



Via Email

David Read, P.E.
Division of Air Resource Management
Florida Dept. of Environmental Protection
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RE: Florida Power Development LLC's Brooksville Power Plant
Facility ID No. 0530380, Title V Permit No. 0530380-002-AV

Dear David:

On behalf of Florida Power Development LLC (FPD), I want to thank you for your timely assistance with the air permitting matter we raised on a telephone call to you late last week. As we mentioned on the call, FPD has contracted with Tateswood Energy, LLC to perform asset management functions to support the Brooksville Power Plant. We very much appreciate your attention to this matter and helping us with an efficient resolution. As we mentioned on the call, FPD seeks clarification and confirmation from the Department that as long as the biomass-fired boiler at the Brooksville Power Plant is meeting its permitted emission limit for carbon monoxide, the operator is not required to utilize the oxidation catalyst.

As you know, FPD proposed to use an oxidation catalyst as part of the biomass conversion project for the Brooksville Power Plant. FPD installed the oxidation catalyst in October 2013, which is when the plant first started up the boiler after its conversion from firing coal to firing biomass. Because of particulate matter dusting and plugging, FPD removed the oxidation catalyst a few weeks later in November 2014. As we mentioned on our call, while FPD worked to improve the electrostatic precipitator's (ESP's) particulate matter removal efficiency, it became prudent and necessary for the plant to remove the catalyst, at least temporarily.

Work on the ESP and particulate matter removal efficiencies continued through the end of June 2014 when the operator took the boiler offline for repairs. The boiler has been out of service since that time, and FPD expects to complete its repairs and start up the boiler again in late January 2015. The boiler operated with the catalyst in place for 22 days (including partial days) and without the catalyst in place for 163 days (again, including partial days). Operation of the boiler without the catalyst in place provided us with helpful information on the extent to which the oxidation catalyst might or might not be needed to ensure compliance with the permitted carbon monoxide (CO) emission limit (40.5 pounds per hour, 12-month rolling average). As confirmed in the permitting note, the Department included the CO limit at the applicant's request to avoid triggering the Prevention of Significant Deterioration—not as the result of an applicable requirement.

Based on certified CEMS data, the boiler can meet the voluntary 12-month rolling average CO emission limit without the catalyst in place. The average pound-per-hour emissions were about 20 to 25 percent below the annual average limit following certification of the CEMS (the period of

April, May, and June 2014). To ensure that there are no compliance concerns related to non-use of the catalyst, however, FPD requests confirmation from the Department that use of the catalyst is not required if the CO limit is otherwise achievable. Specifically, we are seeking clarification that the plant is required to use and maintain the oxidation catalyst *only* to the extent needed to comply with the long-term CO limit.

As we have discussed, other permits (as well as the Brooksville Power Plant's permits) include language making it clear that use of control equipment, such as sorbent injection, is required only to the extent necessary for compliance. This type of discretion is particularly appropriate, we understand, when the associated emission limit is voluntary and not a technology-based limit (such as those associated with PSD permits). Because the Brooksville Power Plant's CO limit is voluntary and the certified CEMS data demonstrates that the boiler is capable of meeting the limit without the catalyst in place, the plant should have the flexibility use the catalyst only when needed to meet the limit.

Due to the particular wording of the permit regarding operation and maintenance of the oxidation catalyst, and our concerns regarding potential interpretation of the condition, we respectfully request that the Department clarify and confirm in writing that the plant is required to operate and maintain the oxidation catalyst only when necessary to meet the permitted CO limit.

We sincerely appreciate your continued cooperation and assistance with this matter. If you have any questions or if we can provide any further information, please do not hesitate to contact us. Dave Hermanson can be reached at 630-800-0214, dhermanson@tateswood.com, and Larry Roberts, the Brooksville Power Plant's Responsible Official, can be reached at 352-799-7881 x110, lroberts@deltapowerservices.com.

Sincerely,



David J. Hermanson, Asset Manager, Tateswood Energy
On Behalf of Florida Power Development LLC

Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Larry Roberts, Responsible Official
Florida Power Development LLC, Brooksville Power Plant

cc: Syed Arif, P.E., Division of Air Resource Management, DEP
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