Department of Environmental Protection

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

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

August 8, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Joseph J. Piermatteo
Senior Vice President
Central Power & Lime, Inc.
10311 Cement Plant Road
Brooksville, Florida 34601

Dear Mr. Piermatteo:

Re: Amendments to PSD-FL-090
Boiler Heat Input Increase From 1000 to 1,850 MMBTU/hr

The Department received your application on March 15, 1995, for amendment of the subject air construction permit allowing an increase to 1,850 MMBTU/hr in the boiler firing rate. The permit is amended as shown:

Specific Condition A.1.c.:

FROM: c. Particulates - 0.03 lb. per million Btu heat input, averaging time per 40 CFR 60.46.

TO: **c. PM/PM10 - 0.0135 lb per MMBTU (25.0 lbs per hour at 1,850 MMBTU/hr), averaging time per 40 CFR 60.46.**

Specific Condition A.1.d.:

FROM: d. Visible emissions - 20% opacity, 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

TO: **d. Visible emissions - 10% opacity, 6-minute average, except for one 6-minute period per hour of not more than 17% opacity.**

Specific Condition A.2.c.:

FROM: c. Particulates - 0.03 lb. per million Btu heat input plus 0.3 lb from the cement kiln and 0.1 lb from the clinker cooler per ton of kiln feed (dry basis), averaging time per 40 CFR 60.46.

TO: **c. PM/PM10 - 0.0135 lb per MMBTU (25.0 lbs per hour at 1,850 MMBTU/hr) plus 0.3 lb from the cement kiln and 0.1 lb from the clinker cooler per ton of kiln feed (dry basis), averaging time per 40 CFR 60.46.**

Specific Condition C.6.:

FROM: 6. Instruments shall be installed, calibrated, and maintained to continuously measure the amounts of coal used, material fed to the kiln, and clinker produced. The records of fuel usage with the fuel analysis, daily kiln feed and clinker produced shall be reported quarterly to the Florida Department of Environmental Regulation Southwest District office.

TO: **6. Instruments shall be installed, calibrated, and maintained to continuously measure the amounts of coal and limestone used in the boiler, material fed to the kiln, and clinker produced. The records of coal and limestone used in the boiler, fuel analysis, daily kiln feed and clinker produced shall be reported quarterly to the Department's Southwest District office.**

Specific Condition G.1.:

FROM: 1. When the power plant boiler is operating alone and the cement plant is not in operation, the maximum heat input rate of the boiler shall not exceed the site specific limit of 1,000 million Btu per hour, maximum three-hour average.

TO: **1. The heat input rate of the boiler, with or without the cement plant operating, shall not exceed the maximum necessary to produce 150 MW of power and shall in no case exceed 1,850 MMBTU/hr, maximum three-hour average.**

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

(a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
(d) A statement of the material facts disputed by Petitioner, if any;
(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
(g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the amendment request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

A copy of this amendment letter shall be attached to and shall become a part of Air Construction Permit PSD-FL-090.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

For Virginia B. Wetherell, Secretary

CERTIFICATE OF SERVICE

This is to certify that this Permit Amendment and all copies were mailed to the listed persons before the close of business on 8-15-95.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Chapter 120.52(9), Florida Statutes, with with the designated Deputy Clerk, receipt of which is hereby acknowledged.

Kim Tober 8-15-95
(Clerk) (Date)

cc: B. Thomas, SWD
J. Harper, EPA
J. Bunyak, NPS
H. Oven, PPS
C. Hetrick, HCBCC

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

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

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

Consult postmaster for fee.

3. Article Addressed to:
Joseph A. Pirnatteo
Central Power & Line
10311 Cement Plant Rd
Brooksville, Fl
34601

4a. Article Number
Z 392 979 026

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

7. Date of Delivery
8-22-95

5. Signature (Addressee)

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

6. Signature (Agent)

PS Form **3811**, December 1991 ☆U.S. GPO: 1993—352-714 **DOMESTIC RETURN RECEIPT**

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

Z 392 979 026

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

UNITED STATES POSTAL SERVICE

PS Form **3800**, March 1993

Sent to: Joe Pirnatteo
Street and No.: Central Power & Line
P.O., State and ZIP Code: Brooksville Fl

Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	8-15-95

PSD-FL-090

Florida Department of
Environmental Protection

Memorandum

TO: Virginia B. Wetherell

THRU: Dan Thompson

FROM: Howard L. Rhodes

DATE: August 8, 1995

SUBJECT: Permit Amendment - Central Power & Lime (PSD-FL-090(D))

Attached is a permit amendment requested by Central Power & Lime, Inc., in Hernando County allowing them to increase the maximum heat input to their power boiler. The amendment was processed as a new PSD permit application and was public-noticed without comments being received. Pursuant to special testing that was approved in advance, the Department has reduced the allowable emissions for particulate matter even though the capacity has been increased.

The Site Certification for this same amendment was approved on August 1, 1995. We recommend approval of the corresponding PSD permit amendment.

HLR/aal/t

Department of Environmental Protection

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

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

May 23, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Joseph J. Piermatteo
Senior Vice President
Central Power and Lime, Inc.
10311 Cement Plant Road
Brooksville, Florida 34601

Dear Mr. Piermatteo:

Enclosed is a proposed amendment and Public Notice for PSD-FL-090 for the Brooksville facility. The Department requires a public notice for this modification. All comments during the public notice period should be addressed to Mr. A. A. Linero at the Department's Tallahassee address.

If there are additional questions on the above, please call Mr. John Reynolds at (904) 488-1344.

Sincerely,

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

CHF/jr/t

Enclosures

cc: B. Thomas, SWD
J. Harper, EPA
J. Bunyak, NPS
H. Oven, PPS
C. Hetrick, HCBCC

Is your RETURN ADDRESS completed on the reverse side?

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

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

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

Consult postmaster for fee.

3. Article Addressed to:
Joseph J. Piermatteo
Central Power & Lime Inc
10311 Cement Plant Rd
Brooksville, Fl 34601

4a. Article Number
Z 311 902 894

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

7. Date of Delivery
5-26-95

5. Signature (Addressee)

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

6. Signature (Agent)

PS Form **3811**, December 1991 ☆U.S.GPO: 1993—352-714 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

Z 311 902 894

Receipt for Certified Mail

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

UNITED STATES POSTAL SERVICE

PS Form **3800**, March 1993

Sent to: Joe Piermatteo
Street and No.: Central Power & Lime
P.O., State and ZIP Code: Brooksville, Fl

Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	5-23-95

PSD-FI-092(D)

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an
Application for Permit Amendment

DEP File No. PSD-FL-090(D)
Hernando Co.

Mr. Joseph J. Piermatteo
Senior Vice President
Central Power & Lime, Inc.
10311 Cement Plant Road
Brooksville, Florida 34601
_____/

INTENT TO ISSUE

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit amendment for a modification (copy attached) to the applicant's facility as detailed in the application/request specified, above, for the reasons stated in the application/request.

The applicant, Central Power & Lime, Inc., applied on March 15, 1995, to the Department for an amendment of their PSD permit to increase the maximum heat input to the power boiler. The facility is located in Hernando County.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-212 and 62-4, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that a permit amendment is required for the proposed work.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit Amendment. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit amendment.

The Department will issue the permit amendment with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
(d) A statement of the material facts disputed by Petitioner, if any;
(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/ request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF INTENT TO ISSUE PERMIT AMENDMENT

PSD-FL-090

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit amendment to Central Power & Lime, Inc., 10311 Cement Plant Road, Brooksville, Florida 34601. This company operates a Portland Cement plant and power cogeneration facility capable of generating a total of 150 megawatts of power. The amendment increases the allowable heat input rate while reducing the allowable particulate matter emissions. Additional control measures will prevent significant increases in actual sulfur dioxide and nitrogen oxides emissions. Therefore, this change will not cause or contribute to a violation of any air pollution standard or adversely affect the environment.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and, (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/ request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application/request is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Department of Environmental Protection
Southwest District
8407 Laurel Fair Circle
Tampa, Florida 33619

Any person may send written comments on the proposed action to Mr. Al Linero at the Department's Tallahassee address. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

Further, a public hearing can be requested by any person(s). Such requests must be submitted within 30 days of this notice.

request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE PERMIT AMENDMENT all copies were mailed by certified mail before the close of business on 5-23-95 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Clerk

5/23/95
Date

Copies furnished to:

B. Thomas, SWD
J. Harper, EPA
J. Bunyak, NPS
H. Oven, PPS
C. Hetrick, HCBCC

Technical Evaluation
and
Preliminary Determination

Central Power & Lime, Inc.
Power Plant/Cement Plant Cogeneration Facility
Hernando County
Brooksville, Florida

Federal Permit Number
PSD-FL-090
State Permit Amendment
PSD-FL-090(D)

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

May 23, 1995

I. Application Information

A. Applicant

Mr. Joseph J. Piermatteo
Senior Vice President
Central Power & Lime, Inc.
10311 Cement Plant Road
Brooksville, Florida 34601

B. Request

The Department received a complete application on April 26, 1995, to allow an increase in the boiler heat input so that 150 megawatts can be generated to meet increased power demand.

C. Classification

The applicant's facility (SIC 3241) is located on Cement Plant Road, Brooksville, Hernando County, Florida. UTM coordinates of the site are: Zone 17, 360.0 km E and 3,162.4 km N.

II. Project Description/Emissions

This cement plant/power cogeneration facility was originally permitted in 1983 under the Power Plant Site Certification Rule (PA 82-17) and two federal air construction permits (Power Plant/ PSD-FL-090, Cement Plant/PSD-FL-091). The facility was permitted to produce 600,000 tons per year of portland cement and 125 megawatts of power when both plants were operating (25 megawatts for internal use and 100 megawatts for export). The design called for the power plant gases to be used for material drying in the cement plant, which resulted in the absorption of about 20% of the power plant's SO_2 emissions in the calcium component of the cement. So that the SO_2 emission limit for normal operation would not be exceeded when the cement plant was down (no absorption of SO2), the power plant heat input was limited to 1,000 MMBTU/hr (sufficient to produce 100 megawatts) when the power plant was operating alone. The purpose of the capacity reduction was to make up for the lost SO_2 absorption when the cement plant was down, while allowing the same power export rate of 100 megawatts.

The current amendment is based on the need to meet increased power demand. The applicant proposes producing a maximum of 150 megawatts while increasing boiler heat input to 1,850 MMBTU/hr. The increases in heat input and power output appear out of proportion because the applicant used the worst-case summer conditions when the cooling water is at its maximum temperature and the unit operates less efficiently. However, the emission limits are not being increased. Limestone injection will be used to control additional SO_2 emitted while NOx will be controlled by combustion adjustments. It is assumed that none of the added power will be used by the new cement kiln at the same location covered under another PSD permit (PSD-FL-227).

With the Department's approval, a power plant test program was conducted by the applicant in October 1994 with the goal of showing that the above control measures would result in no emission increases at higher heat input rates. The power plant was tested at slightly above the permitted rate of 100 megawatts (with the cement plant down) and at rates closer to the requested maximum of 150 megawatts. Both manual stack testing and continuous emission monitors (CEMS) were used for SO2 and NOx emissions. Opacity and stack gas flow rate were continuously measured by stack monitors. Particulate matter emissions were obtained by manual stack sampling. Pertinent results are briefly summarized below along with the Department's proposed limits:

	MMBTU/hr Heat Input	Tons/hr Limestone Injection	Emissions (lb/hr) PM/PM10	SO2	NOx	%Opacity V.E.
Permitted	1,000	-	37	770	846	20
Tested@106MW	1,179	6	6	734	720	5
Tested@137MW	1,516	19	8	683	657	5
Proposed@150MW	1,850	(monitored)	25	770	846	10

The applicant contends that the PM/PM10 results show no increase when analyzed statistically according to the "Student-t" significance test and therefore PSD review does not apply. The Department's position is that PSD applies due a change in a federally enforceable permit limit on heat input which will result in an increase in actual emissions. It is reasonable to assume that an 85% increase in permitted fuel firing rate will result in an increase in actual PM/PM10 emissions. Therefore, actual boiler emissions at the 100 megawatt net output baseline must be compared with future allowable emissions to determine if a PSD-significant increase will occur ((25 - 6) x 8760/2000 = 83 tons/yr). This PM/PM10 increase exceeds the significant emissions rate of 15 tons/yr listed in Table 212.400-2 of Chapter 62-212, Florida Administrative Code (F.A.C.).

III. Rule Applicability

The construction permit application is subject to review under Chapter 403, Florida Statutes (F.S.), and Chapters 62-209 through 62-297 and 62-4, F.A.C. The facility is located in an area designated as attainment for all criteria pollutants (Rule 62-275.400, F.A.C.). The proposed project is subject to the preconstruction review requirements of Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD). The proposed

increase in PM/PM10 emissions exceeds the significant level set forth in Table 212.400-2 of Chapter 62-212, F.A.C. Preconstruction review must include a determination of Best Available Control Technology (BACT), good engineering practice stack height, ambient impact analysis, impact on soils, vegetation, and visibility. Rules 62-212.400(2)(g), 62-296.800, Table 296.800-1, Section 60.220, and 62-297.300, Table 297.330-1, apply to this permit amendment.

IV. Air Quality Analysis

A. Requirements

The proposed project will emit only PM/PM_{10} in a PSD-significant amount. The air quality impact analyses required by the PSD regulations for this pollutant include:

* An analysis of existing air quality;
* A PSD increment analysis;
* An Ambient Air Quality Standards (AAQS) analysis;
* An analysis of impacts on soils, vegetation, wildlife, visibility and of growth-related air quality modeling impacts; and
* A "Good Engineering Practice" (GEP) stack height determination.

The analysis of existing air quality generally relies on preconstruction monitoring data collected with EPA-approved methods. The PSD and AAQS analyses depend on air quality dispersion modeling carried out in accordance with EPA guidelines.

Based on the required analyses, the Department has reasonable assurance that the proposed project, as described in this report and subject to the conditions of approval proposed herein, will not cause or contribute to a violation of any AAQS or PSD increment. However, the following EPA-directed stack height language is included: "In approving this permit, the Florida Department of Environmental Protection has determined that the application complies with the applicable provisions of the stack height regulations as revised by EPA on July 8, 1985 (50 FR 27892). Portions of the regulations have been remanded by a panel of the U.S. Court of Appeals for the D.C. Circuit in NRDC v. Thomas, 838 F. 2d 1224 (D.C. Cir. 1988). Consequently, this permit may be subject to modification if and when EPA revises the regulation in response to the court decision. This may result in revised emission limitations or may affect other actions taken by the source owners or operators." A discussion of the modeling procedure and required analyses follows.

B. Existing Air Quality

Preconstruction ambient air quality monitoring is required for all pollutants subject to PSD NSR. However, an exemption to the monitoring requirement can be obtained if the maximum air quality

impact resulting from the projected emissions increase, as determined by air quality modeling, is less than a pollutant-specific de minimis concentration. Pollutants which do not have a specified de minimis level may also be exempt from preconstruction monitoring requirements. In addition, if an acceptable ambient monitoring method for the pollutant has not been established by EPA, monitoring is not required.

Maximum PM/PM_{10} impacts from the project are predicted to be 0.26 ug/m^3 for the 24-hour averaging time, which is less than the applicable de minimis level of 10 ug/m^3. Therefore, preconstruction ambient air quality monitoring is not required for this project.

C. Modeling Method

1. Model Selection

The EPA-approved Industrial Source Complex (ISC2) dispersion model was used to evaluate pollutant emissions from the proposed project. The model determines ground-level concentrations of inert gases or small particles emitted into the atmosphere by point, area and volume sources. The model incorporates elements for plume rise, transport by the mean wind, Gaussian dispersion, and pollutant removal mechanisms such as deposition. This model allows for the separation of sources, building wake downwash, and various other input and output features. A series of specific model features, recommended by the EPA, are referred to as the regulatory options. The applicant used the EPA recommended regulatory options in each modeling scenario. Direction-specific downwash parameters were used because the stacks were less than the good engineering practice (GEP) stack height.

2. Meteorological Data

Meteorological data used in the ISCST2 model to determine air quality impacts consisted of a concurrent five year period (1987-1991) of hourly surface weather observations and twice-daily upper air soundings from the National Weather Service (NWS) station at Tampa, Florida. These data from the NWS station at Tampa were selected for use in the model because this station is the closest primary weather station to the project site. The surface observations included wind direction, wind speed, temperature, cloud cover and cloud ceiling.

3. Receptor Network

To determine the significant impact area, if any, concentrations were predicted for a total of 239 receptors located at the fenced property and at distances from the power plant of 3.0, 5.0, 7.0, and 10.0 km along 36 radials with each radial spaced at 10-degree intervals.

The Chassahowitzka National Wilderness Area is a PSD Class I area. The nearest boundary is located approximately 15 km from the project site. Maximum impacts for this Class I area were predicted at thirteen discrete receptors located along its boundaries.

D. Results

1. Significant Impact Analysis

The maximum predicted PM/PM_{10} air quality impacts due to the project are 0.26 ug/m^3 for the 24-hour averaging time and 0.02 ug/m^3 for the annual averaging time. These predicted values are less than the applicable significant impact levels of 5 ug/m^3, 24-hour average and 1 ug/m^3, annual average. Therefore, there are no significant impact areas associated with this project, and no further AAQS or PSD Class II modeling for this project is required.

2. Class I Area

Maximum PM/PM_{10} impacts predicted at the nearby PSD Class I area for comparison to the National Park Service (NPS)-recommended Class I significant impact levels are 0.001 ug/m^3 for the 24-hour averaging time and 0.00005 ug/m^3 for the annual averaging time. These values are less than the NPS-recommended Class I significant levels of 0.27 ug/m^3, 24-hour average and 0.07 ug/m^3, annual average. Therefore, no further Class I modeling analysis is required.

E. Additional Impacts Analysis

1. Impacts on Soils, Vegetation, Wildlife, and Visibility

Because the predicted impacts for PM/PM10 are less than the significant impacts, the project is not expected to have a significant adverse effect on regional or Class I area vegetation, soils, wildlife, and visibility.

2. Growth-Related Air Quality Impacts

No growth-related air quality impacts are expected with the completion of this project.

V. Conclusion

Based on the information provided by Central Power and Lime, Inc., the Department has reasonable assurance that the proposed project, as proposed herein, will not cause or contribute to a violation of an ambient air quality standard, PSD increment, or any other technical provisions of Chapters 62-209 through 62-297 of the Florida Administrative Code.

A. A. LINERO CERTIFICATE NO. 26032 STATE OF FLORIDA REGISTERED ENGINEER 5/23

Department of Environmental Protection

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

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

June XX, 1995

DRAFT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Joseph J. Piermatteo
Senior Vice President
Central Power & Lime, Inc.
10311 Cement Plant Road
Brooksville, Florida 34601

Dear Mr. Piermatteo:

Re: Amendments to PSD-FL-090
Boiler Heat Input Increase From 1000 to 1,850 MMBTU/hr

The Department received your application on March 15, 1995, for amendment of the subject air construction permit allowing an increase to 1,850 MMBTU/hr in the boiler firing rate. The permit is amended as shown:

Specific Condition A.1.c.:

FROM: c. Particulates - 0.03 lb. per million Btu heat input, averaging time per 40 CFR 60.46.

TO: **c. PM/PM10 - 0.0135 lb per MMBTU (25.0 lbs per hour at 1,850 MMBTU/hr), averaging time per 40 CFR 60.46.**

Specific Condition A.1.d.:

FROM: d. Visible emissions - 20% opacity, 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

TO: **d. Visible emissions - 10% opacity, 6-minute average, except for one 6-minute period per hour of not more than 17% opacity.**

Specific Condition A.2.c.:

FROM: c. Particulates - 0.03 lb. per million Btu heat input plus 0.3 lb from the cement kiln and 0.1 lb from the clinker cooler per ton of kiln feed (dry basis), averaging time per 40 CFR 60.46.

DRAFT

TO: **c. PM/PM10 - 0.0135 lb per MMBTU (25.0 lbs per hour at 1,850 MMBTU/hr) plus 0.3 lb from the cement kiln and 0.1 lb from the clinker cooler per ton of kiln feed (dry basis), averaging time per 40 CFR 60.46.**

Specific Condition C.6.:

FROM: 6. Instruments shall be installed, calibrated, and maintained to continuously measure the amounts of coal used, material fed to the kiln, and clinker produced. The records of fuel usage with the fuel analysis, daily kiln feed and clinker produced shall be reported quarterly to the Florida Department of Environmental Regulation Southwest District office.

TO: **6. Instruments shall be installed, calibrated, and maintained to continuously measure the amounts of coal and limestone used in the boiler, material fed to the kiln, and clinker produced. The records of coal and limestone used in the boiler, fuel analysis, daily kiln feed and clinker produced shall be reported quarterly to the Department's Southwest District office.**

Specific Condition G.1.:

FROM: 1. When the power plant boiler is operating alone and the cement plant is not in operation, the maximum heat input rate of the boiler shall not exceed the site specific limit of 1,000 million Btu per hour, maximum three-hour average.

TO: **1. The heat input rate of the boiler, with or without the cement plant operating, shall not exceed the maximum necessary to produce 150 MW of power and shall in no case exceed 1,850 MMBTU/hr, maximum three-hour average.**

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

DRAFT

The Petition shall contain the following information:

(a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
(d) A statement of the material facts disputed by Petitioner, if any;
(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
(g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the amendment request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

A copy of this amendment letter shall be attached to and shall become a part of Air Construction Permit PSD-FL-090.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Virginia B. Wetherell, Secretary

DRAFT

CERTIFICATE OF SERVICE

This is to certify that this Permit Amendment and all copies were mailed to the listed persons before the close of business on June XX, 1995.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Chapter 120.52(9), Florida Statutes, with with the designated Deputy Clerk, receipt of which is hereby acknowledged.

_____

(Clerk) (Date)

cc: B. Thomas, SWD
J. Harper, EPA
J. Bunyak, NPS
H. Oven, PPS
C. Hetrick, HCBCC

Best Available Control Technology (BACT) Determination
Central Power and Lime, Inc.
Hernando County
PSD-FL-090(D)
PA 82-17

The applicant proposes to increase boiler fuel consumption by 85 percent over the originally permitted level of 1,000 MMBTU/hr in order to increase power generation from 100 MW to 150 MW. The proposed project for the Brooksville facility will result in a significant increase in emissions of particulate matter (PM/PM10). The project is, therefore, subject to Prevention of Significant Deterioration (PSD) review in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.). The BACT determination is part of the review required by Rule 62.212.410, F.A.C.

Date of Receipt of BACT Application: March 15, 1995

BACT Determination Proposed by Applicant:

Emission Limit: 0.02 lb PM/PM10 per MMBTU heat input to the boiler with a maximum of 37.0 lbs PM/PM10 per hour at 1,850 MMBTU per hour heat input.

Control Technology: Existing baghouse.

BACT Determination Procedure:

In accordance with F.A.C. Chapter 62-212, this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department, on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, Rule 62-212.410(1), F.A.C., states that in making the BACT determination the Department shall give consideration to:

(a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to Section 169, and any emision limitation contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).

(b) All scientific, engineering, and technical material and other information available to the Department.

(c) The emission limiting standards or BACT determinations of any other state.

DRAFT

(d) The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine for the emission source in question the most stringent control available for a similar or identical source or source category. If it is shown that this level of control is technically or economically infeasible for the source, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

BACT Determined by DEP:

Emission Limit: 0.0135 lb PM/PM10 per MMBTU (25.0 lbs PM/PM10 per hour at 1,850 MMBTU/hr)
Visible emissions - 10% opacity, 6-minute average, except for one 6-minute period per hour of not more than 17% opacity.

Control Technology: Existing baghouse with improved bag maintenance/replacement

BACT Determination Rationale:

Recent test results for the boiler operating alone at 137.2 megawatts show that PM/PM10 emissions averaged 7.65 lbs per hour (with new filter bags) while the continuously monitored opacity averaged 5.0 per cent. The tighter limits are based on the Department's assessment of what is achievable with the existing baghouse if bags are replaced on a more frequent basis than before. The Department believes that the permittee will be able to comply consistently with the tighter limits. The additional cost of more frequent bag replacement is not expected to have a significant impact on the permittee's production costs.

Environmental Impact Analysis:

The maximum predicted PM/PM_{10} air quality impacts due to the project are 0.26 ug/m^3 for the 24-hour averaging time and 0.02 ug/m^3 for the annual averaging time. These predicted values are less than the applicable significant impact levels of 5 ug/m^3, 24-hour average and 1 ug/m^3, annual average.

DRAFT

Conclusion:

The ambient air quality impact from PM/PM10 emissions due to the proposed modification is in compliance with all applicable requirements and reflects a reduction in allowable emissions. Therefore, the Department concludes that the emission control technology for the proposed increase in power output represents BACT.

BACT Analysis Details Available From:

A. A. Linero, P.E., Administrator
New Source Review Section
Bureau of Air Regulation
111 South Magnolia Drive
Tallahassee, Florida 32399-2400

Recommended by:

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

_____, 1995
Date

Approved by:

Virginia B. Wetherell, Secretary
Dept. of Environmental Protection

_____, 1995
Date

Florida Department of
Environmental Protection

Memorandum

TO: C. H. Fancy

FROM: A. A. Linero

DATE: May 23, 1995

SUBJ: Central Power & Lime, Inc. - Brooksville
Permit Amendment - PSD-FL-090D

Attached for your review and approval is a permit amendment providing for an increase in boiler heat input to 1,850 MMBTU/hr from the originally permitted level of 1,000 MMBTU/hr. As you recall, Tom Mountain agreed to our proposed PM/PM_{10} emission limit of 25 lb/hr, so we shouldn't get any static from them on that. However, they probably will complain about the limestone monitoring requirement. We believe this is needed to verify SO_2 absorption when the CEMS goes down. The equipment can be installed at reasonable cost.

If you have any questions, we will be glad to discuss the details.

AAL/jr/t

TO: A. Linero & Scott Sheplak

FROM: J. Kissel

DATE: September 10, 1997

SUBJECT: Attached letter re Fla. Crushed Stone/Central P&L

The attached letter requests an amendment "either in the existing permits or in the Title V permits".

I'd like to treat this as a supplement to the Title V application to be addressed in the Title V permit, but since this facility is under PPS, I wanted to run this by you, Al, in case you think Tall'e should take any permitting action on this request. Until the Title V permit is issued, we at the SWD could just give them an authorization letter for the next test cycle.

We'll proceed as above unless I hear differently from either of you.

(Scott: There's been some prior conversations and e-mails on whether Florida Crushed Stone (0530021), Central Power and Lime (0530032), and Chemical Lime (0530005) should be considered as one facility, and who should process the Title V permit. Since Central Power and Lime is permitted under Power Plant Siting, it seems that it should be a Tall'e Title V project, but it would not have to meet the Acid Rain deadline and could be done next year.)

c:\fcs997

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ▪ FAX/377-7158

KA 307-97-07

September 2, 1997

Mr. David Zell
Florida Department of
Environmental Protection
Southwest District Office
3804 Coconut Palm Drive
Tampa, Florida 33619-8318

Subject: Florida Crushed Stone Company/
Central Power & Lime
Hernando County
Permits AO27-231888A and AC27-222095 - Cement Plant
PA82-17D - Power Plant
Permit PSD-FL-090B - Project

Dear Mr. Zell:

On behalf of Florida Crushed Stone Company (FCS) and Central Power & Lime (CPL), I would like to clarify by permit amendment the compliance testing requirements for the FCS cement plant and the CPL power plant. As you are aware, the cement kiln, clinker cooler, raw mill, and limestone dryer associated with the cement plant and the CPL power plant all discharge through a common baghouse and stack. The permits for the facility specify emission limiting standards for the cement plant while operating alone, the power plant while operating alone, and for the cement plant and power plant when operating together. By far, the most common operating scenario is for the cement plant and power plant to operate together.

The current cement plant operating permit (AO27-231888A at Specific Condition 19) requires compliance testing on an annual basis (within 60 days prior to May 1) when only the cement plant sources are operating (the kiln, cooler, raw mill and limestone dryer). The permits are less specific regarding compliance testing requirements for the power plant and for the power plant and cement plant operating together.

Historically, FCS/CPL has conducted annual compliance testing for the regulated air pollutants (particulate matter, sulfur dioxide, nitrogen oxides and opacity) with the cement plant and power plant operating together. Difficulties have arisen in scheduling annual compliance testing with only the cement plant operating because of the reliability factor associated with the power plant. The fact is the power plant has a scheduled six-week outage only every two years for maintenance. With this schedule, it is impossible to conduct compliance testing with the

cement plant sources only operating every year. This matter has been discussed with the Department in the past and the Department has been understanding of operational conditions at FCS/CPL and has either waived or delayed compliance testing of the cement plant sources only (see attached FDEP letter dated April 5, 1995).

Regarding compliance testing when the power plant only is operating, FCS/CPL has had an informal understanding with the Department that if emissions measured with the cement plant and power plant operating together were less than, or "near", the limits permitted for the power plant operating alone, the presumption would be that the power plant operating alone was in compliance. This understanding has never been committed to writing and no specific limits have been established to evaluate how this understanding would be implemented if emissions measured during joint operations fell outside of "near" as referenced in the verbal understanding.

The flexibility the Department has granted in past compliance testing is within the jurisdiction of the Department. Rule 62-297.310(7)(a)(4), F.A.C. states:

> During each federal fiscal year (October 1-September 30), unless otherwise specified by rule, order or permit, the owner or operator of each emission unit shall have a formal compliance test conducted for:
>
> a. Visible emissions, ...
>
> b. Each of the following pollutants, if there is an applicable standard, and if the emission unit emits or has the potential to emit; ... 100 tons per year or more of any other regulated air pollutant; and
>
> c. Each NESHAP pollutant, ...
>
> [Emphasis added]

Rather than continuing to address the necessity of waivers on a case-by-case basis and consistent with the request in the Department's April 5, 1995, letter, we are requesting that the compliance testing requirements of the cement plant and power plant be amended either in the existing permits or in the Title V operation permits which will be issued in the not too distant future.

In proposing amended compliance test requirements, we looked at the planned operating schedule of the FCS/CPL cement plant and power plant. Annually, the cement plant is scheduled for a 7-10 day outage for maintenance, normally during the last quarter of the calendar year. With the power plant, there is a planned outage of approximately six weeks every two years for maintenance. The next power plant outage is scheduled for March 1998.

Consistent with the requirements of Rule 62-297.310(7)(a)4, F.A.C. and the planned operating schedules of the cement plant and the power plant, the following compliance test requirements are proposed:

Combined Cement Plant/Power Plant Operation

- Test the main plant stack emissions for the following pollutants during each federal fiscal year (October 1-September 30):

  Particulate Matter (PM)
  Opacity (VE)
  Nitrogen Oxides (NOx)
  Sulfur Dioxide (SO_2)

  All emission testing should be performed at the main plant stack during a period when the cement plant, clinker cooler, raw mill and limestone dryer are operating simultaneously and under normal operating conditions (as currently defined in Specific Condition No. 23 of Permit A027-231888A), and when the power plant is operating under normal operating conditions and within 90-100 percent of the rate defined in Specific Condition G.1. of PSD-FL-090 as amended August 8, 1995.

  Note 1: The note pertaining to the operation of the limestone dryer included as part of Specific Condition 19 of Permit A027-231888A should be incorporated here.

  Note 2: If it is necessary to specify a test date either in amendments to existing permits or in the forthcoming Title V operating permit, it is requested that the period be specified as "within 60 days prior to the date of May 1".

Cement Plant

- Test the main plant stack emissions for the following pollutants every two years during the scheduled outage of the CPL power plant: (the remainder of Specific Condition 19 of Permit A027-231888A should be incorporated here).

KOOGLER & ASSOCIATES

Power Plant

- It is suggested that there be no specific test requirements for the power plant when operating alone as the power plant is scheduled to operate jointly with the cement plant approximately 97 percent of the time (all but 7-10 days per year) and because of the fact there are no New Source Performance Standards applicable to the power plant. Demonstration of compliance with the cement plant and power plant operating jointly, coupled with the compliance demonstration for the cement plant every two years, should provide the Department with assurance that the joint FCS/CPL facility is operating in compliance with applicable emission limiting standards.

I appreciate your review and consideration of this request. If you have any questions regarding these matters or if additional information is required, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:wa
Enc.

c: Mr. Joe Piermatteo, FCS
Mr. Bryan Adkins, FCS
Mr. Charles Allen, FCS

Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

April 5, 1995

Mr. Tom Mountain
Florida Crushed Stone
Post Office Box 1508
10311 Cement Plant Road
Brooksville, Florida 34605-1508

Dear Mr. Mountain:

In response to your letter dated March 30, 1994, the Department will waive the annual compliance test required by permit AO27-231888 due to the financial and operational problems that it would necessitate. The Department understands that the source will be tested during the next scheduled Power Plant outage that should be in March 1996. Should your schedule change and a Power Plant shut down be scheduled prior to that time please schedule a compliance test for that shut down. Notify the Department 15 days prior to the next compliance test.

Since this situation may arise again please submit an application to the Department to change permit AO27-231888 to require compliance testing that reflects actual operating conditions including Power Plant scheduled outages.

If you have should have any questions, please call me at (813)744-6100 extension 119.

Sincerely,

W. A. Proses

W. A. Proses
Air Compliance Supervisor

cc: John B. Koogler, Ph.D.,P.E. Koogler & Associates

Department of
Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 4, 1996

Mr. Steven C. Cullen, P.E.
Koogler & Associates
Environmental Services
4014 Northwest Thirteenth Street
Gainesville, Florida 32609

Subject: Central Power and Lime, Incorporation, Brooksville Plant

Dear Mr. Cullen;

The Title V Section acknowledges receipt of your amendment to the Title V application for emissions unit 008 at the Central Power and Lime, Incorporation, Brooksville Plant. Action will be taken on the application when we review the initial Title V application, tentatively scheduled for 1998.

No action will be taken by this section on your request by letter to increase the process rate form 100 TPY to 125 TPY in the interim. Applications for a permit change must be submitted on the application form, not by letter. In this case, it would be prudent to submit an application for an air construction permit and to provide sufficient information to evaluate any increase in emissions and to determine whether such increase is related to the installation of a new kiln at Florida Crushed Stone, or any other physical change at the facility.

Please contact me at (904) 488-1344 or by writing using the letterhead address if you have any questions.

Sincerely,

John C. Brown, P.E.
Administrator, Title V
Bureau of Air Regulation

JCB/sk

cc: Al Linero
Bill Thomas
Tom Mountain

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

October 8, 1996

Mr. Scott Sheplak, P.E.
Department of Environmental Protection
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJECT: Central Power & Lime, Inc.
Brooksville Plant, AIRS ID# 0530032
Emissions Unit 008: Lime Storage Bins
Request to Amend Operating Permit AO27-186146
Request to Amend Title V Air Operation Permit Application

Dear Mr. Sheplak:

Central Power & Lime is requesting an increase in the process rate for Emissions Unit 008: Lime Storage Bins at the existing plant in Brooksville, Hernando County, Florida. The process rate is currently limited to 100 tons/hour (tph) by Permit AO27-186146, Specific Condition No. 3. Central Power & Lime is requesting that this rate be increased to 125 tph, as a maximum hourly rate. This request will not affect the annual production rate or the annual rate of emissions, as the annual average rate will not exceed 100 tph.

The process rate is limited only by the operation permit, not by the preceding air construction permit (AC27-091433). Further, this rate increase will not necessitate any physical changes; nor will it require any capital expense. Hence, this request does not constitute a modification per Rule 62-210, F.A.C., or per NSPS.

No fee is required with this request because this is a Title V facility, per Rule 62-213.205(5).

Enclosed please find the pertinent replacement pages for the Title V Air Operation Permit Application. It is requested that the Title V Operation Permit incorporate this change. Central Power & Lime does not believe that it is necessary for the Department to amend and reissue the operation permit, as written approval of this request is sufficient for use during the interim period prior to issuance of the Title V Operation Permit.

In summary, Central Power & Lime requests the following:

- Review of this letter and enclosures
- Updating of the Title V Operation Permit Application
- Amendment of AO27-186146
- Written notification of approval of this rate increase request

Please do not hesitate to contact me at (352) 377-5822, if you have any questions or require further information.

Sincerely,

Steven C. Cullen, P.E.
Koogler & Associates

copy to: Tom Mountain (FCS/CPL)

cc: Teresa Heron
John Reynolds

KOOGLER & ASSOCIATES

C. EMISSIONS UNIT DETAIL INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Details

1. Initial Startup Date: **NA**		
2. Long-term Reserve Shutdown Date:		
3. Package Unit: Manufacturer:	Model Number:	
4. Generator Nameplate Rating:	MW	
5. Incinerator Information: Dwell Temperature: Dwell Time: Incinerator Afterburner Temperature:		°F seconds °F

Emissions Unit Operating Capacity

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate: **125 tph**		
4. Maximum Production Rate:		
5. Operating Capacity Comment (limit to 200 characters):		

Emissions Unit Operating Schedule

Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	**7884** hours/year

F. SEGMENT (PROCESS/FUEL) INFORMATION
(Regulated and Unregulated Emissions Units)

Segment Description and Rate: Segment __1__ of __1__

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): **Material transfer**
2. Source Classification Code (SCC): **3-05-007-12**
3. SCC Units: **Tons Produced**

4. Maximum Hourly Rate: **125**	5. Maximum Annual Rate: **788,400**
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur:	8. Maximum Percent Ash:
9. Million Btu per SCC Unit:	

10. Segment Comment (limit to 200 characters): **Lime Transfer Rate = 100 tph average**

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

KA 307-93-12

October 2, 1995

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

Subject: Central Power & Lime, Inc.
Comments on Permit Amendment for
Boiler Heat Input Increase
PSD-FL-090, PA 82-17D

Dear Mr. Fancy:

We received the above referenced amendment on September 26, 1995. The comments mentioned below are provided simply to clarify two items in FDEP's amendment document. Further action on the part of the Department is neither expected nor necessary.

1. Specific Condition G.1. As reflected in the application and subsequent correspondence and our meetings, the power generation rate for the project is 150 MW, net delivered.

2. Project Description It should be noted that the additional modification request in March 1995 was for a second cement kiln, not lime kiln.

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

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:par

c: H. Oven, PPS
T. Mountain, CPL
L. Curtin, Holland & Knight

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

JUL 12 1995

RECEIVED
JUL 18 1995
Bureau of
Air Regulation

4APT-AEB

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

SUBJ: Central Power and Lime, Inc. (PSD-FL-90D)

Dear Mr. Fancy:

This is to acknowledge receipt of your preliminary determination and draft Prevention of Significant Deterioration (PSD) permit for the above referenced source by letter dated May 23, 1995. The modification to the existing PSD permit will allow the source to increase the maximum heat input to the power boiler. The project triggers PSD review for PM/PM_{10} emissions. We have reviewed the package as requested and have no adverse comments. If you have any questions on this determination, please contact Mr. Gregg Worley of my staff at (404) 347-3555, extension 4139.

Sincerely yours,

Jewell A. Harper
Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

C: AL
JR

THE TAMPA TRIBUNE

Published Daily

Tampa, Hillsborough County, Florida

State of Florida
County of Hillsborough } ss.

Before the undersigned authority personally appeared R. Putney, who on oath says that he is Accounting Manager of The Tampa Tribune, a daily newspaper published at Tampa in Hillsborough County, Florida; that the attached copy of advertisement being a

LEGAL NOTICE HERNANDO

in the matter of

STATE OF FLORIDA

was published in said newspaper in the issues of

MAY 26, 1995

Affiant further says that the said The Tampa Tribune is a newspaper published at Tampa in said Hillsborough County, Florida, and that the said newspaper has heretofore been continuously published in said Hillsborough County, Florida, each day and has been entered as second class mail matter at the post office in Tampa, in said Hillsborough County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm, or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

R Putney

Sworn to and subscribed before me, this 30 *day of* MAY *, A.D. 19*95

Personally Known ______ *or Produced Identification* ______

Type of Identification Produced ______

(SEAL) Ina S Kennedy

INA S. KENNEDY
Notary Public, State of Florida
My comm. expires Mar. 22, 1999
No CC187731

NOTARY PUBLIC

RECEIVED
JUN 9 1995
Bureau of
Air Regulation

cc: J. Reynolds
C. Holladay
C. Hetrick, Hernando Co
J. Harper, EPA
J. Bunyak, NPS
J. Pronek, SW Dist

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION

NOTICE OF INTENT
TO ISSUE
PERMIT AMENDMENT
PSD-FL-090

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit amendment to Central Power & Lime, Inc., 10311 Cement Plant Road, Brooksville, Florida 34601. This company operates a Portland Cement plant and power cogeneration facility capable of generating a total of 150 megawatts of power. The amendment increases the allowable heat input rate while reducing the allowable particulate matter emissions. Additional control measures will prevent significant increases in actual sulfur dioxide and nitrogen oxides emissions. Therefore, this change will not cause or contribute to a violation of any air pollution standard or adversely affect the environment.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interest will be affected by any decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the residing officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application/request is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of
Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Department of
Environmental Protection
Southwest District
8407 Laurel Fair Circle
Tampa, Florida 33619

Any person may send written comments on the proposed action to Mr. Al Linero at the Department's Tallahassee address. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

Further, a public hearing can be requested by any person(s). Such requests must be submitted within 30 days of this notice.

request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION
C.H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399
904-488-1344

BV1765 5/26/95

Florida Department of

Memorandum Environmental Protection

File

TO: Tommy Lemacks

FROM: Buck Oven

DATE: July 25, 1995

SUBJECT: Florida Crushed Stone PA 82-17
Module 8027

On January 25, 1994, Florida Crushed Stone Company submitted a request for modification of PA 82-17, and the PSD-FL-90 permit. On March 21, 1994, the company submitted the $10,000 modification fee to pay for the review of the site certification modification and the Air Permit (PSD Permit) modification. In order to satisfy the requirements of section 62-296, F.A.C. an Air Permit Processing Fee must be deposited to the Department's Florida Permit Fee Trust Fund. Please transfer $7,500.00 from the Operating Trust Fund, subaccount PA 82-17/8027 to the Florida Permit Fee Trust Fund for PSD-FL-90.

Please furnish this office and the Bureau of Air Regulation with a copy of documentation effecting this transfer.

cc: Patty Adams
Landa Korokous

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

KA 307-94-05

May 8, 1995

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

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

Dear Mr. Linero:

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

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

RESPONSE:

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

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

RESPONSE:

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

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

RESPONSE:

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

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

RESPONSE:

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

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

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

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:par
Enc.

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

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

KA 307-94-05

April 24, 1995

RECEIVED
APR 26 1995
Bureau of
Air Regulation

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

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

Dear Mr. Linero:

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

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

RESPONSE:

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

2. **The October 1994 testing showed that increased SO_2 generation from the higher fuel consumption can be controlled below the current allowable limit by tripling the limestone injection rate to about 19 tons per hour. A condition of the new permit will require a minimum verifiable rate of limestone injection at all times while operating at the increased heat input rate. Please explain how CPL proposes to measure and record the limestone injection rate.**

RESPONSE:

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

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

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

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

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

RESPONSE:

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

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

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

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

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:par
Enc.

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

TABLE 1

SUMMARY OF MODELING RESULTS
CPL PM10 EMISSIONS

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

NOTE:

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

KOOGLER & ASSOCIATES

United States Department of the Interior

FISH AND WILDLIFE SERVICE
1875 Century Boulevard
Atlanta, Georgia 30345

IN REPLY REFER TO:

April 20, 1995

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

Dear Mr. Fancy:

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

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

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

Air Quality Modeling Analysis

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

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

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

Best Available Control Technology

The Best Available Control Technology analysis appears to be complete.

Air Quality Related Values Analysis

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

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

Sincerely yours,

for Noreen K. Clough
Regional Director

cc: J. Reynolds
C. Holladay
D. Owen
J. Kissel, SW Dist
J. Kooger, K+A
J. Harper, EPA
Hernando Co. (5-23-95)

United States Department of the Interior

FISH AND WILDLIFE SERVICE
1875 Century Boulevard
Atlanta, Georgia 30345

IN REPLY REFER TO:

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

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Air Quality Modeling Analysis

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

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

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

Sincerely yours,

for Noreen K. Clough
Regional Director

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

April 13, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Joseph J. Piermatteo
Senior Vice President
Central Power & Lime, Inc.
10311 Cement Plant Road
Brooksville, Florida 34601

Dear Mr. Piermatteo:

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

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

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

2. The October, 1994 testing showed that increased SO_2 generation from the higher fuel consumption can be controlled below the current allowable limit by tripling the limestone injection rate to about 19 tons per hour. A condition of the new permit will require a minimum verifiable rate of limestone injection at all times while operating at the increased heat input rate. Please explain how CPL proposes to measure and record the limestone injection rate.

3. An ambient impact analysis for PM_{10} was not done. This analysis is required. In addition, as stated above, the Department has reason to believe, based on test results, that 37.0 lbs/hr is not representative of the current actual PM/PM_{10} emission rate for input into the short term or long term significant impact analysis (SIA). The SIA is required in order to determine whether or not a full impact PM10 analysis including impacts of nearby sources is necessary. Based on test results, the Department has determined that 10.17 lbs/hr is a reasonable upper limit to the short-term emission rate representative of current actual emissions, and that 6.22 lbs/hr is a reasonable long term emission rate representative of current actual emissions. These emission rates should be used as input into the PM10 significant impact analysis and should represent the current emission rate of the power plant. If you do not believe these emission rates are representative of actual conditions, you must provide us with documentation reasonably substantiating higher values.

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

Sincerely

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

CHF/CH/h

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

Is your RETURN ADDRESS completed on the reverse side?

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

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Joe J. Piermattео
Sr. Vice President
Central Power & Lime
10311 Cement Plant
Brooksville, Fl 34601

4a. Article Number
Z 311 902 939

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

7. Date of Delivery
4-17-95

5. Signature (Addressee)
X J W Ray

6. Signature (Agent)
DB

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

Thank you for using Return Receipt Service.

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

Z 311 902 939

UNITED STATES POSTAL SERVICE

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

PS Form 3800, March 1993

Sent to
Joe Piermattео
Street and No.
Central Power & Lime
P.O., State and ZIP Code
Brooksville, Fl

Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	4-13-95

PA 82-17/PSD-FL-0920)

Department of
Environmental Protection

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

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

March 16, 1995

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

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

Dear Ms. Harper:

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

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

Sincerely,

Patricia D. Adams

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

CHF/pa

Enclosures

cc: John Reynolds
Cleve Holladay

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

March 16, 1995

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

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

Dear Mr. Hetrick:

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

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

Sincerely,

Patricia B. Adams

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

CHF/pa

Enclosures

cc: John Reynolds
Cleve Holladay

Department of
Environmental Protection

DIVISION OF AIR RESOURCES MANAGEMENT

APPLICATION FOR AIR PERMIT - LONG FORM

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

This section of the Application for Air Permit form provides general information on the scope of this application, the purpose for which this application is being submitted, and the nature of any construction or modification activities proposed as a part of this application. This section also includes information on the owner or authorized representative of the facility (or the responsible official in the case of a Title V source) and the necessary statements for the applicant and professional engineer, where required, to sign and date for formal submittal of the Application for Air Permit to the Department. If the application form is submitted to the Department on diskette, this section of the Application for Air Permit must also be submitted in hard-copy.

Identification of Facility Addressed in This Application

Enter the name of the corporation, business, governmental entity, or individual that has ownership or control of the facility; the facility name, if any; and a brief reference to the facility's physical location. If known, also enter the ARMS or AIRS facility identification number. This information is intended to give a quick reference, on the first page of the application form, to the facility addressed in this application. Elsewhere in the form, numbered data fields are provided for entry of the facility data in computer-input format.

Central Power & Lime, Inc.
Power Plant
10311 Cement Plant Road
Brooksville, Hernando County, Florida

APIS ID#: 40TPA27003214; ARMS Emissions Unit ID#: 014

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	3-15-95
2. Permit Number:	
3. PSD Number (if applicable):	PSD-FL-090D
4. Siting Number (if applicable):	PA 92-17

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:
Joe Piermatteo, Senior Vice President

2. Owner/Authorized Representative or Responsible Official Mailing Address:

Organization/Firm: **Central Power & Lime, Inc.**
Street Address: **10311 Cement Plant Road**
City: **Brooksville** State: **FL** Zip Code: **34601**

3. Owner/Authorized Representative or Responsible Official Telephone Numbers:
Telephone: **(904) 799-7881** Fax: **(904) 799-3508**

4. Owner/Authorized Representative or Responsible Official Statement:

I, the undersigned, am the owner or authorized representative of the facility (non-Title V source) addressed in this Application for Air Permit or the responsible official, as defined in Chapter 62-213, F.A.C., of the Title V source addressed in this application, whichever is applicable. 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. Further, I agree to operate and maintain the air pollutant emissions units and air pollution control equipment described in this application 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. If the purpose of this application is to obtain an air operation permit or operation permit revision for one or more emissions units which have undergone construction or modification, I 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 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 any permitted emissions unit.*

Joseph J Piermatteo
Signature

3-7-95
Date

* Attach letter of authorization if not currently on file.

Scope of Application

This Application for Air Permit addresses the following emissions unit(s) at the facility (or Title V source). An Emissions Unit Information Section (a Section III of the form) must be included for each emissions unit listed.

Emissions Unit ID	Description of Emissions Unit
014	Power Plant

Purpose of Application and Category

Check one (except as otherwise indicated):

Category I: All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, F.A.C.

This Application for Air Permit is submitted to obtain:

[ ] Initial air operation permit under Chapter 62-213, F.A.C., for an existing facility which is classified as a Title V source.

[ ] Initial air operation permit under Chapter 62-213, F.A.C., for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

[ ] Air operation permit renewal under Chapter 62-213, F.A.C., for a Title V source.

Operation permit to be renewed: _____

[ ] Air operation permit revision for a Title V source to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit to be revised: _____

[ ] Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. Also check Category III.

Operation permit to be revised/corrected: _____

[ ] Air operation permit revision for a Title V source for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit to be revised: _____

Reason for revision: _____

_____

Category II: All Air Operation Permit Applications Subject to Processing Under Rule 62-210.300(2)(b), F.A.C.

This Application for Air Permit is submitted to obtain:

[ ] Initial air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.

Current operation/construction permit number(s):

_____

[ ] Renewal air operation permit under Rule 62-210.300(2)(b), F.A.C., for a synthetic non-Title V source.

Operation permit to be renewed: _____

[ ] Air operation permit revision for a synthetic non-Title V source. Give reason for revision; e.g., to address one or more newly constructed or modified emissions units.

Operation permit to be revised: _____

Reason for revision: _____

_____

Category III: All Air Construction Permit Applications for All Facilities and Emissions Units

This Application for Air Permit is submitted to obtain:

[**X**] Air construction permit to construct or modify one or more emissions units within a facility (including any facility classified as a Title V source).

Current operation permit number(s), if any: **PSD-FL-090, and Site Certification PA 82-17**

[ ] Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

Current operation permit number(s): _____

[ ] Air construction permit for one or more existing, but unpermitted, emissions units.

Application Processing Fee

Check one:

[ ] Attached - Amount: $_____ [X] Not Applicable*

***Fee submitted with application for Modification of Conditions of Certification**

Construction/Modification Information

1. Description of Proposed Project or Alterations:

A permit application to increase the power generating rate of an existing coal fired power plant. Currently permitted allowable emission limits will remain unchanged.

Proposed power generation rate : 150 MW, net delivered

Proposed heat input rate : 1850 MMBtu/hr

2. Projected or Actual Date of Commencement of Construction (DD-MON-YYYY):
Upon FDEP approval

3. Projected Date of Completion of Construction (DD-MON-YYYY):
There are no changes to the plant associated with the requested modification

Professional Engineer Certification

1. Professional Engineer Name: **John B. Koogler, Ph.D., P.E.**
   Registration Number: **12925**

2. Professional Engineer Mailing Address:

   Organization/Firm: **Koogler & Associates**
   Street Address: **4014 NW 13th Street**
   City: **Gainesville** State: **FL** Zip Code: **32609**

3. Professional Engineer Telephone Numbers:
   Telephone: **(904) 377-5822** Fax: **(904) 377-7158**

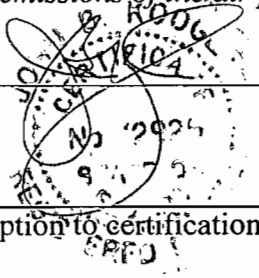
4. Professional Engineer Statement:

   I, the undersigned, hereby certify, except as particularly noted herein, that:*

   (1) To the best of my knowledge, there is reasonable assurance (a) 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; or (b) for any application for a Title V source air operation permit, 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 schedule is submitted with this application;

   (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; and

   (3) For any application for an air construction permit for one or more proposed new or modified emissions units, 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.*



Signature 3/3/95
Date

(seal)

* Attach any exception to certification statement.

Application Contact

1. Name and Title of Application Contact: **Thomas W. Mountain, Environmental Manager**
2. Application Contact Mailing Address: Organization/Firm: **Central Power & Lime, Inc.** Street Address: **10311 Cement Plant Road** City: **Brooksville** State: **FL** Zip Code: **34601**
3. Application Contact Telephone Numbers: Telephone: **(904) 799-7881** Fax: **(904) 796-6281**

Application Comment

N/A

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Name, Location, and Type

1. Facility Owner or Operator: **Central Power & Lime, Inc.**			
2. Facility Name: **Power Plant**			
3. Facility Identification Number: **APIS ID#: 40TPA270032**			[X] Unknown
4. Facility Location Information: Facility Street Address: **10311 Cement Plant Road** City: **Brooksville**		County: **Hernando**	Zip Code: **34601**
5. Facility UTM Coordinates: Zone: **17**		East (km): **360.0**	North (km): **3162.4**
6. Facility Latitude/Longitude: **See Field 5** Latitude (DD/MM/SS):		Longitude (DD/MM/SS):	
7. Governmental Facility Code: **0**	8. Facility Status Code: **A**	9. Relocatable Facility? [ ] Yes [X] No	10. Facility Major Group SIC Code: **49**
11. Facility Comment: **N/A**			

Facility Contact

1. Name and Title of Facility Contact: **Thomas W. Mountain, Environmental Manager**			
2. Facility Contact Mailing Address: Organization/Firm: **Central Power & Lime, Inc.** Street Address: **10311 Cement Plant Road** City: **Brooksville**		State: **FL**	Zip Code: **34601**
3. Facility Contact Telephone Numbers: Telephone: **(904) 799-7881**		Fax: **(904) 796-6281**	

Facility Regulatory Classifications

1. Small Business Stationary Source? [ ] Yes [ ] No [X] Unknown
2. Title V Source? [X] Yes [ ] No
3. Synthetic Non-Title V Source? [ ] Yes [X] No
4. Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)? [X] Yes [ ] No
5. Synthetic Minor Source of Pollutants Other than HAPs? [ ] Yes [X] No
6. Major Source of Hazardous Air Pollutants (HAPs)? [ ] Yes [ ] No [X] Possible
7. Synthetic Minor Source of HAPs? [ ] Yes [X] No
8. One or More Emissions Units Subject to NSPS? [ ] Yes [X] No
9. One or More Emission Units Subject to NESHAP? [ ] Yes [X] No
10. Title V Source by EPA Designation? [ ] Yes [X] No
11. Facility Regulatory Classifications Comment: **N/A**

B. FACILITY REGULATIONS

Depending on the application category, this subsection of the Application for Air Permit form provides either a brief analysis or detailed listing of federal, state, and local regulations applicable to the facility as a whole. (Regulations applicable to individual emissions units within the facility are addressed in Subsection III-B of the form.)

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

N/A

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

Title V Core List	

C. FACILITY POLLUTANT INFORMATION

This subsection of the Application for Air Permit form allows for the reporting of potential and estimated emissions of selected pollutants on a facility-wide basis. It must be completed for each pollutant for which the applicant proposes to establish a facility-wide emissions cap and for each pollutant for which emissions are not reported at the emissions-unit level.

Facility Pollutant Information: Pollutant _____ of _____ **(N/A)**

1. Pollutant Emitted: **N/A**		
2. Estimated Emissions: **N/A**		(tons/year)
3. Requested Emissions Cap: **N/A**	(lb/hour)	(tons/year)
4. Basis for Emissions Cap Code: **N/A**		
5. Facility Pollutant Comment: **See PM/PM10 information within Emissions Unit Information Section.**		

Facility Pollutant Information: Pollutant _____ of _____ **(N/A)**

1. Pollutant Emitted: **N/A**		
2. Estimated Emissions: **N/A**		(tons/year)
3. Requested Emissions Cap: **N/A**	(lb/hour)	(tons/year)
4. Basis for Emissions Cap Code: **N/A**		
5. Facility Pollutant Comment: **N/A**		

Facility Pollutant Information: Pollutant _____ of _____ **(N/A)**

1. Pollutant Emitted: **N/A**		
2. Estimated Emissions: **N/A**		(tons/year)
3. Requested Emissions Cap: **N/A**	(lb/hour)	(tons/year)
4. Basis for Emissions Cap Code: **N/A**		
5. Facility Pollutant Comment: **N/A**		

Facility Pollutant Information: Pollutant _____ of _____ **(N/A)**

1. Pollutant Emitted: **N/A**		
2. Estimated Emissions: **N/A**		(tons/year)
3. Requested Emissions Cap: **N/A**	(lb/hour)	(tons/year)
4. Basis for Emissions Cap Code: **N/A**		
5. Facility Pollutant Comment: **N/A**		

D. FACILITY SUPPLEMENTAL INFORMATION

This subsection of the Application for Air Permit form provides supplemental information related to the facility as a whole. (Supplemental information related to individual emissions units within the facility is provided in Subsection III-I of the form.) Supplemental information must be submitted as an attachment to each copy of the form, in hard-copy or computer-readable form.

Supplemental Requirements for All Applications

1. Area Map Showing Facility Location: [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested **Current information on file with FDEP**
2. Facility Plot Plan: [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested **Current information on file with FDEP**
3. Process Flow Diagram(s): [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested **Current information on file with FDEP**
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested **Current information on file with FDEP**
5. Fugitive Emissions Identification: [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested **Current information on file with FDEP**
6. Supplemental Information for Construction Permit Application: [**X**] Attached, Document ID: **Attachment 1** [ ] Not Applicable

Additional Supplemental Requirements for Category I Applications Only (N/A)

7. List of Insignificant Activities: [ ] Attached, Document ID:_____ [**X**] Not Applicable
8. List of Equipment/Activities Regulated under Title VI: [ ] Attached, Document ID:_____ [ ] Equipment/Activities Onsite but Not Required to be Individually Listed [**X**] Not Applicable

9. Alternative Methods of Operation: [ ] Attached, Document ID:_____ [**X**] Not Applicable
10. Alternative Modes of Operation (Emissions Trading): [ ] Attached, Document ID:_____ [**X**] Not Applicable
11. Enhanced Monitoring Plan: [ ] Attached, Document ID:_____ [**X**] Not Applicable
12. Risk Management Plan Verification: [ ] Plan Submitted to Implementing Agency - Verification Attached, Document ID:_____ [ ] Plan to be Submitted to Implementing Agency by Required Date [**X**] Not Applicable
13. Compliance Report and Plan [ ] Attached, Document ID:_____ [**X**] Not Applicable
14. Compliance Statement (Hard-copy Required) [ ] Attached, Document ID:_____ [**X**] Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION

This subsection of the Application for Air Permit form provides general information on the emissions unit addressed in this Emissions Unit Information Section, including information on the type, control equipment, operating capacity, and operating schedule of the emissions unit.

Type of Emissions Unit Addressed in This Section

Check one:

[X] 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, an individually-regulated emission point (stack or vent) serving a single process or production unit, or activity, which also has other individually-regulated emission points.

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, a collectively-regulated 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.

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section: **Power Plant**		
2. ARMS Identification Number: **014** [ ] No Corresponding ID [ ] Unknown		
3. Emissions Unit Status Code: **A**	4. Acid Rain Unit? [ ] Yes [**X**] No	5. Emissions Unit Major Group SIC Code: **49**
6. Initial Startup Date (DD-MON-YYYY): **N/A**		
7. Long-term Reserve Shutdown Date (DD-MON-YYYY): **N/A**		
8. Package Unit: **N/A** Manufacturer:	Model Number:	
9. Generator Nameplate Rating: **N/A**	MW	
10. Incinerator Information: **N/A** Dwell Temperature:	°F	
Dwell Time:	seconds	
Incinerator Afterburner Temperature :	°F	
11. Emissions Unit Comment: **This application addresses PM/PM10 emissions only, in accordance with FDEP protocol.**		

Emissions Unit Information Section 1 of 1

Emissions Unit Control Equipment

A.

1. Description: **Fabric Filter (Baghouse) - High Temperature (T > 250^0 F)**
2. Control Device or Method Code: **016**

B.

1. Description: **N/A**
2. Control Device or Method Code: **N/A**

C.

1. Description: **N/A**
2. Control Device or Method Code: **N/A**

Emissions Unit Information Section 1 of 1

Emissions Unit Operating Capacity

1. Maximum Heat Input Rate:	**1850** mmBtu/hr
2. Maximum Incineration Rate: **N/A** lb/hr	tons/day
3. Maximum Process or Throughput Rate: **N/A**	
4. Maximum Production Rate: **N/A**	
5. Operating Capacity Comment: **Proposed power generation rate : 150 MW, net delivered**	

Emissions Unit Operating Schedule

Requested Maximum Operating Schedule:	
hours/day: **24**	days/week: **7**
weeks/year: **52**	hours/year: **8760**

B. EMISSIONS UNIT REGULATIONS

Depending on the application category, this subsection of the Application for Air Permit form provides either a brief analysis or detailed listing of all federal, state, and local regulations applicable to the emissions unit addressed in this Emissions Unit Information Section.

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

N/A

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

Title V Core List	

C. EMISSION POINT (STACK/VENT) INFORMATION

This subsection of the Application for Air Permit form provides information about the emission point associated with the emissions unit addressed in this Emissions Unit Information Section. An emission point is typically a stack or vent but can be any identifiable location at which air pollutants, including fugitive emissions, are discharged into the atmosphere.

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: **Stack**	
2. Emission Point Type Code: [ ] 1 [X] 2 [ ] 3 [ ] 4	
3. Descriptions of Emissions Points Comprising this Emissions Unit: **N/A**	
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: **-Cement Plant** **-Power Plant**	
5. Discharge Type Code: [ ] D [ ] F [ ] H [ ] P [ ] R [X] V [ ] W	
6. Stack Height:	**320** feet
7. Exit Diameter:	**16** feet
8. Exit Temperature:	**300** °F
9. Actual Volumetric Flow Rate:	**840,000** acfm

10. Percent Water Vapor :	7.5 %
11. Maximum Dry Standard Flow Rate:	**540,000** dscfm
12. Nonstack Emission Point Height: **N/A**	feet
13. Emission Point UTM Coordinates: Zone: East (km): North (km):	
14. Emission Point Comment: **N/A**	

D. SEGMENT (PROCESS/FUEL) INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of segment data (Fields 1-10) must be completed for each segment required to be reported and for each alternative operating method or mode (emissions trading scenario) under Chapter 62-213, F.A.C., for which the maximum hourly or annual segment-related rate would vary. A segment is a material handling, process, fuel burning, volatile organic liquid storage, production, or other such operation to which emissions of the unit are directly related. See instructions for further details on this subsection of the Application for Air Permit.

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode): **External Combustion Boilers: Electric Generation: Bituminous Coal**	
2. Source Classification Code (SCC): **1-01-002-99**	
3. SCC Units: **Tons Burned**	
4. Maximum Hourly Rate: **77.1 Tons Burned**	5. Maximum Annual Rate: **675,396 Tons Burned**
6. Estimated Annual Activity Factor: **N/A**	
7. Maximum Percent Sulfur: **0.75**	8. Maximum Percent Ash: **8.0**
9. Million Btu per SCC Unit: **24 MMBtu/ton**	
10. Segment Comment: **N/A**	

Segment Description and Rate: Segment _____ of _____ **(N/A)**

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode): **N/A**	
2. Source Classification Code (SCC): **N/A**	
3. SCC Units: **N/A**	
4. Maximum Hourly Rate: **N/A**	5. Maximum Annual Rate: **N/A**
6. Estimated Annual Activity Factor: **N/A**	
7. Maximum Percent Sulfur: **N/A**	8. Maximum Percent Ash: **N/A**
9. Million Btu per SCC Unit: **N/A**	
10. Segment Comment: **N/A**	

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 1 of 2

1. Pollutant Emitted: **PM**		
2. Total Percent Efficiency of Control:		**99.4** %
3. Primary Control Device Code: **016**		
4. Secondary Control Device Code: **N/A**		
5. Potential Emissions:	**37.0** lb/hour	**162.1** tons/year
6. Synthetically Limited? [ ] Yes [X] No		
7. Range of Estimated Fugitive/Other Emissions: **N/A** [ ] 1 [ ] 2 [ ] 3	_____ to _____ tons/year	
8. Emission Factor: **0.02 lb/MMBtu** Reference: **BACT**		
9. Emissions Method Code: [ ] 1 [ ] 2 [ ] 3 [ ] 4 [X] 5		
10. Calculation of Emissions: 0.02 lb/MMBtu X 1850 MMBtu/hr = **37.0 lb/hr** 37.0 lb/hr X 8760 hpy X 1 ton/2000 lb = **162.1 tpy**		
11. Pollutant Potential/Estimated Emissions Comment: **N/A**		

Allowable Emissions (Pollutant identified on front of page)

A.

1. Basis for Allowable Emissions Code: **RULE (BACT for PSD)**		
2. Future Effective Date of Allowable Emissions: **N/A**		
3. Requested Allowable Emissions and Units: **0.02 lb/MMBtu**		
4. Equivalent Allowable Emissions:	**37.0** lb/hour	**162.1** tons/year
5. Method of Compliance: **EPA Method 5**		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): **N/A**		

B.

1. Basis for Allowable Emissions Code: **N/A**		
2. Future Effective Date of Allowable Emissions: **N/A**		
3. Requested Allowable Emissions and Units: **N/A**		
4. Equivalent Allowable Emissions: **N/A**	lb/hr	tons/year
5. Method of Compliance: **N/A**		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): **N/A**		

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 2 of 2

1. Pollutant Emitted: **PM10**		
2. Total Percent Efficiency of Control: **N/A**		%
3. Primary Control Device Code: **016**		
4. Secondary Control Device Code: **N/A**		
5. Potential Emissions:	**37.0** lb/hour	**162.1** tons/year
6. Synthetically Limited? [ ] Yes [**X**] No		
7. Range of Estimated Fugitive/Other Emissions: **N/A** [ ] 1 [ ] 2 [ ] 3	_____ to _____	tons/year
8. Emission Factor: **0.02 lb/MMBtu** Reference: **BACT**		
9. Emissions Method Code: [ ] 1 [ ] 2 [ ] 3 [ ] 4 [**X**] 5		
10. Calculation of Emissions: 0.02 lb/MMBtu X 1850 MMBtu/hr = **37.0 lb/hr** 37.0 lb/hr X 8760 hpy X 1 ton/2000 lb = **162.1 tpy**		
11. Pollutant Potential/Estimated Emissions Comment: **N/A**		

Allowable Emissions (Pollutant identified on front of page)

A.

1. Basis for Allowable Emissions Code: **RULE (BACT for PSD)**		
2. Future Effective Date of Allowable Emissions: **N/A**		
3. Requested Allowable Emissions and Units: **0.02 lb/MMBtu**		
4. Equivalent Allowable Emissions:	**37.0** lb/hour	**162.1** tons/year
5. Method of Compliance: **EPA Method 5**		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): **PM10 assumed as equal to PM.**		

B.

1. Basis for Allowable Emissions Code: **N/A**		
2. Future Effective Date of Allowable Emissions: **N/A**		
3. Requested Allowable Emissions and Units: **N/A**		
4. Equivalent Allowable Emissions: **N/A**	lb/hr	tons/year
5. Method of Compliance: **N/A**		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): **N/A**		

F. VISIBLE EMISSIONS INFORMATION

This subsection of the Application for Air Permit form must be completed for only those emissions units which are subject to a visible emissions limitation. The intent of this subsection of the form is to identify each activity associated with the emissions unit addressed in this section for which a separate opacity limitation would be applicable. Visible emission subtype codes for each such activity are listed in the instructions for Field 1. Most emissions units will be subject to a "subtype VE" limit only.

Visible Emissions Limitation: Visible Emissions Limitation **1** of **1**

1. Visible Emissions Subtype: **VE**
2. Basis for Allowable Opacity: [**X**] Rule [ ] Other **Rule 62-296.405(1)(a) FAC**
3. Requested Allowable Opacity: Normal Conditions: **20** % Exceptional Conditions: **27** % Maximum Period of Excess Opacity Allowed: **6** min/hour
4. Method of Compliance: **EPA Method 9**
5. Visible Emissions Comment: **N/A**

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____ **(N/A)**

1. Visible Emissions Subtype: **N/A**
2. Basis for Allowable Opacity: **N/A** [ ] Rule [ ] Other
3. Requested Allowable Opacity: **N/A** Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour
4. Method of Compliance: **N/A**
5. Visible Emissions Comment: **N/A**

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____ **(N/A)**

1. Visible Emissions Subtype: **N/A**
2. Basis for Allowable Opacity: **N/A** [ ] Rule [ ] Other
3. Requested Allowable Opacity: **N/A** Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour
4. Method of Compliance: **N/A**
5. Visible Emissions Comment: **N/A**

G. CONTINUOUS MONITOR INFORMATION

This subsection of the Application for Air Permit form must be completed for only those emissions units which are required by rule or permit to install and operate one or more continuous emission, opacity, flow, or other type monitors. A separate set of continuous monitor information (Fields 1-6) must be completed for each monitoring system required.

Continuous Monitoring System: Continuous Monitor _____ of _____ **(N/A)**

1. Parameter Code: **N/A**
2. CMS Requirement: **N/A** [ ] Rule [ ] Other
3. Monitor Information: **N/A** Manufacturer: Model Number: Serial Number:
4. Installation Date (DD-MON-YYYY): **N/A**
5. Performance Specification Test Date (DD-MON-YYYY): **N/A**
6. Continuous Monitor Comment: **No CMS required for PM/PM10 emissions from power plant.**

Continuous Monitoring System: Continuous Monitor _____ of _____ **(N/A)**

1. Parameter Code: **N/A**
2. CMS Requirement: **N/A** [ ] Rule [ ] Other
3. Monitor Information: **N/A** Manufacturer: Model Number: Serial Number:
4. Installation Date (DD-MON-YYYY): **N/A**
5. Performance Specification Test Date (DD-MON-YYYY): **N/A**
6. Continuous Monitor Comment: **N/A**

Continuous Monitoring System: Continuous Monitor _____ of _____ **(N/A)**

1. Parameter Code: **N/A**
2. CMS Requirement: **N/A** [ ] Rule [ ] Other
3. Monitor Information: **N/A** Manufacturer: Model Number: Serial Number:
4. Installation Date (DD-MON-YYYY): **N/A**
5. Performance Specification Test Date (DD-MON-YYYY): **N/A**
6. Continuous Monitor Comment: **N/A**

H. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT TRACKING INFORMATION

This subsection of the Application for Air Permit form must be completed for all applications, not just those undergoing prevention-of-significant-deterioration (PSD) review pursuant to Rule 62-212.400, F.A.C. The intent of this subsection is to make a preliminary determination as to whether the emissions unit addressed in this Emissions Unit Information Section consumes PSD increment. PSD increment is consumed (or expanded) as a result of emission increases (decreases) occurring after pollutant-specific baseline dates. Pollutants for which baseline dates have been established are sulfur dioxide, particulate matter, and nitrogen dioxide.

PSD Increment Consumption Determination

1. Increment Consuming for Particulate Matter or Sulfur Dioxide?

   If the emissions unit addressed in this section emits particulate matter or sulfur dioxide, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for particulate matter or sulfur dioxide. Check the first statement, if any, that applies and skip remaining statements.

   [**X**] The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.

   [ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.

   [ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

   [ ] For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

   [ ] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

2. Increment Consuming for Nitrogen Dioxide?

If the emissions unit addressed in this section emits nitrogen oxides, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for nitrogen dioxide. Check first statement, if any, that applies and skip remaining statements.

[ ] The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[**X**] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

3. Increment Consuming/Expanding Code:

PM	[**X**] C	[ ] E	[ ] Unknown
SO2	[**X**] C	[ ] E	[ ] Unknown
NO2	[ ] C	[ ] E	[**X**] Unknown

4. Baseline Emissions:

PM	**37** lb/hour	**162.1** tons/year
SO2	**770** lb/hour	**3372.6** tons/year
NO2		**3705.5** tons/year

5. PSD Comment: **Above emissions are for power plant operating alone.**

I. EMISSIONS UNIT SUPPLEMENTAL INFORMATION

This subsection of the Application for Air Permit form provides supplemental information related to the emissions unit addressed in this Emissions Unit Information Section. Supplemental information must be submitted as an attachment to each copy of the form, in hard-copy or computer-readable form.

Supplemental Requirements for All Applications

1. Process Flow Diagram [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested **Current information on file with FDEP**
2. Fuel Analysis or Specification [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested **Current information on file with FDEP**
3. Detailed Description of Control Equipment [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested **Current information on file with FDEP**
4. Description of Stack Sampling Facilities [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested **Current information on file with FDEP**
5. Compliance Test Report [ ] Attached, Document ID:_____ [ ] Previously submitted, Date:_____ [**X**] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [**X**] Not Applicable
7. Operation and Maintenance Plan [ ] Attached, Document ID:_____ [**X**] Not Applicable
8. Supplemental Information for Construction Permit Application [**X**] Attached, Document ID: **Attachment 1** [ ] Not Applicable
9. Other Information Required by Rule or Statute [ ] Attached, Document ID:_____ [**X**] Not Applicable

Additional Supplemental Requirements for Category I Applications Only (N/A)

10. Alternative Methods of Operation
[ ] Attached, Document ID:_____ [X] Not Applicable

11. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID:_____ [X] Not Applicable

12. Enhanced Monitoring Plan
[ ] Attached, Document ID:_____ [X] Not Applicable

13. Identification of Additional Applicable Requirements
[ ] Attached, Document ID:_____ [X] Not Applicable

14. Acid Rain Application (Hard-copy Required)

[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID:_____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID:_____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID:_____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID:_____

[X] Not Applicable

ATTACHMENT 1

SUPPLEMENTAL INFORMATION FOR PSD REVIEW

CENTRAL POWER & LIME, INC.
HERNANDO COUNTY, FLORIDA

The aspects discussed below need to be addressed under PSD review for the particulate matter emissions from the proposed project, in accordance with Rule 62-212.400, FAC.

1.0 BEST AVAILABLE CONTROL TECHNOLOGY (BACT) ANALYSIS

A particulate matter emission limit of 0.02 pound per MMBtu heat input is proposed as BACT for the power plant when operating alone. This emission limit corresponds to the presently permitted maximum allowable mass emission rate of 37.0 pounds per hour at 1850 MMBtu per hour heat input. The existing baghouse reflects the best available control equipment for particulate matter. It should be noted that the currently permitted maximum allowable particulate matter emission limit for the combined operation of the power plant and the cement plant will remain unchanged at 86.5 lbs/hr; 37.0 lbs/hr from the power plant and 49.5 lbs/hr from the cement plant.

The proposed BACT limit is more stringent than the current BACT limit of 0.03 lb/MMBtu. The proposed limit is also in line with control requirements imposed on other existing and pre-NSPS coal fired power plants using a baghouse for control of particulate matter. As another point of comparison, the proposed BACT limit corresponds to a particulate matter concentration of less than 0.01 gr/dscf. Installation of additional or alternate control equipment at this existing facility is considered neither practical nor necessary.

2.0 AMBIENT IMPACT ANALYSIS

An extensive ambient air quality review was conducted for particulate matter when the power plant was originally permitted. Given that the maximum allowable emission rate will not change (37.0 lbs/hr from the power plant and 86.5 lbs/hr from the power and cement plants), an ambient air analysis at this time would simply indicate a zero net impact based on identical negative (current) and positive (proposed) modeling input. Consequently, additional air quality analysis is not required.

3.0 ADDITIONAL IMPACT ANALYSES

There will be no change in the operation of the power plant or in the allowable particulate matter emissions as a result of this request. Therefore, additional impact analyses are not required.

3.1 Impairment to Visibility, Soils, Vegetation

There will be no change in the allowable particulate matter emissions as a result of this request. Therefore, additional analyses are not required.

3.2 Growth Related Impacts

There will be no change in the operation of the power plant or in the manpower requirements as a result of this request. Therefore, no growth related impacts are expected.

3.3 Impairment to Visibility

There will be no change in the allowable particulate matter emissions as a result of this request. Therefore, additional analyses are not required.

3.4 Air Quality Related Values Analysis

There will be no change in the allowable particulate matter emissions as a result of this request. Therefore, an AQRV analysis is not required.

4.0 GOOD ENGINEERING PRACTICE STACK HEIGHT ANALYSIS

As there will be no change in the power plant stack as a result of this request, the GEP stack height evaluation originally reviewed and approved by FDEP remains valid. Consequently, no additional analysis is required.

Law Offices
HOLLAND & KNIGHT

A Partnership Including Professional Corporations

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Atlanta
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Jacksonville
Lakeland
Miami
Orlando
St. Petersburg
Tampa
Washington, D.C.
West Palm Beach

March 13, 1995

LAWRENCE N. CURTIN
904-425-5678

VIA FACSIMILE

Mr. Clair Fancy
Department of Environmental
Protection
Twin Towers Office Building
2600 Blair Stone Road

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

Dear Clair:

As a follow up to our telephone conversation of February 24, 1995, regarding the application to modify the CP&L permit, this letter constitutes our request to withdraw data relating to sulfur dioxide and nitrogen oxide emissions that resulted from testing at the facility during October 6 through 14, 1994.

Based upon our discussions, we understand that as a result of the analyses of the particulate matter testing information from that same time period, the Department has determined there was a slight increase in actual emissions. The performance test results indicated that this increase is statistically insignificant. The increase is approximately 1.43 pounds per hour in the average emission rate at the higher generation rate. We understand that since this "increase" is less than the regulatory significance level for particulate matter emissions, no PSD review will be required. We request that the allowable emissions contained in the current permits not be modified and that the heat input limitation and the megawatt output be changed in accordance with our earlier requests in the application to modify the permit dated December 9, 1994.

As you are aware, we do not believe the change in the heat input or the output of the facility constitute a modification for purposes of PSD review. Nevertheless, since PSD review will not be required under the Department's interpretation, it is not necessary for us to pursue the question of whether a modification will occur.

Please let us know immediately if you disagree with this approach or if you need additional information. As always, we appreciate your cooperation and assistance.

Sincerely,

HOLLAND & KNIGHT

Lawrence N. Curtin (MRH)

Lawrence N. Curtin

cc: Mr. Tom Mountain
Dr. John Koogler

LNC/mrh
TAL-59528

J. Reynolds
C. Holladay

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

KA 307-93-12

March 3, 1995

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

Subject: Application To Modify Permit
Coal Fired Power Plant
Central Power & Lime, Inc.
Hernando County, Florida
PSD-FL-090, PA 82-17

Dear Mr. Fancy:

This is a follow up to our telephone conversation on February 24, 1995, regarding the above referenced project.

Per our conversation, CPL hereby withdraws the December 1994 application.

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

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:par

c: Tom Mountain, CPL
Larry Curtin, Holland & Knight

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

KA 307-93-12

March 3, 1995

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

Subject: Application To Modify Permit
Coal Fired Power Plant
Central Power & Lime, Inc.
Hernando County, Florida
PSD-FL-090, PA 82-17

Dear Mr. Fancy:

This is a follow up to our telephone conversation on February 24, 1995, regarding the above referenced project wherein CPL proposes to increase the power generation rate to 150 MW, net delivered.

In accordance with FDEP approval and protocol, performance tests were conducted by CPL at the baseline rate and later within 90 percent of the requested rate (report submitted previously to FDEP). The performance test results indicated that while statistically there was no increase in particulate matter emissions, there was an increase of 1.43 pounds per hour in the average emission rate at the higher power generation rate.

Based on the results of the performance tests, FDEP has indicated that a PSD review is required for particulate matter. This conclusion was based on the fact that the testing indicated an increase in the average particulate matter emission rate; and, that the net emission increase based on the "actual" tested emissions (6.22 lbs/hr) and the "potential" allowable emissions (37.0 lbs/hr) would exceed the significant emission level pursuant to Rule 62-212, Florida Administrative Code (FAC). The "increase" when annualized, using 8760 hours per year, would be 134.8 tons per year. Although CPL does not agree with the Department's rationale concerning this issue, the information requested is provided in the enclosed permit application to expedite the modified permit issuance.

It is expected that the additional permit processing fee (corresponding to a PSD review) is covered by the fee submitted with the application for Modification of Conditions of Certification. Accordingly, no additional permit processing fees are warranted.

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

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:par
Enc.

c: Tom Mountain, CPL
Larry Curtin, Holland & Knight

Law Offices
HOLLAND & KNIGHT

A Partnership Including Professional Corporations

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West Palm Beach

Bruce

February 23, 1995

RECEIVED
FEB 24 1995
Bureau of
Air Regulation

VIA FACSIMILE

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

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

Dear Clair:

You will recall that last year we engaged in a series of discussions with you and other representatives of the Department in an effort to remove from the PSD permit and the Conditions of Certification for the Central Power & Lime, Inc. (CPL) cogeneration facility in Brooksville, Florida, a restriction on heat input that results in limitation on the maximum megawatts produced when the power plant is operating by itself. The current limit restricts output to approximately 100 megawatts. We requested the ability to increase that to 133 megawatts, net output.

As a result of a meeting with you and staff on October 3, 1994, we requested permission to operate the power plant at a rate of up to 133 megawatts, net, for a four day period to conduct emissions tests for sulfur dioxide, particulate matter and nitrogen oxides. The data generated were to be used in the regulatory analysis and it was our understanding that if no significant increases were evident, the heat input limitation could be modified to allow the increased output without PSD review. The testing was authorized by letter dated October 6, 1994, from Howard Rhodes to Tom Mountain.

The tests were conducted as scheduled and the data have been submitted to the Department for review. We understand that Department staff agree that there are no increases in sulfur dioxide or nitrogen oxide emissions evident as a result of the increase in the output. However, a question has been raised concerning particulate matter.

As we understand it, the issue with respect to particulate matter is whether there should be some reduction in allowable

emissions from the facility to a level that would equate to those required by the new source performance standards for particulate matter contained in 40 C.F.R. Section 60.40a, or the so called subpart Da standards. The rationale for this apparently is that staff has interpreted the increase in generating rate as a modification that would increase the actual particulate matter emission rate, even though the testing information indicated that the emissions were well below the allowable rate. If the testing data are utilized to establish a baseline for actual emissions, the data apparently indicate that there would be a slight particulate matter increase with the increase in megawatts. The testing data indicate that the actual particulate matter emissions increased by slightly over one pound per hour at the increased generating rate, but the emission rates that were observed at both rates are not statistically different. Moreover, both levels are less than emissions that previously have been observed at the facility. We believe that the data support our request that the heat input limitation be dropped, and we do not believe that there is any justification for the Department to take this opportunity to reduce our allowable emissions, particularly to a level that would be the equivalent of the subpart Da new source performance standards.

We believe that the federal regulations sustain our position. The new source performance standards indicate that more stringent standards can be applied to an affected facility if there is a modification to that facility resulting in an increase in emissions. We do not believe that the increased output constitutes a physical change or a change in the method of operation for purposes of either NSPS or PSD. However, assuming for the sake of argument that it does, the situation appears to be controlled by the provisions of 40 C.F.R. Section 60.14(h), which provides:

> (h) No physical change, or change in the method of operation, at an existing electric utility steam generating unit shall be treated as a modification for purposes of this section provided that such change does not increase the maximum hourly emissions of any pollutant regulated under this section above the maximum hourly emissions achievable at that unit during the 5 years prior to the change.

Emissions have been in excess of the levels experienced during the testing period during the past 5 years. Consequently, there is no basis for the application of NSPS to this facility.

We are anxious to conclude this matter. We hope that you will agree with us that the output of the power plant can be increased without triggering PSD review or the application of NSPS, and that processing should be completed without further delay.

Please let me know where this matter stands at your earliest convenience.

Sincerely,

HOLLAND & KNIGHT

Lawrence N. Curtin

cc: Mr. Tom Mountain
Dr. John Koogler

LNC/mrh
TAL-58275

CENTRAL POWER & LIME, INC.

RECEIVED
DEC 22 1994
Bureau of
Air Regulation

December 19, 1994

Mr. C. H. Fancy, P.E.
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
Tallahassee, Florida 32399-2400

Re: CPL Power Plant Air Construction Application (12/9/94) Hernando County.

Mr. Fancy:

Per our discussion on Friday, 11/18/94, in your office, we agreed that the processing fee for the above referenced application was to be paid for out of the $10,000 processing fee paid to the Power Plant Siting Office in March 1994 and that an additional fee submitted with the application was not required.

Please call immediately if you have any questions regarding payment of the fee. Your prompt review of the application would be greatly appreciated.

Sincerely,

Tom Mountain

Tom Mountain
Environmental Manager

TM/ls
cc: G. Reynolds

P.O. BOX 1508 / 10311 CEMENT PLANT ROAD / BROOKSVILLE, FL 34605-1508 / PHONE (904) 799-7881 / FAX (904) 796-6281

File Copy

Department of Environmental Protection

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

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

December 15, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Mountain:

Re: Request for an Amendment to the Federal Construction Permit [PSD-FL-090] to Change a Condition of the Testing Authorization Amendment [PSD-FL-090(A)] Issued to Central Power & Lime, Inc.'s Power Plant: PSD-FL-090(Aa)

The Department has reviewed the request that you provided on October 13, 1994 (enclosed), via FAX, which asked for a change/ amendment to Condition #11 of the testing authorization [PSD-FL-090(A)] issued October 6, 1994. Based on a review of the files, the request is acceptable and the following will be changed and added:

Condition #11.:

FROM: This Department action is only to authorize the performance tests described above and in the request letter. Any operation above the 100 MW net output level after the last performance test run or the consecutive 96-hours of CEMS data collection is completed will be deemed a violation of the Site Certification No. PA 82-17; and, PSD-FL-090.

TO: This Department action is only to authorize the performance tests described above and in the request letter. Any operations **after the conclusion of the testing project that were authorized in PSD-FL-090(A) shall be in accordance with** the Site Certification No. PA 82-17 and **the federal construction permit No.** PSD-FL-090.

Enclosure to be incorporated:

- **Lawrence N. Curtin's letter received October 13, 1994, via the FAX.**

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

Sincerely,

Howard L. Rhodes

Howard L. Rhodes
Director
Division of Air Resources Management

HLR/rbm

Enclosure

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

12-16-94 BR

Is your RETURN ADDRESS completed on the reverse side?

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

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. Tom Mountain
Env. Mgr.
Central Power & Lime, Inc.
P.O. Box 150X
Brooksville, FL 34605-150X

4a. Article Number
Z 751 860 021

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

5. Signature (Addressee)

6. Signature (Agent)

7. Date of Delivery
12-21-94

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

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

Thank you for using Return Receipt Service.

Z 751 860 021

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

UNITED STATES POSTAL SERVICE

Sent to Mr. Tom Mountain	
Street and No. Env. Mgr.	
P.O., State and ZIP Code Central Power & Lime, Inc.	
Postage P.O. Box 150X	$
Certified Fee Brooksville, FL 34605-150X	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date PSD-FL-090(Aa) Amendment Letter to PSD-FL-090(A) mailed: 12-16-94	

PS Form **3800**, March 1993

Enclosure

LAW OFFICES

HOLLAND & KNIGHT

ATLANTA
FORT LAUDERDALE
JACKSONVILLE
LAKELAND
MIAMI
ORLANDO
ST. PETERSBURG
TALLAHASSEE
TAMPA
WEST PALM BEACH
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FAX (904) 224-8832

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

MEMORANDUM

TO: Clair Fancy

FROM: Lawrence N. Curtin

DATE: October 13, 1994

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

---

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

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

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

Let us know if you have any questions.

cc: Tom Mountain

LNC/mph
TAL-51684

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes

FROM: for Clair Fancy John Brown

DATE: December 15, 1994

SUBJECT: Amendment Letter to the Federal Construction Permit No. PSD-FL-090(A): Central Power & Lime, Inc. PSD-FL-090(Aa)

Attached for your approval and signature is a letter amendment [PSD-FL-090(Aa)] that will change Condition #11 of the amendment [PSD-FL-090(A)] that authorized some performance tests on the existing Power Plant. The Power Plant was authorized to construct by the federal construction permit No. PSD-FL-090. The existing facility is located west of Brooksville, Hernando County, Florida. The amendment/change is not controversial.

I recommend your approval and signature.

CHF/BM/rbm

Attachment

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

December 14, 1994

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

RE: CPL Power Plant
Air Construction Application
Hernando County

Dear Mr. Mountain:

The Bureau of Air Regulation received the above referenced request on December 13, 1994, without the required processing fee. As soon as the fee is received, we will begin processing your request. If you have any questions, please call Patty Adams at (904)488-1344.

Sincerely,

Patricia G. Adams

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

CHF/pa

cc: John Reynolds

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

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

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

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

Consult postmaster for fee.

3. Article Addressed to:

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

4a. Article Number

Z 751 860 009

4b. Service Type

☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

5. Signature (Addressee)

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

6. Signature (Agent)

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

Thank you for using Return Receipt Service.

Z 751 860 009

Receipt for Certified Mail

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

UNITED STATES POSTAL SERVICE

Sent to Mr. Tom Mountain	
Street and No. P. O. Box 1508	
P.O., State and ZIP Code Brooksville, FL 34605-1508	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date Mailed: 12/15/94 CPL Power Plant Air Construction Appl.	

PS Form **3800**, March 1993

CENTRAL POWER & LIME, INC.

December 9, 1994

RECEIVED
DEC 13 1994
Bureau of
Air Regulation

Mr. Clair H. Fancy
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Application to Construct (Modify)
Air Pollution Sources
CPL Power Plant
Brooksville, Florida

Mr. Fancy:

Enclosed are four (4) copies of the construction/modification application for the subject facility.

Please call me if you have any questions.

Sincerely,

Tom Mountain
Environmental Manager

Copy: Larry Curtain, H&K

P.O. BOX 1508 / 10311 CEMENT PLANT ROAD / BROOKSVILLE, FL 34605-1508 / PHONE (904) 799-7881 / FAX (904) 796-6281

Florida Department of Environmental Protection

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

APPLICATION TO ~~OPERATE~~/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Coal Fired Power Plant [ ] New[1] [x] Existing[1]

APPLICATION TYPE: [x] Construction [ ] Operation [x] Modification

COMPANY NAME: Central Power & Lime, Inc. COUNTY: Hernando

Identify the specific emission point source(s) addressed in this application (i.e., Lime Kiln No. 4 with Venturi Scrubbers; Peaking Unit No. 2, Gas Fired) Power Plant

SOURCE LOCATION: Street 10311 Cement Plant Road City Brooksville

UTM: East (17) 360.008 km North 3162.392 1 km

Latitude 28 ° 34 ' 57 "N Longitude 82 ° 25 ' 53 "W

APPLICANT NAME AND TITLE: Mr. Joe Piermatteo, Senior Vice President

APPLICANT ADDRESS: P.O. Box 1508, Brooksville, Florida 34605-1508

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Central Power & Lime, Inc. I certify that the statements made in this application for a construction permit are true, correct and complete to the best of my knowledge and belief. further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization Signed: Joseph A Piermatteo

Joe Piermatteo, Senior Vice President

Name and Title (Please Type)

Date: 12/9/94 Telephone No. (904) 799-7881

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been xxxxxx/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

[1] See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed _____

John B. Koogler, Ph. D., P.E.
Name (Please Type)

Koogler & Associates Environmental Services
Company Name (Please Type)

4014 N.W. 13th Street, Gainesville, Fl. 32609
Mailing Address (Please Type)

Florida Registration No. 12925 Date: 12/8/94 Telephone No. (904) 377-5822

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

A permit application to increase the generating rate and the heat input rate to an existing coal fired power plant with no change in emissions. Also see page 2a of 12.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction N/A Completion of Construction N/A

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Baghouse - $12,220,000 - existing baghouse

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

PSD-FL-090

PA 82-17

SECTION IIA: PROJECT INFORMATION

The steam generator at the Central Power and Lime, Inc. (CPL) plant originally went into service in 1949 at the American Electric Power Corporation Twin Branch station in Mishawaka, Indiana. The generator was retired in 1980, relocated to the CPL site and reconfigured. The reconfiguration did not constitute a major modification.

During the permitting of the plant, emission limiting standards for sulfur dioxide were imposed and were reduced several times to respond to concerns of interested parties. The originally proposed limits represented BACT and the reductions in the limits represented improvements to BACT. Emission limiting standards were also imposed for particulate matter, nitrogen oxides and the opacity of emissions. The emission limiting standards in the Final Conditions of Certification (PA 82-17, June 29, 1986) are:

Power Plant Only

SO_2 - 1.2 lb/MMBtu boiler heat input, maximum 2-hour average and 770 lb/hr, 3-hour average.

NOx - 0.7 lb/MMBtu boiler heat input not to exceed 846 lb/hr.

PM - 0.03 lb/MMBtu boiler heat input.

VE - 20% opacity, 6-minute average except for one 6-minute period per hour of not more than 27% opacity.

Power and Cement Plants

SO_2 - 1.2 lb/MMBtu boiler heat input, maximum 2-hour average and 781 lb/hr, maximum 3-hour average.

NOx - 0.7 lb/MMBtu boiler heat input plus 2.9 lb/ton kiln feed, not to exceed 1205 lb/hr.

PM - 0.03 lb/MMBtu boiler heat input plus 0.4 lb/ton kiln feed (for kiln and cooler).

VE - 10% opacity, 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

The emission limiting standards in PSD-FL-090 are:

Power Plant Only

SO_2 - the lesser of these: 1.2 lb/MMBtu boiler heat input, maximum 2-hour average; 0.9 lb/MMBtu boiler heat input, maximum 3-hour average; and 915 lb/hour, maximum 3-hour average.

NOx - 0.7 lb/MMBtu boiler heat input.

PM - 0.03 lb/MMBtu boiler heat input.

VE - 20% opacity, 6-minute average except for one 6-minute period per hour of not more than 27% opacity.

Heat Input Rate - When the power plant boiler is operating alone and the cement plant is not in operation, the maximum heat input rate of the boiler shall not exceed the site specific limit of 1,000 MMBtu per hour, maximum 3-hour average.

Power and Cement Plants

SO_2 - 50 lb/hr, maximum 3-hour average plus the lesser of these: 1.2 lb/MMBtu boiler heat input, maximum 2-hour average; 0.9 lb/MMBtu boiler heat input, up to 1000 MMBtu, then decreasing linearly to 0.74 lb/MMBtu boiler heat input at 1234 MMBtu/hr, maximum 3-hour average; and 915 lb/hr, 3-hour average.

NOx - 0.7 lb/MMBtu boiler heat input plus 2.9 lb/ton kiln feed.

PM - 0.03 lb/MMBtu boiler heat input plus 0.3 lb/ton of kiln feed from the cement kiln and 0.1 lb/ton of kiln feed from the clinker cooler.

VE - 10% opacity, 6-minute average, except for one 6-minute period per hour of not more than 17% opacity.

By letter dated October 3, 1994, CPL requested approval from the Department to conduct tests demonstrating there would be no increase in actual emissions as the power generating rate of the plant increased from nominally 100 mw, net (near the 1000 MMBtu/hr limit with the power plant operating alone, imposed by PSD-FL-090) to nominally 133 mw, net. The approval was granted by amendment to PSD-FL-090(A) on October 6, 1994, and the tests were conducted during the period October 6-14, 1994.

The tests demonstrated there is no correlation between the power generating rate (heat input rate) and emission rates and demonstrated the plant could operate at generating rates within 90 to 100 percent of 150 mw, net, without exceeding presently permitted emission limits. Furthermore, the tests showed there was no increase in sulfur dioxide and nitrogen oxides emissions as the generating rate increased and only a slight (but not significant) increase in particulate matter emissions. The test report has been submitted to the Department.

The plant was able to achieve the increased generating rate without a significant increase in emission rates by increasing the limestone injection rate to control sulfur dioxide, by modulating the combustion air to control nitrogen oxides and by baghouse design to control particulate matter.

As a result of the data developed during the October 6-14, 1994, test period and the contracted electric power commitment of CPL, CPL is requesting a permit modification to allow a maximum electric power

generating rate of 150 mw, net, whether the power plant is operating in conjunction with the cement plant or operating with the cement plant out of service. The test data demonstrate there is no increase in sulfur dioxide or nitrogen oxides emissions and less than a significant increase in particulate matter emissions as the generating rate is increased to 150 mw, net:

Target Emission Rate (mw, net)	Test Emission Rate (mw, net)	Measured Emission Rate					
		SO2		NOx		PM	
		(lb/hr)	(tpy)(1)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
100	106	695.2	3045	757.1	3316	6.22	27.2
150	137	599.8	2627	706.7	3095	7.65	33.5
Increase in Actual Emissions		< 0		< 0		6.3	
Significant Increase		40		40		15(2)	

(1) Based on 8760 hours per year.
(2) PM10 significant level.

CPL is requesting that the most restrictive of the presently permitted emission limits remain in effect as these limits reflect BACT and satisfy the air quality review of the PSD permitting process. The proposed permit limits are:

Power Plant Only

SO_2 - 0.90 lb/MMBtu boiler heat input up to 850 MMBtu per hour boiler heat input, then decreasing linearly to 0.42 lb/MMBtu at 1850 MMBtu per hour(1) boiler heat input and 770 lb/hr, all 3-hour averages.

NOx - 0.70 lb/MMBtu boiler heat input up to 1200 MMBtu per hour boiler heat input, then decreasing linearly to 0.46 lb/MMBtu at 1850 MMBtu per hour(1) boiler heat input and 846 lb/hr, averaging time per 40 CFR 60.46.

PM - 0.03 lb/MMBtu boiler heat input up to 1200 MMBTU per hour boiler heat input, then decreasing linearly to 0.02 lb/MMBtu at 1850 MMBtu per hour(1) boiler heat input and 37.0 lb/hr, averaging time per 40 CFR 60.46.

VE - 20% opacity, 6-minute average except for one 6-minute period per hour of not more than 27% opacity.

Heat Input - When the power plant is operating alone and the cement plant is not in service, the maximum heat input rate to the boiler shall not exceed 1850 MMBtu per hour(1), maximum 3-hour average.

(1) The 1850 MMBtu per hour heat input rate is the maximum expected heat input rate necessary to generate 150 mw, net, with the power plant operating at the lowest efficiency.

Power and Cement Plants

SO_2 - 50 lb/hr plus 0.90 lb/MMBtu boiler heat input up to 850 MMBtu per hour boiler heat input, then decreasing linearly to 0.42 lb/MMBtu at 1850 MMBtu per hour(1) boiler heat input and 781 lb/hr, all 3-hour averages.

NOx - 0.70 lb/MMBtu boiler heat input up to 1200 MMBtu per hour boiler heat input, then decreasing linearly to 0.46 lb/MMBtu at 1850 MMBtu per hour(1) boiler heat input plus 2.9 lb/ton of kiln feed (dry basis) and 1205 lb/hr, averaging time per 40 CFR 60.46.

PM - 0.03 lb/MMBtu boiler heat input up to 1200 MMBTU per hour boiler heat input, then decreasing linearly to 0.02 lb/MMBtu at 1850 MMBtu per hour(1) boiler heat input plus 0.3 lb/ton of kiln feed (dry basis) from the cement kiln and 0.1 lb/ton of kiln feed (dry basis) from the clinker cooler and 86.5 lb/hr, averaging time per 40 CFR 60.46.

VE - 10% opacity, 6-minute average except for one 6-minute period per hour of not more than 17% opacity.

Heat Input - When the power plant and the cement plant are operating together, the maximum heat input rate to the boiler shall not exceed 1850 MMBtu per hour(1), maximum 3-hour average.

(1) The 1850 MMBtu per hour heat input rate is the maximum expected heat input rate necessary to generate 150 mw, net, with the power plant operating at the lowest efficiency.

It should be noted that the increase in the electric power generating rate and the demonstrated control of sulfur dioxide, nitrogen oxides and particulate matter can be achieved with no physical changes to the steam boiler or air pollution control systems. It should also be noted that the plant will continue to operate in compliance with all applicable regulations and permit conditions.

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;

if power plant, hrs/yr 8760 ; if seasonal, describe: _____

F. If this is a new source or major modification, answer the following questions. (Yes or No)

Minor modification to an existing source.

1. Is this source in a non-attainment area for a particular pollutant? No

   a. If yes, has "offset" been applied? NA

   b. If yes, has "Lowest Achievable Emission Rate" been applied? NA

   c. If yes, list non-attainment pollutants. NA

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. Yes (1)

3. Does the State "Prevention of Significant Deterioration" (PSD) requirement apply to this source? If yes, see Sections VI and VII. Yes (1)

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? No

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? No

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? No

   a. If yes, for what pollutants? N/A

   b. If yes, in addition to the information required in this form, any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

(1) The minor modifications proposed herein is a change in the permitted electric power generating rate and the corresponding heat input rate with no physical modification to the plant and no significant change in emissions. The modification does not affect the previously determined BACT nor does it trigger another PSD review.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Not applicable				

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): Not applicable

2. Product Weight (lbs/hr): Not applicable

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Power Plant alone (emission rates for power/cement plant operations remain unchanged)

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
P.M.	37.0	162	BACT	See proposed	6168	27016	
SO_2	770	3373	BACT	emission	2197	9623	
NOx	846	3706	BACT	limits in	1673	7328	
				Section IIA			
				(p. 2A of 12)			

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

[4]Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency (1)	Range of Particle Sizes Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Baghouse	PM	99.4	>2μm	(2)
Limestone injection	SO_2	65.0	NA	(2)
B&W Low NO_x Dual register burner	NO_x	49.4	NA	(2)

(1) These are required efficiencies at maximum generating rate for power plant operations only.

(2) Calculated efficiencies documented by testing.

E. Fuels - For Plant Only

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Coal	70.0 tph	77.1 tph	1850

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis: Coal

Percent Sulfur: 0.75 Percent Ash: 8.0

Density: -- lbs/gal Typical Percent Nitrogen: 1.4

Heat Capacity: 12,000 BTU/lb --

Other Fuel Contaminants (which may cause air pollution): None

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average NA Maximum NA

G. Indicate liquid or solid wastes generated and method of disposal.

Fly ash and bottom ash generated in the power plant is used as a raw material in the cement plant.

Stack gas characteristics for power plant only:

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 320 ft. Stack Diameter: 16 ft at top ft.

Gas Flow Rate: 840,000 ACFM 540,000 DSCFM Gas Exit Temperature: 300 °F.

Water Vapor Content: 7.5 % Velocity: 69.6 FPS

SECTION IV: INCINERATOR INFORMATION - Not Applicable

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq.& Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste: _____

Total Weight Incinerated (lbs/hr): _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer: _____

Date Constructed: _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: [ ] Cyclone [ ] Wet Scrubber [ ] Afterburner

[ ] Other (specify) _____

Brief description of operating characteristics of control devices: _____

_____

_____

_____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

_____

_____

_____

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS
See Attached Pages

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)].

2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation per- mit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8 1/2" 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

SECTION V. SUPPLEMENTAL INFORMATION

1. Operating Conditions

A. Generating Rate, net - 150 mw
Auxiliary Loads - 15 mw
Generating Rate, gross - 165 mw

B. Heat Input Rate - The heat input rate will vary with plant efficiency. The efficiency is a function of cooling water temperature and other operating factors. The heat input rate at the lowest expected plant efficiency is 1850 MMBtu/hour or 11,212 Btu/kw, gross.

C. Coal Use Rate - The coal feed rate will be a function of the heating value of the coal. During tests conducted over the period October 6-14, 1994, the heating value of coal ranged from 11,514 to 12,541 Btu/lb. For purposes of this application, a nominal heating value of 12,000 Btu/lb has been selected. The nominal maximum coal use rate at a heat input rate of 1850 MMBtu/hr is 77.1 tph.

2/3. Controlled and Uncontrolled Emissions

Particulate Matter (AP-42, Section 1.1)

Uncontrolled Emissions

= 10 A lb/ton of coal, where A is the ash content of the coal (A = 8.0%)

= 10 (8.0) x 77.1 tph coal

= 6168 lb/hr

x 8760/2000

= 27,016 tpy

Controlled Emissions

= 37.0 lb/hr (current permit limit)

x 8760/2000

= 162 tpy

Sulfur Dioxide (AP-42, Section 1.1)

Uncontrolled Emissions

= 38 S lb/ton of coal, where S is the sulfur content of the coal (S = 0.75%)

= 38 (0.75) x 77.1 tph coal

= 2197 lb/hr

x 8760/2000

= 9623 tpy

Controlled Emissions

= 770 lb/hr (current permit limit)

x 8760/2000

= 3373 tpy

Nitrogen Oxides (AP-42, Section 1.1)

Uncontrolled Emissions

= 21.7 lb/ton of coal for a dry-bottom wall fired furnace

= 21.7 lb/ton x 77.1 tph coal

= 1673 lb/hr

x 8760/2000

= 7328 tpy

Controlled Emissions

= 846 lb/hr (current permit limit)

x 8760/2000

= 3706 tpy

Other Emissions - will be at present permitted or actual emission rates. When both the power plant and cement plant operate, PSD-FL-090 and 091 imposes the following emission limits which will be complied with:

Total fluorides	-	0.7 lb/hr
Sulfuric acid mist	-	1.7 lb/hr
Beryllium	-	0.0005 lb/hr
Mercury	-	0.03 lb/hr

4/5. Control Equipment Specifications and Efficiencies

Particulate Matter

Baghouse E-20

Number of bags	-	3876
Bag Length	-	37 ft.
Bag Diameter	-	12 inches
Total Cloth Area	-	450,500 ft^2
Air/Cloth Ratio	-	2.3/1 with power and cement plants
Cleaning	-	Reverse air; variable cycle

Efficiency required with power plant only

$$E_p = (6168 - 37) \times 100/6168 = 99.4\%$$

Sulfur Dioxide

Limestone injection

Efficiency required with power plant at maximum rate

$$E_3 = (2197 - 770) \times 100/2197 = 65.0\%$$

Nitrogen Oxides

B & W Low NOx Dual Register Burners

Efficiency required with power plant at maximum rate.

$$E_n = (1673 - 846) \times 100/1673 = 49.4\%$$

6. Flow Diagram - See Attachment 1

7. Location Map - See Attachment 2

8. Site Map - See Attachment 3

9. Application Fee of $250 for minor modification to be deducted from $10,000 fee paid for Site Certification modification.

10. Not Applicable.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY - Not Applicable

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

[ ] Yes [ ] No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

[ ] Yes [ ] No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

1. Control Device/System: 2. Operating Principles:

3. Efficiency:* 4. Capital Costs:

*Explain method of determining

5. Useful Life: 6. Operating Costs:

7. Energy: 8. Maintenance Cost:

9. Emissions:

Contaminant	Rate or Concentration

10. Stack Parameters

a. Height: ft. b. Diameter: ft.

c. Flow Rate: ACFM d. Temperature °F.

e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

a. Control Device: b. Operating Principles:

c. Efficiency:[1] d. Capital Cost:

e. Useful Life: f. Operating Cost:

g. Energy:[2] h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device: b. Operating Principles:

c. Efficiency:[1] d. Capital Cost:

e. Useful Life: f. Operating Cost:

g. Energy:[2] h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:[1]

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:[2]

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

10. Reason for selection and description of systems:

[1]Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION - Not Applicable

A. Company Monitored Data

1. _____ no. sites _____ TSP _____( ) SO^2* _____ Wind spd/dir

Period of Monitoring _____/____/_____ to _____/____/_____
month day year month day year

Other data recorded_____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

b. Was instrumentation calibrated in accordance with Department procedures?

[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from _____/_____/_____ to _____/_____/_____
month day year month day year

2. Surface data obtained from (location) _____

3. Upper air (mixing height) data obtained from (location) _____

4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO_2	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

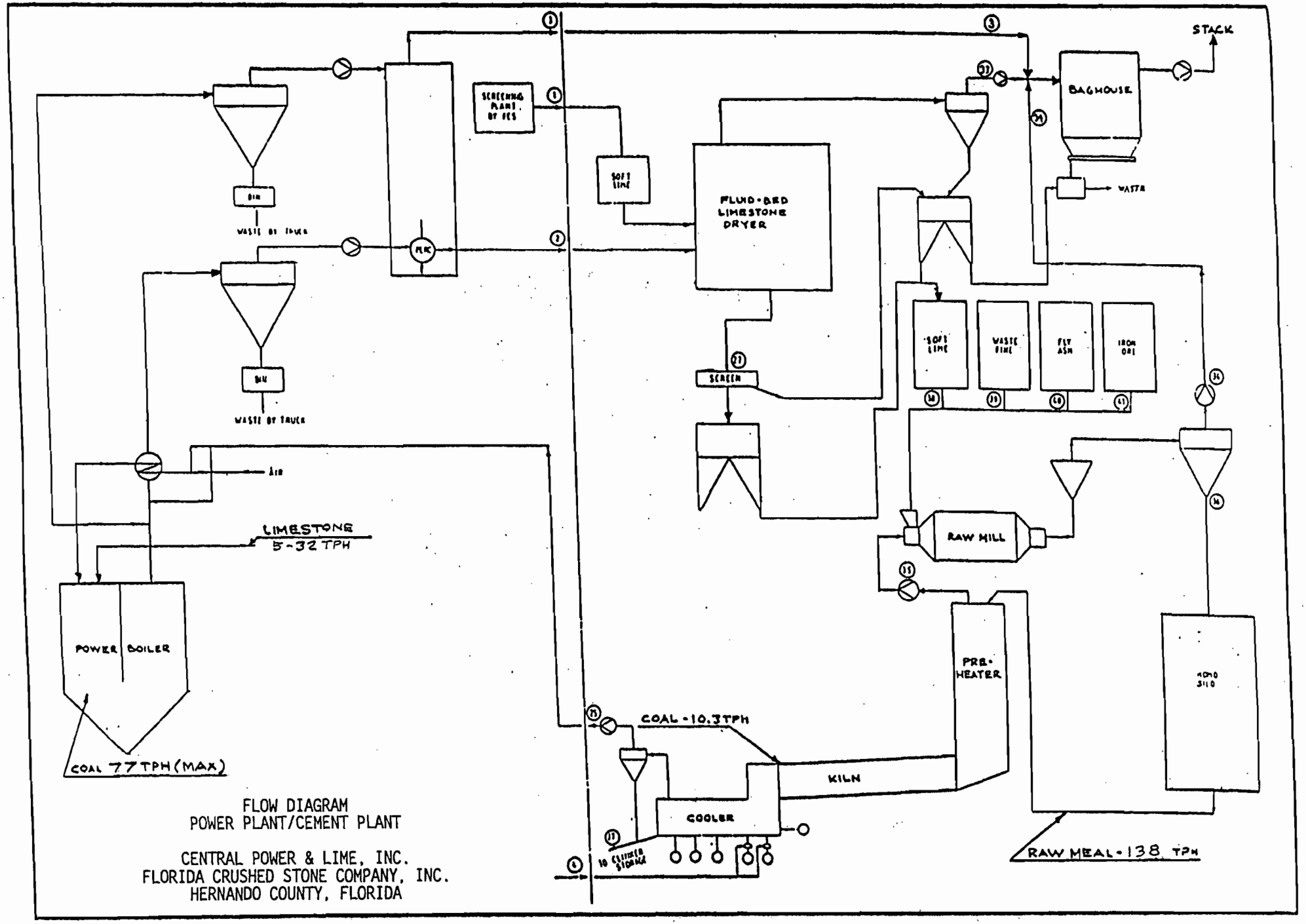
F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

ATTACHMENT 1

KOOGLER & ASSOCIATES



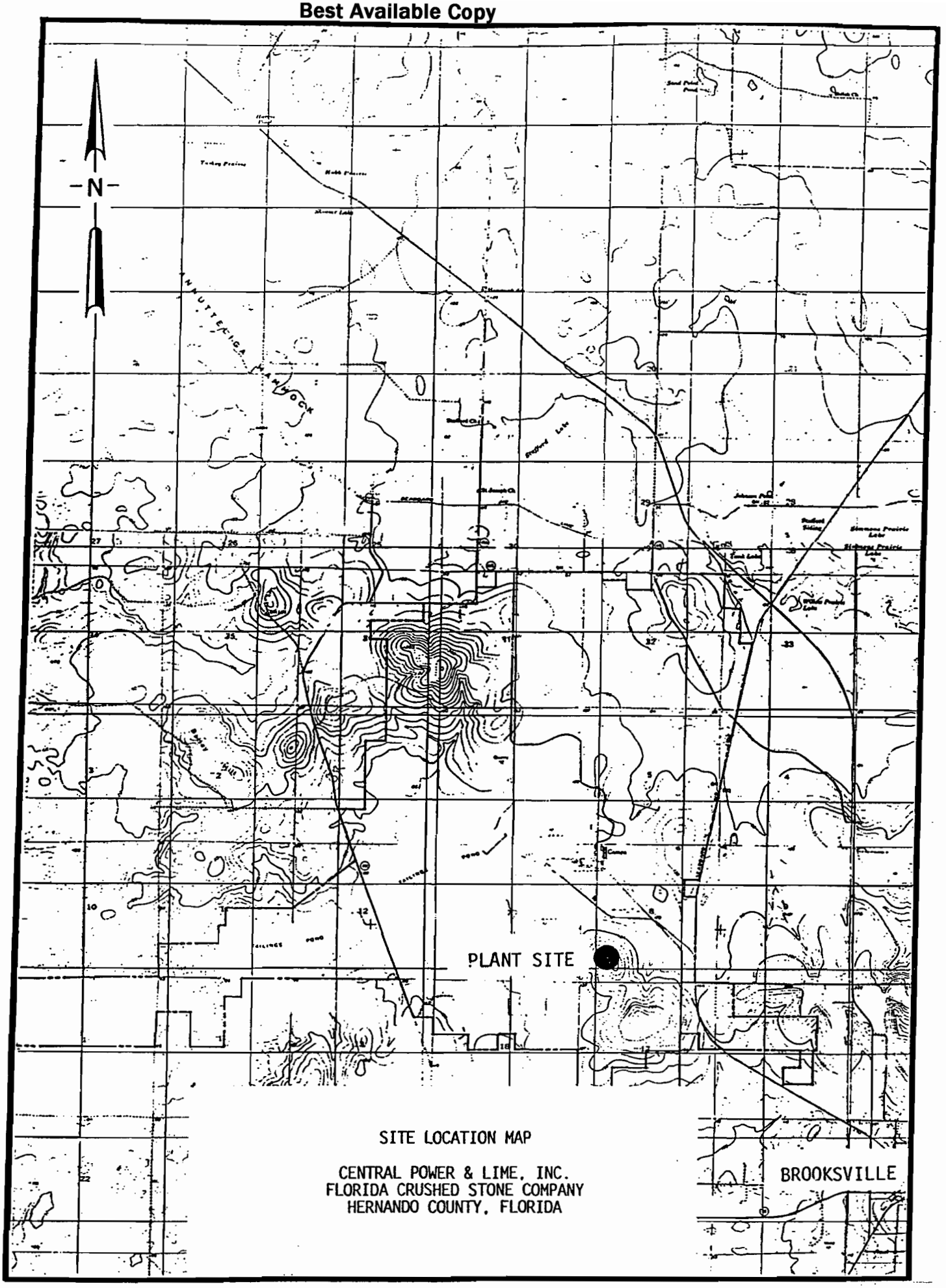
FLOW DIAGRAM
POWER PLANT/CEMENT PLANT

CENTRAL POWER & LIME, INC.
FLORIDA CRUSHED STONE COMPANY, INC.
HERNANDO COUNTY, FLORIDA

ATTACHMENT 2

KOOGLER & ASSOCIATES

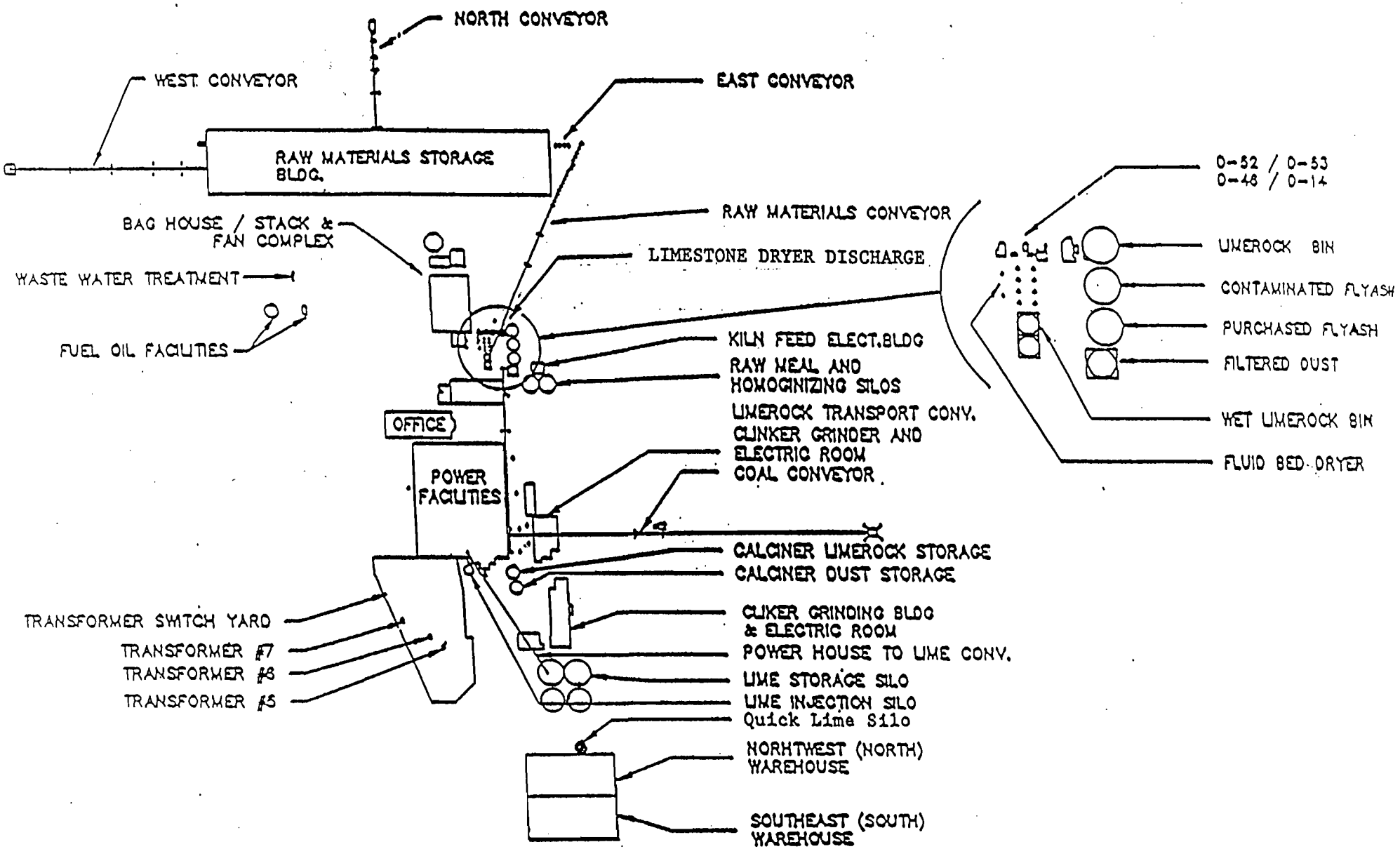
Best Available Copy



SITE LOCATION MAP

CENTRAL POWER & LIME, INC.
FLORIDA CRUSHED STONE COMPANY
HERNANDO COUNTY, FLORIDA

ATTACHMENT 3



SITE MAP

CENTRAL POWER & LIME, INC.
FLORIDA CRUSHED STONE COMPANY, INC.
HERNANDO COUNTY, FLORIDA

PERMIT APPLICATION

ATTACHMENT A

FUEL ANALYSIS RESULTS

COAL

ELECTRIC
FUELS
CORPORATION

AL LABORATORY
TH AVENUE SOUTH, ST. PETERSBURG, FL 33701, (813) 824-6725

REPORT OF ANALYSIS

Central Power and Lime Inc.
Attn: Butch Wheeler
P.O. Box 1508
Brooksville, Florida 33512

August 4, 1994

Sample Identification: Submitted coal sample, July, 1994 Monthly
Our Laboratory Number: 27985

	Basis		
	As Received	Dry	DAF
Moisture	8.10%	xxxxx	
Ash	9.14%	9.95%	
Volatile Matter	33.53%	36.49%	40.52%
Fixed Carbon	49.23%	53.56%	
Sulfur	0.70%	0.76%	
Btu/lb	12340	13428	14911

Carbon	77.11%
Hydrogen	5.03%
Nitrogen	1.58%
Oxygen	5.57%

Ash Fusion Temperatures (Deg F)

	Reducing
Initial	2700+
Softening	2700+
Hemispherical	2700+
Fluid	2700+

Base Acid Ratio	0.11
Slagging Factor	0.08
Fouling Factor	0.07

Mineral Ash Analysis
Ignited Basis

Silica as SiO2	57.14%
Alumina as Al2O3	29.20%
Ferric Oxide as Fe2O3	4.14%
Magnesia as MgO	0.88%
Calcium Oxide as CaO	2.01%
Potassium Oxide as K2O	2.25%
Sodium Oxide as Na2O	0.62%
Titania as TiO2	1.59%
Phosphorus as P2O5	0.21%
Sulphur Trioxide	1.66%
Undetermined	0.30%

* Total moisture submitted by client

Submitted by,
Thomas M. Gaston
Laboratory Supervisor

FUEL OIL

ELECTRIC FUELS CORPORATION

AL LABORATORY
H AVENUE SOUTH. ST. PETERSBURG, FL 33701. (813) 824-6725

REPORT OF ANALYSIS

Central Power and Lime Inc.
Attn: Butch Wheeler
P.O. Box 1508
Brooksville, Florida 33512

August 4, 1994

Sample Identification: Submitted fuel oil sample #0794
July, 1994

Our Laboratory Number: 27986

Sulfur	0.28%
Btu/lb	19,309
Btu/gal @ 60 deg F	137,866
Carbon	87.33%
Hyrogen	9.37%
Nitrogen	0.31%

Submitted by,

Thomas M. Gaston
Laboratory Supervisor

ON-SPEC. USED OIL

Progress Environmental Laboratories
4420 Pendola Point Road
Tampa, Florida 33619
(813) 247-2805
FAX: (813) 248-1537

- CERTIFICATE OF ANALYSIS -
(HRS #E84207 and FDER CompQap #900306G)

To: Florida Crushed Stone
10311 Cement Plant Road

Brooksville, FL 34601

Attn: Butch Wheeler

Report Date: 7/06/94
Page: 1

PEL Lab # : 9406-00159-1
Client ID : Waste Oil
Project ID :
Location : Central Power & Lime
Matrix : Oil
**Density on sample: .90

Collection Information:
Sample Date: 6/24/94
Sample Time: 0:00
Sampled By : Client
Sample Quality:

ND = Less than MDL

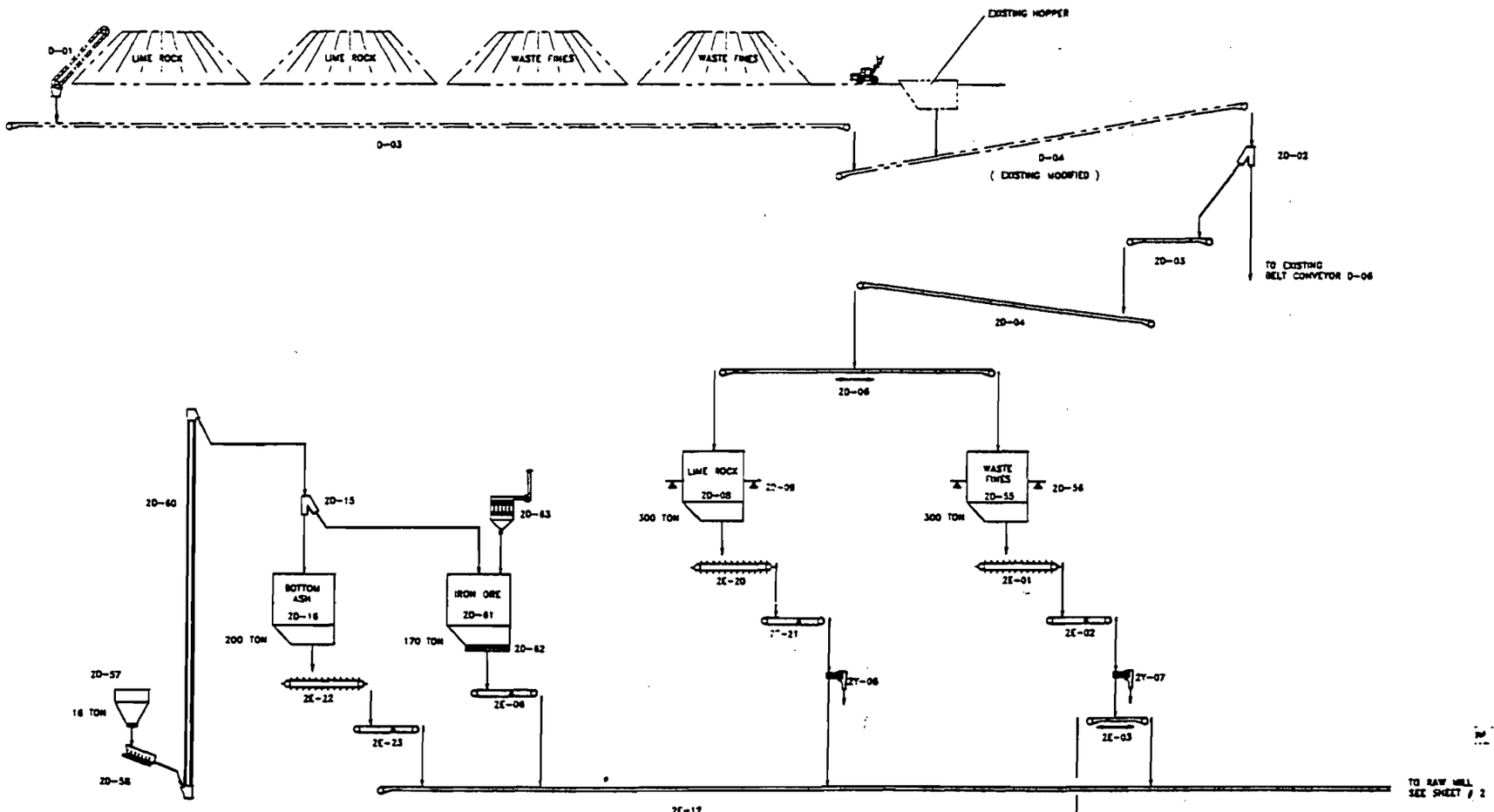
Parameter	Method	Results	Units	MDL
Cadmium	EPA 6010	ND	mg/kg	0.1
Chromium	EPA 6010	ND	mg/kg	0.2
Arsenic	EPA 6010	ND	mg/kg	0.23
Lead	EPA 6010	1.87	mg/kg	0.37
Total Organic Halogens	EPA 9252	680.	mg/kg	500.0
Flash Point	EPA 1010	>200.	Deg.F	1.0
*Sulfur	ASTM D4239 M-C	.52%	%	0.01
*BTU	ASTM D240-92	139050.0	BTU/Gallon	

Respectfully submitted,
Vincent M. Giampa, Laboratory Supervisor.

PERMIT APPLICATION

ATTACHMENT B

PROCESS FLOW DIAGRAMS



FLORIDA CRUSHED STONE
LEESBURG, FLORIDA

NONE

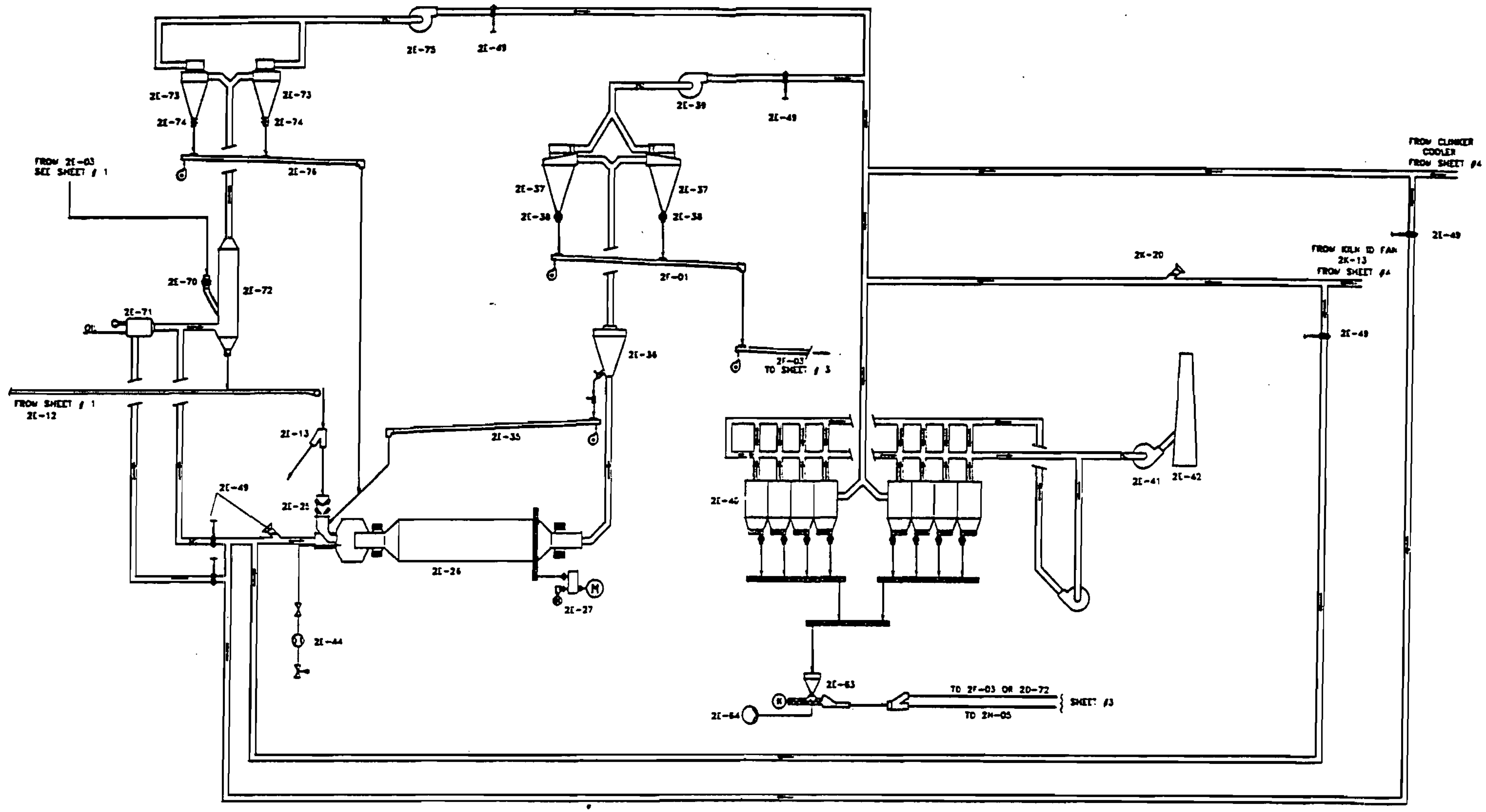
8840-2200

MECHANICAL PROCESS FLOW SHEET
RAW MATERIAL STORAGE AND HANDLING

07-150.00.10- 327599

B

BEST AVAILABLE COPY



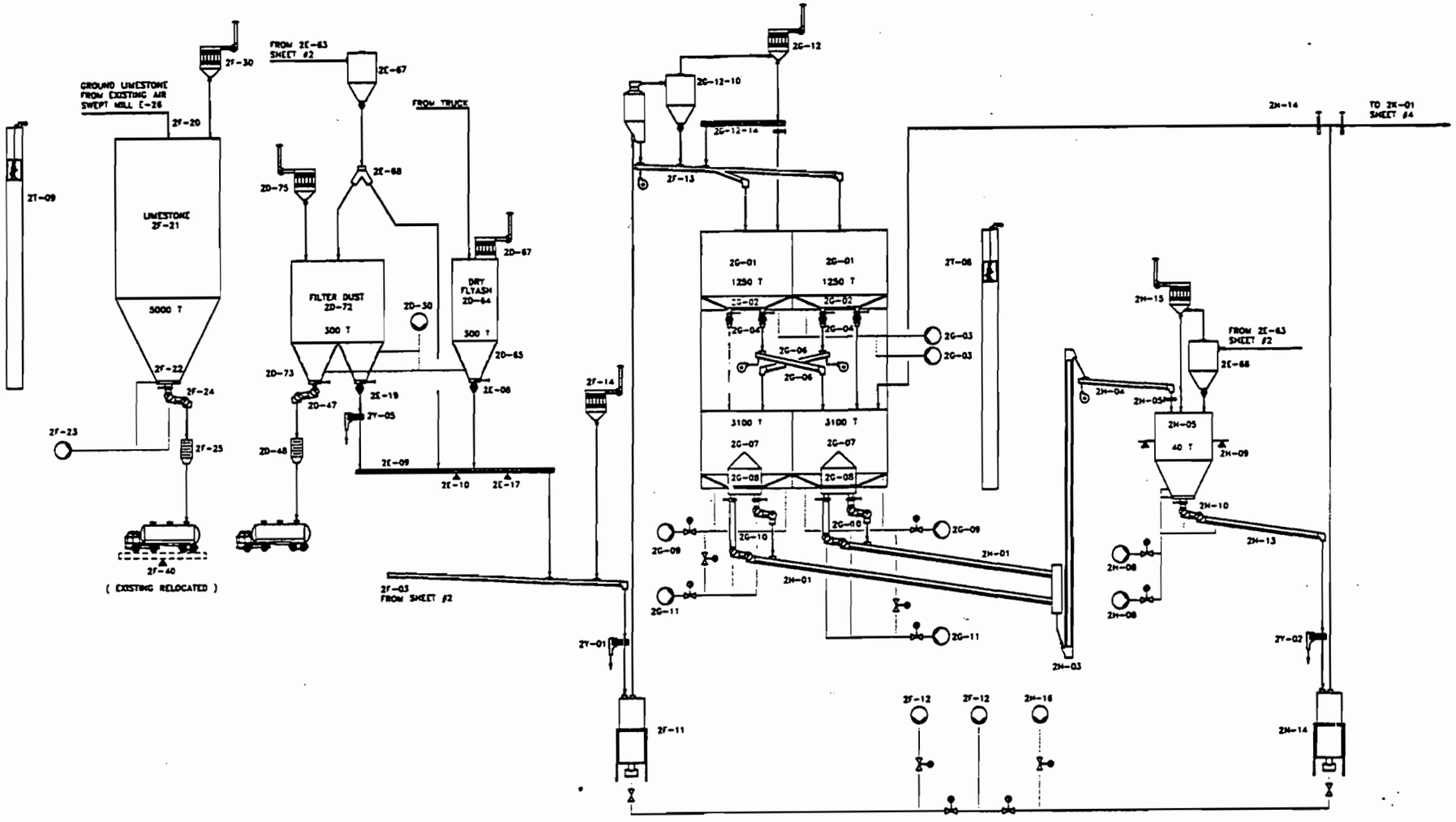
FLORIDA CRUSHED STONE
LEESBURG, FLORIDA

MECHANICAL PROCESS FLOW SHEET
RAW MILL SYSTEM

NONE

6840-2200

D7-150.00.10- 327599 B



9	UPDATED FLOWSHEET	K.S.	02-27-08
8	ORIGINAL RELEASE	K.S.	02-15-08

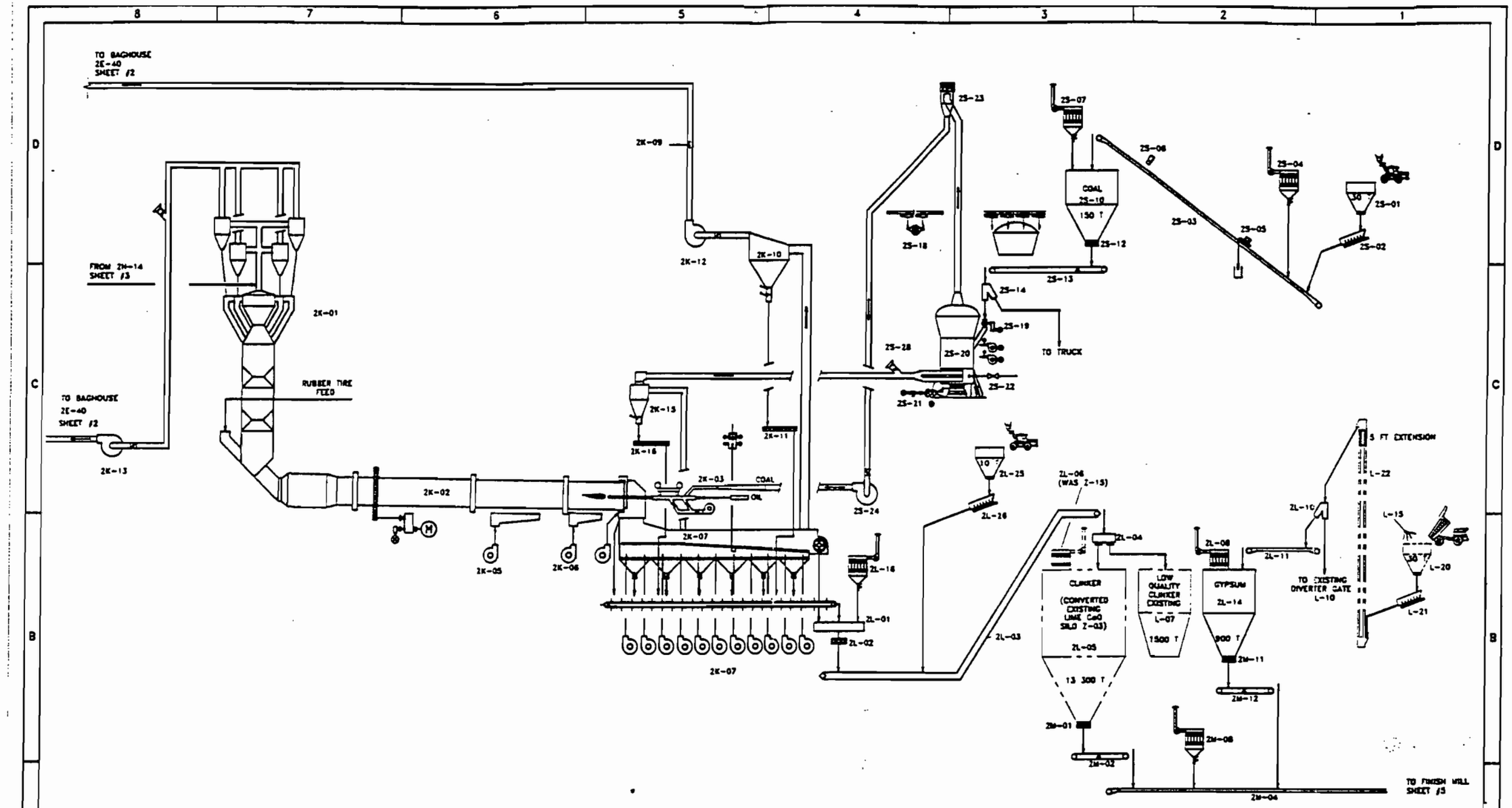
FLORIDA CRUSHED STONE
LEESBURG, FLORIDA

SCALE: NONE

58-40-2200

MECHANICAL PROCESS FLOW SHEET
RAW MATL. STORAGE, HOMOGENIZING SILO & KILN FEED

07-150.00.10- 327599 | 9



A	OPERATOR FLOWSHEET	M.S.	92-12-10
0	ORIGINAL RELEASE	M.S.	92-10-08

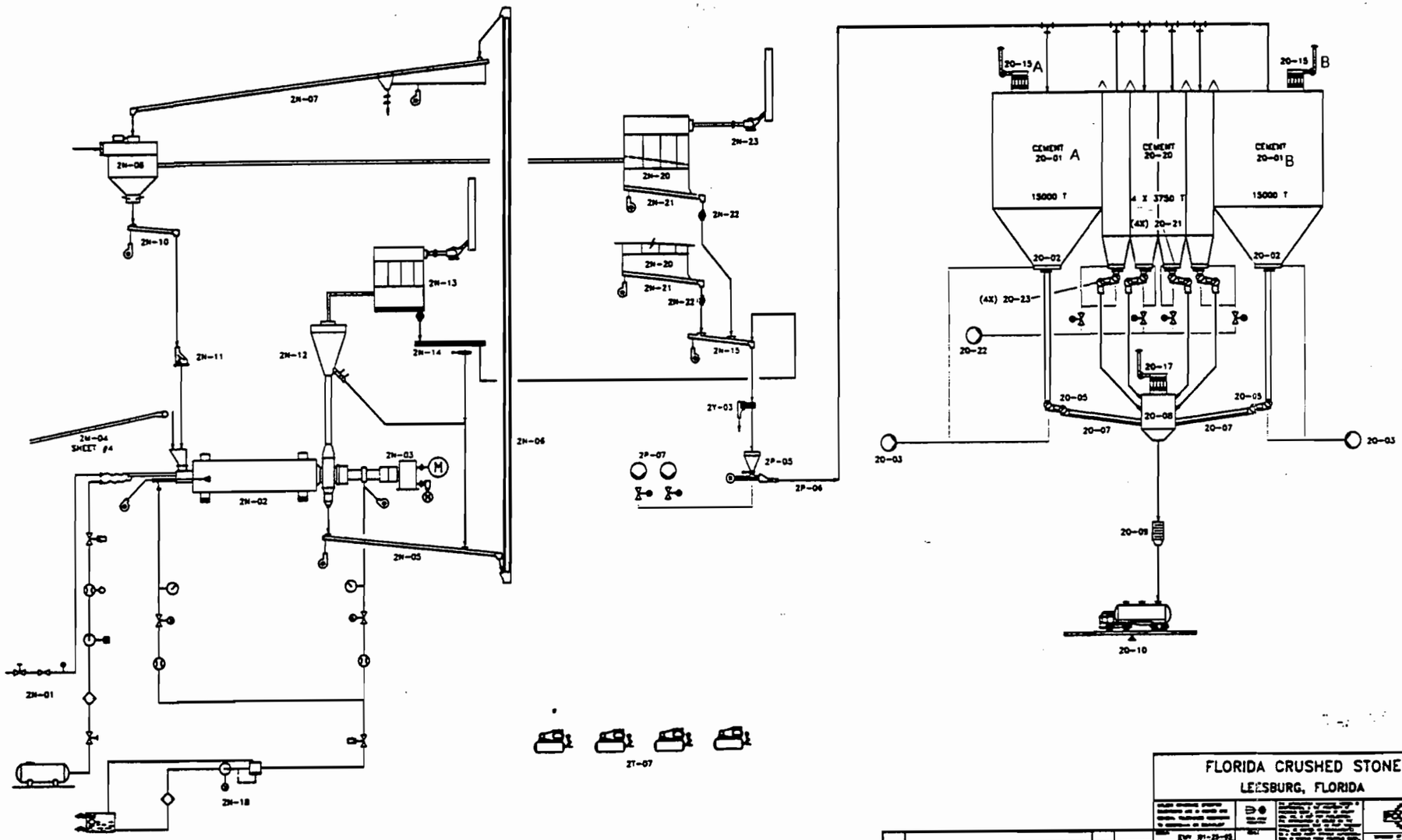
FLORIDA CRUSHED STONE
LEESBURG, FLORIDA

NONE

6840-2200

MECHANICAL PROCESS FLOW SHEET
PREHEATER, KILN, COOLER AND COAL SYSTEM

037-150.00.10-327599 8



B	UPDATED FLOWSHEET	M.S.	02-27-09
A	ORIGINAL RELEASE	M.S.	02-15-08

FLORIDA CRUSHED STONE
LEESBURG, FLORIDA

NONE

6840-2200

MECHANICAL PROCESS FLOW SHEET
FINISH GRINDING SYSTEM

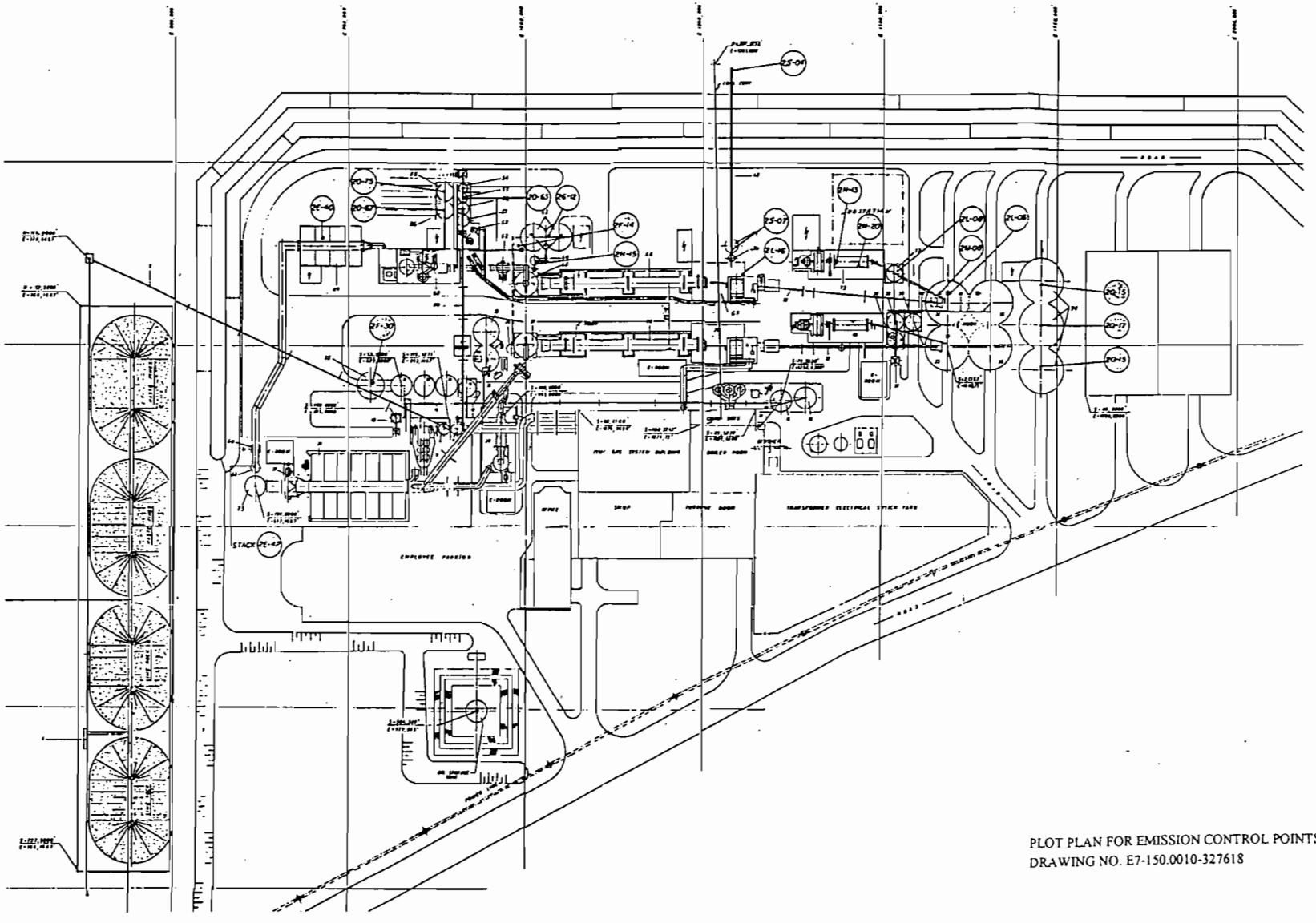
07-150.00.10- 327599

B

PERMIT APPLICATION

ATTACHMENT C

FACILITY PLOT PLAN



PLOT PLAN FOR EMISSION CONTROL POINTS
DRAWING NO. E7-150.0010-327618

RTP ENVIRONMENTAL ASSOCIATES INC.

SITE PLAN OF FLORIDA CRUSHED STONE

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 9, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Mountain:

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

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

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

Sincerely,

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

CHF/JR/bjb

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

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

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

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

Consult postmaster for fee.

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

4a. Article Number
P 872 563 691

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

7. Date of Delivery
11-14-94

5. Signature (Addressee)

6. Signature (Agent)

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

DOWNTOWN STA. USPS BROOKSVILLE FL NOV 14 1994

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

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

P 872 563 691

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

UNITED STATES POSTAL SERVICE

Sent to: Mr. Tom Mountain	
Street and No.: P. O. Box 1508	
P.O., State, and ZIP Code: Brooksville, FL 34605-1508	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date: Mailed: 11-9-94 Permit: PSD-FL-090A	

PS Form **3800**, JUNE 1991

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

RECEIVED
NOV 2 1994
Bureau of
Air Regulation

KA 308-94-05

November 1, 1994

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

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

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

Dear Mr. Fancy and Mr. Oven:

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

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

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

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

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

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:wa
Enc.

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

LAW OFFICES

HOLLAND & KNIGHT

ATLANTA
FORT LAUDERDALE
JACKSONVILLE
LAKELAND
MIAMI
ORLANDO
ST. PETERSBURG
TALLAHASSEE
TAMPA
WEST PALM BEACH
WASHINGTON, D.C.

315 SOUTH CALHOUN STREET
P.O. DRAWER 810 (ZIP 32302-0810)
TALLAHASSEE, FLORIDA 32301
(904) 224-7000
FAX (904) 224-8832

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

MEMORANDUM

TO: Clair Fancy

FROM: Lawrence N. Curtin

DATE: October 13, 1994

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

---

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

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

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

Let us know if you have any questions.

cc: Tom Mountain

LNC/mrh
TAL-51564

LAW OFFICES

HOLLAND & KNIGHT

315 SOUTH CALHOUN STREET
P.O. DRAWER 810 (ZIP 32302-0810)
TALLAHASSEE, FLORIDA 32301
(904) 224-7000
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WASHINGTON, D.C.

OF COUNSEL
MASTRY, MARDER, DAVIS, JOHNSON, BARTLETT & LYNN, P.A.
360 CENTRAL AVENUE
P.O. BOX 3542 (ZIP 33731)
ST. PETERSBURG, FL 33701
(813) 896-7171 FAX (813) 822-6048

SPECIAL COUNSEL
LITIGATION & BANKRUPTCY
SHAW, LICITRA, PARENTE, EBERNIO & SCHWARTZ, P.C.
1010 FRANKLIN AVENUE
GARDEN CITY, NY 11530
(516) 742-0010 FAX (516) 742-2570
900 EAST 42ND STREET
NEW YORK, NY 10017
(212) 338-0670

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TO: Clair Fancy FROM: Lawrence N. Curtin

CITY: REPLY TO: TALLAHASSEE DIRECT TELEPHONE NO.:

MESSAGE:

Date 10/13/94	URGENCY: ☐ Super Rush ☐ Rush ☐ Regular	
Recipient's Fax No. (Area Code and Number)	Confirmation Required? ☐ Yes ☐ No	
Confirmation Telephone No.	Confirmed By	Time Confirmed
Operator	Number of Pages (Including Cover Sheet) 2	
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TALLAHASSEE, FLORIDA 32301
(904) 224-7000
FAX (904) 224-8832

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

MEMORANDUM

TO: Clair Fancy

FROM: Lawrence N. Curtin

DATE: October 13, 1994

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Let us know if you have any questions.

cc: Tom Mountain

LNC/mpl
TAL-51664

Department of
Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

October 6, 1994

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

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

Dear Mr. Mountain:

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

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

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

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

The performance tests shall be subject to the following conditions:

1. A written test result report shall be submitted to these offices within 45 days upon completion of the last test run.

2. The performance tests shall be conducted from October 6 thru 9, 1994, for the 100 MW net output level and October 10 thru 13, 1994, for the 133 MW net output level.

3. Sulfur dioxide, nitrogen oxides, and opacity emissions and stack gas flow rate data shall be recorded using continuous emissions monitors (CEMS) during all tests. If the plant CEMS are used for these tests, these systems shall be quality assured pursuant to 40 CFR 60, Appendix F requirements. The data assessment report from 40 CFR 60, Appendix F, for the most recent relative accuracy test audit (RATA) and most recent cylinder gas audit (CGA), shall be submitted with the test report. In addition, two sets of emission measurements (two sets of three one-hour runs) shall be conducted for the pollutants particulate matter (PM; assume that all of PM is PM10; EPA Method 5), sulfur dioxide (EPA Method 6 or 6C), and nitrogen oxides (EPA Method 7E).

4. Any performance tests shall be conducted using EPA Reference Methods, as contained in 40 CFR 60 (Standards of Performance for New Stationary Sources), or any other method approved by the Department, in writing, in accordance with Rule 62-297.620, F.A.C.

5. Daily records (i.e., heat input, steam production, pressure, temperature, total and net MW outputs, fuel input rates, etc.) of boiler operations during the tests shall be required. Also, daily record keeping of the control equipment parameters shall be required and any alteration of the control equipment operational parameters between the 100 MW and the 133 MW net output tests shall be documented and summarized in the final report.

6. A Type I or II stack audit may be conducted by the Department's Southwest District office.

7. During the tests, no permitted emission limitation shall be exceeded.

8. The authorized performance tests shall not result in the release of objectionable odors pursuant to Rule 62-296.320(2), F.A.C.

9. Performance testing shall immediately cease if operations are not in accordance with the conditions in the air section of Site Certification No. PA 82-17; PSD-FL-090; and, this authorization protocol. Performance testing shall not resume until appropriate measures to correct the problem(s) have been implemented.

10. The performance tests for pollutant emissions shall be conducted under the direct supervision and responsible charge of a professional engineer registered in Florida.

11. This Department action is only to authorize the performance tests described above and in the request letter. Any operation above the 100 MW net output level after the last performance test run or the consecutive 96-hours of CEMS data collection is completed will be deemed a violation of the Site Certification No. PA 82-17; and, PSD-FL-090.

12. The Department's Bureau of Air Regulation and Southwest District shall be notified, in writing, on the date of the last test run completion and the CEMS data collection.

13. The tests shall be conducted at 98-100% of the 100 MW and 133 MW net outputs. Any variation from these levels may invalidate the data for assessment purposes.

14. Any federally enforceable limitation contained in the permit will have to be addressed as a permitting action in accordance with the appropriate regulations if any of these limitations are to be changed.

15. Enclosures to be incorporated:
    - o Lawrence N. Curtin's October 3, 1994 letter.
    - o Conditions of Approval: PSD-FL-090 Emission Limitations.

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

Sincerely,

Howard L. Rhodes
Director
Division of Air Resources Management

HLR/rbm

Enclosures

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

Conditions of Approval
PSD-FL-090

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

A. Emission Limitations

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

a. SO_2 - the lesser of these: 1.2 lb. per million Btu heat input, maximum two-hour average; 0.9 lb. per million Btu heat input, maximum three-hour average; and 915 lb. per hour, maximum three-hour average.

b. NO_x - 0.7 lb. per million Btu heat input, averaging time per 40 CFR 60.46.

c. Particulates - 0.03 lb. per million Btu heat input, averaging time per 40 CFR 60.46.

d. Visible emissions - 20% opacity, 6-minute average, except for one 6-minute period per hour of not more than27% opacity.

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3. Article Addressed to:

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

4a. Article Number
Z 751 859 996

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

7. Date of Delivery
10-12-94

5. Signature (Addressee)

6. Signature (Agent)

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

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PS Form **3800**, March 1993

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

ATTORNEYS AT LAW

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

SUITE C
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TALLAHASSEE, FLORIDA 32301

MAILING ADDRESS:
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TELEPHONE (904) 877-0099
FACSIMILE (904) 877-0981

NORMAN H. HORTON, JR.
OF COUNSEL

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

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

HAND-DELIVERY

October 6, 1994

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

Dear Mr. Mitchell:

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

> Specific Condition No. 20.: (New)
>
> The federal regulations contained in 40 CFR 761 prohibit the burning of used oil containing greater than or equal to 2 ppm of polychlorinated biphenyls (PCBs) for energy recovery in startup or shutdown conditions. Within thirty days from the date this condition becomes final, the permittee shall conduct a one-time test (EPA 8080) of a representative sample of the on-site generated on-specification used oil to confirm that the used oil being utilized for the purposes identified within this permit does not contain quantifiable levels (> 2ppm) of PCBs.

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

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

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

Sincerely,

C. Anthony Cleveland

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

xc: Ms. Lizanne Garcia
Mr. Tom Mountain

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

October 5, 1994

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

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

Dear Mr. Curtin:

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

Sincerely,

Patty Adams

Patricia G. Adams
Planner
Bureau of Air Regulation

/pa

Enclosure

cc: Bruce Mitchell

LAW OFFICES

HOLLAND & KNIGHT

315 SOUTH CALHOUN STREET
P.O. DRAWER 810 (ZIP 32302-0810)
TALLAHASSEE, FLORIDA 32301
(904) 224-7000
FAX (904) 224-8832

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WASHINGTON, D.C.

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

October 3, 1994

VIA HAND DELIVERY

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

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

Dear Mr. Fancy:

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

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

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

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

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

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

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

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

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

Sincerely,

HOLLAND & KNIGHT

Lawrence N. Curtin

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

LNC/mrh
TAL-51034

Department of Environmental Protection

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

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

September 8, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Mountain:

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

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

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

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

Analysis of data in Attachment 1, 3 and 4, shows that a difference in actual vs. allowable emissions of slightly over 1% for NO_x and for SO_2 would exceed the PSD-significant level of 40 TPY, while a 7% increase over actual PM/PM_{10} emissions would exceed the significant level of 15 TPY. To conclude that a 21% increase in net power output would not carry with it an increase in actual emissions of at least these magnitudes would be unlikely. Viewed another way, if the three SO_2 stack test measurements are averaged and compared with the allowable (691 vs. 770 lbs/hr with the cement plant down) and the difference is then multiplied by the 1993 operating hours, the increase would be (770-691)(1/2000)(7353) = 290 TPY. The actual difference would be higher because the 691 lbs/hr average is based on operation at rates higher than the 100 MW "baseline" rate.

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

Sincerely,

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

CHF/JB/bjb

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

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

4a. Article Number
P 872 562 700

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

7. Date of Delivery
9-13-94

5. Signature (Addressee)

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6. Signature (Agent)
Thomas W. [signature]

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

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PS Form 3800, JUNE 1991

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

KA 307-93-12

August 4, 1994

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

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

Dear Mr. Brown:

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

Letter of 2/25/94:

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

RESPONSE:

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

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

Letter of 2/25/94:

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

RESPONSE:

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

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

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

Letter of 2/25/94:

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

RESPONSE:

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

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

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

Letter of 7/7/94:

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

RESPONSE:

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

Letter of 7/7/94:

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

RESPONSE:

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

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

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

Letter of 7/7/94:

3. Explanation of the variation of SO2 limits (PSD permit states 0.9 lbs/MMBtu vs. Site Certification limit of 1.2 lbs/MMBtu).

RESPONSE:

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

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

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

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

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

Letter of 7/7/94:

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

RESPONSE:

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

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

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

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

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

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:PAR:wa

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

KOOGLER & ASSOCIATES

ATTACHMENT 1

HIGH LOAD OPERATING DATA

CENTRAL POWER & LIME, INC.
BROOKSVILLE, FLORIDA

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

NOTE: (1) Net delivered MW is determined after taking into account the line loss. Typically the net MW at the plant would be about 3.5 MW higher.

(2) The maximum allowed coal use for the power plant is determined by multiplying the nominal use of 62.5 tons per hour (TPH) by 10 percent, or 68.8 TPH.

(3) It should be noted that the above documented operation rate is within 10% of the requested certification limit of 150 MW net delivered.

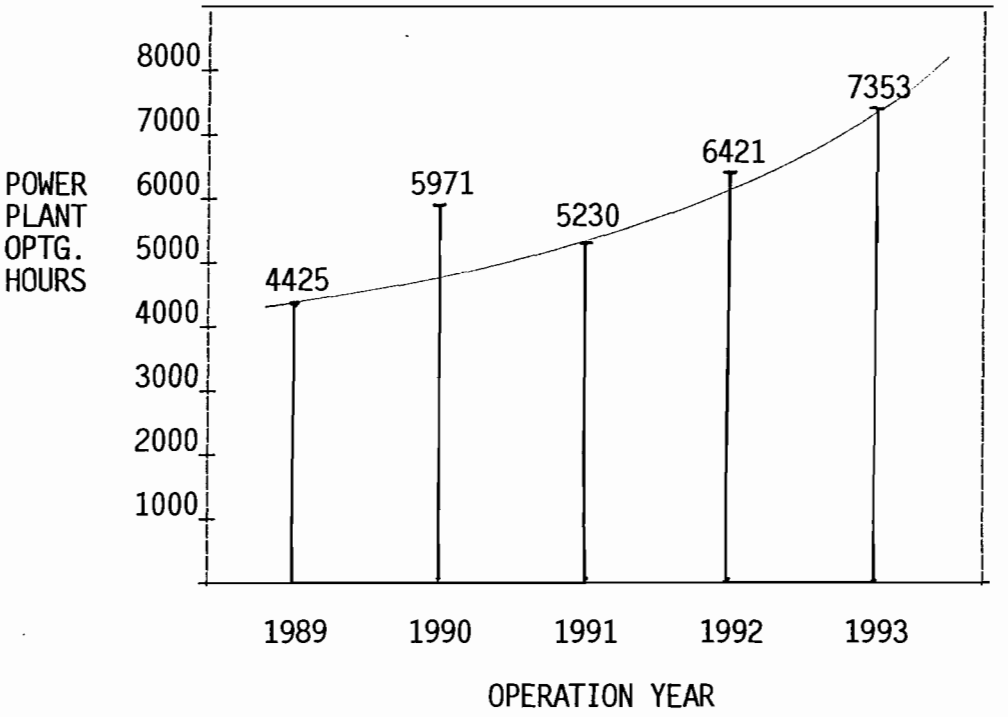
(4) Although there is no direct/simple correlation between the coal use, heat input, power generation rate, and emission rates, the demonstration of compliance with emission limits is possible with continuous monitors.

KOOGLER & ASSOCIATES

ATTACHMENT 2

POWER PLANT OPERATING HOURS

CENTRAL POWER AND LIME, INC.
BROOKSVILLE, FLORIDA



NOTES:

(1) In view of the above information, it can be seen how FCS has increased control over the complex variables involved in keeping the power plant on-line.

(2) It can be seen that none of the above years' operating hours can be considered representative of normal operations for the power plant (90+ percent on-line).

KOOGLER & ASSOCIATES

ATTACHMENT 3

POWER PLANT EMISSIONS DATA

CENTRAL POWER & LIME, INC.
BROOKSVILLE, FLORIDA

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

NOTES:

(1) Both the cement plant and power plant exhaust through the same stack.

(2) NOx measurement not conducted.

(3) SO_2 measurements conducted on 12/08/92.

(4) This measurement is suspect.

(5) This entry represents information from Attachment 1. PM measurements have not been conducted yet in 1994.

KOOGLER & ASSOCIATES

ATTACHMENT 4

ESTIMATED ANNUAL EMISSIONS FOR POWER PLANT

CENTRAL POWER & LIME, INC.
BROOKSVILLE, FLORIDA

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

NOTES:

(1) Based on emission measurements presented in Attachment 2.

(2) NOx measurement not conducted.

(3) The emission measurement is suspect.

(4) This entry represents information from Attachment 1, and allowable annual operating hours of 8760.

(5) PM measurements have not been conducted yet in 1994.

ATTACHMENT 5

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

CENTRAL POWER & LIME, INC.
BROOKSVILLE, FLORIDA

KOOGLER & ASSOCIATES

PA 82-17, 1983

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

I. Air

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

A. Emission Limitations

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

a. SO_2 - 1.2 lb. per million Btu heat input, maximum daily average, and 1,200 lb. per hour, maximum three-hour average.

b. NO_x - 0.7 lb. per million Btu heat input, averaging time per Rule 17-2.700, FAC.

c. Particulates - 0.1 lb. per million Btu heat input, averaging time per Rule 17-2.700, FAC.

d. Visible emissions - 20% opacity, 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

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

a. SO_2 - 1.2 lb. per million Btu heat input, maximum daily average, and 1,250 lb. per hour, maximum three-hour average.

b. NO_x - 0.7 lb. per million Btu heat input plus 2.9 lb. per ton of kiln feed (dry basis), averaging time per Rule 17-2.700, FAC.

ATTACHMENT 6

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

CENTRAL POWER & LIME, INC.
BROOKSVILLE, FLORIDA

PART I

Specific Conditions

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

A. Emission Limitations

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

   a. SO_2 - 0.9 lb. per million Btu heat input, maximum three-hour average (not to exceed 915 lb. per hour, maximum three-hour average).

   b. NO_x - 0.7 lb. per million Btu heat input, averaging time per 40 CFR 60.46.

   c. Particulates - 0.03 lb. per million Btu heat input, averaging time per 40 CFR 60.46.

   d. Visible emissions - 20% opacity, 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

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

   a. SO_2 - 50 lb. per hour plus 0.74 lb. per million Btu boiler heat input, maximum three-hour average (not to exceed ~~965~~ lb/hr maximum three-hour average).

   b. NO_x - 0.7 lb. per million Btu heat input plus 2.9 lb. per ton of kiln feed (dry basis), averaging time per 40 CFR 60.46.

   c. Particulates - 0.03 lb. per million Btu heat input plus 0.3 lb. from the cement kiln and 0.1 lb from the clinker cooler per ton of kiln feed (dry basis), averaging time per 40 CFR 60.46.

ATTACHMENT 7

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

CENTRAL POWER & LIME, INC.
BROOKSVILLE, FLORIDA

KOOGLER & ASSOCIATES

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

A. Emission Limitations

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

a. SO_2 - 1.2 lb. per million Btu heat input, maximum two-hour average, and ~~915~~ 770 lb. per hour, maximum three-hour average.

b. NO_x - 0.7 lb. per million Btu heat input, averaging time per Rule 17-2.700, FAC, not to exceed 846 lb/hr.

c. Particulates - 0.03 lb. per million Btu heat input, averaging time per Rule 17-2.700, FAC.

d. Visible emissions - 20% opacity, 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

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

a. SO_2 - 1.2 lb. per million Btu heat input, maximum two-hour average, and 965 781 lb. per hour, maximum three-hour average.

b. NO_x - 0.7 lb. per million Btu heat input plus 2.9 lb. per ton of kiln feed (dry basis), averaging time per Rule 17-2.700, FAC, not to exceed 1205 lb/hr.

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

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

ATTACHMENT 8

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

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

I.A. Emission Limitations

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

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

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

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

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

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

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

Within 60 calendar days after achieving the maximum capacity at which each unit will be operated (but no later than 180 operating days after initial startup) and annually thereafter, the permittee shall conduct performance tests for particulate matter, SO_2, NOx, and visible emissions while operating at 90-100% of the maximum allowable net deliverable power production rate and shall conduct visible emission tests on all coal handling and flyash baghouses. The Department shall be furnished a written report of the results of such performance tests within 45 days of completion of the tests. The performance tests will be conducted in accordance with the provisions of 40 CFR 60.46.

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 7, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Dr. Koogler:

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

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

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

3. Explanation of the variation of SO2 limits (PSD permit states 0.9 lbs/MMBtu vs. Site Certification limit of 1.2 lbs/MMBtu).

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

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

Sincerely,

John C. Brown, Jr.
Administrator
Permitting and Standards

JCB/JR/bjb

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

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

4a. Article Number
P 872 562 696

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7/11/94

5. Signature (Addressee)
Wendy Quenbach

6. Signature (Agent)

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PS Form **3800**, JUNE 1991

Modification
Actual to Allowable:

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

KA 307-93-12

June 17, 1994

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

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

Dear Mr. Brown:

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

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

RESPONSE:

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

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

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

RESPONSE:

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

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

RESPONSE:

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

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

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

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

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:PAR:wa

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

Provide
1. Actual Annual Emissions

TABLE 1

HIGH LOAD OPERATING DATA

CENTRAL POWER AND LIME, INC.
BROOKSVILLE, FLORIDA

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

NOTE: (1) Net delivered MW is determined after taking into account the line loss. Typically the net MW at the plant would be about 3.5 MW higher.

(2) The maximum allowed coal use for the power plant is determined by multiplying the nominal use of 62.5 tons per hour (TPH) by 10 percent, or 68.8 TPH.

(3) It should be noted that the above documented operation rate is within 10% of the requested certification limit of 150 MW net delivered.

(4) Although there is no direct/simple correlation between the coal use, heat input, power generation rate, and emission rates, the demonstration of compliance with permit limits is possible with continuous monitors.

Florida Department of
Environmental Protection

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

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

February 25, 1994

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Dr. Koogler:

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

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

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

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

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

Sincerely,

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

JCB/JR/pa

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

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

4a. Article Number
P 872 562 609

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Susan Bryant

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

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PS Form 3800, JUNE 1991

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

ATTORNEYS AT LAW

TIMOTHY P. ATKINSON
M. CHRISTOPHER BRYANT
R. L. CALEEN, JR.
C. ANTHONY CLEVELAND
TERRY COLE
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SEGUNDO J. FERNANDEZ
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OF COUNSEL

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

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

February 25, 1994

HAND DELIVERY

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

Re: Florida Crushed Stone Request for Modifications

Dear Clair:

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

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

Sincerely,

C. Anthony Cleveland

CAC:cjb/

Enclosure

KBN

February 25, 1994

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

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

Dear Mr. Cleveland:

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

1. FDEP PSD rules define a modification as "any physical change in, change in the method of operation of, or addition to a stationary source or facility which increases the actual emissions of any air pollutant regulated under...". An increase in the production rate is excluded from this definition unless the change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975. Therefore, information should be requested to factually determine if:

   a. There are any physical modifications to the source (power plant boiler) to achieve the requested increase in power production rate.

   b. The requested changes would constitute a "change in the method of operation" of the facility (it appears this may be the case).

   c. The change is for a change in the "production rate" of the facility (i.e., 1,000 MMBtu/hr), which is prohibited under a federally enforceable permit condition (i.e., PSD permit).

   d. If either a., b. or c. above are affirmative, it must be determined if there is an increase in actual emissions of any regulated pollutant. Existing actual emissions are defined as the actual average emissions from the last two years of operation. These must be compared to the requested future maximum emissions. If the increase in any pollutant is significant, then PSD review would be required.

KBN ENGINEERING AND APPLIED SCIENCES, INC.

1034 Northwest 57th Street, Gainesville, Florida 32605, 904 331 9000, FAX 904 332 4193

1408 West Cypress Street, Suite 210, Tampa, Florida 33607, 813 287 1717, FAX 813 287 1716

1601 Cent Moore Road, Suite 105, Boca Raton, Florida 33487, 407 994 0810, FAX 407 994 0503

6821 Southpoint Drive North, Suite 216, Jacksonville, Florida 32216, 904 296 0663, FAX 904 296 0146

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

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

Please call if you have any questions concerning this matter.

Sincerely,

David A. Buff

David A. Buff, P.E.
Principal Engineer

cc: Larry Jennings

13076A1/11

Florida Department of
Environmental Protection

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

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

February 17, 1994

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

Dear Ms. Harper:

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

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

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

Sincerely,

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

CHF/pa

Enclosure

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

Florida Department of
Environmental Protection

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

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

February 17, 1994

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

Dear Mr. Bunyak:

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

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

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

Sincerely,

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

CHF/pa

Enclosure

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

Florida Department of
Environmental Protection

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

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

February 17, 1994

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

Dear Mr. Thomas:

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

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

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

Sincerely,

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

CHF/pa

Enclosure

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

Florida Department of
Environmental Protection

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

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

February 17, 1994

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

Dear Mr. Hetrick:

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

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

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

Sincerely,

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

CHF/pa

Enclosure

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

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

KA 307-93-12

January 25, 1994

RECEIVED
JAN 26 1994
Bureau of
Air Regulation

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

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

Gentlemen:

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

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

   FROM: When the power plant boiler is operating alone and the cement plant is not in operation, the maximum heat input rate of the boiler shall not exceed the site specific limit of 1,000 million Btu per hour, maximum three-hour average.

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

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

Note that the proposed condition eliminates the necessity to reduce the electric power generating capacity when the cement plant is not operating. See Attachment 2 for background information. Also, as the increased generating rates will be achieved with no increase in emissions, the existing emission limits (for particulate matter, SO_2 and NOx) stated in terms of heat input rate, become meaningless and have been deleted from the proposed permit condition.

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

FROM: Within 60 calendar days after achieving the maximum capacity at which each unit will be operated (but no later than 180 operating days after initial startup) and annually thereafter, the permittee shall conduct performance tests for particulates, SO_2, NOx, and visible emissions during normal operations near ($\pm$ 3%) 1,234 million Btu per hour heat input when the power plant and cement plant are operating in combination, and 1,000 million Btu per hour when the power plant is operating alone, and visible emission tests on all coal handling and flyash baghouses. The Department shall be furnished a written report of the results of such performance tests within 45 days of completion of the tests. The performance tests will be conducted in accordance with the provisions of 40 CFR 60.46.

TO: Within 60 calendar days after achieving the maximum capacity at which the power plant will be operated (but no later than 180 operating days after initial startup at the maximum allowable capacity) and annually thereafter, the permittee shall conduct performance tests for particulate matter, SO_2, NOx, and visible emissions while operating at 90-100% of the maximum allowable net deliverable power production rate and shall conduct visible emission tests on all coal handling and flyash baghouses. The Department shall be furnished a written report of the results of such performance tests within 45 days of completion of the tests. The performance tests will be conducted in accordance with the provisions of 40 CFR 60.46.

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

A. No Increase in Hours of Operation

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

B. No Increase in Allowable Emissions

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

C. No Increase in Allowable Air Quality Impacts

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

D. Consistency with PSC Approval

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

E. Operating Flexibility

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

F. Rule Applicability

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

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

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

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

Very truly yours,

KOOGLER & ASSOCIATES

John B. Koogler, wa

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

JBK:PAR:wa
Enc.

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

KOOGLER & ASSOCIATES

3/6/1984

THE FLORIDA CABINET

Sitting as:

THE SITING BOARD

DEPARTMENT OF ENVIRONMENTAL REGULATION

IN RE: Consideration of a Recommended Order from Hearing Officer and Exceptions regarding Florida Crushed Stone's application for power plant certification.

AGENDA ITEM NO. 1
March 6, 1984

P R O C E E D I N G S

The above-entitled matter came on to be heard before the GOVERNOR AND CABINET, sitting as the SITING BOARD, DEPARTMENT OF ENVIRONMENTAL REGULATION, at the Cabinet Conference Room, LL-03, The Capitol, Tallahassee, Florida, on Tuesday, the 6th day of March, 1984, commencing at approximately 2:10 P.M.

Reported by:

RAYMOND F. DUTKIEWICZ

Court Reporter

P R E S E N T

BOB GRAHAM; Governor

GEORGE FIRESTONE, Secretary of State

GERALD LEWIS, Comptroller

JIM SMITH, Attorney General

RALPH D. TURLINGTON, Commissioner of Education

* * * * *

P R O C E E D I N G S

GOVERNOR GRAHAM: Department of Environmental Regulation.

MR. BOTTCHER: Thank you, Your Honor. I am John Bottcher, attorney with the Department of Environmental Regulation. We are here to discuss again the power plant certification issue involving an application by Florida Crushed Stone. With me today is Mr. Buck Oven, the power plant coordinator from the Department, and representing Secretary Tschinkel is Steve Smallwood, chief of air quality for the Department. Mr. Smallwood could address any policy ramifications you wish to discuss on the air quality allocation issue.

Secretary Tschinkel sends her apologies for not being able to be here this afternoon.

The parties to this proceeding, as I mentioned, the Applicant, Florida Crushed Stone, of course, the Department of Environmental Regulation and we have Intervenors. The main Intervenor that we'll be hearing from today is Florida Mining and Mineral. We received a recommended order from the hearing officer and this was discussed at length on February 21st, and deferred until today.

Florida Crushed Stone wishes to construct and operate a coal-fired cogeneration facility near

Brooksville, Florida to produce electricity and cement.

We left two issues pending the last time, one was the propriety of the Department's BACT determination, that's Best Available Control Technology, and then the issue of the allocation of the remaining air quality increment.

I wish to go into a brief history on the allocation process. Anytime you have any environmental decisions made you allocate the resource to a certain extent. Somebody gets to use it and somebody, therefore, does not get to use it. Starting back in the early 1970s with the Clear Air Act of 1970, the federal government tried to set forth a process to allocate increment. This was litigated for more than ten years. Congress finally came to grips with it in 1977, adopted an act setting forth the basic scheme that we operate under today, and it essentially sets forth two types of standards; one, ambient standards, which are to protect public health and welfare. These are your adverse effects standards above which you expect adverse effects, and then there is the other type of standards, called PSD, Prevention of Significant Deterioration, which is designed to protect those areas of the United States which are already clean, that are already below the adverse effects standards. This PSD program is

further divided into the various classes. We have Class I through III. Florida has only two classes, Class I and Class II, Class I being those preservation areas, wilderness areas, national parks, for which we have very stringent increments of pollution allowed, and everything else is Class II in Florida.

During the process of developing this regulatory scheme, there was great debates about allocating the remaining increment. Starting in the early '70s, the DPC, prior to the DER, attempted to write rules on it. We had a rule, a nondegradation rule, and at that time there was a serious proposal to allocate the remaining increment on a -- the next person gets half -- when anyone comes in, you only allow any one person to get half of what's left. That way you never run out. That never was adopted.

Later, I think around 77-78, a sole source increment proposal was considered by the Environmental Regulation Commission that would set a maximum for any one source. Right now the way it is, the increment is set up to where all the sources cannot violate that increment, and for Class I those increments are very stringent.

Well, this proposal then was to -- well, let's not allow any one source to take no more than a certain

amount. At that time the proposal for sulfur dioxide on a 24-hour basis was 10 micrograms. That was not adopted.

The issue was again addressed by rule-making through the Department in 1980 and '81, with the final adoption in '81 of the rules we operate under today, and which we feel is adequate for allocating the resource.

There is no specific provision for allocation of the resource; however, it can be allocated and is allocated on a case-by-case basis through determination of Best Available Control Technology.

To put this in perspective, when a source comes in for a DER license, they have to show to us that they meet all our numerical standards. We have dozens of standards. For S_O2 alone, there is ten standards. They have to show us they meet every one of those, and then, if they meet every one of those -- and then, if they meet all of those, we go into another process called determination of BACT in which we look at the environmental, the social and the economic aspects of even requiring them to emit less. That's where we look at the allocation of the increment.

If we do a determination of Best Available Control Technology we go public with it. There is public

notice required by the state and federal law, and in our power plant siting there is even more public notice. At that time entities that see this as either constraining them or somehow prohibiting future growth in that area can come forward and present evidence that our allocation was wrong, and that's what happened precisely in this case. Counties can come in. The growth management agencies could come in and say, "Wait a minute, you're giving that increment to somebody that's not in our comprehensive plan," or, "You're giving too much."

Well, we'll take into account that increment consumption and balance that with what the technology will allow to reduce the emissions. If, on balance, we can reduce the emissions and reduce the consumption of the increment, we do that. That's precisely what happened here, and the hearing officer found, specifically, that our Best Available Control Technology did this, that it was supported by competent substantial evidence.

The evidence is that the best control strategy for this facility is a sulfur emission standard of .74, which is the most stringent in the state of Florida. It does not require a scrubber. It is predicated on the use of low sulfur coal with some of

the sulfur dioxide absorbed into the cement as the flue gases go through the cement plant.

It's a fairly innovative concept. We were convinced that this is the best control available, when you take into account other balancing factors.

Now, for other new sources, any large power plant that's built in the United States has to put on a scrubber now under federal law. This particular facility falls into an exception of that requirement of having to put on a scrubber. That requirement for a scrubber was imposed by Congress so that we encouraged the use of high sulfur American fuel, as opposed to importing fuel or using up the smaller reserves of low sulfur fuel. It was a policy decision to encourage the use of this natural resource in the United States.

The scrubber would have serious environmental and social adverse effects, and this is why we propose that the facility have an air standard absent a scrubber. The scrubber would have consumed fresh water, would create a toxin-laden sludge which would have to be disposed of, which would probably mean a landfill and risk to groundwater pollution. It would cost more. It would use up electricity that would otherwise be used by consumers.

We just felt, on balance, there was no need for a

scrubber since they were achieving the lowest emission standards. The hearing officer found that, and we're in the posture here today of recommending that you adopt the hearing officer's findings of fact on that issue.

Now, on the issue of allocation, it was suggested that perhaps we look again through rule-making at an allocation formula, or some other allocation process. We're familiar with other states -- there is four states that we know of that have the process, numerical numbers -- numerical process, whereby you're only allowed to use 50 percent or 75 percent of the remaining increment; however, in the final analysis it comes down to a case-by-case approach. Each one of those states has a process where, "Well, we really want that facility; therefore, we'll give them more." Most all the states, by far the majority of the states have adopted the federal scheme, which is identical to the Florida scheme, which is, you take this into account through your Best Available Control Technology.

As I mentioned the last time, we recommend the adoption of the hearing officer's recommended order and the specific denial of all the exceptions filed by Florida Mining.

Is there any questions?

GOVERNOR GRAHAM: Are there any questions? I guess -- you said that, without scrubbers, this project met the standards?

MR. BOTTCHER: Yes, sir.

GOVERNOR GRAHAM: For nondegradation?

MR. BOTTCHER: Yes, sir.

GOVERNOR GRAHAM: With scrubbers, would they have met the standard to a greater extent or be further below the ceiling?

MR. BOTTCHER: Not necessarily. They could have both higher sulfur coal, put scrubbers on it, and still had the same type emissions. In fact, the federal law would allow that to occur, where they would have had the same emissions that they now are getting under this proposal and still have the scrubbers on it, but the scrubbers could reduce it even further, because the amount of sulfur that comes out is a function of the sulfur in the coal and the amount that's removed after it's burned, and, in this particular facility, some of it will be removed going through the cement plant.

If you put a scrubber on -- if you have a scrubber with 70 percent efficiency or 90 percent efficiency, that would remove that much more sulfur. So, you can lower the numbers even lower than what's proposed here by use of a scrubber, but we feel, even though you

could lower the S_O2 limits, you start getting these other adverse effects coming into play, which balance out going lower on the S_O2.

GOVERNOR GRAHAM: Is there any questions? Yes, Mr. Firestone.

MR. FIRESTONE: It's been alleged that the allocation that would be utilized by this permit would preclude any further economic development in the county. Would you care to comment on that? In other words, would that eliminate the opportunity for any kind of industrial growth in that county by virtue of the fact of not having any allowable options there in terms of the --

MR. BOTTCHER: No, it would not totally eliminate it. It would -- of course, the whole purpose of these standards, this nondegradation standard, is to put a limit on the amount of sulfur dioxide that's emitted in the area, and in this case it's to protect the Class I Chassahowitzka Wilderness area. I mean, that's the whole purpose of that rule, is to put a cap on it; however, there is plenty of room left for other facilities.

It was determined at the hearing that another company, competing company, Florida Rock, could build an identical facility at their present location and

still have not consumed all of the increments. The problem is -- there is a third one -- Florida Mining, Intervenors that you'll hear from later today, that lines up -- they are in between Florida Crushed Stone and the wilderness area. So it's going to be harder for them to have any leeway. They cannot build an identical facility; however, they can build other facilities. I mean, it's not a total restriction on their growth at that place, at that location. They could build -- in fact, we calculated they could build a cement plant there. What they can't do is build one -- an identical cogeneration facility. They could build a cogeneration facility with different pollution parameters coming out of the stack, different emission standards, lower emission standards, or some other -- or, they could locate it at a different place. They could build an identical one at some other location.

It's just that at their location where they have a present cement plant they are going to be restricted in what they can do there, but it's not a total restriction.

MR. FIRESTONE: Based on a hundred percent increment, with this being approved, what would the balance, percentagewise, be available to the county?

MR. BOTTCHER: Well, I wouldn't say it's for the

county. In this particular area, in the one area where it's the most stringent, or where it has the worst impact, I think the total consumption there is a little more than half when you take into account that Florida Crushed Stone is consuming 48 percent, and there is an existing facility there that's consuming a small amount of it, and I don't have the figures right here in front of me, but there is about 40 percent of it left.

MR. FIRESTONE: That would be after approval or at this time?

MR. BOTTCHER: No, after approval. At this time there is about 90 percent of it available at that one particular spot.

MR. FIRESTONE: What's the parameters of that spot? What is the spot --

MR. BOTTCHER: It's the Chassahowitzka -- I can't even say it now -- the wilderness area, Chassahowitzka Wilderness area.

MR. FIRESTONE: Do you know what the square mileage is of that?

MR. BOTTCHER: Well, the actual spot, itself, where these plumes come down is very small, in the neighborhood of probably five square kilometers. It's a very small area with this high spot as we call it

where the high concentrations actually hit and become the highest. That's a very small area.

MR. FIRESTONE: So, something that was 10 kilometers away would not be affected by this?

MR. BOTTCHER: It may or may not be, depending on exactly where it's located and how the meteorological conditions move the pollution of that source over to the wilderness area.

GOVERNOR GRAHAM: Are there any other questions? Let me ask, do you -- what jurisdiction do you retain after a project is approved if, for instance, in five years new technology is developed or other circumstances would appear to make it appropriate to increase the requirements for emission control from a previously approved project, are you able to do so?

MR. BOTTCHER: Yes, we have that statutory authority. Of course, it's not easy to impose new requirements on an existing facility, but it can be done and we have done it. We have required a lot of facilities in Florida to retrofit with pollution control, and particularly, if some innovative technology comes out -- and one thing we see on the horizon are dry scrubbers -- we may see that they are going to be imposed on all existing facilities, and we have the legal authority to do that.

GOVERNOR GRAHAM: Is the difficulty an astronomic difficulty or a legal difficulty or pragmatic, or --

MR. BOTTCHER: It's a combination, but it can be done, and it has been done.

GOVERNOR GRAHAM: Are there any further questions? Thank you.

MR. CURTIN: Governor, members of the Cabinet, my name is Larry Curtin and I'm here once again on behalf of Florida Crushed Stone Company who is the Applicant. What I'd like to do is take a few minutes to explain to you in a little more detail than we were able to last time what we're talking about, and in doing that, I think I can make an effort to address some of the questions that you've posed so far.

Some of the exhibits that we're going to be showing you, and we've got several of them, are actual exhibits that were admitted into evidence at the hearing, and since, because of the print on some of them, you'd need a pair of binoculars to see them, we've made up a little booklet here for each of you that contains a picture of these, that, if we could get that distributed, it would be helpful, and we'll go through it from this chart over here.

I think everybody understands what we're talking about here today, and that is a cogeneration project

which has received qualification from the Federal Energy Regulatory Commission. The qualification was received under federal legislation which allows industrial facilities to engage in this type of activity and to sell the excess power that's so produced into the utility power grid. The project, essentially, consists of a 600,000 ton per year cement plant and a 125 megawatt generating facility which will be located at the site of an existing limerock operation.

To our knowledge, this is the first type project like this of this kind in the United States, and because of that we didn't have any plans to go by when this project was conceived.

Essentially what happened was that Mr. Gregg, who is the president of Florida Crushed Stone, got the idea to do this and went to engineering firms and boiler manufacturers, and basically cajoled them to take a look at it. They told him at first that it couldn't be done, and through basically his efforts he's been able to come up with now a project that all the engineers that we've talked to say will work and will work very well, and will also be extremely innovative. The thing was basically designed from scratch and because of that we've had some difficulties

with it, but I think also that the theory behind the design of the project is very important, and that was to integrate this project into the existing site and to make the maximum use of existing materials which were available, most of which otherwise would be wasted, so that you could produce a product while at the same time controlling the pollutants that would otherwise might be discharged, and that product would be useful, rather than simply putting a scrubber on the tail end of the facility, controlling the emissions and producing an additional waste material that would have to be disposed of.

If I could move over to this exhibit here, this is the actual exhibit from the hearing. It's an artist's rendition of the power plant facility, and the cement plant. It should be the first page in your booklet, and you have a blown-down picture of it, which was admitted into evidence. If we could start over here at the first structure on the left-hand side, that is the stack, which is where the emissions from the total facility will be discharged to the atmosphere. Immediately to the right of the stack is kind of a rectangular box, that's an air pollution control device. It's called a bag house, and the purpose of that is to control emissions of particulate matter.

That will also assist us in controlling sulfur dioxide, since a small percentage of the sulfur dioxide emissions will be trapped in there.

The next structure is the cement plant, which will be used, obviously, to prepare the cement. If we move over here to this rectangular building here, sort of in the foreground, is an office, and the building behind that is the turbine generator. Right behind that is the switch yard, which is where the electricity goes, and it will come out the transmission line that runs along the front of the picture.

The building which is a little taller, right behind the turbine generator, is the boiler, and that's where the combustion will take place, and that will produce the steam to drive this equipment here to make the electricity.

The boiler will be coal-fired, as stated. The flue gases from the boiler which would normally -- if you had just a single power plant, you'd have a stack alongside of it. It would go right out into the atmosphere here. This material is going to go through these pipes into the cement plant where part of the gas stream is going to be diverted into the kiln which is used for production of cement. There will be a removal of sulfur dioxide that will be achieved in the

kiln.

In addition, this flue gas is going to be used to dry the waste material that's already present on the site. That material is depicted on the far left of the picture. What that is is a waste fine material from limerock production.

What is happening currently at the site is that they are producing an aggregate material which has to be washed. Approximately 50 percent of that material, as I understand it, is wasted now. It goes out into the settling area, along with the water that's used to wash it, and it goes through a series of clarification ponds and it sits there. It's wet and it's something that can be used in the production of cement, and what Mr. Gregg is proposing to do with this project, is to take this material out of those settling areas, bring it into the cement plant, and use the waste heat from the power plant to dry it so that it will be useful. In other words, he's saving some BTUs, we think.

Some of the other features of the project, as far as environmental innovations or features, of course, with any cogeneration project you have a sequential use of energy, and that is an energy savings. The two facilities will basically exchange energy, and that is the reason why it's been a qualified facility under

FERC rules.

In addition there are a number of water use features that we think are significant, not the least of which is that there will be no discharge from this facility to any surface waters of the state of Florida or the United States. We will not disturb any wetlands that are in the area. We also have what we refer to as a double use of water, which we think is going to reduce the consumption of water on the site. This will occur through the use of the water in the power plant for condenser cooling.

As I mentioned before, we have a series of ponds now that takes water from the aggregate operation and runs it through to clarify it. The last pond is a clear water pond. That will be the cooling pond for the power plant, the waters necessary to cool the condenser. That water will go through the power plant, perform the cooling function and then it will be routed back into the cooling pond, but a part of the water is going to be diverted from that cooling stream into the aggregate plant for use in washing so that we're going to reduce the consumption there.

In addition, the drying of the waste flue -- the drying of the wet material with the waste flue gas, we're also going to utilize the fly ash and bottom ash

byproducts, which are byproducts from the combustion of coal in the cement pumps. That's going to eliminate for us the need to landfill or otherwise dispose of this material.

To the extent that it's not used, it will be stored on site in silos which will be enclosed.

Another feature which we think is very significant relates to the elimination of one of the primary particulate waste streams that would occur otherwise in the cement plant. What is going to happen there is that we're going to take from the cement plant, from the process that's known as the "clinker cooler", as it is the gas which would otherwise be discharged to the atmosphere and would contain particulate, that is going to go back to the power plant, and that will be used to help in the combustion process as pre-heated air. So, the second largest particulate matter emission source from the cement plant is going to be eliminated.

Finally, I think Mr. Bottcher indicated to you that this facility will have the lowest emission rate in the state of Florida for any coal-fired power plant, without a scrubber. That is an accurate statement. That will be achieved through several processes; number one, we intend to use low sulfur

fuel; number two, along with the fuel Mr. Gregg has decided to inject into the combustion process a lime-rock material which will be crushed with the coal. That will result in a chemical reaction as the coal is being burned which will remove a percentage of the potential sulfur dioxide emissions actually right in the boiler. This is a process which has not been demonstrated in the United States on a full scale basis. It has been studied. We've looked at all the plans that we could get to do this process on a pilot scale. We've talked to the engineers and the boiler designers, and they all say it will work.

We are guaranteeing a 25 percent removal from this process, although there are indications that it could work much better. There is a facility in Germany that uses this on a full scale basis, and when Mr. Gregg found out about the process, he went over to Germany and looked at this process on a full scale operation and talked to the people.

We're pretty confident that it's going to work. So, we have in the boiler then the 25 percent removal. We also have in the cogeneration mode, that gas stream that would otherwise be discharged, going through the cement plant, through the kiln, and achieving an additional removal, and then there is a slight removal

into the bag house, and the net result is that, coming out the end of the stack you're going to have the lowest emission rate in the state.

Again, we think the project is quite innovative.

Now, there has been a lot of talk in the case about modeling and the consumption of increment in the Class I area, and what we've got next for you is a couple of exhibits that we'd like to just quickly show you to kind of give some perspective on all of the things that we've done here and try and help to clarify exactly what's going on in this case.

Again, this map is our Exhibit No. 34. It's in the book, and it was presented as an exhibit at the hearing and received into evidence. What it consists of is a map that was prepared by Dr. Koogler, our air modeling expert, and it contains, by numbers, all the sources that are impacting increment, and those that have to be factored into the modeling exercise that are in the area.

This area up here is the Class I area. That's the Chassahowitzka Wildlife Refuge, and it's in gray. You can see the boundaries. There are little numbers up in the vicinity of Brooksville on the exhibit, and I think you can make out the numbers in there. I know you can.

Source No. 1, which is northwest of Brooksville, is the Florida Crushed Stone Company's site. These other sites around that are marked on the legend and numbered as to what they are. Source No. 8 on that map, which is northwest, again, of Florida Crushed Stone, is the Florida Mining site. That's the site where they have an existing power plant -- or, excuse me, existing cement plant.

Source No. 2, which is to the right of Florida Mining is Adams Asphalt, which is an increment consuming source that exists in the area, and that source is important because Florida Rock's property is slightly to the north of that. Florida Rock is not marked on this map because it was not a site that was in existence, but it would be located just north of the No. 2.

All those things have to go into the modeling exercise.

Now, what we also did at the hearing, in conjunction with this map and with the modeling, this, again, is how Exhibit 34-A, included in your package, this was actually prepared at the hearing by Dr. Koogler. He's the air modeling expert. Unfortunately, he's a better modeler than he is an artist, but I think for purposes of the perspective and to understand the

modeling exercise and the impact, that this is very helpful.

What Dr. Koogler did, and this is not based on actual modeling, this is just simply an explanation of what it is, he drew the box up here on the left which is the Class I area. It's hypothetically the Chassahowstzka Class I area. What he did then was depict by these Xs along the boundary, what would be known as receptor points, and those are the things that go into the modeling. When you model, our impacts are shown at a receptor point, and those are based along the boundary of the area.

Now, the modeling exercise, essentially you have to know certain things. First of all you take the meteorological information. That information is our meteorological data, 24 hours a day for a period of five consecutive years of available data so you have all that mass of information. That's why you have to use a computer.

In addition to the meteorological information, which includes wind speed, velocity, temperature, et cetera, you have to have the exact location of the source. You have to know that to put it in the model. You've got to know how big the source is. You have to know the fuel type and the combustion characteristics

so you can tell what's to be coming out of the stack in order to put it in the model. The stack size, in terms of height, has to be known, as well as the diameter of the stack, because that affects the existing velocity of the gas. A smaller diameter would push the gas up a little bit higher.

You have to know the temperature of the gas as well. All of these things are taken into account and put in the model, and what Dr. Koogler assumes is that you had two hypothetical sources located exactly the same distance from the Class I area, exactly the same size, and that you had a wind direction coming out of the southeast in this fashion. Then you crank this information into the model.

What you're going to come out with is a series of impacts during all of these periods of time, all of these 24-hour periods of time during the five years. You throw out the highest, because the Class I increment is allowed to be exceeded once per year, so you're looking at the second highest concentration. That is your increment impact, and for regulatory purposes that's what you have to meet.

What the computer does and what you end up with is a series of bell-shaped curves which depict the impacts of these facilities. If you look down here,

this curve furthest to the left is the south. That will be Source No. 1's impact. That's depicted by basically a bell-shaped curve. The peak of the curve is the highest impact at the source on any receptor in the Class I area.

Now, the reason this thing is bell shaped is because the plume, although it's depicted as a straight line here, the maximum impact is the centerline of the plume, but what happens is -- when it comes off, is that it spreads. So you've got a situation where you have a spreading plume with a maximum in the center.

Now, this line here, the centerline, X, is the maximum impact of this source in a single mode. That is depicted by Receptor No. 2, if you were going to count from the bottom. These impacts will run along and the dual curves depict the impacts of both these sources.

So, for Source No. 1 the impact on the second receptor is the greatest; Source No. 2, the impact on the last receptor is the greatest, and then you have to put these together and determine the combined impact so you can determine what the increment consumption is. You draw the curves and you get the relative contributions of the different sources at the different receptors, again, recalling that, because

the plume spreads out, there is going to be an overlap, but you can notice that the maximum impact for Source No. 1 occurs here, and the impact of Source No. 2 on that receptor approaches zero.

Now, what you end up with is a curve that's going to look like this because, again, the two identical sources. You start down at the bottom here, and there is zero impact from any source. You run up along the curve and you get to the peak of the curve for Source No. 1. You're going to go beyond that, and that is going to be the maximum impact. That is the combined contribution of Source No. 1 and Source No. 2 at this point right here, and it's Receptor No. 3 in the circle.

Now, how you get that, essentially, is you can see that the curve for Source No. 2 is overlapping here, and it's starting to rise along Receptor No. 3. So you take the contribution from the bottom of the curve to this point, and then you add that to this, and you get it right here, then you go down in the middle, come back up, up here, and then go down and approach zero, but again, if you look, the contribution of Source No. 1 on this receptor up here which is closest to the maximum impact for Source No. 2 is approaching zero.

Again, we think that's of significance in this case. This last exhibit here, which I'm sure you can't see, but which is also in your package, was our Exhibit No. 41. It was introduced. It was presented by us in order to attempt to respond to the arguments that had been made in the case concerning the blocking out effects that this particular plant would have on other sources that might want to locate ajacent to us or near us.

What we did for the top line here is, these one, two, three, four columns, was to look at our facility, Florida Crushed Stone at 965 pounds an hour, which is the pounds that we're requesting. We placed at the Florida Mining site a hypothetical cogeneration facility that had exactly the same configuration, stack parameters and all that information, and we modeled that along with Adams Asphalt, which consumes increment, and all other sources which consume increment. The purpose of this was to show, basically, the relative contributions of Florida Crushed Stone to the increment consumption, and also the fact that you can't simply take this kind of information, look for the maximum impact of the two sources and add them together. It doesn't come out. You can see that the maximum impact for Florida Mining is 4.4 micrograms.

The maximum impact of Florida Crushed Stone is 2.2, but nowhere on the chart does it show 6.6. That just doesn't come in because different meteorological conditions produce different results so that, if you look, in each case Florida Crushed Stone's impact is less than that of Florida Mining.

Again, that relates to the curve information that I showed you before and is also a function of geography. The two sources are not located the same distance from the Class I area. We're further away. They're closer. They're going to, because of that, produce a curve which is going to be steeper and there is going to be less concentration and contribution from us, and I'll get to that in a minute, but, significantly, when you look at the highest impact of Florida Mining on the increment, which is the 4.4, our contribution to that is only .7. Similarly, if you drop down to the bottom of the chart, that shows a hypothetical -- that shows Florida Crushed Stone at 965 pounds an hour, and, although that says "FMM", it's supposed to be Florida Rock Industries, hypothetically, at 965 pounds an hour.

Their worst case occurred in the year 1975 on the meteorological information, at day 288. Our contribution to the increment consumption was .4 micrograms.

Their contribution was 3.6. The other contributions were 3 and 1 for a total of 4.4, and obviously they can put their facility in the same as we can.

The reason is, again, that they are located back beyond Florida Mining and Materials.

Now, if you'll look at this information, you can see that Florida Crushed Stone's contribution to increment is less than the maximum predicted increment consumption. When you take these other facilities away, you take Florida Mining away, again, that is a function of georgraphic location. The reason is that, if you look on this map, the wind condition that is most severe for Florida Mining and Materials will occur when the wind is blowing from the east. When that happens, they are going to go straight over to the Class I area. If you line that up with our facility, number one, our maximum impact goes under the Class I area. So what you're getting from us is the contribution from the spread of the plume just as I showed you on those curves. It's not as high as the maximum prediction.

When the wind direction blows from the southeast, which is when our maximum impact occurs, their configuration is going to have them going beyond the top of the Class I area. So I guess the point of all

this is that it's not as simple as it looks to simply say, "If your impact is 3.1, that means there is 1.9 micrograms left for anybody else." If you change any of the variables in the equation, in the modeling information, and that includes the installation of a scrubber, you're going to modify the inputs and the likelihood is that the worst case conditions are going to occur on days that are different than the days that I'm showing you up here.

We don't think that we're particularly contributing to any kind of a problem here and I guess that's the significant point.

In addition to all that, when you look at the project, all the innovative features and the limerock injection technology that is being pioneered here, I think you might say that, down the road, in response to the question that you asked, Governor, that Mr. Gregg might be pioneering the technology that takes care of whatever problems may arise, and he's doing that in a way that's going to allow him to avoid producing additional waste product, which we think is very significant.

The .74, the lowest emission rate in the state, I think is significant, and again, emphasizing that there are facilities in the state that have been

permitted that will have a scrubber, which is a form of flue gas desulfurization, those facilities had emission limitations that are higher than ours. Mr. Gregg has chosen to try to come in and be the lowest, notwithstanding the fact that this is cogeneration, and that perhaps, based on cogeneration, he could have asked for a break.

We think, again, he's the first one in the barrel. Obviously, it's been a long process. We -- he's broken the ground, designed the facility and engineered it, and in that sense he's probably going to help some people if there are any that are going to come along after him.

A lot of the innovative features that you're seeing on this project may not be present if a scrubber technology is selected here. The reason is that all these fits don't exactly occur in that configuration. We think that this is something that ought to be encouraged. We think that Mr. Gregg ought not to be penalized because he's the first one to come up with this kind of an innovative idea. We feel as though we've met all the regulatory requirements. We think that, when you study this information, you can see that the situation is very complicated, but that we did present the testimony to back up what we have said, and

we believe that we're entitled to have the project approved.

GOVERNOR GRAHAM: Questions?

MR. CURTIN: Thank you.

GOVERNOR GRAHAM: Is there anyone else to be heard on behalf of the Applicant? If not, on behalf of the Intervenors?

MR. LAWSON: Governor and members of the Cabinet, I'm John Lawson. I'm a lawyer from Tampa. I was here two weeks ago. I represent Florida Mining and Materials. We have, first, for you a county commissioner from Herando County, Mr. Greg Copeland. I would ask him to come forward.

MR. COPELAND: Good afternoon members of the Cabinet. I have prepared some remarks and, as I had two weeks ago -- and, you know, each time we come up to this proceeding we get more information. I'm not sure that all the information that we get is necessarily -- the concern is shared in terms of the future of our state, the future of the community in which I live, Hernando County, and the economic implications that this plant has for Hernando County.

You just saw an artist's rendering of the plant. Very pretty. Mr. Firestone asked the question about the allegation of a limitation on the future economic

activity in the county. I am one who makes that allegation. It is because I'd like to see three pretty pictures before this Board and three cogenerators in Hernando County on our tax rolls, employing our people, that I come before you today.

We have heard about the innovative technology that is being employed, but, gentlemen, I ask you to consider, does the innovative technology provide us with the cleanest plant that modern technology can provide us with? And I think, if you remember the submissions from Florida Mining at the last meeting, clearly, it does not. I do not recall Florida Crushed Stone repudiating the information contained and drawn from one of their own submissions at the hearing, that 48 percent of the available increment would be used.

One of the other things we haven't heard, when Mr. Curtin tells this Board that it is the lowest emitting power plant or would become the lowest emitting power plant of S_O2 emissions in the state, he doesn't tell you about the location of that Class I area at the same time, how many power plants do we have with the relative impact that this proposal brings, or that future proposals would bring? That's the other point I want to make, is about the future, gentlemen, going back again to the economic growth of

the county.

The future is something that's difficult to see, but in the hearing officer's report, even though I disagree with much that she had said, she did make some salient points regarding economies of the cement business. She indicates that more than half of the cost of producing cement is the production or purchase, rather, of electricity. Well, obviously, if that is the case, there is going to be a market requirement then placed upon the people that are in that business in Hernando County, and we have three people that are in that business in a big way, that a future need for increment to build power plants will be required. There is no mystery about that part of our future, but I for one am not willing to see, and I don't think this Board is willing to see the future of any community mortgaged to one company or mortgaged to one type of industry.

The strength of Florida in the future is going to be in broadening the base of our economic activity, and in Hernando County, if we are soley dependent on the limerock industry that will not produce the reduction in unemployment that I'd like to see.

Gentlemen, we have to be thinking about the broad public interests today. We have to be about that

business. And Florida Statutes and the intent of the -- as it's stated in the statute regarding power plant siting, you are called upon to balance those broader public interests. In the statute it talks about the premises on which your actions should be based. It says, "To assure the citizens of the state of Florida that operational safeguards are technically sufficient for their welfare and protection." It says, "To effect a reasonable balance between the need for the facility and the environmental impact resulting from the construction and operation of the facility, including air and water quality, fish and wildlife, and water resources and other natural resources of the state." It also says, "To provide abundant low cost electrical energy."

Well, gentlemen, if we are in fact to meet -- or, if you are in fact -- I was thinking I was with you on that one -- but, if you -- the burden is on you, gentlemen, to meet that test in the statute. Then there is no advantage to creating a power plant or allowing a power plant to be certified without the most modern technology. To strike such a balance in favor of the public interest, the broader public interest with a scrubber, as I believe it's envisioned by the Power Plant Siting Act, would protect and enhance the

economic welfare of the people of Hernando County, in particular, and the state as a whole. It would conserve and protect the vital natural resources of the state, as our constitution additionally requires us to do, that resource being our air in this case, and would provide the potential for additional cogeneration facilities in the area, and I think that we have to look at what additional cogeneration facilities mean in terms of our electrical capacity, electrical generating capacity.

Obviously, it's a great concept. Rate payers are going to get the benefits through reduced power bills, bills that they won't be paying for public utilities already on stream to develop power plants, but at the same time, if we allocate all the resource to this one company, or 50 percent, approaching 50 percent, will we be meeting the full maximum potential of cogeneration in Hernando County as one area where it will work quite well because of the existing natural resources, being the limerock there, that are available for the manufacturing portion of that concept.

The other point that we need to concern ourselves with is the economic benefits that doesn't accrue necessarily to either Florida Crushed Stone or Florida Mining or Florida Rock, but the economic benefits that derive to the people that will work for these firms.

They will earn their living by working for those firms, and that point was driven home by Florida Crushed Stone.

This matter has not been without controversy in the county. They took out full-page ads in December of 1982, telling the people that they would have the gravy for their steak and the icing for their cake. They told them that they'd have 277 jobs in the first year of operation, new jobs for the community. They told them that we would have $5.2 million worth of new economic impact in the community. Well, gentlemen, I submit that I'd like to see those benefits multiplied by three, and I think with scrubber technology placed on that plant, where we're putting the known technology, the proven technology to work to reduce the S_02 emissions in this state, we will have the opportunity to see more people employed. Imagine, not 277 jobs being created in Hernando County, where the unemployment rate now is over 10 percent, and has been as high as 15 in recent memory, but imagine the creation of perhaps 800 jobs. Imagine the creation of $15.6 million, to multiply their figures by three, and if we reduce the emissions level, gentlemen, we'll have the opportunity not only for the limerock industry to take advantage of that very valuable state resource, our air, but we'll have some left over for other industries, and we might

even have a little bit left over to breathe.

The other point I want to make in terms of the Class I area -- and I don't think anyone has mentioned it so far, either today or at a previous meeting, to you, is that a Class I area has an air increment allocation of 5 micrograms, compared to a Class II area with 90. In Hernando County, because of the Class I area, our air increments are therefore enhanced in terms of the economic value that they represent. To not recognize the distinctions that exist within this application from previous applications that have come before you would be to ignore that situation that exists in Hernando County where those increments are of significant economic value, and believe me, gentlemen, we're talking about something that's going to go into the future for 30 years, according to the application, 30 years on this plant.

What would Florida Crushed Stone have thought had, 30 years ago, someone had come before them, before this body with the people that were sitting here 30 years ago and taken as much increment as they propose to take? They say, "The circumstances vary with the modeling. It's complicated," that, "it's difficult to understand and predict," but I think the one thing that we can say with certainty is that a use of low sulfur coal and the

use of a scrubber would provide the balance in the public interest for 30 years down the road and the intervening time.

You know, the last time, Governor, we were here you made quite a point with the folks from Occidental Petroleum about that slime pit that they were trying to keep and not mend, shall we say. I think if we can visualize the use of our air in the same way that we visualize and know the use -- the effects that certain uses of our land have, we'd have more respect for the air. It's different than water. It's different than land. You can't see it, but it's meetings like this that bring home the value of it to the public, that bring home the value of not having enough of it to create new jobs, to create additional industries and, indeed, that's all I'm asking you to do today, and we've been told, and in fact it's in the hearing officer's report, that the difference between what Florida Crushed Stone is proposing to you, as their best -- as their definition of Best Available Technology, and a scrubber, that the difference between those two, in the hearing officer's own words, in terms of the cost, the difference, to quote her, is "insignificant", and I think, gentlemen, the increment is insignificant, if you can think of that increment in terms of jobs, in

terms of economic growth, in terms of what our future will or won't be.

I think that is the value and that is the balance that you're going to have to strike on this state's irreplaceable natural resource. Thank you.

GOVERNOR GRAHAM: Mr. Turlington.

MR. TURLINGTON: How do you answer the director of the Department of Environmental Regulation when he says that we shouldn't use the scrubbers beyond a certain point, because beyond a certain point, well, we're going to have more environmental adverse consequences than we would if we just didn't use the scrubbers? Now, I gather that we could use scrubbers, which is what you're recommending, but if we do, then we've got another environmental consequence.

MR. COPELAND: That's true, there is a consequence, but it's not true that that consequence can't be dealt with with the technology that we have. It's my understanding that, in a case that came before this Board, in a publicly-regulated utility, Orlando Utility, that in fact scrubbers were required of that plant that would be coming on line. They are not all that far from Brooksville. They are in the state of Florida, obviously, and I think the technology exists to protect our water, and I certainly have an interest in that, as

you do, and certainly --

MR. TURLINGTON: Isn't the question of a scrubber or not a scrubber one that was really the Department's decision in terms of how they -- what they consider to be the interest of the state?

MR. COPELAND: Yeah, well, let me -- yeah, well, that's interesting. I'm glad you asked that, Commissioner, because in reading a report that Mrs. Tschinkel delivered at the University of Florida in March of 1983, to an interdisciplinary group working on this very problem of acid rain and S_O2 emissions and all the ramifications that it will have for the state, she recommended at that time that the state of Florida keep S_O2 emissions at 1982 levels, that we reduce our S_O2 emissions in the state of Florida. Why? Because of the national direction that is being charted that some reduction will more than likely be mandated in the emissions of S_O2 around this nation, and that the cost of retrofitting our plants in Florida to meet those standards would be tremendous, and in this particular instance, discussion about retrofitting a plant that is being newly constructed at this time, with the national legislature talking about reducing S_O2 emissions is, to me, not the best route to go.

I think that, if the Department had paid more

attention, perhaps, to the March -- of course, this was in March of 1983, and the decisions regarding this plant, I think, were initiated before that time -- perhaps it would have been a different decision. I think we're still faced with the reality that the very best and the most insignificant, in terms of the cost difference, use or technology to clean our air, to keep our air clean, rather, was not used, and we should, when you're talking about 965 pounds of S_O2 being placed into the atmosphere, versus the less than 200 pounds that could be emitted, if we go with the scrubbers, if you gentlemen will let us go with scrubbers, let us have those scrubbers --

MR. TURLINGTON: But the Department says that we're better, at this point, not to use the scrubbers because there are some environmentally adverse aspects of using the scrubbers?

MR. COPELAND: Perhaps I need to go sit down and you need to ask them why scrubbers are okay in Orlando and they are not okay in Brooksville, and why environmental aspects are different in one area than they are the other.

The other point that I'd make is, as things evolve, unfortunately some things get out in front of us, and we're left with the -- you know, the prior

actions, and I think that, in this case, perhaps, Mrs. Tschinkel's recommendation at the University of Florida, being a later recommendation, should carry a little more weight.

MR. TURLINGTON: Well, if I understand this right, if, for example -- and you say there is really no great economic difference between the use of scrubbers or not, so obviously the Applicant probably could have not been economically concerned about whether to use scrubbers or not. It was an environmental decision which the Department said that they would rather have settled on not using scrubbers, and keep -- and meeting the quality standards.

MR. COPELAND: That's one point, and it's a point that I was trying to make at the zoning hearing that we had on this very matter, Commissioner. I asked Mr. Koogler who is out here today, who is their air quality expert, how much of this emission you're -- at that time they were proposing to put 1500 pounds of S_O2 an hour in the air. So I asked him, "How much of that can you take out with a scrubber?" And he said, in a rather soft voice, "90 percent," and when I asked him to state it again, he repeated his answer and the crowd, you know, sighed. They couldn't believe it. 90 percent of the S_O2 could be removed. When Mr. Gregg came up to

testify I asked him how much or why is it you don't want to put the scrubbers on. He said, "Well, they cost too much." So I asked him how much they cost, and he said he did not know. He did not know. Mr. Oven with DER answered the question, "$10 million."

At the time he was proposing a $100 million project. That's ten cents on the dollar.

MR. TURLINGTON: I thought you just answered the question, though, that the scrubbers really wouldn't be different economically from the --

MR. COPELAND: That's right. That's what I'm trying to say, that it's interesting from the Applicant's standpoint, over time, that they did not in fact look in 1982, in December of 1982, the Applicant -- the president of the company didn't know how much the scrubbers would cost, yet that was his reason for saying he didn't want them.

This business of environmental impacts on scrubbers is brand new. It's a little like Jerry Falwell's congregation hearing from the atheists. You know, they are putting pollution in the air, you know, tremendous amounts, 965 pounds an hour, approaching 8 million pounds a year, and they're telling you that they're concerned about the environmental impacts. I'm sorry, I don't buy it, and I think that --

MR. TURLINGTON: I gather that, based on what the Department said, that they were the ones -- that the Department says that the scrubbers -- well, you know -- beyond a point will be more environmentally damaging than the other way. Now, that sounds like that's their --

MR. COPELAND: I'm 29, and in 29 years I've made some mistakes, and it's difficult sometimes to admit mistakes. Perhaps that's the instance here, that it's difficult to admit mistakes, and being at the point of government in Florida, it is a little more difficult when the spotlight is shining down on you, and I think that perhaps that's it, in all due respect to the people at DER. I think they ought to follow the lead of their secretary, who says we ought to cap emissions of S_O2 at 1982 levels. Those are her words, not mine.

Are there any other questions?

GOVERNOR GRAHAM: Mr. Turlington, do you have any further questions?

MR. TURLINGTON: Not at this time.

GOVERNOR GRAHAM: I'd like to ask a question.

MR. COPELAND: Yes, Governor.

GOVERNOR GRAHAM: Do you currently have pending before the county commission, or to your knowledge, any municipalities, applicants for economic development facilities which would have the effect of using up

increment of air quality in the area that's relevant to this decision?

MR. COPELAND: No, we do not. We are developing an industrial park at our airport, and we're wanting to develop other industrial areas in the county. We have a very limited amount of industrially-zoned property, and we're just beginning to grow, as you know, I think, from going to Hernando County,in that respect, and with the citrus freeze that's come down, the need for additional industry is just that much greater.

GOVERNOR GRAHAM: So, your concerns are essentially anticipatory, is that correct?

MR. COPELAND: They are, and they are based in part on the hearing officer's findings, that, in order for these other companies to remain in the -- either to remain, in Florida Mining's case, in the cement business, or to venture into that business, that it will be necessary for them to enter onto that same playing field with a cogenerator.

GOVERNOR GRAHAM: If there were assurances that jurisdiction for control of air pollution technology continued with the Department of Environmental Reguation, and that that jurisdiction would be exercised at such time as it was necessary in order to allow additional ecnomic development to occur in the area

affected by this application, how would that affect your attitude towards this Applicant?

MR. COPELAND: Well, now, that's a salient question, indeed, and that's a difficult one for me to answer. I suppose, in the absolute circumstance, where I had to choose between what is proposed and what I'm proposing, and if we had to meet in the middle somewhere, and that was the middle ground, I suppose I could support that. The only reservation I have about it, to be honest with you, Governor, members of the Cabinet, is that, with the past performance being what it's been in terms of this application, with the Department, I think we're going to need a little more aggressive follow through on this question of S_O2 emissions, and that -- you know, if we had some definite numbers in there and a time frame or something, or some percentages, what type of scrubber would possibly be required, or something fairly specific that we could lay our hands on at a future date without the benefit of quite as many attorneys as we have in the room -- you know, I don't know how many we've got today -- and without all these charts, but something that would allow for the future growth of the county, I guess that would be the best deal that we could -- or, compromise, excuse me, that we could reach, if we

cannot today act to actually put in place technology that is proven and is available now, as opposed to going into an experimental or, as they put it, innovative program which the -- the consequence of which we do not know at this time, and they really, in talking to the DER people, myself, Mr. Oven, who is the siting manager, has been very helpful -- I'll compliment him -- he tells me there is three different ways to do this, and, you know, if one of those three ways doesn't work and they come back to the Department and they say, "Well, we can't meet it," what are you going to do? You know, are they going to close the plant down? I don't think so, and if that's going to be where you're at in terms of what will be required, if we could get some of those people to classify that here for you today -- because it's -- that's crucial to me, crucial to me, to have something that we can really implement when that time comes, and that there be a triggering mechanism built into it that is reasonable and available and not something that's going to require either Hernando County or these other corporations or companies that we want to solicit to come in and do legal battle before this Board or with the Department -- again, because obviously it's going to be a handicap to the county in recruiting those kinds of industries if there is not a good

triggering mechanism there that can easily be moved into place, and, of course, I think from a cost standpoint, if I was the applicant and we were laboring under that possibility in the future -- of course, they will speak for themselves, but I would think the cost of doing it now would be signficantly less, but again, that's something they will address.

Thank you for that question. I think that gets to where we might get some relief. Thank you for your time, gentlemen.

MR. LAWSON: Governor, the concept that you have stated, if spelled out in what is called a retrofit, that would have some conditions that would be set now, it wouldn't be triggering -- it would not require the lawyers to come to Tallahassee. It would just require the scientists to do the math and then say, "Okay. Now is the time for you to reduce your emissions," that would be acceptable to my client in the sense that it would not appeal an order that contained that condition.

Mr. -- Commissioner Turlington, we are talking a scrubber and low sulfur coal, not a scrubber and medium or high sulfur coal. We are not comparing, as DER did and the hearing officer, 3, 4 percent coal with -- you know, with that much sulfur in it. We're asking to take out sulfur that's .75, to 1 percent sulfur coal.

So you can see, automatically, you start cutting your sludge by one-fourth to -- I mean, by three times to four times. So, that's the first answer.

The second answer, of course, is that the only way you can get down to what we're asking -- and, Governor, in response to your question -- a scrubber without low sulfur coal, really doesn't do very much. It will, as Mr. Bottcher indicated, result in some reduction, 965 pounds an hour, perhaps, down into the range of 800.

We are talking about a scrubber and low sulfur coal, Governor. We are talking about 965 pounds an hour, versus 148 pounds an hour, which we are quite willing to recommend that you round that up to 200 pounds an hour, because then, Mr. Secretary, the 50-plus percent that they were talking about in relation to the present 10 percent would become only about 20 percent in relation to the present 10 percent.

Our next witness is going to be Mr. Bronson, the president, but I want to make a couple or three remarks that may seem stark, but I want to place it in the framework for you.

If it weren't for Chassahowitzka, the proposed BACT would be punitive on Florida Crushed Stone, because it would be unnecessary. It is important to understand

that. It would be punitive to Florida Crushed Stone to require them to come down to 965 in a Class II area. The window is 18 times higher, but because of Chassahowitzka, 965 is punitive to my client, and it is punitive to my client for the reason that, as Mr. Bottcher said, my client can't replicate the crushed stone facility because of what happens to Chassahowitzka at the point where they intersect on the top line of their Exhibit 41, that's that chart in there.

We would automatically be set at 778 or below, and 778, Governor and members of the Cabinet, is zero.

It is important to understand Best Available Control Technology does not mean Best Available Control Technology. It means the Best Available Control Technology under the circumstances, and therefore I make the stark statement, except for Chassahowitzka, this would be punitive. We would be on their side yelling and screaming they should not be forced down so far, but because of Chassahowitzka, we are here yelling and screaming they have not gone far enough, and we tell you what that is, that is a 90 percent scrubber operating on low sulfur coal, and that changes 965 pounds to 148 pounds.

GOVERNOR GRAHAM: I'd like to ask similar questions to the ones I asked the Commissioner. Are

you aware of your client or any other economic entities in the area affected by this application who are -- who have imminent plans to pursue activities which would add to the emission level?

MR. LAWSON: Governor, my client does not have anything filed, and we do not have anything on the drawing board. Mr. Bronson will explain what they are doing. They have been looking at it, and will be looking at it, and they are certainly -- almost certainly going to be here -- I say almost certainly because I want you to understand that I do not consider the retrofit, where you spell out what will trigger them now -- the rules of the game now. Don't leave us to those vagaries of future regulation, with the lawyers and the monies and the pragmatics and the things you're talking about, Governor.

GOVERNOR GRAHAM: Let me ask you a question, first.

MR. LAWSON: Yes.

GOVERNOR GRAHAM: Are you aware of anyone other than your client who has any plans?

MR. LAWSON: Governor, we understand that Florida Rock and General Portland Cement have filed an application, but I have not seen it.

GOVERNOR GRAHAM: With DER?

MR. LAWSON: Yes, sir, under the Power Plant Siting thing, but I have not seen it and I do not know whether that's true. My client has not -- my client has not anything on the drawing board, is the reason that I say we're almost certain. Then the reason that we're willing to accept the retrofit, it makes us put our position in a fashion where, if we aren't affected and others aren't affected, then they don't have to do it, but we are affected -- in other words, the horror story I'm telling you, if that's true, and it comes true, then spelling out the retrofit now makes sure that the horror story can be cleared up. So that's the reason that we feel that way, and I think you had some other questions, Governor?

GOVERNOR GRAHAM: You answered the second question which was, if DER or an appropriate agency retained jurisdiction to acquire further pollution-reduction devices at a future date, where the current level constituted an inhibitant to economic expansion by other entities, would that be satisfactory to you?

MR. LAWSON: Yes, sir. With the appropriate safeguards, we would accept that. Is that what we prefer? No, it isn't, but from the point of view of you all, we can't ask you to regulate our competition amongst each other. So, yes, it would be acceptable

with appropriate --

MR. SMITH: Why -- a lot of the things you're talking about, I just don't find where, by the evidence, any of that was presented to the hearing officer. I wonder why?

MR. LAWSON: Well, General, we brought a chart up here the other day that shows how the reduction from 965 pounds per hour coming out of the stack -- that's at the stack -- to 148 will reduce what would be a 44 percent consumption, or a 48 percent consumption, down in the range of 10 percent, and then, because it had been alleged that that could not be properly inferred and extrapolated from the evidence, we presented to the aides a diagram -- a textual statement last Wednesday that explained how we did that math, and the reason that we have suggested that you not use the strict 148, but that you round up at the 200, is because there is some slight slippage, but the slippage that we're talking about for a margin of error is important to understand. We're talking about the difference between 148 and 200, versus 200 and 965, and the record will support that you can make those calculations and see that that kind of dramatic reduction in emissions will result in that kind of dramatic protection of the increment at Chassehowitzka.

GOVERNOR GRAHAM: Mr. Smith, do you have any further questions?

MR. SMITH: No.

GOVERNOR GRAHAM: Are there any further questions? Thank you, sir.

MR. BRONSON: Governor and members of the Cabinet, my name, for the record is Tommy Bronson. I'm the president of Florida Mining and Materials. I'd like to make certain at the conclusion of this hearing and your action, that, above all else, that you understand the consistent position that our company has taken in this matter, and what my greater concerns are than those you've heard about today, and those greater concerns, I believe, legitimately are those concerns that the Cabinet and only the Cabinet should consider, and certainly the record shows that it's only -- it has not been -- these points have not been considered up to this point.

First I want to make it clear we support cogeneration. Mr. Curtin's statement for Florida Crushed Stone in the record very early said, "Cogeneration should be encouraged as the policy in the U.S."

We believe that this is an important policy that should be encouraged and enhanced in the state of Florida. My own testimony last July, Volume IV,

pages 18 through 26, which, for the sake of time, I won't get into, but it's in the record so that the Attorney General understands, I make statements like, "Cogenerators can produce electricity cheaper," and I go on and describe that. That's in the public interest. There is no argument whatsoever with us about Florida Crushed Stone being a cogenerator. We support that. We think that's in the interest of the state of Florida, its electric customers. We're convinced that we want, as an investor, to be a cogenerator, ourselves. All we're trying to do is be able to be a cogenerator, and ask that this Cabinet, through its environmental policies, with respect to this permit, allows us to compete on the same basis, on the same fair basis, as far as pollution technology is concerned. We simply are here in order that we can be a cogenerator on a comparable basis with Florida Crushed Stone.

As I mentioned to you that we met, two weeks ago, whatever it was, the third time I ever met with Mr. Gregg on this particular issue -- and we've talked about it for quite a long time. We think it's good for our industry. We think it's good for our companies. We're certain it holds these possibilities of being good for Florida's electrical customers.

Now, what I told him then was, "Brown, I'm going

to be for your project. There is no way I'm going to go to the county commissioners and try to frustrate your zoning proposition, because we want to be cogenerators, too, but when you don't use a scrubber, you have foreclosed the possibility of our being a cogenerator on the same basis as you."

I don't think personally that that's in the public interest, and I know it's not in our interest, and that's why I'm here, primarily, today. I hope that, regardless of what all has been said about our involvement as an Intervenor in this case, the conversation that's being whispered around the halls of the Capitol, as I understand it, that this is simply a matter of a competitor trying to frustrate the legitimate -- or thwart the legitimate business interests of a competitor is absolutely not true, and nothing that I've said, nothing that this company has done would be to the contrary of that, and you know that I wouldn't be here personally -- I hope all of you realize, I wouldn't be here personally on that sort of frivolous basis and, above everything else, I hope that is clear after I complete my remarks today.

Now, first off, let's get it straight as to whether or not Florida Mining is a potential cogenerator, or, in this particular instance, a competitor

simply trying to frustrate a competitor's business interests. The record shows that at least four years prior to Florida Crushed Stone getting involved in cogeneration, that myself, personally, Fred Corrs, my vice president of cement, we were in Germany looking at the possibility of building a cogenerating facility, looking particularly for smaller coal-fired boilers than what the large public utilities are using, and what's commonly used in this country. I would even say to you that we, at that particular point in time, are more of a potential cogenerator than is Florida Crushed Stone. They have to build both the cement plant and a power plant. We don't have one cement plant. We have two cement plants sitting in Brooksville emitting 500,000 cubic feet of waste heat a minute that can be used in cogeneration. All we have to do to become a cogenerator is to build the power plant, which is the lesser difficult and the lesser cost project compared to a cement plant our size.

You should realize that our company is prepared to be a cogenerator, whether we made the application or not for air permits at this point. If this is really an issue, I can bring down to you tomorrow a member of our Board of Directors, the chairman of our parent company, the president and a bank who has had

cogeneration at Florida Mining discussed. I can get all or some of those as quick as tomorrow to come down and confirm that, whenever the economic incentives are in place, our company desires to be a cogenerator.

It's very clear to me that the air pollution -- the air pollution questions of the permitting process is a lot easier than the other. All you've got to do is take about four months, be responsible enough to submit a proposal for a scrubber, which is the Best Available Control Technology, clearly, available to this industry, and you can get your permits, clearly, in four months, rather than the long process that Florida Crushed Stone has been through, and that they have complained about.

A little bit of background, just so that you'll have a clear understanding of some of the salient points and so that they not be misunderstood. The Class I area in Florida, the one that we're most concerned with is at Chassahowitzka. Then there is another one up here at Bradwell, and then there is the Everglades. Now, the important thing is, with respect to Chassahowitzka, this little orange area represents Hernando County, and you've heard and seen charts about the three limerock operations that are there. Mr. Bottcher even made the comment that you could move

these kind of facilities somewhere else.

If cogeneration is going to use the waste heat of a cement manufacturing plant, it's got to be where the limestone is. It's got to be where the plants are. In this particular instance, the limestone that extends through the central part of the state you can't build cement plants on them. Everybody has gone and looked and examined that ideology. There is too much flint in the Ocala limestone formation through here, all along the limestone on this west coast of Florida, unless you are just above Chassahowitzka, has too much magnesium. You can't move this. The incidence of the Class I area, the proximity of Hernando County's pure enough limestone deposits and its proximity to these principal central Florida markets lies, unfortunately, at this particular point right here in one place. It's special. It's a unique circumstance.

Now, I think -- I'll skip over that and get quickly to the point. Right now -- so that we can answer some of the questions. This chart is taken from data that was in Exhibit 41. Right now the increment that is being used in Hernando County is 3 percent. That includes our two cement plants and all the other contributors to S_O2.

GOVERNOR GRAHAM: Excuse me?

MR. BRONSON: Yes, sir?

GOVERNOR GRAHAM: That is 3 percent over the Chassahowitzka Refuge, is that correct?

MR. BRONSON: That's correct. This is the S_O2 impact on the Class I area, which is, in this particular instance, Chassahowitzka. The 5 microgram limits, because of the Class I area -- and I think Mr. Curtin said, or I heard somebody else say you have to realize that throughout Florida that increment is 18 times larger in other so-called class areas. We have a unique situation here where Class I limestone cement manufacturing is all occurring in close proximity to each other.

Now, Florida Crushed Stone's permit proposal would use up 48 percent of the increment and then, if we were to build the same sized plant, using the same technology, then this green area is Florida Mining. You can see that we add, as Mr. Curtin has pointed out, because of our proximity, about 15 percent more S_O2 than they -- than Florida Crushed Stone would, simply because of our proximity to the Class I area. We're closer there.

If Florida Rock, which has expressed an interest in being a cogenerator, and if we were going to optimize the potential for cogeneration in Florida, were to build

a plant, you can see that their blue area would use up 180 percent of the increment. That's clearly not possible because of the Class I area and the increments that are allowed.

Now, what we're trying our best to do is to allow all three of these people. That's all we want to do, and if it genuinely has potential for the electric rate payers of Florida, then all three in this unique location need to be able to be cogenerators, and we're saying that, if you were to require scrubbers, that this chart fairly and accurately depicts that only 30 percent of the total increment would be used. Remaining is 70 percent. That addresses the problems Mr. -- Commissioner Copeland has brought to our attention, that if you use these scrubbers you have then plenty of room for the development of other cogeneration if it came about, or for other economic development in the county that is growing and needs desperately to be able to have other economic activity.

Now, quickly, that leads us to really the closing remarks. The question is, is the state of Florida -- is the Florida -- is the Power Plant Siting Board going to have a policy to promote cogeneration? The question is, and this is what I've been trying to point out to you at this point, for the state -- in the record -- I

wish the Attorney General could hear this, but, for the record, and in the record, cogeneration can produce electricity more cheaply than that produced by a public utility. That's in the record. Volume IV, pages 20 through 26, our testimony.

In the same volume, same area, "Cogeneration can help avoid the necessity of adding expensive units to the utility system." Another place in the record, "Cogeneration projects would increase employment in the area." Another area, "Investment in cogeneration will increase the tax rolls and receipt of the area." Cogeneration, in another area, "saves energy." In fact, conservation was the sole basis for the PFC's determination in their look at the need for this facility, in determining the need.

Now, the DER -- and this is what we -- somehow we completely -- and the issue I'm most concerned with and have been from the very beginning, the DER, itself, acknowledged while it was concerned with providing room for more cement plants, it did not consider the need to preserve room for cogeneration projects. That's in Volume IV, pages 132 to 134.

I'd also suggest to you that it's a matter of fact that, in addition to that, these facts that I've just enumerated were not ruled on by the hearing officer.

Now, you gentlemen have the legal means and the duty to depart from the recommended order and to render a decision on a matter of public policy that has not been adequately considered in the record up to this point. The Cabinet is the Power Plant Siting Board. Indeed, at this particular point, it's obvious that the Cabinet is the only one who can possibly protect the potential for the development of cogeneration.

In reviewing the agenda summaried this morning, I saw it here in the Capitol, all you have to do is look at the agenda summary, whatever you call it that you get for this meeting. There is a summary that makes no mention of the policy issue related to cogeneration. Then you look down there and you see the exceptions to the recommended orders and so forth. What I'm trying to tell you is that the larger policy issue with respect to you all developing that for the -- developing the potential of cogeneration has not been addressed at this point. The PFC considered need, but there is nothing on cogeneration in that record. The DER considered only the environmental questions, which I think is appropriate, and, as I said, the hearing -- the DER said they didn't even consider the matter with respect to reserving for cogeneration.

Now, the PFC clearly is the state's leading

expert with respect to whether or not this cogeneration is potentially beneficial to Florida's electric customers and ought to be considered in a separate manner, and I want to make it clear to everybody concerned, I don't consider this whole matter anybody's particular fault. I really understand, after it's been explained to me, you have an agency. You have hearing officers to hear these matters, but this is the first time on this kind of issue, and the fact that the policy issue has not been considered is one I think of fact.

In closing, quickly, let me say -- well, before I do that, since the question of the scrubber created other kinds of environmental problems, quickly, my calculations say that there would be sludge in the order of 40 to 80,000 tons a year. These plants are located on holes in the ground in Hernando County that has had in the order of five to 7 million tons removed from those holes for over at least 20 years, and lesser tonnage for longer periods than that. We're talking about, where do we have a place to place sludge. There are not any toxin-laden wastes, and I would ask you to ask Mr. Bottcher whether he or Florida Crushed Stone has even looked at it at this point, because I understand they haven't, as to what specific problems and

specific solutions are involved in getting rid of the scrubber wastes. I'm telling you that even if there are toxic wastes, and even if the water supply is endangered, we removed anywhere from two to eight feet and more feet of clay of overburden over these limestones deposits. You layer that down one foot. It's a common practice in order to protect toxic wastes from being able to -- a window going into the aquifer or water supplies, and you've made that layer impervious.

In closing, the Florida Crushed Stone proposal forecloses competition, to us and to others, to be a cogenerator on a comparable basis. This is not fair. We don't think it is consistent with the actions of this Cabinet or any regulatory body who regulates matters of this kind.

Additionally, cogeneration, if you adopt the Florida Crushed Stone permit proposal, the potential for cogeneration will be significantly reduced. This is not fiction. It's a matter of the record. We think it's a matter of fact.

What we're asking you, very specifically, gentlemen, is leave us the opportunity. Leave us the opportunity to be a comparable generator -- cogenerator. That's all we're asking. Give the electric customers of Florida the chance to realize greater benefits from

cogeneration than just one plant in connection with central Florida cement manufacturing. By doing this, requiring in Hernando County, with cement manufacturers, the use of a scrubber and low sulfur coal with emissions limited to 200 pounds, if you do that, then the result is that fairness has been preserved, cogeneration -- the potential for it has been developed to its optimal levels, environmental -- the environment has been protected in its greatest way possible, and the economic interests of Hernando County have been optimized.

Thank you very much.

GOVERNOR GRAHAM: Is there any questions?

MR. TURLINGTON: Yes.

GOVERNOR GRAHAM: Mr. Turlington.

MR. TURLINGTON: Mr. Bronson, did you indicate -- I believe that you did -- that the limerock that's in Hernando County is actually the principal deposit that we have in Florida that is suitable for cement and particularly for cogeneration?

MR. BRONSON: That's correct, Commissioner Turlington. There is limerock underlay in, geographically, virtually all of Florida, but you need a level of purity in calcium carbonate. You need it absent flint,

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which is essentially silica, and it needs to be in close proximity to principal markets. Those conditions for central Florida exist at Brooksville, and it doesn't exist at other places.

MR. TURLINGTON: You made a reference, and these are, I believe, your exact words, that we operate two cement plants right in Brooksville. Did you mean they operate right in Brooksville, or did you mean they operate at the site of your deposit?

MR. BRONSON: That's what I mean, is at the site of our deposit, which is eight miles northwest of Brooksville.

MR. TURLINGTON: There is no way that, economically, you could talk about -- I gather that, if you in a sense relocated the plant even a few miles, it could change significantly this problem that we have with the Class I area?

MR. BRONSON: That's correct.

MR. TURLINGTON: So, there is really not any way that you -- well, you've flat out got to have whatever it is right there at the location of the deposits, or otherwise it's not economically viable?

MR. BRONSON: That's correct. I think Mr. Bottcher and the DER has missed that, because I've heard him say it twice that you could move these things around, but

cogeneration has to occur in conjunction with the manufacture of another product, using heat, typically, that provides excess heat as a waste heat that could be used in the manufacture of electricity. It's got to occur where the limerock deposits occur. It has to occur where the cement manufacturing and the waste heat generation occurs in order to get the optimal benefits for cogeneration.

MR. TURLINGTON: Now --

MR. BRONSON: God knows I would save a lot of money if this could be moved somewhere else.

MR. TURLINGTON: I don't see any great argument here about what's going to be good for the rest of Hernando County in terms of opening up something, because it looks to me like what you're -- that, if it's 18 times more pure, or whatever it is, that you've got to have because of your location over there at the Class I area, that obviously this is not the gut issue of what it would take in terms of locating someplace else in the east of Hernando County. So we're really looking at this question of cogeneration opportunities for, essentially, of the three deposits, if we look at that -- for maximum -- for three deposits, that would be suitable for cogeneration. Now, I gather -- someone mentioned Portland Cement Company. Do they have a

deposit there somewhere, or what is that --

MR. BRONSON: The Portland -- yeah, well, they do, actually. Portland Cement Company does have deposits just northeast of Florida Rock's operations, but my understanding is, and I think it's in the record, that Florida -- General Portland and Florida Rock have talked about General Portland building a plant on Florida Rock's property. Now, those are companies, not my own, and to be very --

MR. TURLINGTON: You're really still talking about the three fundamental locations?

MR. BRONSON: That's right.

MR. TURLINGTON: 200 pounds, just -- going back to that chart where you had 180, and then about -- you know, the blue and the orange and the --

MR. BRONSON: Yes, sir?

MR. TURLINGTON: -- and the green, I believe, are the three colors. And then you get over there to the bar that's off to the right --

MR. BRONSON: Yes, sir.

MR. TURLINGTON: Is that a bar that represents the control of 200 pounds of emissions?

MR. BRONSON: Yes, sir, I -- those numbers were, I believe --

MR. TURLINGTON: If that's the case, what's wrong

with 400 pounds of emissions? It looks to me like you'd have room for 400. I mean, what's the problem? Why 200 pounds?

MR. BRONSON: With respect to using the increment that's available, 400 is as good as 200, if that's the possible. With respect to using the Best Available Control Technology, using identical coals, and that's where the DER is being misleading, I don't know why they continue, other than to recite the record, this characterizes what's in the record. With respect to 148 pounds, using the same coal as up here at the 900 pounds, and --

MR. TURLINGTON: Would there be any difference in the economic operation if you had a different figure than 200 pounds? If you were following that suggestion that was made about the use of scrubbers and 200 pounds--

MR. BRONSON: Yes, sir, as you -- as the sulfur content increases in coal, the cost per ton goes down, and in eastern Kentucky where the coal -- we buy 140,000 tons of coal a year. We do know what we're talking about in this area.

MR. TURLINGTON: That's per pound of coal, what I'm talking about, you know, in the end you will really generate electricity, and you're making cement --

MR. BRONSON: You're right.

MR. TURLINGTON: So, the per pound of coal may not mean anything. From the standpoint of comparing one operation from another it might make some difference. Would it matter to me if you set a standard, and you were in this business, would it matter to me if I had a standard -- significantly to me, if I had a standard of 400 pounds as opposed to 200 pounds?

MR. BRONSON: Yes, sir, I was going to try to explain that to you, if it was 400 pounds and you were using a scrubber, you would use less expensive coal, and that sulfur content would be higher. That's what the economics would call on a person to do.

MR. TURLINGTON: But the scrubber operation would really be the same?

MR. BRONSON: Yes, sir.

GOVERNOR GRAHAM: Any further questions, Mr. Turlington? Any questions? I'd like -- it seems to me we've got consensus that the encouragement of cogeneration is in the public interest. So we want to do that. As of today, none of the facilities in this area are cogenerating, is that correct?

MR. BRONSON: That's correct, yes, sir.

GOVERNOR GRAHAM: What has been the constraint to date, if it is economically advantageous, for their -- why has cogeneration not come today in this area if it

economically advantageous?

MR. BRONSON: The history of it, very quickly, to hit on the points, and you could talk 30 minutes on each item, the Federal Regulatory Commission, when they passed regulations and asked the states to do the same thing, they said, "Public utilities shall buy -- purchase the excess power from cogenerators and pay the avoided costs."

It has taken some time to get the definition of "avoided costs" straightened out, because of the mix of fuels that utilities burn throughout the day, throughout the year. So the avoided cost issue -- our Public Service Commission aggressively, I think, probably, ahead of most other PSCs in the country, the best I can tell in talking to other cement companies, aggressively grabbed this. They have indicated the potential is there. It ought to be developed. They tangled the avoided cost definitions. Those definitions have been overcome, and that covers about 65 percent -- 60 to 70 percent of the cost of generating electricity now, over time. That means, if a cogenerator -- fuel cost is less than the avoided cost of the generator -- of the public utility generator, then that means he is able then to make a profit off the difference of avoided costs, by definition of the public utility and

his cost of fuel, which is the way it will be in the case of Florida Power Corporation right now, because about 35 percent of their total fuel is oil, which is more expensive than coal, which is what Florida Crushed Stone or we or anybody else would use. Then the second piece, Governor, over time, though everybody knows that our public utilities are shedding those more expensive fuels and opting for less expensive fuels, which is, of course, coal, and if we don't build anymore nuclear generators, well then, we're down to confronting all the environmental issues and the economic issues related to coal.

Now, the capacity credits, obviously there is -- at least 30 percent of the cost of generating electricity has not been covered by the cogenerator, because avoided only deals with fuel.

Now, again, our PSC aggressively recognized this, recognized that incentives were necessary if the potential was going to be developed, and they've been conducting hearings which I think are close to conclusion, and that will provide capacity credits that covers the other 30 percent of the cost of generating electricity.

I think, clearly, the cogenerators, the public utilities might not be too happy with this, but

cogenerators clearly would have all other cost advantages, because they wouldn't have all the administrative expenses, all of the customer service expenses, regulatory expenses, the so-called GNA expenses. Cogenerators wouldn't have that. So, it's real that an efficient cogenerator, having a boiler who has BTUs to kWhs equivalent to the most efficient of the public utilities, can, with appropriate capacity credits, generate electricity less expensively than the public utility. That's in the interest of the public, I believe, as a policy issue, and one which we're saying, the buck stops right here.

So, that's a kind of picture of the way it is, Governor.

GOVERNOR GRAHAM: It seems to me that, if everybody accepts that as being desirable public policy, we then have to divide the issue chronologically; one, what does it take to get started within the near term, and, number two, what does it take to establish an environment that will allow it to happen more extensively in the mid and long term? Clearly -- I don't know if these numbers are accurate, because they were not proffered from the record, but accepting their accuracy, that the cost of the total plant is 100 million and the cost of adding scrubbers is an additional

10 million, I would assume that one of the issues about whether this plant will go forward with cogeneration is how much capital cost has to be invested as an initial matter, and how that then affects the economics of the overall operation?

It seems to be that the public's interest could be advanced by making it as economically advantageous within existing environmental standards for Company 1 to go forward, but with Company 1 clearly understanding that, at such time that they have to meet more stringent standards in order to leave a window of opportunity for 2, 3, 4, 5 and 6, that they are obligated to do so. Would that not meet your concern?

MR. BRONSON: That meets my company's concerns. It probably doesn't meet all of the environmental concerns, but looking selfishly at our company's interest, it would meet that concern.

MR. SMITH: Maybe Mr. Bottcher ought to answer this. My understanding of the record is that scrubbers were rejected as being environmentally non-sound at this time.

MR. BOTTCHER: That's correct, Your Honor.

MR. SMITH: So, Governor, that -- I understand where you're coming from, but apparently that kind of evidence was --

MR. BOTTCHER: I'd like to just point out one thing about scrubbers, and that is that they are not environmentally unsound in all situations. It's just that, when we do the balancing, you take into account the reduction of the emissions and the environmental consequences. In this situation it was --

MR. SMITH: Okay. But, constrained as we are in the capacity that we sit here, you know, we don't have the luxury to all of a sudden say, "Hey, scrubbers sound like a great idea," because that was heard and rejected.

GOVERNOR GRAHAM: Could I just pursue that question, then. It depends upon whether you're a microscopic or a telescopic environmentalist. I'm now going to give us an opportunity to be a telescopic environmentalist.

Assume that this project goes forward under the guidelines recommended by the hearing officer, that is, no scrubbers because of the finding that scrubbers, at this point in time, are not, on balance, environmentally desirable. At a point in the future, other applicants come forward with serious proposals for cogeneration which would have the effect, if they are to be given economic parity with the first applicant, of requiring Applicant 1 to have to adopt some technology which may

be scrubbers, if nothing better is developed in the interim.

Now, the question is, what's the balance of public interest in terms of the opportunity to get additional concerns involved in cogeneration, versus the requirement that Applicant 1 go to the expense and to the environmental complications of adopting a scrubber technology? At that point, what is the legal status of DER and what is the policy framework within which DER will evaluate that question?

MR. BOTTCHER: Well, it's awfully hard to predict the future, but legally we can require a retrofit.

GOVERNOR GRAHAM: You can or cannot?

MR. BOTTCHER: We can, oh, definitely we can, if the circumstances dictate it, and there would have to be some motivating factor, and I think an appropriate allocation of the air resource would be such a factor. If somebody came in, we'd have to go through a legal proceeding. There would have to be an actual modification of this certification. It could be done if the facts at that time show that it's necessary to do so and that, you know, the Best Available Control Technology for the other one required that this one be reduced. Yeah, legally, I think we could do that. It's just, pragmatically, it's going to be difficult,

because once a facility gets built and it's existing, it's difficult to change it, but legally we can.

GOVERNOR GRAHAM: Well, I have understood that retrofitting for scrubbers was a technically feasible --

MR. BOTTCHER: Oh, yes.

GOVERNOR GRAHAM: -- and not inordinately, additionally -- in other words, the expense of inserting scrubbers on an already operating plant was not substantially greater than inserting scrubbers at the time of original construction?

MR. BOTTCHER: Right, particularly if it's designed with that in mind, that they may have to put them on it at some time, that is correct. From a technical standpoint, when they put them in it's going to cost a certain amount, and the amount will vary, you know, it will change somewhat, but that is correct. When I was talking about the pragmatics of actually going through and getting a legal requirement imposed to have them retrofit, that is -- would be the difficult thing, even though we could do it legally.

MR. SMITH: I don't know beans about scrubbers, okay? How much do you know about scrubbers?

MR. BOTTCHER: Not a whole lot, but we have some, you know, experts that testified at this hearing.

MR. SMITH: Well, I mean, do you know enough to

answer this question: Given the technology that we have today, assume the situation that we approve this application and Mr. Bronson's company comes in here in six months or a year and files an application saying, if you will convert to scrubbers, there is enough of the resource for us to share. We can all economically be competitive. Given the environmental equation and the state of the art, do you see DER entertaining that kind of a proposal?

MR. BOTTCHER: We would entertain it. We would avoid the requirement of --

MR. SMITH: I mean entertain it in a favorable way?

MR. BOTTCHER: We would avoid the imposition of a scrubber if it could be achieved in another way. We prefer not to have the S_O2 generated initially so you have to clean it up afterwards. If they could find a lower source coal, or, you know, low sulfur coal, perhaps that would be one way of doing it. One thing that's an unknown right now is how much absorption will take place going through the cement plant. The tests show that it may get up to 40 percent. They are only guaranteeing 25 percent.

In reality this plant may emit a lot less sulfur. So a couple of years down the road, after it's in

operation, we may find that there is more leeway.

MR. SMITH: So, there might be enough available resource, given the efficiency of the plant, to let another company go forward without a change in technology?

MR. BOTTCHER: Yes, even with the 965, Florida Mining could go ahead and put a plant in that they are proposing, the 200 pounds, and that could go in under the present --

GOVERNOR GRAHAM: But the problem is that's going to put them at an economically disadvantageous position, because they're going to have to have greater capital costs than their competitors, and that --

MR. TURLINGTON: Is it the capital costs or is it the operating costs, or is it both?

MR. BOTTCHER: It's a combination.

GOVERNOR GRAHAM: Mr. Firestone?

MR. FIRESTONE: You know, we're sitting here and dealing with a technical field of which I don't think anyone here has great expertise. Is it my understanding that the low sulfur coal that would be utilized in the proposed plant would be foreign source coal?

MR. BOTTCHER: No, Your Honor. It's eastern Kentucky coal. It's got to be railed in. The national policy to require scrubbers on new facilities is

predicated on encouraging the use of high sulfur American coal. There is low sulfur American coal. The problem is there is not enough to go around. So what Congress has done is said, okay, let's --

MR. FIRESTONE: Okay. What would happen in the event that some crisis developed that limited the supply of low sulfur coal? What posture would the plant be in? Would you then mandate retrofitting?

MR. BOTTCHER: Yes. they're going to have to meet that emission standard of .74. If they can't meet it with low sulfur coal, they are going to have to either close it down or come in with some alternative which would probably be retrofitting a scrubber.

MR. FIRESTONE: What circumstances could you think of whereby there could be a shortage of low sulfur coal that we have not discussed today?

MR. BOTTCHER: It's difficult for me to say, but a possibility exists that the federal government could say that, "We're not going to allow low sulfur coal to be burned in power plants and we want to save it for some strategic reason or for some other reason, and you just have to find some alternative source of energy."

MR. FIRESTONE: Would it be possible -- I see that Mr. Cresse is in the room from the Public Service Commission, and I wonder, Mr. Cresse, if you would share

with us some of the proceedings that occurred before the Public Service Commission and what conclusions you may have, if any, on this issue?

MR. CRESSE: Mr. Secretary, let me say at the outset that I'm not --

GOVERNOR GRAHAM: Mr. Cresse, for the record, would you please give your name, address and affiliation?

MR. CRESSE: Yes, sir. I'm Joe Cresse. I live at 283 Shamrock South, Tallahassee, Florida, zip 32308. I'm affiliated with the Florida Public Service Commission, and --

GOVERNOR GRAHAM: I wouldn't go any further than that.

MR. TURLINGTON: In what capacity, Mr. Cresse?

MR. CRESSE: -- and I'll not go beyond that in my self-preservation instincts. Let me say that I'm here at the request of you folks, and you have a very difficult task, and a very difficult decision.

Relatively speaking, our decision was very simple. The public policy we think of this nation, and we believe of the state of Florida, is to encourage cogeneration for multiple purposes. The first is that the use of fuel, whatever that source of fuel is, in this instance it may be coal, in other instances,

cogeneration may be from oil or it may be from natural gas, but the basic underlying policy of this nation is that it is more efficient use of limited natural resources to have cogeneration than it is to burn exhaustible fuels and some fuels which there are a great deal of shortage of in the direct burning of electricity. So, that is the national policy.

The law that was passed, I believe it was a 1978 law, at the national level, and we attempted to implement that very rapidly -- as a matter of fact, according to the Supreme Court we attempted to implement it -- or, the district court, a little bit too rapidly, and that is that we adopted some rules and regulations without specific Florida Statute authority to do so, and so our initial rules were overturned and we started over again.

We do have, as an objective, clearly, to provide the appropriate types of incentives to get as much cogeneration in the state of Florida as economically feasible, and that's true because we think, not only from the standpoint of the preservation of the fuel, but in fact, for the benefit of the rate payer, it is beneficial if the utilities can avoid making the marginal cost investments that would be necessary, and they are enormous, to meet the growth demands for

electricity in the state.

Energy conservation will only go so far, and we have probably an array of programs throughout the state of Florida that I would rank, based on limited knowledge, but somewhat state pride, too, we probably have the best conservation programs being performed by Florida utilities than any state in the Union, and they are getting results. As a matter of fact, from 1980 to date, the conservation efforts will save about one-half of the planned additions that were projected in 1980, when the Legislature authorized that law.

That is 6000 megawatts, and it costs, if I could ever get my figures in the right place, $1,500,000 per megawatt, or $1,500 per kilowatt to build electric generating plants in this state.

So, we are interested in it. We think it's in the long range best interest of everybody in the state of Florida.

As far as fuels are concerned, low sulfur fuel is in plentiful supply in this nation. There is not much imported that can be imported, and it's a question of price. It's always a question of price. There is pending at the federal level a tremendous concern about acid rain, particularly in the northern part of the United States, and in the southern part of Canada.

Congress has been considering various forms of legislation to in fact deal with the acid rain problem in the Northeast. You may recall in President Reagan's message he wanted to discuss the matter for an additional year. There was some thought that he was going to support legislation that would in fact require a reduction in S_O2 emissions equivalent to 50 percent of what is in fact being emitted now in the eastern 31 states of this nation.

If that takes place, it would depend then upon what they mandated in order to achieve those reductions. If, in fact, they left the utilities and the other industrial concerns who are emitting S_O2 to the least cost alternative, then I suspect that low sulfur coal, the price of it, would increase rather dramatically. That was one of Congress's concerns, that if you leave it to the least cost alternative to remove S_O2 emissions by 50 percent, that you will cause a tremendous dislocation economically throughout the nation, in that no high sulfur coal will be sold in the nation because the least cost alternative would be the purchase of low sulfur coal. So, the price could go up but I don't think there would be tremendous shortages of it. There would be a dislocation time, and you'd still be able to get it. The question is what the price would be.

One of the benefits of the Congressional policy that is applicable to power plants built by electric utilities, the requirement that they put on a scrubber, is that it gives you a wider range of fuels which you can use in order to achieve the type of reductions that are mandated from an environmental standpoint.

Obviously, if they take out 90 percent of whatever S_O2 is included in the fuel, that 90 percent of four and a half pounds, as opposed to 90 -- to 4½ percent as opposed to 90 percent of 1 percent sulfur coal, you'd still get the same 90 percent, but you'd have a whole lot less left over. So, those options will be available in the future, and I expect that that's the principal reason that sulfur -- that the electric power plants must put on scrubbers or equivalent technology with the construction of a new plant, and that's a long speech, but that's about all I can offer you, unless you have some specific questions.

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GOVERNOR GRAHAM: Mr. Cresse, if we are all agreed that what we want to do is to create an environment that will encourage cogeneration, we have a situation here in which one applicant is prepared to go forward with a cogeneration cement plant. This applicant can achieve that purpose and stay within air quality standards without having to install scrubbers. The consequence of that, however, is that the window of remaining clean air is a relatively shallow one, and could have the effect of, in the future, precluding other similarly situated companies at a similar capital and operational cost from engaging in cogeneration.

There is the possibility, however, that applicant one could be required as a condition of initial licensure to agree to install state of the art emission control devices at some future time whenever those other competitors, or noncompetitors but emission-generating industries, indicate a serious intent to go forward, and who would otherwise be precluded from doing so because of the degree of air pollution created by applicant number one. Now, my question to you is, how would you recommend we work our way out of this thicket to allow us to get somebody who wants to start, so we can continue the process,

but in the same step, create a future environment that will not discourage others from doing so, either because of environmental constraints or because of economic disadvantages that they will be put to?

MR. CRESSE: Governor, I think what I would do is fairly simple. If you had personally been assigned to this case nine months ago at the entry level, and had proposed this question to the two contestants in this application, one being the applicant, and I believe the other one being Mr. Bronson, and asked them that question, I believe this issue would have been solved a long time ago; and I think I heard Mr. Bronson answer it earlier when you asked -- earlier, when you asked him that question, he said that seems to be satisfactory to him. I would suggest that the owner of the other -- of the application is here, and if you ask him that question you may have resolved this issue very amicably among all parties, and I would take the direct approach and ask him, because I think that --

GOVERNOR GRAHAM: So, your answer to the question is to ask the question to somebody else, is that right?

MR. CRESSE: No, sir. I think the -- what you're dealing with here, Governor, is, first, a unique area

in the State of Florida, unique from its environmental constraints that have been placed on it, but also unique because it has, simultaneously, great potential for cogeneration.

Unfortunately, there may be but one of these places in the State, but it is unique, and so the question really is, does this unique situation require a unique kind of treatment? I think you've discovered a way that is fair to all parties, would in fact encourage cogeneration, and I believe these folks back here on the left are just anxious to come up and say, yeah, they think that's a pretty good idea.

Governor, why don't you ask them, and I think we can all go home?

GOVERNOR GRAHAM: Well, with that --

MR. CRESSE: If they don't answer positively, I'll come back and help you along with it.

GOVERNOR GRAHAM: With that prospect in mind, would the representative of the applicant please come forward and -- to respond to the question which I asked to Mr. Cresse, and he adroitly deflected?

MR. CURTIN: Would you like to hear from one of the attorneys or --

MR. SMITH: Whoever has got the answer.

MR. CRESSE: As your last adviser, I suggest you hear directly from the owner.

MR. CURTIN: If I could just briefly respond, and then you can hear from the owner if you desire to do so.

Governor, I think the answer to the question is that we're prepared, of course, to comply with any requirement or rule that's subsequently adopted in accordance with the Siting Act, and I think you can see from the complexities of the situation -- not the chart, which we didn't have an opportunity to review at the hearing, but the modeling information, that it is obviously very complicated, and it seems to me that we've got a situation where you have Florida Mining and Florida Rock industries that are both -- have said they are potential cogenerators, that are clearly going to be in direct competition for whatever increment is going to be available, because of the fact that that's just the way they are located, and that we may or may not contribute to that situation, based upon the modeling information, and it seems to me that it would be reasonable at such time as those facilities came in, and both tried to get in, that if they could demonstrate that it was directly a result of our facility, and that

they were proposing to use technology that they wanted us to use, and they couldn't come in, that it would be reasonable to reopen the proceeding on Florida Crushed Stone to see what could be done, and I guess that would be the answer to the question.

GOVERNOR GRAHAM: So, would you like to propose some language that might be added to the order that would affect that?

MR. CURTIN: Well, the question that I'd ask, and perhaps this is a question for the Attorney General or for DER, we believe that Florida Mining is a party to this proceeding. We have -- we did contest their standing at the hearing level. We have not contested it in front of you.

So, as of today they are full participants. If they choose not to exercise the right to appeal, assuming that the project is approved, we will contest the standing no further. That gives them the ability, under the Power Plant Siting Act, to request a modification of our permit as a party based on changed circumstances. They would have the right to do that, and the agencies would then have the right to review that.

That is in addition to the reopener clause in the statute, based on future rules. So I guess the

answer, or what I'm saying, simply is that it looks to me like there exists two mechanisms to achieve that end without modifying the conditions that are -- that have been proposed.

GOVERNOR GRAHAM: As I understand, what you're suggesting is that, if you agree to not further challenge Mr. Bronson's firm's right to be an intervenor, and his firm agrees not to pursue an appeal, assuming this order is granted, then that would allow Mr. Bronson's firm to, at a future date, request a reopening of this order for purposes of considering additional conditions, such as scrubbers --

MR. CURTIN: Or some other type of reduction, that is correct.

GOVERNOR GRAHAM: -- or whatever else may be appropriate at a future date?

MR. CURTIN: That is correct.

GOVERNOR GRAHAM: Mr. Bronson, do you want to respond to that offer?

MR. BRONSON: Governor, I think, in fairness, what -- if I understand -- maybe the lawyers can straighten this out, but I think what Mr. Curtin is suggesting is that you issue the permit as submitted today and leave the question in the future as to whether or not we did -- if we become a cogenerator,

to raise all these same issues that we've raised here today. What he's doing is saying to us, "Well, why don't you spend another $100,000.00 to go through this kind of process with the facts the same as they are right now?" I want you all to understand in fairness, and I think Brown Greg and Mr. Curtin will bear this out, all of our business people, one generating unit like this would generate something like nine hundred ninety-seven million kWh a year. We both variously guess at the cost of amortization of the capital, the operation of the scrubber would be something like two to three tenths of a cent per kWh, tenths of a cent per kWh. That's twenty-seven million dollars a year difference in revenue in operating costs for those who don't have scrubbers, as opposed to those who do have, and that's at the heart of this thing, and I think that, when we say we're not willing to talk about it in the future, let's deal with it right now. It's for that kind of reason --

GOVERNOR GRAHAM: But we have another factor that's injected now, and that's that the environmentalists, or those who are looking at this from a strictly environmental standpoint, have indicated that, at the present time there are some negative

factors, putting aside the air quality factors, to requiring scrubbers before they are necessary.

Do you think it's possible that language could be developed that would be incorporated in this order which would carry out the public purpose of facilitating and opening at such time as there was another applicant whose application would be adversely affected, environmentally or economically by the conditions that were granted here?

MR. CURTIN: Governor, we're -- certainly we're not trying to be unreasonable or difficult. I think what I'm saying is simply that I see no way for us to come up with language that would solve everybody's problem and, at the same time say, that we are never going to have the opportunity to test that somewhere, or that certain burdens would have to be met, as they would if modifications were requested, simply because we think that the evidence, that -- you know, we've had hearings on this thing. A lot of the things that you've heard today are not in the record. We haven't had an opportunity to test those things, the evidence about the relative impacts and, you know, how these facilities contribute to the increment or the wind direction, or things that we've presented, and I think that it would be

great if we could come up with some kind of language, but I'm afraid that the difficulties of doing that are just pretty immense.

I mean, I think that what you're saying is that, you know, five years down the road, if somebody wants to come in and build a cogeneration facility, and they are somehow shut out by our action, you know, is there something that can be done, and I think the answer to that is yes. The variables in that process are the things that would happen in the meantime, where other facilities that are not under the jurisdiction, for example, of the Governor and Cabinet, would get permits and might have an effect on what's happening up there, and so, you know, that's kind of a -- there is a lot of vagaries here. As you can see from the modeling information, when you start talking about whose impact is doing what, we think that it should have to be demonstrated that it's our impact that's causing the problem here before we are required to -- you know, to make a massive change to the project, but we are certainly willing to face the possibility, given the circumstances, and a change in circumstances, that proceedings could be initiated, either through the Department's action, which we would be allowed to participate in, or through

action to modify our own permit, which we would also be allowed to participate in. In other words, it's too complicated and speculative, that it's difficult for us to agree today on a set of circumstances.

MR. FIRESTONE: Governor, in review of those remarks, because it is complicated, because I think it's an important issue facing Florida's future, I'd like to move to defer to allow the parties to have an opportunity to negotiate and, although it's not part of the motion, should Mr. Cresse be available, he could probably operate as sort of a referee arbitrator on the issue, unless that's a -- that's not part of my motion, I'm asking a question --

MR. CRESSE: That's the reason I asked you to ask the owner, Governor, not the lawyers. Unfortunately you get obscure answers always when you -- not always, but occasionally on very heavy issues, you get obscure answers that you don't totally understand if you'd have asked the owner, but let me just say this, sir, I understand what you're attempting to do in your language. I think that is appropriate, because of this unique area, because of the great potential for cogeneration in this unique area. It seems to me that if you defer this matter on this

single issue to see if all these lawyers can write up an agreement of what takes place under those circumstances, and you request DER's staff to develop -- to write one up in the even they fail, you may have accomplished a tremendous --

MR. FIRESTONE: I'd rather see two principals get together than we telling the owners what to do.

MR. CRESSE: I would have, too, sir, but I would suggest that you maybe not try to have someone arbitrate between them, hold the heavy hand or the light hand over them and say, "This is what we would like to see, and we're asking you all to sit down and negotiate this language. We're also simultaneously asking the DER attorney to bring us this language, should you all fail." Nine chances out of ten, they will agree to the language rather than want DER's language, I can almost guarantee that.

MR. FIRESTONE: Governor, I'll put the motion, and it does not include the conscription of Mr. Cresse.

MR. CURTIN: The owner is on his way to the podium.

GOVERNOR GRAHAM: What is that?

MR. CURTIN: The owner is on his way to the podium.

MR. LEWIS: Governor, could I ask a question?

GOVERNOR GRAHAM: Yes, Mr. Lewis.

MR. LEWIS: As much as I enjoy these hearings, we had two hours of this at the last meeting, and more than two hours this evening, and I have no place to go. Let me just say that. I never plan to travel on Cabinet day. I know better after nine years.

I think we're somewhat constrained by the Administrative Procedures Act, and I'd like to ask the Attorney General, I'd just like to move that we adopt the recommended order. I really, up until about two minutes ago, you know, was hoping also we could come to some resolution, but I don't think that's possible.

I don't think we're sitting here as arbiters. I think we are in a quasi-judicial capacity. We have a recommended order. We have findings of fact. I sort of liked the recommendation that Mr. Curtin made, but the opposition doesn't want to do that, and that's up to them.

I think we ought to go ahead, fulfill our statutory responsibility. There will probably be an appeal. It is a difficult decision we have to make. Mr. Cresse is right, but this won't be the

first or the last time that we have had a unique situation, a difficult situation.

Let's bite the bullet and do what we have to do, and I move that we adopt the recommended order of the hearing officer.

GOVERNOR GRAHAM: Okay. We had a motion to defer. Was there a second to that motion?

MR. SMITH: No, sir.

GOVERNOR GRAHAM: All right. There was no second to that motion, so that motion has failed.

Now, we have a motion to approve the hearing officer's report. Is there a second to that motion?

MR. SMITH: Is it too soon to ask a question?

GOVERNOR GRAHAM: No, ask a question if it's in order.

MR. SMITH: You know, I think there is a way to write this order to capture, really, the intent that was expressed by the Governor, that somewhere down the road the intervenors would have the opportunity to come in, present their case, and maybe a requirement for modifications, but I'm concerned, Tommy -- Mr. Bronson, that you all don't fully understand. I want to make sure that -- and I think, agreeing with what the Governor may be talking about, that you all really do understand the posture

that we're in, because you keep talking about scrubbers, and the fact is, that evidence was presented to the hearing officer. That was rejected, and we don't have the power to disregard that, except in a very unique situation where we've read -- where every member of this Board can testify they have read the record themselves, and they find no substantial, competent evidence, or no undisputed facts that would cause us to overturn the hearing officer's recommendation.

So, the issue of us imposing a requirement for scrubbers, you know, in this proceeding is really moot. We don't have that power, and I'm not sure, based on what I keep hearing from you and some of your witnesses, that you all, you know, fully appreciate that.

That's not to say that down the road with a change in the technology, you know, that that could happen, and we're not foreclosing that, and I think what the Governor's saying is we need to make it clear that, down the road, and that maybe next year, six months from now or three years from now, you could come in and open this proceeding, show that there was new technology, that there is a better way for everybody to do it, and everybody share that

limited resource, and that's the way we would be going forward.

I just think it's important for everybody to understand what we're talking about.

GOVERNOR GRAHAM: Gentlemen, we still don't have a second to the motion as made by Mr. Lewis. Is there a second to that motion, which is to approve the hearing officer's report? All right. That motion fails.

Now, as I understand, we have a problem in that the 90 days for this application runs out before our next meeting, which means that we've got to make a decision between now and that date, or have a deferral if we are in agreement to waive that.

MR. SMITH: Let me just -- let me try a motion that we would adopt the recommended order as the final order in this case, reject the exceptions to the findings of fact because there is competent substantial evidence in the record to support the hearing officer's findings, reject the exceptions to the conclusions of law and conditions as they are supported by the findings of fact, but that the intervenor can continue to have standing in this case and the opportunity to, at some future date, to reopen this case to present evidence of new or

change in technology in order to obtain a permit to operate a cogenerating plant.

MR. LEWIS: Second.

MR. CURTIN: That's fine with us.

MR. TURLINGTON: I would think so.

MR. SMITH: I think that captures, Governor, what you were trying to get to. Maybe -- I don't have private authorship.

GOVERNOR GRAHAM: All right. There is a motion and second on that.

What I'm trying to get to is to let this project go forward without imposing any unnecessary economic or environmental burdens, and I'm convinced at this point that the hearing officer's recommendation is an appropriate commencing point. Second, I want to clearly leave open the opportunity for this matter to be reviewed at a future date, taking into account economic and environmental factors that might, at that point, warrant a further condition upon this order and require changes in the capital or operating processes of this plant in order to accommodate the needs of our economic entities, some of whom may be other cement plants interested in cogeneration, some of whom may be economic activities of an unspecified alternate nature.

If we could capture that concept, I think we would have done the best we could for the public purpose.

MR. SMITH: I accept that amendment.

GOVERNOR GRAHAM: Was that drafted with sufficient -- with clarity to --

MR. BOTTCHER: I'm writing it down here. I think I've got the essence of it, taking both the Attorney General's and the Governor's language, it would say in the order that the intervenors would continue to have standing and to have the opportunity to reopen the certification upon a showing of a change in circumstances, taking into account social and economic factors which would require a reduction of emissions in order for other facilities to be permitted in the area.

MR. BRONSON: If you'll add the words, "other facilities on a comparable basis," that's fine.

GOVERNOR GRAHAM: I would -- it is my intent that other facilities, where the other facilities are, themselves, comparable in terms that they are in the same business, that they would have an opportunity to enter into cogeneration on equivalent economic and environmental terms with this applicant.

MR. CURTIN: Governor, we -- the owner has

instructed me to advise you that he would commit to continue to look for ways to reduce emissions, and should he find a methodology that would be acceptable under the scheme that he is proposing, that we would, in advance of Florida Mining having a problem, come back to this body and request that the conditions be modified to reflect that.

GOVERNOR GRAHAM: What's your feeling about the additional langauge that we've just added to this approval?

MR. CURTIN: I believe it would be acceptable.

GOVERNOR GRAHAM: All right. We have a motion --

MR. LAWSON: Governor, might I have an opportunity to read it for --

GOVERNOR GRAHAM: Yes, sir.

MR. LAWSON: -- for Florida Mining?

GOVERNOR GRAHAM: Why don't you read it out loud so everybody can hear it and everybody can --

MR. BOTTCHER: The Intervenors continue to have standing in this proceeding --

GOVERNOR GRAHAM: Excuse me, sir. This comes at the end of the original sentence which the Attorney General read, which -- so we're now starting -- strike the period and insert the additional language.

MR. BOTTCHER: Well, it would be a new paragraph

added to --

GOVERNOR GRAHAM: All right.

MR. BOTTCHER: This paragraph for the Attorney General's last part of his motion, "Intervenors continue to have standing in this proceeding to have the opportunity to reopen certification upon a showing of a change in circumstances, taking into account social and economic --" I just added the "social", it wasn't in there originally.

GOVERNOR GRAHAM: All right.

You used the word -- could you put in there, "social, environmental and economic circumstances"?

MR. BOTTCHER: Okay. Social -- right -- economic and environmental, that's the order they are in, factors, taking --"change in circumstances, taking into account social, economic and environmental factors which would require a reduction of emissions in order for other facilities on a comparable basis to receive permits in this vicinity."

Okay. What Mr. Lawson is suggesting, instead of saying, "Upon a showing of a change in circumstances", just a "showing of circumstances."

MR. LAWSON: Just one moment, please.

GOVERNOR GRAHAM: All right. Does anyone want to comment? We have a motion which incorporates that

langauge, which has been seconded. Does anyone wish to make any comment before we take action on that motion? Does any member of the Board have any comments? If not, is there any objection to that motion? Without objection, the motion is adopted.

Thank you. Is there any other business to come before the Cabinet? All right. The meeting is adjourned.

(Whereupon, consideration of the Department of Environmental Regulation Agenda Item No. 1 was concluded.)

* * * *

CERTIFICATE

STATE OF FLORIDA)
COUNTY OF LEON)

I, RAYMOND F. DUTKIEWICZ, Court Reporter and Notary Public at Tallahassee, Florida, do hereby certify as follows:

THAT I correctly reported in shorthand the foregoing proceedings at the time and place stated in the caption hereof;

THAT I later reduced my shorthand notes to typewriting, or under my supervision, and that the foregoing pages 3 through 109, both inclusive, contain a full, true and correct transcript of the proceedings on said occasion;

THAT I am neither of kin nor of counsel to any parties involved in this matter nor in any manner interested in the result thereof;

THIS 21st day of March, 1984.

RAYMOND F. DUTKIEWICZ
Court Reporter and Notary Public
State of Florida at Large

My commission expires 3/23/86

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

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- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
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I also wish to receive the following services (for an extra fee):

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

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3. Article Addressed to:

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

4a. Article Number

P 872 562 609

4b. Service Type

☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

2/28/94

5. Signature (Addressee)

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

6. Signature (Agent)

Shawn Bryant

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Thank you for using Return Receipt Service.

P 872 562 609

Receipt for Certified Mail

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Sent to: John B. Koogler, K&A	
Street and No.: 4014 NW 13th Street	
P.O., State and ZIP Code: Gainesville, FL 32609	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date: Mailed: 2-25-94 Permit: PSD-FL-090.	

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Is your RETURN ADDRESS completed on the reverse side?

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

4a. Article Number

P 872 562 696

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

7. Date of Delivery

7/11/94

5a. Signature (Addressee)

Wendy Quesbeck

6. Signature (Agent)

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

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UNITED STATES POSTAL SERVICE

Sent to John B. Koogler	
Street and No. 4014 N.W. Thirteenth St.	
P.O., State and ZIP Code Gainesville, FL 32609	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date Mailed: 7/7/94	

PS Form **3800**, JUNE 1991

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

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

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3. Article Addressed to:

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

4a. Article Number

P 872 562 700

4b. Service Type

☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

9-13-94

5. Signature (Addressee)

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

6. Signature (Agent)

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UNITED STATES POSTAL SERVICE

Sent to Mr. Tom Mountain	
Street and No. P. O. Box 1508	
P.O., State and ZIP Code Brooksville, FL 34605-1508	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date Mailed: 9/8/94	

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2. ☐ Restricted Delivery

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3. Article Addressed to:

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

4a. Article Number

Z 751 859 996

4b. Service Type

☐ Registered ☐ Insured
☐ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

10-12-94

5. Signature (Addressee)

6. Signature (Agent)

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

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UNITED STATES POSTAL SERVICE

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Sent to Tom Mountain	
Street and No. PO Box 1508	
P.O., State and ZIP Code Brooksville FL 34605-1508	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date 10/7/94	

PS Form 3800, March 1993

Is your RETURN ADDRESS completed on the reverse side?

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I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

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

4a. Article Number
P 872 563 691

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

7. Date of Delivery
11-14-94

USPS BROOKSVILLE DOWNTOWN NOV 14 1994

5. Signature (Addressee)
[signature]

6. Signature (Agent)

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

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

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P 872 563 691

UNITED STATES POSTAL SERVICE

Receipt for Certified Mail
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Sent to Mr. Tom Mountain	
Street and No. P. O. Box 1508	
P.O., State and ZIP Code Brooksville, FL 34605-1508	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date Mailed: 11-9-94 Permit: PSD-FL-090A	

PS Form **3800**, JUNE 1991

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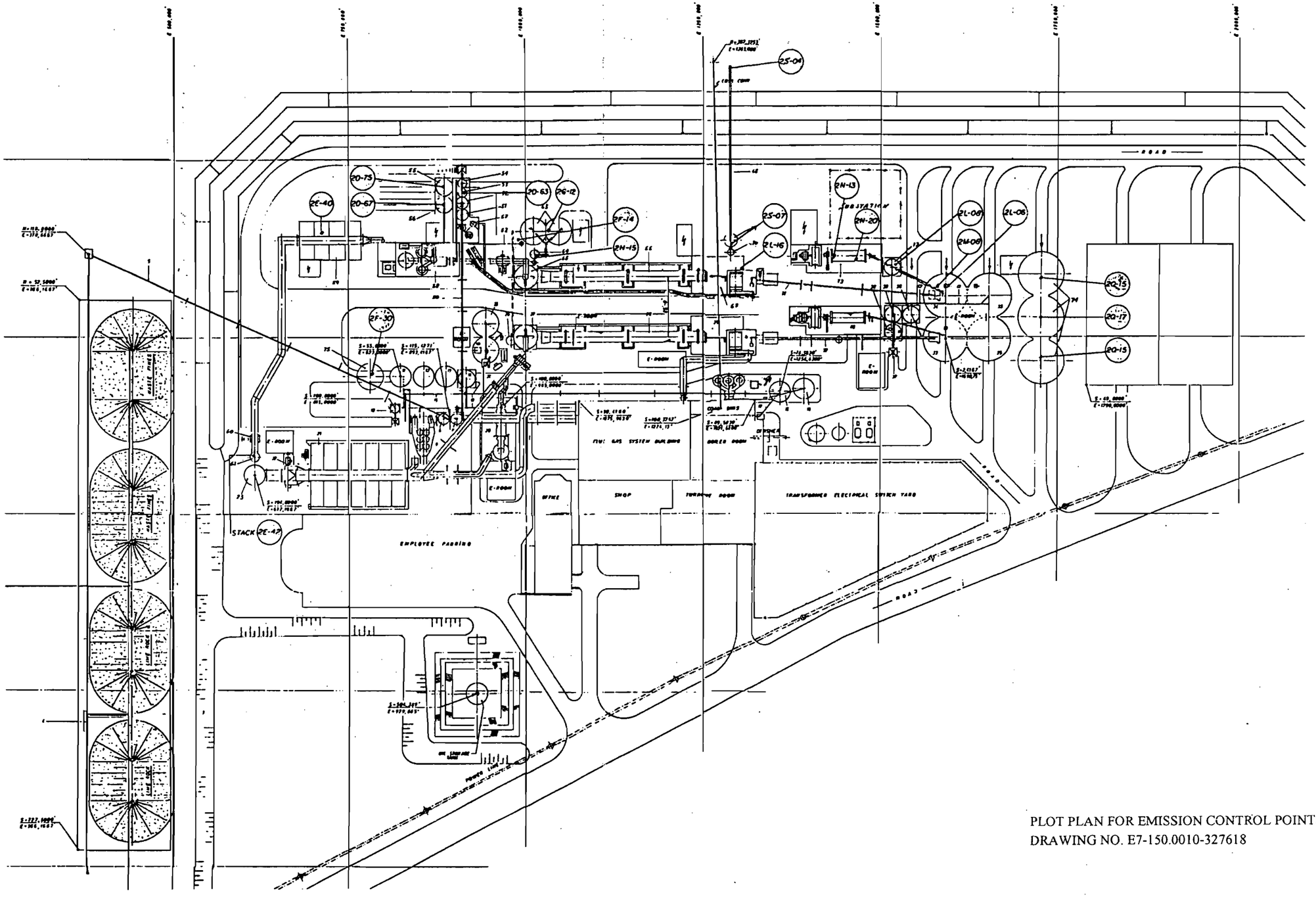

PLOT PLAN FOR EMISSION CONTROL POINTS
DRAWING NO. E7-150.0010-327618

RTP ENVIRONMENTAL ASSOCIATES INC.

SITE PLAN OF FLORIDA CRUSHED STONE

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I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

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

4a. Article Number
Z 751 860 009

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

5. Signature (Addressee)

7. Date of Delivery

6. Signature (Agent)

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

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UNITED STATES POSTAL SERVICE

Sent to: Mr. Tom Mountain	
Street and No.: P. O. Box 1508	
P.O. State and ZIP Code: Brooksville, FL 34605-1508	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date: Mailed: 12/15/94 CPL Power Plant Air Construction Appl.	

PS Form **3800**, March 1993

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- The Return Receipt will show to whom the article was delivered and the date delivered.

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

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

Consult postmaster for fee.

3. Article Addressed to:

Mr. Tom Mountain
Env. Mgr.
Central Power & Lime, Inc.
P.O. Box 150X
Brooksville, FL 34605-150X

4a. Article Number
Z 751 860 021

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

7. Date of Delivery
12-21-94

5. Signature (Addressee)

6. Signature (Agent)

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

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

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UNITED STATES POSTAL SERVICE

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Sent to Mr. Tom Mountain	
Street and No. Env. Mgr.	
P.O., State and ZIP Code Central Power & Lime, Inc.	
Postage P.O. Box 150X	$
Certified Fee Brooksville, FL 34605-150X	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date PSD-FL-090(Aa) Amendment Letter to PSD-FL-090(A) mailed: 12-16-94	

PS Form 3800, March 1993

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

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

Consult postmaster for fee.

3. Article Addressed to:
Joe J. Piermatteo
Sr. Vice President
Central Power & Lime
10311 Cement Plant
Brooksville, Fl 34601

4a. Article Number
Z 311 902 939

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

7. Date of Delivery
4-17-95

5. Signature (Addressee)
X FW Ray

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

6. Signature (Agent)
DH

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

Thank you for using Return Receipt Service.

Z 311 902 939

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

UNITED STATES POSTAL SERVICE

PS Form **3800**, March 1993

Sent to Joe Piermatteo	
Street and No. Central Power & Lime	
P.O., State and ZIP Code Brooksville, Fl	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date 4-13-95	

PA 82-17/PSD-Fl-0920)

Is your RETURN ADDRESS completed on the reverse side?

SENDER:
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I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Joseph J. Piermatteo
Central Power & Lime Inc
10311 Cement Plant Rd
Brooksville, Fl 34601

4a. Article Number
Z 311 902 894

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

7. Date of Delivery
5-26-95

5. Signature (Addressee)

6. Signature ~~(Agent)~~

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

PS Form **3811**, December 1991 ☆U.S.GPO: 1993—352-714 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

Z 311 902 894

Receipt for Certified Mail
No Insurance Coverage Provided
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(See Reverse)

UNITED STATES POSTAL SERVICE

PS Form **3800**, March 1993

Sent to: Joe Piermatteo	
Street and No.: Central Power & Lime	
P.O., State and ZIP Code: Brooksville, Fl	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date 5-23-95	

PSD-FI-092(D)

Is your RETURN ADDRESS completed on the reverse side?

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- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Joseph J. Pirnatteo
Central Power & Line
10311 Cernant Plant Rd
Brooksville, Fl
34601

4a. Article Number
Z 392 979 026

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

7. Date of Delivery
8-22-95

5. Signature (Addressee)

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

6. Signature (Agent)

PS Form **3811**, December 1991 ☆U.S. GPO: 1993—352-714 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

Z 392 979 026

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

UNITED STATES POSTAL SERVICE

PS Form **3800**, March 1993

Sent to: Joe Pirnatteo
Street and No.: Central Power & Line
P.O., State and ZIP Code: Brooksville Fl

Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	8-15-95

PSD-Fl-090

Law Offices
HOLLAND & KNIGHT

A Partnership Including Professional Corporations

315 South Calhoun Street
Suite 600
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Washington, D.C.
West Palm Beach

LAWRENCE N. CURTIN
904-425-5678

March 13, 1995

VIA FACSIMILE

Mr. Clair Fancy
Department of Environmental
Protection
Twin Towers Office Building
2600 Blair Stone Road

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

Dear Clair:

As a follow up to our telephone conversation of February 24, 1995, regarding the application to modify the CP&L permit, this letter constitutes our request to withdraw data relating to sulfur dioxide and nitrogen oxide emissions that resulted from testing at the facility during October 6 through 14, 1994.

Based upon our discussions, we understand that as a result of the analyses of the particulate matter testing information from that same time period, the Department has determined there was a slight increase in actual emissions. The performance test results indicated that this increase is statistically insignificant. The increase is approximately 1.43 pounds per hour in the average emission rate at the higher generation rate. We understand that since this "increase" is less than the regulatory significance level for particulate matter emissions, no PSD review will be required. We request that the allowable emissions contained in the current permits not be modified and that the heat input limitation and the megawatt output be changed in accordance with our earlier requests in the application to modify the permit dated December 9, 1994.

As you are aware, we do not believe the change in the heat input or the output of the facility constitute a modification for purposes of PSD review. Nevertheless, since PSD review will not be required under the Department's interpretation, it is not necessary for us to pursue the question of whether a modification will occur.

Please let us know immediately if you disagree with this approach or if you need additional information. As always, we appreciate your cooperation and assistance.

Sincerely,

HOLLAND & KNIGHT

Lawrence N. Curtin (mrh)

Lawrence N. Curtin

cc: Mr. Tom Mountain
Dr. John Koogler

LNC/mrh
TAL-59528

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

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OF COUNSEL

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

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

February 25, 1994

HAND DELIVERY

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

Re: Florida Crushed Stone Request for Modifications

Dear Clair:

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

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

Sincerely,

C. Anthony Cleveland

CAC:cjb/

Enclosure

KBN

February 25, 1994

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

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

Dear Mr. Cleveland:

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

1. FDEP PSD rules define a modification as "any physical change in, change in the method of operation of, or addition to a stationary source or facility which increases the actual emissions of any air pollutant regulated under...". An increase in the production rate is excluded from this definition unless the change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975. Therefore, information should be requested to factually determine if:

   a. There are any physical modifications to the source (power plant boiler) to achieve the requested increase in power production rate.

   b. The requested changes would constitute a "change in the method of operation" of the facility (it appears this may be the case).

   c. The change is for a change in the "production rate" of the facility (i.e., 1,000 MMBtu/hr), which is prohibited under a federally enforceable permit condition (i.e., PSD permit).

   d. If either a., b. or c. above are affirmative, it must be determined if there is an increase in actual emissions of any regulated pollutant. Existing actual emissions are defined as the actual average emissions from the last two years of operation. These must be compared to the requested future maximum emissions. If the increase in any pollutant is significant, then PSD review would be required.

KBN ENGINEERING AND APPLIED SCIENCES, INC.
Gainesville, Florida
Boca Raton, Florida 33487
Jacksonville, Florida 32225
One Church Street, Suite 801
Rockville, Maryland 20850
301 738 3300

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

Please call if you have any questions concerning this matter.

Sincerely,

David A. Buff

David A. Buff, P.E.
Principal Engineer

cc: Larry Jennings

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

KA 307-93-12

June 17, 1994

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

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

Dear Mr. Brown:

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

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

RESPONSE:

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

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

Chris - Patty
Tried to call him
back if you can
have meeting on
6/28
CJM

Clair: Howdy?
Hope you can meet
with us on Tue (6/28)
at 2.30 pm. We'll try
to explain this issue
in a clearer manner.
See you soon.
Regards, Pradeep

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

RESPONSE:

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

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

RESPONSE:

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

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

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

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

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:PAR:wa

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

TABLE 1

HIGH LOAD OPERATING DATA

CENTRAL POWER AND LIME, INC.
BROOKSVILLE, FLORIDA

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

NOTE: (1) Net delivered MW is determined after taking into account the line loss. Typically the net MW at the plant would be about 3.5 MW higher.

(2) The maximum allowed coal use for the power plant is determined by multiplying the nominal use of 62.5 tons per hour (TPH) by 10 percent, or 68.8 TPH.

(3) It should be noted that the above documented operation rate is within 10% of the requested certification limit of 150 MW net delivered.

(4) Although there is no direct/simple correlation between the coal use, heat input, power generation rate, and emission rates, the demonstration of compliance with permit limits is possible with continuous monitors.

KOOGLER & ASSOCIATES

KOOGLER & ASSOCIATES
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RECEIVED
NOV 2 1994
Bureau of
Air Regulation

KA 308-94-05

November 1, 1994

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

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

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

Dear Mr. Fancy and Mr. Oven:

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

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

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

Bruce 11/2

You might want to see if Mikes people can review (maybe Marty could do it). Need to coordinate with Buck on this.

Claire

11-4-94

Patty, I need to discuss this project with you - do we have a copy that we can give to Mike's group to evaluate?

Ben

Bruce - 11-3

Mike can use the file copy if he'll return it to us - We always does - Let me know.

Patty

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

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

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:wa
Enc.

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