

## Scearce, Lynn

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**From:** Scearce, Lynn  
**Sent:** Friday, December 16, 2011 4:30 PM  
**To:** 'tony.d.hopkins@jpmorgan.com'  
**Cc:** 'jdaniel@cemexusa.com'; 'gperko@hgslaw.com'; 'sosbourn@golder.com'; 'Mulkey, Cindy'; Zhang-Torres (Cindy.Zhang-Torres@dep.state.fl.us); 'forney.kathleen@epa.gov'; 'ceron.heather@epa.gov'; 'aharvey@earthjustice.org'; Read, David; Linero, Alvaro; Friday, Barbara; Scearce, Lynn; Koerner, Jeff  
**Subject:** 0530380-001-AC, Florida Power Development, LLC, Brooksville Power Plant, Draft Permit  
**Attachments:** 0530380-001-AC - FPD Written Intent - Signed.pdf

Tracking:	Recipient	Delivery
	'tony.d.hopkins@jpmorgan.com'	
	'jdaniel@cemexusa.com'	
	'gperko@hgslaw.com'	
	'sosbourn@golder.com'	
	'Mulkey, Cindy'	
	Zhang-Torres (Cindy.Zhang-Torres@dep.state.fl.us)	Delivered: 12/16/2011 4:30 PM
	'forney.kathleen@epa.gov'	
	'ceron.heather@epa.gov'	
	'aharvey@earthjustice.org'	
	Read, David	Delivered: 12/16/2011 4:30 PM
	Linero, Alvaro	Delivered: 12/16/2011 4:30 PM
	Friday, Barbara	Delivered: 12/16/2011 4:31 PM
	Scearce, Lynn	Delivered: 12/16/2011 4:30 PM
	Koerner, Jeff	Delivered: 12/16/2011 4:31 PM
	Mulkey, Cindy	Delivered: 12/16/2011 4:30 PM

Dear Mr. Hopkins:

Attached is the official **Notice of Draft Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

*\*\*Please notice your permit is electronically signed and is also PDF searchable.*

*Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

Owner/Company Name: FLORIDA POWER DEVELOPMENT, LLC  
Facility Name: BROOKSVILLE POWER PLANT  
Project Number: 0530380-001-AC  
Permit Status: DRAFT  
Permit Activity: CONSTRUCTION  
Facility County: HERNANDO

Click on the following link to access the permit project documents:  
[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0530380.001.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0530380.001.AC.D_pdf.zip)

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

Regards,

**Lynn Searce**

Office of Permitting and Compliance (OPC)

Division of Air Resources Management

850-717-9025



## P.E. CERTIFICATION STATEMENT

### PERMITTEE

Florida Power Development, LLC  
700 Louisianan, Suite 1000  
Houston, Texas 34601

Authorized Representative:  
Mr. Daniel A. Hopkins

DEP Files No. 0530380-001-AC (PSD-FL-90E)

Expires: December 31, 2014

Brooksville Power Plant  
Woody Biomass Conversion Project  
Hernando County

### PROJECT DESCRIPTION

Florida Power Development proposes to convert the existing coal-fueled 150 MW Brooksville Power Plant to a 70 to 80 MW woody biomass-fueled power plant. The project includes: new fuel storage and handling systems; conversion of the pulverized coal boiler to a grate-suspension boiler; and construction of air pollution control equipment and an approximate 165-foot stack distinct from the baghouse and stack currently shared with co-located CEMEX cement plant.

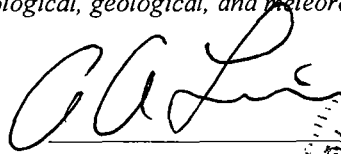
A review pursuant to the rules for Prevention of Significant Deterioration (PSD) and a determination of best available control technology pursuant to Rule 62-212.400, F.A.C. were not required. A separate Facility Identification No. (0530380) will be established by this project for the Brooksville Power Plant. The original PSD permit (PSD-FL-090) issued by the U.S. Environmental Protection Agency (EPA) for the power plant portion of the integrated power and cement facility will also be revised by this action to reflect the separation of the two plants and the resulting separate facility identification numbers.

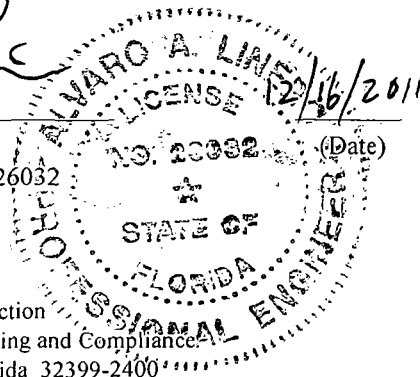
The fuel feedstock for the project will consist of clean woody biomass which will be locally sourced and will be delivered by truck to the Brooksville Power Plant. Ultra-low sulfur distillate fuel oil and natural gas will be used for biomass boiler startup, shutdown and bed stabilization. Ultra-low sulfur distillate fuel oil will also be used in the existing emergency equipment that consists of an emergency generator and an emergency ditch pump engine. The project will not result in PSD-significant emissions. The project is a major source of hazardous air pollutants (HAP) and the biomass boiler is ultimately subject to 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters and Commercial and Industrial Solid Waste Incineration. Subpart DDDDD has been delayed by EPA until the proceedings for judicial review of the rules are completed or the EPA completes its reconsideration of the rule. If, and when, Subpart DDDDD comes into force, the biomass boiler must meet its applicable requirements for existing units.

Emissions will be limited by the efficient combustion of clean low sulfur woody biomass in the boiler; particulate removal in a new electrostatic precipitator; SO<sub>2</sub>, and other acid gas removal by an in-duct sorbent injection system in conjunction with the electrostatic precipitator; NO<sub>x</sub> destruction by a selective catalytic reduction system; and carbon CO, volatile organic compounds and organic HAP destruction by an oxidation catalyst system. Best management practices will be implemented to minimize fugitive dust emissions from biomass and ash handling, storage, processing and conveyance. Continuous emissions monitoring systems will be required for SO<sub>2</sub>, NO<sub>x</sub> and CO. A continuous opacity monitoring system will be required for visible emissions.

[www.dep.state.fl.us/air/emission/bioenergy/central\\_power.htm](http://www.dep.state.fl.us/air/emission/bioenergy/central_power.htm)

*I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Chapters 62-4 and 62-204 through 62-297, F.A.C. However, I have not evaluated and I do not certify any other aspects of the proposal (including, but not limited to, the electrical, civil, mechanical, structural, hydrological, geological, and meteorological features).*

  
A. A. Linero, P.E.  
Registration Number 26032



**Scearce, Lynn**

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**From:** Gary Perko [GaryP@hgslaw.com]  
**To:** Scearce, Lynn  
**Sent:** Friday, December 16, 2011 4:30 PM  
**Subject:** Read: 0530380-001-AC, Florida Power Development, LLC, Brooksville Power Plant, Draft Permit

Your message was read on Friday, December 16, 2011 4:30:17 PM (GMT-05:00) Eastern Time (US & Canada).

## Friday, Barbara

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**From:** Langston.David@epamail.epa.gov  
**Sent:** Tuesday, December 13, 2011 7:48 AM  
**To:** Friday, Barbara  
**Subject:** Re: CEMEX Construction Materials Florida, L.L.C, Brooksville South Cement Plant; 0530021-037-AC

Thank you.

David Langston  
Sr. Environmental Engineer  
RCRA Programs  
404-562-8478  
[langston.david@epa.gov](mailto:langston.david@epa.gov)

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**From:** "Friday, Barbara" <[Barbara.Friday@dep.state.fl.us](mailto:Barbara.Friday@dep.state.fl.us)>  
**To:** "'jdaniel@cemexusa.com'" <[jdaniel@cemexusa.com](mailto:jdaniel@cemexusa.com)>  
**Cc:** "'gtownsend@cemexusa.com'" <[gtownsend@cemexusa.com](mailto:gtownsend@cemexusa.com)>, "'mlee@kooglerassociates.com'" <[mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com)>, Zhang-Torres <[Cindy.Zhang-Torres@dep.state.fl.us](mailto:Cindy.Zhang-Torres@dep.state.fl.us)>, Kathleen Forney/R4/USEPA/US@EPA, Heather Ceron/R4/USEPA/US@EPA, Ana Oquendo/R4/USEPA/US@EPA, David Langston/R4/USEPA/US@EPA, "Searce, Lynn" <[Lynn.Searce@dep.state.fl.us](mailto:Lynn.Searce@dep.state.fl.us)>, "Friday, Barbara" <[Barbara.Friday@dep.state.fl.us](mailto:Barbara.Friday@dep.state.fl.us)>, "DeVore, Christy" <[Christy.DeVore@dep.state.fl.us](mailto:Christy.DeVore@dep.state.fl.us)>, "Arif, Syed" <[Syed.Arif@dep.state.fl.us](mailto:Syed.Arif@dep.state.fl.us)>  
**Date:** 12/09/2011 09:49 AM  
**Subject:** CEMEX Construction Materials Florida, L.L.C, Brooksville South Cement Plant; 0530021-037-AC

Dear Mr. Daniel :

Attached is the official Final Permit for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

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Attention: Christy DeVore

Owner/Company Name: CEMEX CONSTRUCTION MATERIALS FLORIDA, LLC Facility Name: CEMEX  
BROOKSVILLE S. CEMENT & POWER PLANT Project Number: 0530021-037-AC Permit Status: FINAL  
Permit Activity: CONSTRUCTION Facility County: HERNANDO

Click on the following link to access the permit project documents:

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0530021.037.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0530021.037.AC.F_pdf.zip)

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<<http://www.adobe.com/products/acrobat/readstep.html>> .

Regards,

Barbara Friday

Office of Permitting and Compliance (OPC) Division of Air Resources Management  
850-717-9095

Please take a few minutes to share your comments on the service you received from the department by clicking on this link DEP Customer Survey.

[attachment "0530021-037-AC - CEMEX TF Extension - Signed.pdf" deleted by David Langston/R4/USEPA/US]

## Friday, Barbara

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**From:** Zhang-Torres  
**To:** Friday, Barbara  
**Sent:** Monday, December 12, 2011 10:20 AM  
**Subject:** Read: CEMEX Construction Materials Florida, L.L.C, Brooksville South Cement Plant; 0530021-037-AC

Your message was read on Monday, December 12, 2011 10:20:04 AM (GMT-05:00) Eastern Time (US & Canada).

## Scearce, Lynn

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**From:** Hopkins, Tony D [tony.d.hopkins@jpmorgan.com]  
**Sent:** Friday, December 16, 2011 4:31 PM  
**To:** Scearce, Lynn  
**Subject:** Read: 0530380-001-AC, Florida Power Development, LLC, Brooksville Power Plant, Draft Permit  
**Attachments:** ATT00001

Your message was read on Friday, December 16, 2011 4:30:40 PM (GMT-05:00) Eastern Time (US & Canada).

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## Scearce, Lynn

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**From:** Hopkins, Tony D [tony.d.hopkins@jpmorgan.com]  
**Sent:** Sunday, December 18, 2011 10:37 PM  
**To:** Scearce, Lynn  
**Subject:** RE: 0530380-001-AC, Florida Power Development, LLC, Brooksville Power Plant, Draft Permit

This is to verify I can see the documents.

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**Tony Hopkins** | Executive Director | Global Commodities | Principal Investments | **J.P. Morgan**  
700 Louisiana, Suite 1000 Houston, TX 77002 | T: 713-236-3046 | F: 713-250-3005 | C: 832-452-6553 | [tony.d.hopkins@jpmorgan.com](mailto:tony.d.hopkins@jpmorgan.com)

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**From:** Scearce, Lynn [<mailto:Lynn.Scearce@dep.state.fl.us>]  
**Sent:** Friday, December 16, 2011 3:30 PM  
**To:** Hopkins, Tony D  
**Cc:** [jdaniel@cemexusa.com](mailto:jdaniel@cemexusa.com); [gperko@hgslaw.com](mailto:gperko@hgslaw.com); [sosbourn@golder.com](mailto:sosbourn@golder.com); Mulkey, Cindy; Zhang-Torres; [forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov); [ceron.heather@epa.gov](mailto:ceron.heather@epa.gov); [aharvey@earthjustice.org](mailto:aharvey@earthjustice.org); Read, David; Linero, Alvaro; Friday, Barbara; Scearce, Lynn; Koerner, Jeff  
**Subject:** 0530380-001-AC, Florida Power Development, LLC, Brooksville Power Plant, Draft Permit

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Facility Name: BROOKSVILLE POWER PLANT  
Project Number: 0530380-001-AC  
Permit Status: DRAFT  
Permit Activity: CONSTRUCTION  
Facility County: HERNANDO

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Regards,

**Lynn Searce**

Office of Permitting and Compliance (OPC)

Division of Air Resources Management

850-717-9025



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**Scearce, Lynn**

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**From:** Daniel, James S. (Jim) [JDaniel@cemexusa.com]  
**To:** Scearce, Lynn  
**Sent:** Friday, December 16, 2011 8:42 PM  
**Subject:** Read: 0530380-001-AC, Florida Power Development, LLC, Brooksville Power Plant, Draft Permit

Your message was read on Friday, December 16, 2011 8:41:55 PM (GMT-05:00) Eastern Time (US & Canada).