power plant. See monitoring plan (Acid Rain Application for SO2 Opt-In, Att. B). Installed to meet requirements of SO2 Opt-In and CAIR.	

Continuous Monitoring System: Continuous Monitor 6 of 9

1. Parameter Code: VE	2. Pollutant(s):
3. CMS Requirement:	<input checked="" type="checkbox"/> Rule Other
4. Monitor Information... Manufacturer: Lear Siegler Model Number: RM-4200 Serial Number: 15305715	
5. Installation Date: 1986	6. Performance Specification Test Date: 4/7/05
7. Continuous Monitor Comment: Measures VE from the main stack exhaust to demonstrate compliance with the VE limit. This opacity monitor will be used to satisfy opacity monitoring for Acid Rain SO2-Opt-In requirements of the power plant.	

EMISSIONS UNIT INFORMATION

Section [1] of [1]

Power Plant Boiler

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)**Complete if this emissions unit is or would be subject to continuous monitoring.****Continuous Monitoring System:** Continuous Monitor 7 of 10

1. Parameter Code: O₂	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
4. Monitor Information... Manufacturer: Yokogawa Model Number: ZA8C Serial Number: JJ113QA336	
5. Installation Date: 1986 (upgraded in 2002)	6. Performance Specification Test Date: 4/7/05
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor 8 of 10

1. Parameter Code: EM	2. Pollutant(s): NOx
3. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Thermoelectron Model Number: 410 I Number: 733025819	
5. Installation Date: 12/17/2007	6. Performance Specification Test Date: 12/27/2007
7. Continuous Monitor Comment: Installation to meet requirements of CAIR. See Monitoring Plan for details.	

EMISSIONS UNIT INFORMATION

Section [1] of [1]

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <u>Att 1.</u> <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>011-AV</u>
3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>011-AV</u>
4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>011-AV</u> <input type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>011-AV</u> <input type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>3/29/2008</u> Test Date(s)/Pollutant(s) Tested: <u>RATAs NOx – 12/27/2007, SO2-2/21/2008</u> <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [1] of [1]

I. EMISSIONS UNIT ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rules 62-212.400(4)(d) and 62-212.500(4)(f), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities: (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements: <input checked="" type="checkbox"/> Attached, Document ID: Att. A and B__
2. Compliance Assurance Monitoring: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
3. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

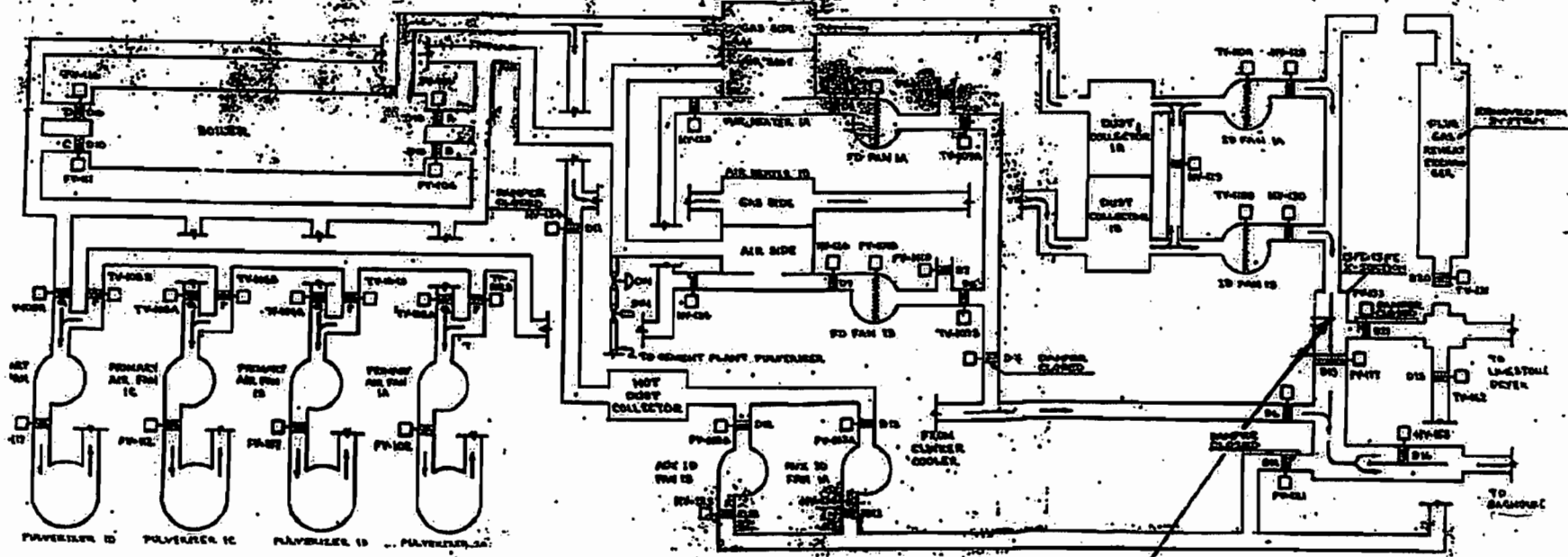
Additional Requirements Comment

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Attachment 1

Process Flow and CEM location for CAIR and SO2 Opt-In Programs for DPS Florida LLC, 150-MW Boiler

BEST AVAILABLE COPY



SO₂/NO_x
Sampling
Location

CPL POWER PLANT
EXHAUST SYSTEM
Showing SO₂/NO_x Sampling Location

LARAMORE, DOUGLASS & POPHAM

Sheet 3 of 3

Job No. _____

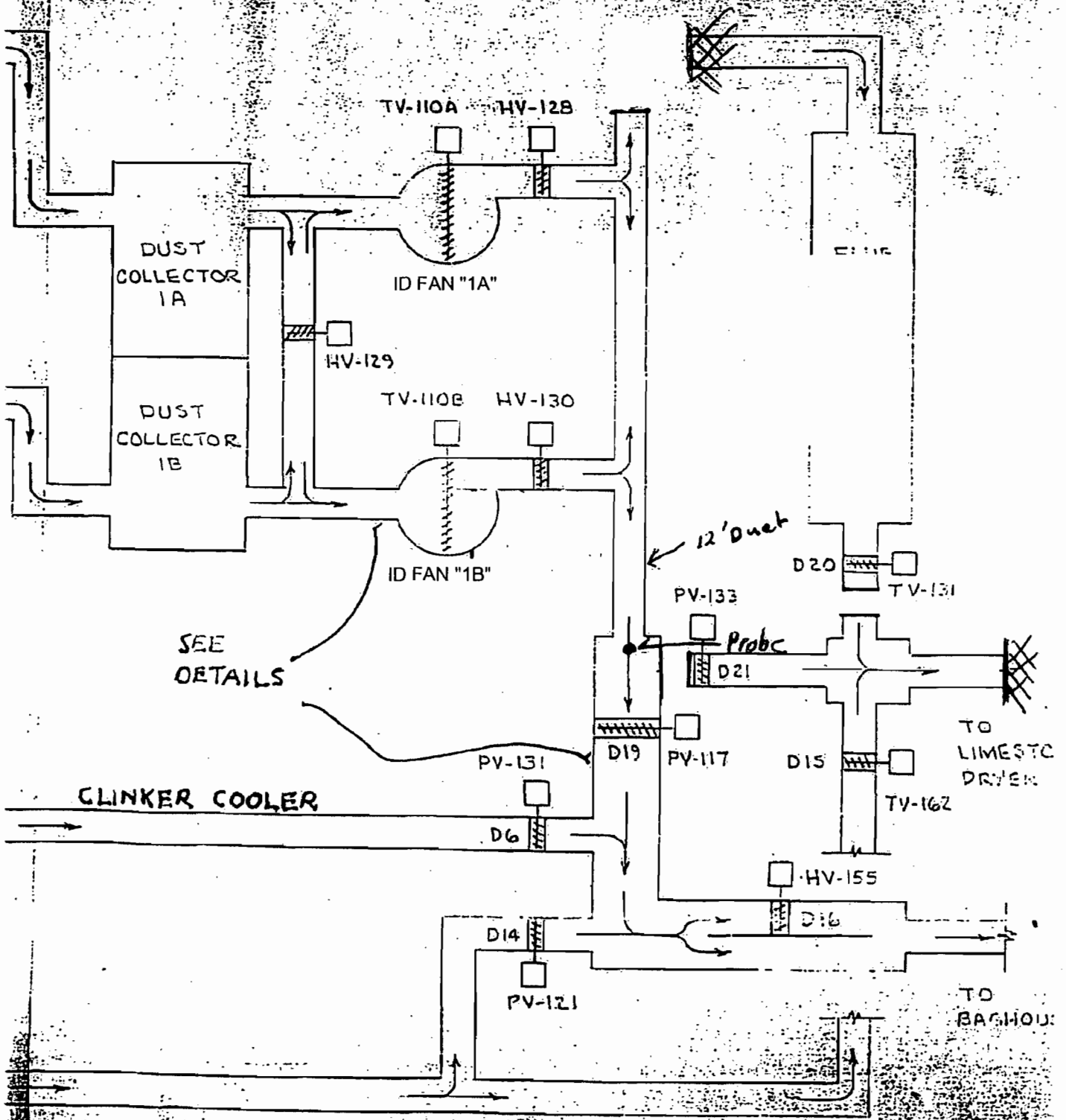
Date _____

Project _____

Comp. by _____

Subject _____

Ch'd. by _____



CONTINUOUS EMISSIONS MONITORING at DPS Florida LLC aka CENTRAL POWER AND LIME

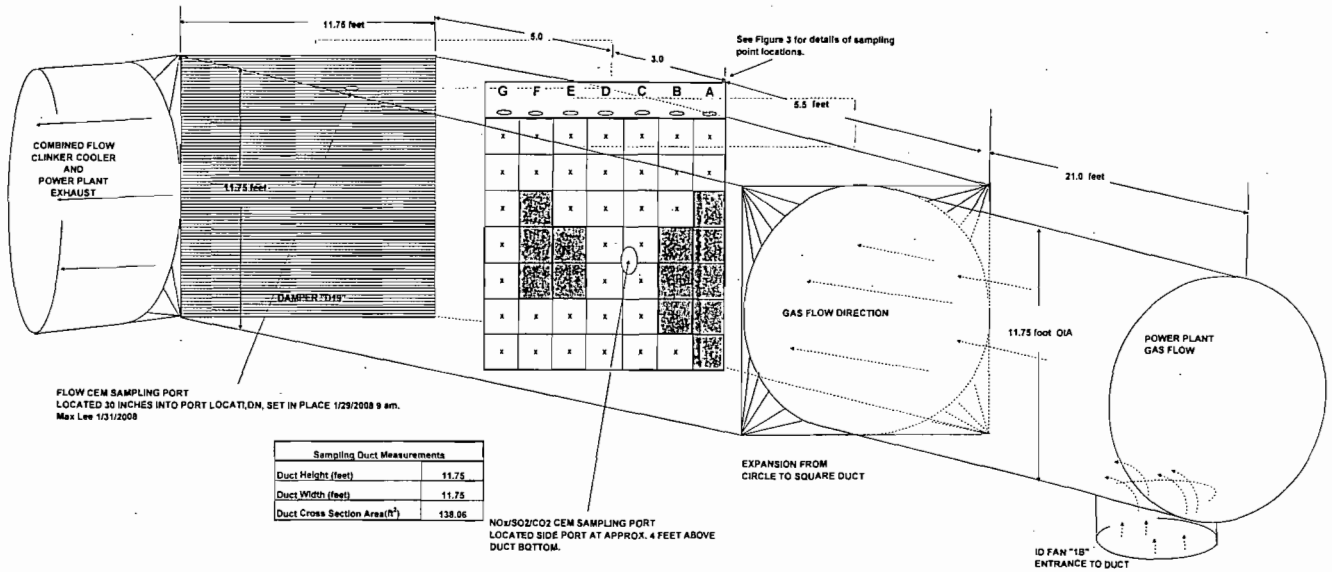


FIGURE 2

Attachment 2

Acid Rain Part Application (DEP Form No. 62-210.900(1)(a))

Acid Rain Part Application

For more information, see instructions and refer to 40 CFR 72.30, 72.31, and 74; and Chapter 62-214, F.A.C.

This submission is: New Revised Renewal

STEP 1

Identify the source by plant name, state, and ORIS or plant code.

Central Power & Lime	FL	10333
Plant name	State	ORIS/Plant Code

STEP 2

Enter the unit ID# for every Acid Rain unit at the Acid Rain source in column "a."

If unit a SO₂ Opt-in unit, enter "yes" in column "b".

For new units or SO₂ Opt-in units, enter the requested information in columns "d" and "e."

a	b	c	d	e
Unit ID#	SO ₂ Opt-in Unit? (Yes or No)	Unit will hold allowances in accordance with 40 CFR 72.9(c)(1)	New or SO ₂ Opt-in Units Commence Operation Date	New or SO ₂ Opt-in Units Monitor Certification Deadline
1	Yes	Yes	7/1/2008	7/1/2008
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		

Central Power & Lime

Plant Name (from STEP 1)

STEP 3

Read the standard requirements.

Acid Rain Part Requirements.

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Submit a complete Acid Rain Part application (including a compliance plan) under 40 CFR Part 72 and Rules 62-214.320 and 330, F.A.C., in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
 - (ii) Submit in a timely manner any supplemental information that the DEP determines is necessary in order to review an Acid Rain Part application and issue or deny an Acid Rain Part;
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain Part application or a superseding Acid Rain Part issued by the DEP; and
 - (ii) Have an Acid Rain Part.

Monitoring Requirements.

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR Part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR Part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.
- (4) For applications including a SO₂ Opt-in unit, a monitoring plan for each SO₂ Opt-in unit must be submitted with this application pursuant to 40 CFR 74.14(a). For renewal applications for SO₂ Opt-in units include an updated monitoring plan if applicable under 40 CFR 75.53(b).

Sulfur Dioxide Requirements.

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another Acid Rain unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000, or the deadline for monitor certification under 40 CFR Part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain Part application, the Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR Part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR Part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR Part 77.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the EPA or the DEP:
 - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR Part 75, provided that to the extent that 40 CFR Part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and

Central Power & Lime
Plant Name (from STEP 1)

**STEP 3,
Continued.**

Recordkeeping and Reporting Requirements (cont)

(iv) Copies of all documents used to complete an Acid Rain Part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR Part 72, Subpart I, and 40 CFR Part 75.

Liability.

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain Part application, an Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.
- (6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR Part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (7) Each violation of a provision of 40 CFR Parts 72, 73, 74, 75, 76, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities.

No provision of the Acid Rain Program, an Acid Rain Part application, an Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any state law regulating electric utility rates and charges, affecting any state law regarding such state regulation, or limiting such state regulation, including any prudence review requirements under such state law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a state in which such program is established.

**STEP 4
For SO₂ Opt-in
units only.**

In column "f" enter the unit ID# for every SO₂ Opt-in unit identified in column "a" of STEP 2.

For column "g" describe the combustion unit and attach information and diagrams on the combustion unit's configuration.

In column "h" enter the hours.

f	g	h (not required for renewal application)
Unit ID#	Description of the combustion unit	Number of hours unit operated in the six months preceding initial application
1	150-MW bituminous coal-fired dry-bottom boiler EGU (portion of co-generation facility, AIRS ID 0530021)	3086

Central Power & Lime

Plant Name (from STEP 1)

STEP 5

For SO₂ Opt-in units only.
(Not required for SO₂ Opt-in renewal applications.)

In column "i" enter the unit ID# for every SO₂ Opt-in unit identified in column "a" (and in column "f").

For columns "j" through "n," enter the information required under 40 CFR 74.20-74.25 and attach all supporting documentation required by 40 CFR 74.20-74.25.

i	j	k	l	m	n
Unit ID#	Baseline or Alternative Baseline under 40 CFR 74.20 (mmBtu)	Actual SO ₂ Emissions Rate under 40 CFR 74.22 (lbs/mmBtu)	Allowable 1985 SO ₂ Emissions Rate under 40 CFR 74.23 (lbs/mmBtu)	Current Allowable SO ₂ Emissions Rate under 40 CFR 74.24 (lbs/mmBtu)	Current Promulgated SO ₂ Emissions Rate under 40 CFR 74.25 (lbs/mmBtu)
1	5,069,911	5,640,078	1.112	1.2	Under EPA review (see Att. C.)

STEP 6

For SO₂ Opt-in units only.

Attach additional requirements, certify and sign.

- A. If the combustion source seeks to qualify for a transfer of allowances from the replacement of thermal energy, a thermal energy plan as provided in 40 CFR 74.47 for combustion sources must be attached.
- B. A statement whether the combustion unit was previously an affected unit under 40 CFR 74.
- C. A statement that the combustion unit is not an affected unit under 40 CFR 72.6 and does not have an exemption under 40 CFR 72.7, 72.8, or 72.14.
- D. Attach a complete compliance plan for SO₂ under 40 CFR 72.40.
- E. The designated representative of the combustion unit shall submit a monitoring plan in accordance with 40 CFR 74.61. For renewal application, submit an updated monitoring plan if applicable under 40 CFR 75.53(b).
- F. The following statement must be signed by the designated representative or alternate designated representative of the combustion source: "I certify that the data submitted under 40 CFR Part 74, Subpart C, reflects actual operations of the combustion source and has not been adjusted in any way."

Signature <i>Terry Woodard</i>	Date 4-30-08
--------------------------------	--------------

STEP 7

Read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign, and date.

Certification (for designated representative or alternate designated representative only)

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name TERRY WOODARD	Title PLANT MANAGER
--------------------	---------------------

DPS Florida LLC	
Owner Company Name	

352 799-7881	E-mail address twoodard@deltapowerservices.com
Phone	

Signature <i>Terry Woodard</i>	Date 4-30-08
--------------------------------	--------------

STEP 6

For SO₂ Opt-in units only.

A. If the combustion source seeks to qualify for a transfer of allowances from the replacement of thermal energy, a thermal energy plan as provided in 40 CFR 74.47 for combustion sources must be attached.

NA

B. A statement whether the combustion unit was previously an affected unit under 40 CFR 74.

The combustion unit was not previously an affected unit under 40 CFR 74 (i.e., sulfur dioxide opt-ins)

C. A statement that the combustion unit is not an affected unit under 40 CFR 72.6 and does not have an exemption under 40 CFR 72.7, 72.8, or 72.14.

The combustion unit is not an affected unit under 40 CFR 72.6 and does not have an exemption under 40 CFR 72.7, 72.8, or 72.14

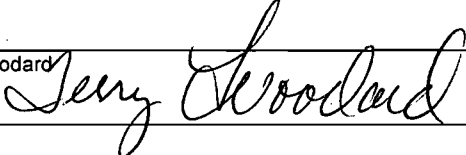
D. Attach a complete compliance plan for SO₂ under 40 CFR 72.40.

See Attachment A

E. The designated representative of the combustion unit shall submit a monitoring plan in accordance with 40 CFR 74.61. For renewal application, submit an updated monitoring plan if applicable under 40 CFR 75.53(b).

See Attachment B

F. The following statement must be signed by the designated representative or alternate designated representative of the combustion source: "I certify that the data submitted under 40 CFR Part 74, Subpart C, reflects actual operations of the combustion source and has not been adjusted in any way."

Terry Woodard Name		Power Plant Manager Title
-----------------------	--	------------------------------

ATTACHMENT A

Compliance plan for SO₂ under 40 CFR 72.40.

Facility ORIS Code: 10333

§ 72.40 General.

(a) For each affected unit included in an Acid Rain permit application, a complete compliance plan shall:

(1) For sulfur dioxide emissions, certify that, as of the allowance transfer deadline, the designated representative will hold allowances in the compliance account of the source where the unit is located (after deductions under §73.34(c) of this chapter) not less than the total annual emissions of sulfur dioxide from the affected units at the source.

ATTACHMENT B

Monitoring Plan and Correspondence with EPA-CAMD

Best Available Copy

Max Lee

From: Ghanta.Venu@epamail.epa.gov
Sent: Wednesday, April 16, 2008 2:50 PM
To: mlee@kooglerassociates.com
Subject: RE: FW: Central Power and Lime So2 Opt-In Monitoring Plan



Central Power&Lime
CAIR MON PL...

Mr. Lee:

Great. The file looks good. It will take a few days before this is loaded into the database. After that, go ahead and submit all your testing data with your Q1 EDR.

Venu Ghanta
Chemical Engineer, Emissions Monitoring Branch Clean Air Markets Division US Environmental Protection Agency
202-343-9009 (phone)

"Max Lee"
<mlee@kooglerassociates.com>
04/16/2008 02:38 PM
Please respond to
<mlee@kooglerassociates.com>
Venu Ghanta/DC/USEPA/US@EPA
mp-cair@EPA
Subject
RE: FW: Central Power and Lime So2 Opt-In Monitoring Plan

Hello Mr. Ghanta,
Attached is the monitoring plan for the CAIR portion of the monitoring plan.
Im glad you requested this separate CAIR monitoring plan as I was not exactly sure how you wanted CAIR and SO2 opt-in to be handled.
If this is accepted, this monitoring plan will be used to submit the CAIR 1Q 2008 EDR and certifications.

Thank you,
Max Lee

-----Original Message-----

From: Ghanta.Venu@epamail.epa.gov [mailto:Ghanta.Venu@epamail.epa.gov]
Sent: Wednesday, April 16, 2008 1:04 PM
To: mlee@kooglerassociates.com
Subject: Re: FW: Central Power and Lime So2 Opt-In Monitoring Plan

Mr. Lee:

Thanks for sending over this monitoring plan. It actually looks good, but can I ask you to do one thing? Can you remove the Acid Rain-related information for now (any SO2 and

CO2 mass-related components)? We need to get a CAIR NOx monitoring plan into the system right away, so that you can submit a report for the first quarter. With the ARP-related information in the monitoring plan, it's going to come back with a few errors and may not get accepted.

So, please put together a monitoring plan for CAIR NOx and email it to mp-cair@epa.gov . Once we get past the monitoring plan and the required quarterly submission, we can start working on getting your ARP information in place.

Thanks,

Venu Ghanta
Chemical Engineer, Emissions Monitoring Branch Clean Air Markets Division US Environmental Protection Agency
202-343-9009 (phone)

"Max Lee"
<mlee@kooglerassociates.com>
04/16/2008 11:16 AM
Please respond to
<mlee@kooglerassociates.com>

To
Venu Ghanta/DC/USEPA/US@EPA
cc
Subject
FW: Central Power and Lime So2
Opt-In Monitoring Plan

Hello Mr. Ghanta,

Attached is the SO2 monitoring plan for the Central Power and Lime power plant applying to opt-in to the SO2 program. It assumes the SO2 will begin 7/1/2008. Thus it needs to be opened for the 3rd quarter 2008. I will send you the SO2 and opacity RATAs next.

I appreciate your patience,

Sincerely,
Max Lee

Maxwell Lee, Ph.D., P.E.
Engineer
Koogler & Associates, Inc.
4014 NW 13th Street
Gainesville FL 32609
352 377 5822 office
352 377 7158 fax

CONFIDENTIALITY: This message is the property of Koogler and Associates, Inc. The information contained in this message may contain legally privileged and confidential information. It is intended only for the use of the person(s) or addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, disclosure, distribution or duplication of this communication, and the information contained in it, is strictly prohibited. If you are not the intended recipient, please contact the sender by electronic mail and immediately destroy all copies of the original message.

MONITORING PLAN
MONITORING DATA CHECKING SOFTWARE 4.2.57

04/29/2008
PAGE 1

FACILITY INFORMATION (RT 102)

ORIS Code/Facility ID: 10333 EPA AIRS ID: State ID: 0530021

Plant Name: CENTRAL POWER & LIME State: FL Latitude: 283458 Longitude: 822551

County Code: 053 County Name: HERNANDO Source Category/Type: COGENERATION

Primary SIC Code/Description: 4911 Electric Services

Add Quarter: 2008Q1

Update Quarter: 2008Q1

UNIT OPERATION INFORMATION (RT 504)

Unit ID	Unit Short Name	Boiler Type	Max Heat Input (mmBtu)	1st Comm Operation Date	Retirement Date	Stack Exit Height	Stack Base Elevation	Area At Stack Exit	Area At Flow Monitor	Non-Load-Based Unit
1	UNIT 1	DB	1850.0	06/29/1988	/ /	320	171	273	138	

Boiler Type Codes: DB - Dry bottom wall-fired boiler

UNIT PROGRAM INFORMATION (RT 505)

Unit ID	Program	Unit Class	Reporting Frequency	Program Participation Date	State Regulation Code	State/Local Regulatory Agency Code
1	ARP	OP	Q	07/01/2008		FL
1	SUBH	AS	Q	01/01/2008	62-210 FAC	FL

Unit Class Codes: AS - CAIR NOx Annual + Ozone Season, OP - Opt-in
 Reporting Frequency Codes: Q - Quarterly

EIA Cross Reference Information (RT 506)

Unit ID	Part 75 Monitoring Location ID	EIA Boiler ID	EIA Flue ID	EIA Reporting Year	EIA 767 Reporting Indicator	EIA Facility ID
1	1	1	E42	2007		10333

UNIT/STACK/PIPE ID: 1

MONITORING SYSTEMS/ANALYTICAL COMPONENTS (RT 510)

SYSTEM						ANALYTICAL COMPONENTS AND DAHS SOFTWARE						
Stat.	System ID	Para-meter	P/B	First Reporting Date	Last Reporting Date	Comp. ID	Stat.	Comp. Type	Sample Method (SAM)	Manufacturer	Model or Version	Serial #
A	110	SO2	P	07/01/2008	/ /	1SP	A	SO2	DIN	THERMOELECTRON	43I	0734726457
						DAS	A	DAHS		ESC STACKVISION	8832I	2303
U	120	NOX	P	01/01/2008	/ /	1CP	U	CO2	DIN	THERMOELECTRON	410I	733025819
						1NP	U	NOX	DIN	THERMOELECTRON	42I	727725254
						DAS	U	DAHS		ESC STACKVISION	8832I	2303
U	130	CO2	P	01/01/2008	/ /	1CP	U	CO2	DIN	THERMOELECTRON	410I	733025819
						DAS	U	DAHS		ESC STACKVISION	8832I	2303
U	140	FLOW	P	01/01/2008	/ /	1FP	U	FLOW	DP	EMRC		1117
						DAS	U	DAHS		ESC STACKVISION	8832I	2303
A	150	OP	P	07/01/2008	/ /	1OP	A	OP	ISC	TELEDYNE MONITOR LABS	560	5600901
						DAS	A	DAHS		ESC STACKVISION	8832I	2303

Parameter Monitored Codes: CO2 - Carbon dioxide, FLOW - Stack Flow, NOX - NOx emission rate, OP - Opacity, SO2 - Sulfur dioxide

Primary/Backup Codes: P - Primary

Component Type Codes: CO2 - CO2 analyzer, DAHS - Data acquisition & handling system, FLOW - Stack Flow analyzer, NOX - NOx analyzer, OP - Opacity analyzer, SO2 - SO2 analyzer

SAM codes: DIN - Dilution in-stack, DP - Differential pressure, ISC - Cross stack in situ

Status Codes: A - Add, U - Unchanged

Unit/Stack/Pipe ID: 1

EMISSIONS FORMULAS (RT 520)

Status	Formula ID#	Parameter	Formula Code	Formulas
A	101	SO2	F-1	$(1.66 * 10^{**(-7)}) * S\#(1SP-110) * S\#(1FP-140)$
U	102	NOX	F-6	$(1.194 * 10^{**(-7)}) * S\#(1NP-120) * 1800 * (100/(S\#(1CP-120)))$
A	103	CO2	F-11	$(5.7 * 10^{**(-7)}) * S\#(1CP-130) * S\#(1FP-140)$
U	104	HI	F-15	$S\#(1FP-140) * (1/1800) * (S\#(1CP-130)/100)$
U	105	NOXM	F-24	$F\#(102) * F\#(104) * T_U$

Status Codes: A - Add, U - Unchanged

Parameter Codes: CO2 - CO2 mass emissions, HI - Heat input, NOX - NOx emission rate, NOXM - NOx mass emissions,
 SO2 - SO2 mass emissions

SPAN VALUES (RT 530)

Unit/ Stk ID	Para- meter	Meth- Sc. od	MPC/ MEC/ MPF	Max. NOx Rate	Span Value	Full-Scale Range	Units of Meas.	Eff. Date and Hour	Inactive Date & Hour	Def.			
										Dual Spans Req.	High Range Value	Flow Rate Span Val. In SCFH	Flow Rate Full Scale In SCFH
1	CO2	H TB	14.000		20.0	20.0	%	01/01/2008 00	/ /				
	FLOW	H TR	22500000.000		1.000	3.000	INH2O	01/01/2008 00	/ /			22500000	40000000
	NOX	H TR	325.000	1.573	500	500	PPM	01/01/2008 00	/ /				
	SO2	H HD	325.000		500	500	PPM	07/01/2008 00	/ /				

Parameter Codes: CO2 - Carbon dioxide, FLOW - Stack flow, NOX - NOx concentration, SO2 - Sulfur dioxide

Scale Codes: H - High

Method Codes: HD - Historical data, TB - Table of Constants, TR - Test results

Units of Measure Codes: % - Percent, INH2O - Inches of water, PPM - Parts per million

MAXIMUMS, MINIMUMS, DEFAULTS, AND CONSTANTS (RT 531)

Unit/Stack/ Pipe ID	Parameter	Value	Units of Measure	Purpose	Fuel Type	Source of Value	Controlled/ Uncontrolled Indicator	Begin Use of Value Date	Hr	Value No Longer Used Date	Hr
1	CO2M	5.000	%CO2	DC	NFS	DCPD	A	01/01/2008	00	/ /	

Parameter Codes: CO2M - Minimum percent CO2

Units of Measure Codes: %CO2 - Percent CO2

Purpose Codes: DC - Diluent Cap Value

Source of Value Codes: DCPD - Diluent cap default: Part 75

Fuel Type Codes: NFS - Non fuel specific

RECTANGULAR DUCT WAF (RT 532)

Unit/ Stack/ Pipe ID	Duct Width at Test Location	Duct Depth at Test Location	WAF	Method of Deter- mining WAF	WAF Effective Date	WAF No Longer Effective Hr Date	WAF Deter- mination Date	Number of Test Runs	Number of Test Ports	Number of Method 1 Traverse Points	Number of Method 1 Traverse Points In RATA
1	11.8	11.8	0.9685	DF	02/13/2008	06 / /	02/13/2008	39	7	36	36

Method of Determining WAF Codes: DF - Default

UNIT AND STACK LOAD RANGE AND OPERATING LOAD (RT 535)

Unit/Stack/ Pipe ID	Units of Measure	Maximum Hourly Load	Three-load RATA Exemption Status
1	MW	155	

RANGE OF OPERATION, NORMAL OPERATING LEVEL AND OPERATING LEVEL USAGE (RT 536)

Unit/ Stack ID	Upper Bound of Range Of Operation	Lower Bound of Range Of Operation	Two Most Frequently-used Operating Levels	Designated Normal Op. Level	Second Designated Normal Op. Level	Activation Date	Deactivation Date
1	150	80	H,L	H	L	01/01/2008	/ /

MONITORING METHODOLOGIES (RT 585)

Unit ID	Parameter	Methodology	Fuel Type	Primary/ Secondary	Missing Data Approach	Begin Date	End Date
1	CO2	CEM	NFS	P	SPTS	07/01/2008	/ /
	HI	CEM	NFS	P	SPTS	01/01/2008	/ /
	NOXR	CEM	NFS	P	SPTS	01/01/2008	/ /
	OP	COM	NFS	P	NA	07/01/2008	/ /
	SO2	CEM	NFS	P	SPTS	07/01/2008	/ /

Parameter Codes: CO2 - Carbon Dioxide, HI - Heat Input, NOXR - NOx Emission Rate, OP - Opacity, SO2 - Sulfur Dioxide

Fuel Type Codes: NFS - Non-fuel specific

Methodology Codes: CEM - Continuous emission monitoring, COM - Continuous opacity monitoring

Missing Data Approach Codes: NA - Not applicable, SPTS - Standard Part 75

CONTROL INFORMATION (RT 586)

Unit ID	Parameter	Type of Controls	Primary/ Secondary	Original Installation?	Controls Installation Date	Controls Optim- ization Date	Controls Retirement Date	Ozone Season Only?
1	PART	B	P	O	/ /	/ /	/ /	
	SO2	WLS	P	O	/ /	/ /	/ /	

Parameter Codes: PART - Particulates, SO2 - Sulfur dioxide

Type of Controls Codes: B - Baghouse, WLS - Wet Limestone

FUEL TYPE INFORMATION (RT 587)

Unit ID	Fuel Classification	Primary/ Secondary Fuel	Start Date	End Date	Ozone Season Flag	Method to Qualify for Monthly GCV	Method to Qualify for Daily % Sulfur
1	C	P	06/29/1988	/ /			
	OOL	I	06/29/1988	/ /			

Fuel Classification Codes: C - Coal, OOL - Other oil

ATTACHMENT C

SO2 Opt-In Application to EPA-CAMD

(under review)

COPY



308-04-01
April 18, 2008

CENTRAL POWER & LIME, INC.

Robert Miller
U.S. EPA
1310 L Street, N.W.
2nd floor
Washington, DC 20005

SUBJECT: SO2 Opt-in Application for Central Power & Lime facility (ORIS 10333)

Dear Mr. Miller:

Following the emailed request of David Sellers at Perrin Quarles Associates, Inc. to Max Lee at Koogler & Associates, Inc., I am sending you a hardcopy of the worksheet and calculations required for the SO2 Opt-In Application. Please note that calculations are the same as provided in the February 18, 2008 application.

*mL 4/29/08
February* Regarding monitoring of emissions, the required SO2 Opt-in continuous emissions monitoring system (CEMS) has been installed. Initial certification of the SO2 monitor system was completed ~~March~~ *February* 21, 2008. Initial certification of the installed continuous monitoring system for CAIR-compliance has been completed. This system includes CO2-diluent and flow monitoring which will be applicable to the SO2 Opt-in CEMS. The monitoring plan has been submitted and accepted to CAMD.

Continuous Opacity monitoring is conducted at a location where the emissions of the power plant and cement plant are combined (i.e., downstream of the Opt-in CEMS). The existing opacity monitoring is annually certified per 40 CFR part 60 will provide Part 75 opacity monitoring.

I appreciate your expedited review and look forward to discussion on the timeframe to enter the program and the proposed allowances.

As Mr. Sellers suggested I am including below the certification statement for this provided information. This statement is the same of the signature page of the Opt-In Application.

I certify that, to the best of my knowledge and belief, the combustion source is not an affected unit under 40 CFR 72.6.

I certify that the data submitted under subpart C of part 74 reflects operations of the combustion source and is not adjusted in any way.

I am authorized to make this submission on behalf of the owners and operators of the combustion source or opt-in sources for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary

responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Terry Woodard, DPS LLC Florida, Power Plant Manager



Signature

4-22-08

Date

Cc: Max Lee, Koogler & Associates, Inc.

Cc: Robert Noble, DPS LLC

Enc:



Central Power and Lime, ORIS 10333

Combustion Source ID# 1

Opt-In Permit Application Worksheet

For more information, see instructions and refer to 40 CFR 74.20-74.22

Type of Fuel: bituminous coal Heat Content Units: btu/lb Control System Efficiency: 0 %
 Fuel Units: 1000 ton SO₂ Emissions Factor: 29250 (see attached calc) Fuel Pretreatment Efficiency: 0 %

(a) 1985/1st Operating Year: 1989__ (b) 1986/2nd Operating Year: 1990__ (c) 1987/3rd Operating Year: 1991__ (d) 1985/1st Year

	Quantity	% S	Heat Content	Fuel Consumption	Quantity	% S	Heat Content	Fuel Consumption	Quantity	% S	Heat Content	Fuel Consumption	SO ₂ Emissions
Jan				mmBtu				mmBtu				mmBtu	lbs
Feb				mmBtu				mmBtu				mmBtu	lbs
Mar				mmBtu				mmBtu				mmBtu	lbs
Apr				mmBtu				mmBtu				mmBtu	lbs
May				mmBtu				mmBtu				mmBtu	lbs
June				mmBtu				mmBtu				mmBtu	lbs
July				mmBtu				mmBtu				mmBtu	lbs
Aug				mmBtu				mmBtu				mmBtu	lbs
Sep				mmBtu				mmBtu				mmBtu	lbs
Oct				mmBtu				mmBtu				mmBtu	lbs
Nov				mmBtu				mmBtu				mmBtu	lbs
Dec				mmBtu				mmBtu				mmBtu	lbs
ANNUAL	192.282	0.75	13,000	4,999,332 mmBtu	278.967	0.75	13,000	7,253,142 mmBtu	225.613	0.75	13,000	5,865,938 mmBtu	

Total these values for each worksheet and transfer each total to Step 12 of the Opt-in Permit Application

1985/1st Operating Year Fuel Consumption
4,999,332 mmBtu

Average Annual Fuel Consumption
6,039,471 mmBtu

1985/1st yr SO₂ Emissions
5,624,249 lbs



Opt-In Permit Application Worksheet

For more information, see instructions and refer to 40 CFR 74.20-74.22

Type of Fuel: fuel oil Heat Content Units: btu/barrel Control System Efficiency: 0 %
 Fuel Units: 1000 barrels SO₂ Emissions Factor: 1318.8 (see attached calc) Fuel Pretreatment Efficiency: 0 %

	(a) 1985/1st Operating Year: <u>1989</u>				(b) 1986/2nd Operating Year: <u>1990</u>				(c) 1987/3rd Operating Year: <u>1991</u>				(d) 1985/1st Year
	Quantity	% S	Heat Content	Fuel Consumption	Quantity	% S	Heat Content	Fuel Consumption	Quantity	% S	Heat Content	Fuel Consumption	SO ₂ Emissions
Jan				mmBtu				mmBtu				mmBtu	lbs
Feb				mmBtu				mmBtu				mmBtu	lbs
Mar				mmBtu				mmBtu				mmBtu	lbs
Apr				mmBtu				mmBtu				mmBtu	lbs
May				mmBtu				mmBtu				mmBtu	lbs
June				mmBtu				mmBtu				mmBtu	lbs
July				mmBtu				mmBtu				mmBtu	lbs
Aug				mmBtu				mmBtu				mmBtu	lbs
Sep				mmBtu				mmBtu				mmBtu	lbs
Oct				mmBtu				mmBtu				mmBtu	lbs
Nov				mmBtu				mmBtu				mmBtu	lbs
Dec				mmBtu				mmBtu				mmBtu	lbs
ANNUAL	12.003	0.2	5,880,000	70,579 mmBtu	7.395	0.2	5,880,000	43,482 mmBtu	3.724	0.2	5,880,000	21,897 mmBtu	

Total these values for each worksheet and transfer each total to Step 12 of the Opt-in Permit Application

**1985/1st Operating Year
Fuel Consumption**
70579 mmBtu

**Average Annual Fuel
Consumption**
45323 mmBtu

**1985/1st yr
SO₂ Emissions**
15,830 lbs

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0268
Expires 1-21-88



Opt-In Permit Application

Page 1

For more information, see instructions and refer to 40 CFR 74.16

STEP 1
Identify the facility by plant name, State, OMB code from NADS (if known), and operator's name.

Plant Name Central Power & Lime	State FL	OMB Code 10333
Operating Company Name DPS Florida LLC		

STEP 2
Identify the combustion source by unique ID number and short name assigned by the operating company.

Combustion Source ID# 1	Short Name EU 008
----------------------------	----------------------

STEP 3
Enter the requested information on the location of the source.

Plant Site Address 10311 Cement Plant Road Brooksville, FL 34605		
County Hernando	Latitude 28.3457	Longitude 82.2555
Plant Mailing Address Same		

STEP 4
Check the appropriate box.

Has the combustion source previously participated in the Opt-in Program?

Yes No

If Yes, enter the effective date of the most recent opt-in permit →

--

STEP 5
Briely describe the combustion source and the facility. Attach the required information.

General facility description Cogeneration facility consisting of one electric steam generating unit and cement plant. Electricity sold under long-term contract to utilities. EGU to Opt-in.
Combustion source description Electric generating unit consists of single dry-bottom wall fired boiler 150-MW capacity.

A diagram showing the configuration of the combustion source and the facility is attached.

1/30/08
Date

Central Power & Lime
Plant Name (from Step 1)

1
Combustion Source ID#

STEP 6
Indicate whether the combustion source has SO₂ controls.

- Scrubber Other Controls (specify):
limestone injection Uncontrolled

STEP 7
Check the top box and the second or third box and attach the required information.

- Two copies of a complete Monitoring Plan (as required by 40 CFR parts 74 and 75) are attached.
 A completed Certificate of Representation is attached.
 A completed Certificate of Representation has been previously submitted.

STEP 8
Specify the compliance plan for the combustion source. Check the second box to identify an additional method of compliance.

- Hold allowances in accordance with 40 CFR 72.9(c)(1).
 A Thermal Energy Plan is attached. This combustion source seeks to transfer allowances to one or more replacement units for the replacement of thermal energy.

STEP 9
Provide the required information on the operating history of the combustion source. Indicate that the required documentation is attached.

Date the combustion source commenced operation → 06/88 mm/yy

Number of hours the combustion source operated during the six months immediately preceding this application → 2738.9 hrs

Preceding six months of operation → 07/07 mm/yy 12/07 mm/yy

Start End (Date of Application)

- Data supporting determination of operating hours are attached.

STEP 10
Identify the time period for which the baseline data is provided.

- Baseline 1985-1987
- Alternative Baseline, beginning with → 1989 year
- Combustion source began operation after 1985.
 Combustion source was subject to natural catastrophe during 1985-1987. Documentation of natural catastrophe is attached.

STEP 11
Complete and attach one worksheet for each type of fuel used at the combustion source.

Number of completed worksheets attached → 1 (combined) worksheets

1/30/2008
Date

Central Power & Line
Plant Name (from Step 1)

1
Combustion Source ID#

STEP 12
For each fuel type used at the combustion source, indicate that a worksheet is attached, enter the total 1985 (or first year) fuel consumption from the bottom row of the worksheet, and enter the average of the total fuel consumption for the three operating years from the bottom row of the worksheet. Enter the SO₂ emissions for the first operating year from each worksheet.

Fuel Type	Total 1985 (or first year) Fuel Consumption	Average Annual Fuel Consumption	SO ₂ Emissions for 1985 (or first year)
<input checked="" type="checkbox"/> Bituminous Coal	4,999,332 mmBtu	6,039,471 mmBtu	5,624,249 lbs
<input type="checkbox"/> Subbituminous Coal			
<input type="checkbox"/> Lignite Coal			
<input type="checkbox"/> Distillate Oil			
<input checked="" type="checkbox"/> Residual Oil	70,579 mmBtu	45,320 mmBtu	15,830 lbs
<input type="checkbox"/> Natural Gas			
<input type="checkbox"/> Other (describe):			
<input type="checkbox"/> Other (describe):			

STEP 13
Enter the total 1985 (or first year) fuel consumption, the total average annual fuel consumption, and the total 1985 (or first year) actual SO₂ emissions for all fuels used.

(a) Total 1985 (or first year) Fuel Consumption	(b) Total Average Annual Fuel Consumption (Baseline)	(c) Total SO ₂ Emissions for 1985 (or first year)
5,069,911 mmBtu	6,084,791 mmBtu	5,640,078 lbs

STEP 14
Calculate the actual 1985 (or first year) SO₂ emissions rate.

Total SO ₂ Emissions for 1985 (or first year)		Total 1985 (or first year) Fuel Consumption		Actual 1985 (or first year) SO ₂ Emissions Rate
5,640,078 lbs	÷	5,069,911 mmBtu	=	1.112 lbs/mmBtu

Date 1/30/08

Central Power & Lime
Plant Name (from Step 1)

1
Combustion Source ID#

STEP 19
Calculate and enter the proposed allowances for the combustion source.

Baseline (Step 13(b))		Lowest of 3 SO ₂ Emission Rates		Proposed Allowances
6,084,791 <small>mmBtu</small>	X	1.112 <small>lbs/mmBtu</small>	+ 2,000 =	3,385 <small>allowances</small>

STEP 20
Calculate and enter the proposed allowances for the combustion source, if the current permitted SO₂ emissions limit differs from the current allowable SO₂ emissions rate.

Baseline (Step 13(b))		Lowest of 4 SO ₂ Emission Rates		Proposed Allowances
NA <small>mmBtu</small>	X	<small>lbs/mmBtu</small>	+ 2,000 =	<small>allowances</small>

STEP 21
Read the Opt-in Program requirements and certifications, and sign and date.

Opt-in Program Requirements

Permit Requirements.

- (1) The designated representative of each combustion source under 40 CFR part 74 shall:
 - (i) Submit a complete opt-in permit application (including a compliance plan);
 - (ii) Submit in a timely manner any supplemental information that the Administrator or the permitting authority determines is necessary to review an opt-in permit application and issue or deny an opt-in permit;
- (2) The owners and operators of each combustion source under 40 CFR part 74 shall:
 - (i) Have an opt-in permit; and
 - (ii) Operate the opt-in source in compliance with the opt-in permit.

Monitoring Requirements.

- (1) The owners and operators and, to the extent applicable, the designated representative of each combustion source and each opt-in source shall comply with the monitoring requirements of 40 CFR parts 74 and 76;
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 76 shall be used to determine compliance by the opt-in source with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide under the Acid Rain Program;
- (3) The requirements of 40 CFR parts 74 and 76 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other regulatory characteristics at the opt-in source under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements.

- (1) The owners and operators of each opt-in source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the opt-in source's compliance subaccount (for deductions under 40 CFR 74.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the opt-in source; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An opt-in source shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements upon the effective date of the opt-in source's opt-in permit.
- (4) Allowances shall be held in, allocated from, or transferred among Allowances Tracking System accounts in accordance with the Acid Rain Program, including 40 CFR parts 73 and 74.
- (5) An allowance shall not be allocated in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the opt-in permit application, or the opt-in permit, and no provision of law shall be construed to limit the authority of the United States to suspend or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Excess Emissions Requirements.

- (1) The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an affected unit that has excess emissions in any calendar year shall:
 - (i) Pay within demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

1/30/08
Date

SO2- Out-in Form steps

CPI determination of Out-in allowances for SO2 based on 40 CFR 74

Step 12

Quantity of fuel consumed: 40 CFR 75.20

year	coal 1000 ton	oil 1000 x barrel
1989	192.282	12.003
1990	278.967	7.395
1991	225.613	3.724
average	232.287	7.708

Step 12 column a
Step 13 column a

First Year Fuel Consumption (1989): 40 CFR 74.20(b)
unit conversion: 40 CFR 74.20(b)ii

coal	oil	coal + oil
2	0.001	
heat content of fuel: 40 CFR 74.22		
coal btu/lb of coal	oil btu/barrel of oil	
13000	5,880,000	
1000 ton	1000 x barrel	
1989	192.282	12.003
coal mmbtu/yr	oil mmbtu/yr	coal + oil mmbtu/yr
4,999,332	70,879	5,069,911

Step 12 column b
Step 13 column b

Annual Fuel Consumption avg. (88-91): 40 CFR 74.20(b)
unit conversion: 40 CFR 74.20(b)ii

coal	oil	coal + oil
2	0.001	
heat content of fuel: 40 CFR 74.22		
coal btu/lb of coal	oil btu/barrel of oil	
13000	5,880,000	
1000 ton	1000 x barrel	
1989-1991	232.287	7.708
coal mmbtu/yr	oil mmbtu/yr	coal + oil mmbtu/yr
6,039,471	46,320	6,084,791

SO2- Opt-in Form steps

CPL determination of Opt-in allowances for SO2 based on 40 CFR 74

Step 12

1989 Annual SO2 Emissions: 40 CFR 74.22(b)

unit conversion: 40 CFR 74.20(b)(1)
 coal oil
 2 0.001

heat content of fuel: 40 CFR 74.22
 coal oil
 btu/lb of coal btu/barrel of oil
 13000 5,680,000

Sulfur content of fuels: 40 CFR 74.22(b)
 average % S
 coal oil
 0.75 0.2

k factor: 40 CFR 74.22(b)
 bituminous coal heavy oil
 lb/1000 ton lb/1000 barrel
 39000 6504

SO2 Emission Factor: 40 CFR 74.22 (b)
 lb/1000 ton lb/1000 barrel
 29250 1318.8

Annual SO2 emissions calculation: 40 CFR 74.22(c).

coal oil
 1000 ton/yr 1000 x barrel/yr
 192.26 12.003

SO2 Emission Factor: 40 CFR 74.22 (b)
 lb/1000 ton lb/1000 barrel
 29,250 1,319

Control System Eff.: 40 CFR 74.22 (c)
Emissions are controlled to permit limit
 coal oil
 1 1

fuel pretreatment efficiency: 40 CFR 74.22(c) (no pretreatment)
 coal oil
 1 1

1989 Annual SO2 Emissions: 40 CFR 74.22(b)

coal (SO2lb/yr)	oil (SO2lb/yr)	coal+oil (SO2lb/yr)
5,824,249	15,830	5,840,078

Step 12 column c
 Step 13 column c

Step 14

1989 Actual SO2 Emission Rate: 40 CFR 74.22(e)

Total SO2 1989 (lb)	Total Fuel (mmbtu)	lb/mmbtu
5,840,078	5,089,911	1.112

2) 1989 Allow emiss rate

SO2- Opt-in Form steps

Step 15

40 CFR 74.23: (1989) Allowable SO2 emission rate

Allowable SO2 emission rate in 1989: 40 CFR 74.23(a)(1)(i)
lb/mmbtu
1.2

Citation of permit authority for SO2 limit: 74.23(a)(1)(ii);
Permit: AC27-118674 issued by Florida DER (predecessor to Florida DEP)

Averaging time: 74.23(a)(1)(iii)
3-hr average

Annualization Factor: 74.23(a)(1)(vi), Table 2
0.93

Annualization Factor: 40 CFR 74.23(a)(iv), Table 2
factor for unit with averaging <= 1 day, for scrubbed unit

1989 Allowable SO2 Emissions Rate = (Allowable SO2 Emission Rate) x (Annualization Factor): 74.23(a)(2)(b)
lb/mmbtu
1.116

3) Current Allow emiss rate

SO2- Opt-in Form steps

Step 16

40 CFR 74.24: Current allowable SO2 emission rate.

Current Allowable SO2 emission rate: 40 CFR 74.24(a)
lb/mmbtu
1.2

Citation of permit authority for SO2 limit: 74.24(b)
Permit: 0530021-011-AV issued by Florida DEP

Averaging time: 74.24(c)
2-hr average

Proposed Allowances

SO2- Opt-in Form steps

CPL determination of Opt-in allowances for SO2 based on 40 CFR 74

Step 19

Calculation of Proposed Allowances

	Annual Fuel Consumption avg. (89'-91'): 40 CFR 74.20(b) (see Step 13 column b)		
	mmbtu/yr		
	8,084,791		
Lowest of 3 SO2 emission rates	Actual 89-91	1989 Allow	Current Allow
	lb/mmbtu	lb/mmbtu	lb/mmbtu
	1.112	1.116	1.200
	mmbtu/yr	lb/mmbtu	Proposed Allowances
	8,084,791	1.112	ton/yr
			3385

Max Lee

From: Roberts, Larry [lroberts@deltapowerservices.com]
Sent: Monday, January 14, 2008 12:28 PM
To: mlee@kooglerassociates.com
Subject: operating hours 2007

Jul 522.58
Aug 655.98
Sep 576.97
Oct 123.32
Nov 133.40
Dec 726.61

No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.516 / Virus Database: 269.19.2/1223 - Release Date: 1/13/2008 8:23 PM

1/14/2008

Attachment 3

CAIR Part (DEP Form No. 62-210.900(1)(b))

Clean Air Interstate Rule (CAIR) Part

For more information, see instructions and refer to 40 CFR 96.121, 96.122, 96.221, 96.222, 96.321 and 96.322; and Rule 62-296.470, F.A.C.

This submission is: New Revised Renewal

STEP 1

Identify the source by plant name and ORIS or EIA plant code

Plant Name: Central Power and Lime	State: Florida	ORIS or EIA Plant Code: 10333
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STEP 2

In column "a" enter the unit ID# for every CAIR unit at the CAIR source.

In columns "b," "c," and "d," indicate to which CAIR program(s) each unit is subject by placing an "X" in the column(s).

For new units, enter the requested information in columns "e" and "f."

a	b	c	d	e	f
Unit ID#	Unit will hold nitrogen oxides (NO _x) allowances in accordance with 40 CFR 96.106(c)(1)	Unit will hold sulfur dioxide (SO ₂) allowances in accordance with 40 CFR 96.206(c)(1)	Unit will hold NO _x Ozone Season allowances in accordance with 40 CFR 96.306(c)(1)	New Units Expected Commence Commercial Operation Date	New Units Expected Monitor Certification Deadline
1	702	To be determine	321		

Central Power & Lime

Plant Name (from STEP 1)

STEP 3

Read the
standard
requirements.

CAIR NO_x ANNUAL TRADING PROGRAM

CAIR Part Requirements.

- (1) The CAIR designated representative of each CAIR NO_x source and each CAIR NO_x unit at the source shall:
 - (i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.122 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and
 - (ii) [Reserved];
- (2) The owners and operators of each CAIR NO_x source and each CAIR NO_x unit at the source shall have a CAIR Part included in the Title V operating permit issued by the DEP under 40 CFR Part 96, Subpart CC, and operate the source and the unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

- (1) The owners and operators, and the CAIR designated representative, of each CAIR NO_x source and each CAIR NO_x unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HH, and Rule 62-296.470, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HH, shall be used to determine compliance by each CAIR NO_x source with the following CAIR NO_x Emissions Requirements.

NO_x Emission Requirements.

- (1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_x source and each CAIR NO_x unit at the source shall hold, in the source's compliance account, CAIR NO_x allowances available for compliance deductions for the control period under 40 CFR 96.154(a) in an amount not less than the tons of total NO_x emissions for the control period from all CAIR NO_x units at the source, as determined in accordance with 40 CFR Part 96, Subpart HH.
- (2) A CAIR NO_x unit shall be subject to the requirements under paragraph (1) of the NO_x Requirements starting on the later of January 1, 2009, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.170(b)(1) or (2) and for each control period thereafter.
- (3) A CAIR NO_x allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the NO_x Requirements, for a control period in a calendar year before the year for which the CAIR NO_x allowance was allocated.
- (4) CAIR NO_x allowances shall be held in, deducted from, or transferred into or among CAIR NO_x Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FF and GG.
- (5) A CAIR NO_x allowance is a limited authorization to emit one ton of NO_x in accordance with the CAIR NO_x Annual Trading Program. No provision of the CAIR NO_x Annual Trading Program, the CAIR Part, or an exemption under 40 CFR 96.105 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.
- (6) A CAIR NO_x allowance does not constitute a property right.
- (7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart EE, FF, or GG, every allocation, transfer, or deduction of a CAIR NO_x allowance to or from a CAIR NO_x unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR NO_x unit.

Excess Emissions Requirements.

If a CAIR NO_x source emits NO_x during any control period in excess of the CAIR NO_x emissions limitation, then:

- (1) The owners and operators of the source and each CAIR NO_x unit at the source shall surrender the CAIR NO_x allowances required for deduction under 40 CFR 96.154(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AA, the Clean Air Act, and applicable state law.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the CAIR NO_x source and each CAIR NO_x unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the DEP or the Administrator.
 - (i) The certificate of representation under 40 CFR 96.113 for the CAIR designated representative for the source and each CAIR NO_x unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.113 changing the CAIR designated representative.
 - (ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_x Annual Trading Program.
 - (iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR NO_x Annual Trading Program or to demonstrate compliance with the requirements of the CAIR NO_x Annual Trading Program.
- (2) The CAIR designated representative of a CAIR NO_x source and each CAIR NO_x unit at the source shall submit the reports required under the CAIR NO_x Annual Trading Program, including those under 40 CFR Part 96, Subpart HH.

Central Power & Lime

Plant Name (from STEP 1)

**STEP 3,
Continued**

Liability.

- (1) Each CAIR NO_x source and each CAIR NO_x unit shall meet the requirements of the CAIR NO_x Annual Trading Program.
- (2) Any provision of the CAIR NO_x Annual Trading Program that applies to a CAIR NO_x source or the CAIR designated representative of a CAIR NO_x source shall also apply to the owners and operators of such source and of the CAIR NO_x units at the source.
- (3) Any provision of the CAIR NO_x Annual Trading Program that applies to a CAIR NO_x unit or the CAIR designated representative of a CAIR NO_x unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

No provision of the CAIR NO_x Annual Trading Program, a CAIR Part, or an exemption under 40 CFR 96.105 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_x source or CAIR NO_x unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

CAIR SO₂ TRADING PROGRAM

CAIR Part Requirements.

- (1) The CAIR designated representative of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall:
 - (i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.222 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and
 - (ii) [Reserved];
- (2) The owners and operators of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall have a CAIR Part included in the Title V operating permit issued by the DEP under 40 CFR Part 96, Subpart CCC, for the source and operate the source and each CAIR unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

- (1) The owners and operators, and the CAIR designated representative, of each CAIR SO₂ source and each SO₂ CAIR unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HHH, and Rule 62-296.470, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HHH, shall be used to determine compliance by each CAIR SO₂ source with the following CAIR SO₂ Emission Requirements.

SO₂ Emission Requirements.

- (1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall hold, in the source's compliance account, a tonnage equivalent in CAIR SO₂ allowances available for compliance deductions for the control period, as determined in accordance with 40 CFR 96.254(a) and (b), not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO₂ units at the source, as determined in accordance with 40 CFR Part 96, Subpart HHH.
- (2) A CAIR SO₂ unit shall be subject to the requirements under paragraph (1) of the Sulfur Dioxide Emission Requirements starting on the later of January 1, 2010 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.270(b)(1) or (2) and for each control period thereafter.
- (3) A CAIR SO₂ allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the SO₂ Emission Requirements, for a control period in a calendar year before the year for which the CAIR SO₂ allowance was allocated.
- (4) CAIR SO₂ allowances shall be held in, deducted from, or transferred into or among CAIR SO₂ Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FFF and GGG.
- (5) A CAIR SO₂ allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO₂ Trading Program. No provision of the CAIR SO₂ Trading Program, the CAIR Part, or an exemption under 40 CFR 96.205 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.
- (6) A CAIR SO₂ allowance does not constitute a property right.
- (7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart FFF or GGG, every allocation, transfer, or deduction of a CAIR SO₂ allowance to or from a CAIR SO₂ unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR SO₂ unit.

Excess Emissions Requirements.

If a CAIR SO₂ source emits SO₂ during any control period in excess of the CAIR SO₂ emissions limitation, then:

- (1) The owners and operators of the source and each CAIR SO₂ unit at the source shall surrender the CAIR SO₂ allowances required for deduction under 40 CFR 96.254(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AAA, the Clean Air Act, and applicable state law.

Central Power & Lime

Plant Name (from STEP 1)

**STEP 3,
Continued**

Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the CAIR SO₂ source and each CAIR SO₂ unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Department or the Administrator.

(i) The certificate of representation under 40 CFR 96.213 for the CAIR designated representative for the source and each CAIR SO₂ unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.213 changing the CAIR designated representative.

(ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HHH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HHH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.

(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR SO₂ Trading Program.

(iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR SO₂ Trading Program or to demonstrate compliance with the requirements of the CAIR SO₂ Trading Program.

(2) The CAIR designated representative of a CAIR SO₂ source and each CAIR SO₂ unit at the source shall submit the reports required under the CAIR SO₂ Trading Program, including those under 40 CFR Part 96, Subpart HHH.

Liability.

(1) Each CAIR SO₂ source and each CAIR SO₂ unit shall meet the requirements of the CAIR SO₂ Trading Program.

(2) Any provision of the CAIR SO₂ Trading Program that applies to a CAIR SO₂ source or the CAIR designated representative of a CAIR SO₂ source shall also apply to the owners and operators of such source and of the CAIR SO₂ units at the source.

(3) Any provision of the CAIR SO₂ Trading Program that applies to a CAIR SO₂ unit or the CAIR designated representative of a CAIR SO₂ unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

No provision of the CAIR SO₂ Trading Program, a CAIR Part, or an exemption under 40 CFR 96.205 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR SO₂ source or CAIR SO₂ unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

CAIR NO_x OZONE SEASON TRADING PROGRAM

CAIR Part Requirements.

(1) The CAIR designated representative of each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall:

(i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.322 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and

(ii) [Reserved];

(2) The owners and operators of each CAIR NO_x Ozone Season source required to have a Title V operating permit or air construction permit, and each CAIR NO_x Ozone Season unit required to have a Title V operating permit or air construction permit at the source shall have a CAIR Part included in the Title V operating permit or air construction permit issued by the DEP under 40 CFR Part 96, Subpart CCCC, for the source and operate the source and the unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

(1) The owners and operators, and the CAIR designated representative, of each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HHHH, and Rule 62-296.470, F.A.C.

(2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HHHH, shall be used to determine compliance by each CAIR NO_x Ozone Season source with the following CAIR NO_x Ozone Season Emissions Requirements.

NO_x Ozone Season Emission Requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall hold, in the source's compliance account, CAIR NO_x Ozone Season allowances available for compliance deductions for the control period under 40 CFR 96.354(a) in an amount not less than the tons of total NO_x emissions for the control period from all CAIR NO_x Ozone Season units at the source, as determined in accordance with 40 CFR Part 96, Subpart HHHH.

(2) A CAIR NO_x Ozone Season unit shall be subject to the requirements under paragraph (1) of the NO_x Ozone Season Emission Requirements starting on the later of May 1, 2009 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.370(b)(1),(2), or (3) and for each control period thereafter.

(3) A CAIR NO_x Ozone Season allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the NO_x Ozone Season Emission Requirements, for a control period in a calendar year before the year for which the CAIR NO_x Ozone Season allowance was allocated.

(4) CAIR NO_x Ozone Season allowances shall be held in, deducted from, or transferred into or among CAIR NO_x Ozone Season Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FFFF and GGGG.

(5) A CAIR NO_x Ozone Season allowance is a limited authorization to emit one ton of NO_x in accordance with the CAIR NO_x Ozone Season Trading Program. No provision of the CAIR NO_x Ozone Season Trading Program, the CAIR Part, or an exemption under 40 CFR 96.305 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.

(6) A CAIR NO_x Ozone Season allowance does not constitute a property right.

(7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart EEEE, FFFF or GGGG, every allocation, transfer, or deduction of a

CAIR NO_x Ozone Season allowance to or from a CAIR NO_x Ozone Season unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR NO_x Ozone Season unit.

Central Power & lime Plant Name (from STEP 1)
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**STEP 3,
Continued**

Excess Emissions Requirements.

If a CAIR NO_x Ozone Season source emits NO_x during any control period in excess of the CAIR NO_x Ozone Season emissions limitation, then:
 (1) The owners and operators of the source and each CAIR NO_x Ozone Season unit at the source shall surrender the CAIR NO_x Ozone Season allowances required for deduction under 40 CFR 96.354(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
 (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AAAA, the Clean Air Act, and applicable state law.

Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the DEP or the Administrator.
 (i) The certificate of representation under 40 CFR 96.313 for the CAIR designated representative for the source and each CAIR NO_x Ozone Season unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.113 changing the CAIR designated representative.
 (ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HHHH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HHHH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_x Ozone Season Trading Program.
 (iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR NO_x Ozone Season Trading Program or to demonstrate compliance with the requirements of the CAIR NO_x Ozone Season Trading Program.
 (2) The CAIR designated representative of a CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall submit the reports required under the CAIR NO_x Ozone Season Trading Program, including those under 40 CFR Part 96, Subpart HHHH.

Liability.

(1) Each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit shall meet the requirements of the CAIR NO_x Ozone Season Trading Program.
 (2) Any provision of the CAIR NO_x Ozone Season Trading Program that applies to a CAIR NO_x Ozone Season source or the CAIR designated representative of a CAIR NO_x Ozone Season source shall also apply to the owners and operators of such source and of the CAIR NO_x Ozone Season units at the source.
 (3) Any provision of the CAIR NO_x Ozone Season Trading Program that applies to a CAIR NO_x Ozone Season unit or the CAIR designated representative of a CAIR NO_x Ozone Season unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

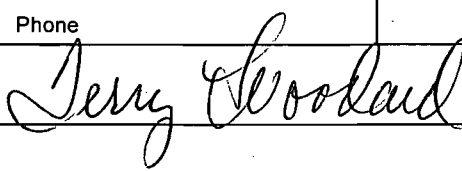
No provision of the CAIR NO_x Ozone Season Trading Program, a CAIR Part, or an exemption under 40 CFR 96.305 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_x Ozone Season source or CAIR NO_x Ozone Season unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

STEP 4

Certification (for designated representative or alternate designated representative only)

Read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign, and date.

I am authorized to make this submission on behalf of the owners and operators of the CAIR source or CAIR units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Terry Woodard Name	Power Plant Manager Title
DPS Florida LLC Company Owner Name	
352 799-7881 Phone	twoodard@deltapowerservices.com E-mail Address
Signature 	Date 4-30-08

CONTINUOUS EMISSIONS MONITORING at DPS Florida LLC aka CENTRAL POWER AND LIME

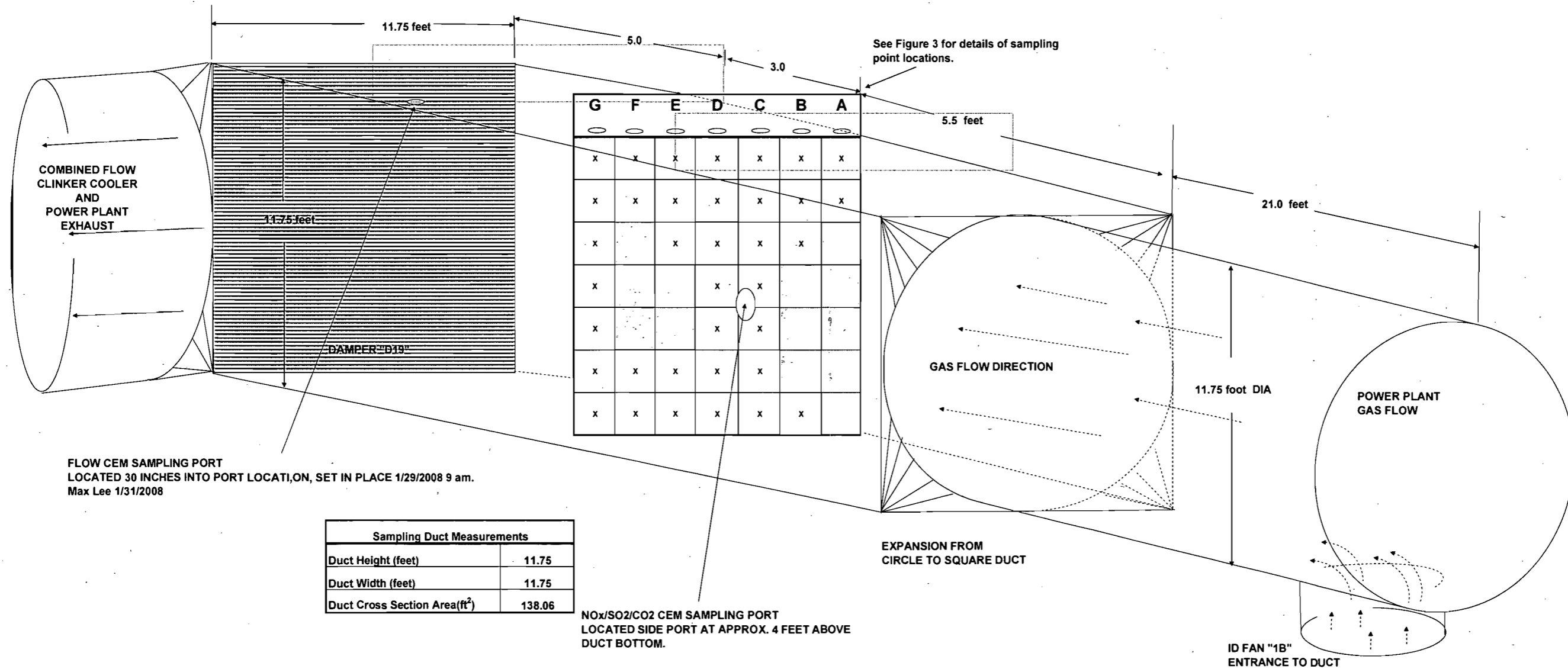


FIGURE 2