



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

July 27, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Gary Lambert  
Executive Vice President  
CPV Gulfcoast, Ltd  
35 Braintree Hill Office Park, Suite 107  
Braintree, Massachusetts 02184

Re: DEP File No. 0810194-002-AC (PSD-FL-300A)  
Zero Liquid Discharge System

Dear Mr. Lambert:

The applicant, CPV Gulfcoast, applied on April 19, 2001, to the Department for a modification to air construction permit number PSD-FL-300 for its combined cycle power plant located at Manatee, County. The modification is to construct/install a Zero Liquid Discharge (ZLD) System. The Department has reviewed the modification request. The referenced permit is hereby modified as follows:

New Specific Condition 51:

A Zero Liquid Discharge (ZLD) System may be installed as part of the combined cycle facility. The ZLD system shall comply with the characteristics described in CPV's application dated April 19, 2001.

In addition, the expiration date of Section II, Specific Condition 11 is revised to read:

BACT Determination: In conjunction with extension of the 18 month periods to commence or continue construction, the extension of the December 30, 2002 3 permit expiration date, or any increases in MW generated by steam, heat input limits, hours of operation, oil firing, low or baseload operation, short-term or annual emission limits, annual fuel heat input limits or similar changes; the permittee may be required to demonstrate the adequacy of any previous determination of best available control technology for the source. [40 CFR 52.21(j)(4); 40CFR 51.166(j) and Rule 62-4.070 F.A.C.]

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit modification) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

Howard L. Rhodes, Director  
Division of Air Resources  
Management

"More Protection, Less Process"

Printed on recycled paper.

Mr. Gary Lambert  
Page 2 of 2  
July 20, 2001

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this permit modification was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 4/3/01 to the person(s) listed:

cc: Gary Lambert, CPV  
Gregg Worley, EPA  
John Bunyak, NPS  
Cathy Sellers, Esquire  
Bill Thomas, SWD  
Marion Forthoffer, Manatee County  
Scott Sumner, P.E.

**FINAL DETERMINATION**  
**File No. 0810194-002 AC (PSD-FL-300A)**  
**CPV – GULFCOAST POWER GENERATING FACILITY**  
**245 MW NOMINAL COMBINED CYCLE FACILITY**

The Department distributed a Public Notice package on June 5, 2001 for the project to construct a Zero Liquid Discharge (ZLD) System at the CPV electrical power generating plant near Piney Point in Manatee County. The Public Notice of Intent to Issue was published on June 14, 2001 in The Bradenton Herald.

No written comments were received during the initial 30-day public comment period. Previously, CPV verbally requested to revise the permit expiration date stated in Section II, Specific Condition 11 of the permit. The Department agreed with CPV request and changed the expiration date to 2003.

The final action of the Department is to issue the permit with the changes noted above.

Florida Department of  
Environmental Protection

Memorandum

---

TO: Howard L. Rhodes  
THRU: CLAIR FAWLY  
THRU: A.A. Linero  
FROM: Teresa Heron  
DATE: July 20, 2001  
SUBJECT: CPV Gulfcoast Power Generating Facility  
Zero Liquid Discharge (ZLD) System  
DEP File No.0810194-002-AC (PSD-FL-300A)

BAK

---

Attached is the final permit modification for the construction of a Zero Liquid Discharge System (ZLD) at the CPV Gulfcoast Power Generating facility near Piney Point, Manatee County.

The basic unit is the waste water treatment system which includes two mechanical forced draft cooling towers.

Emissions of particulate matter (PM/PM<sub>10</sub>) will be very low, it is estimated at 4.11 tons/yr. This increase in annual PM<sub>10</sub> emissions is less than the major source modification threshold for PSD permitting. The predicted emission rate is based on a continuous 3,750 gallons/minute circulating flow rate.

The original permit, PSD-FL-300, was issued on February 5, 2001.

Day 90 is August 12, 2001 so we are well ahead of schedule. We recommend your signature and approval of this permit modification.

AAL/th

Attachments

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Gary Lambert  
 Executive Vice President  
 CPV Gulfcoast, Ltd.  
 35 Braintree Hill Office Park  
 Suite 107  
 Braintree, MA 02184

2. Article Number (Copy from service label)

7000 2870 0000 7028 2829

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) B. Date of Delivery

11/19/01

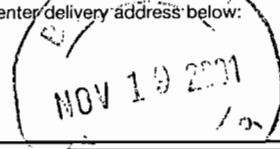
C. Signature

x C. P. V.

- Agent
- Addressee

D. Is delivery address different from item 1? If YES, enter delivery address below:

- Yes
- No



3. Service Type

- Certified Mail
- Express Mail
- Registered
- Return Receipt for Merchandise
- Insured Mail
- C.O.D.

4. Restricted Delivery? (Extra Fee)

- Yes

**U.S. Postal Service  
CERTIFIED MAIL RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

7000 0600 0026 4129 9204

Mr. Gary Lambert

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark Here

Recipient's Name (Please Print Clearly) (to be completed by mailer)

CPV Gulfcoast Ltd.  
 Street, Apt. No.; or PO Box No.  
 35 Braintree Hill Office Park ste. 107  
 City, State, ZIP+4  
 Braintree, MA 02184

PS Form 3800, February 2000

See Reverse for Instructions

# BRADENTON HERALD

www.bradenton.com  
P.O. Box 921  
Bradenton, FL 34206-0921  
102 Manatee Avenue West  
Bradenton, FL 34205-8894  
941/748-0411 ext. 7065


Bradenton Herald  
Published Daily  
Bradenton, Manatee, Florida

STATE OF FLORIDA  
COUNTY OF MANATEE;

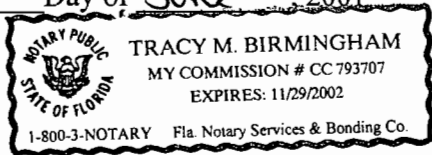
Before the undersigned authority personally appeared Sheila Dalesio, who on oath says that she is a Legal Advertising Representative of the Bradenton Herald, a daily newspaper published at Bradenton in Manatee County, Florida; that the attached copy of the advertisement, being a Legal Advertisement in the matter of PUBLIC NOTICE OF INTENT TO ISSUE PERMIT in the Court, was published in said newspaper in the issues of JUNE 14, 2001.

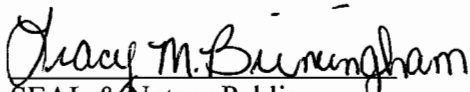
Affiant further says that the said publication is a newspaper published at Bradenton, in said Manatee County, Florida, and that the said newspaper has heretofore been continuously published in said Manatee County, Florida, each day and has been entered as second-class mail matter at the post office in Bradenton, in said Manatee County, Florida for a period of 1 year next preceding the first publication of the attached copy of advertisement; and affiant further says that she 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.

See  
Back  
of  
Sheet

  
(Signature of Affiant)

Sworn to and subscribed before me this  
14<sup>th</sup> Day of June 2001



  
SEAL & Notary Public

Personally Known  OR Produced Identification   
Type of Identification Produced \_\_\_\_\_

**PUBLIC NOTICE OF  
INTENT TO ISSUE AIR  
CONSTRUCTION  
PERMIT**

**STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL  
PROTECTION**

**DEP File No.  
0810194-002-AC and  
PSD-FL-300A**

**CPV Gulfcoast Power  
Generating Facility  
Zero Liquid Discharge  
(ZLD) System  
Manatee County**

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to CPV Gulfcoast Ltd. The permit is to construct a Zero Liquid Discharge (ZLD) System at the CPV electrical power generating plant near Piney Point in Manatee County. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. Prevention of Significant Deterioration of Air Quality (PSD), for emissions of particulate matter (PM/PM10). The applicant's name and address are CPV Gulfcoast Ltd., 35 Bristol Road, Suite 101, Easton, Massachusetts 02375.

The project consists of the installation of a Zero Liquid Discharge (ZLD) System. The ZLD system will result in an additional source of particulate emissions. These additional emissions will result from the waste water treatment system, which includes two mechanical forced draft cooling towers. As with the already permitted five cell cooling tower, the waste water towers will experience cooling tower drift with attendant emissions of dissolved solids contained in the water droplet drift. Although the waste water towers will be equipped with state-of-the-art drift eliminators designed to achieve a drift rate of 0.0005% of the circulating water flow, the higher dissolved solids concentration in the circulating water results in higher emission rates. Total annual emissions for the ZLD system are predicted to be 4.11 tons/yr.

An air quality impact analysis was conducted. Maximum impacts due to proposed emissions from the project are less than the applicable PSD Class II significant impact levels for all applicable pollutants. Therefore no increment consumption analysis was required. Emissions from the facility will not cause or contribute to a violation of any state or federal ambient air quality standards. The

notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28.106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) a concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this

project has no significant impact on the PSD Class I Chassahowitzka National Wilderness Area.

The Department will issue the FINAL permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of "Public Notice of Intent to Issue Air Construction Permit." Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice sections 120.60F(3) of the Florida statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that

notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file 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:

**Dept. of Environmental Protection Bureau of Air Regulation**  
111 S. Magnolia Dr, Ste 4  
Tallahassee, FL 32301  
Ph. (850) 488-1344  
Fax: (850) 922-6979

**Dept. of Environmental Protection Southwest District Office**  
3804 Coconut Drive  
Tampa, FL 33619-8218  
Ph. (813) 744-6100

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information. The Department's technical evaluations and Draft Permit can be viewed at [www.dep.state.fl.us/air/permitting.htm](http://www.dep.state.fl.us/air/permitting.htm) by clicking on Utility and Other Facility Permits. 6/14/01

**PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT**

**STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION**

DEP File No. 0810194-002-AC and PSD-FL-300A

**CPV Gulfcoast Power Generating Facility Zero Liquid Discharge (ZLD) System Manatee County**

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to CPV Gulfcoast Ltd. The permit is to construct a Zero Liquid Discharge (ZLD) System at the CPV electrical power generating plant near Piney Point in Manatee County. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. Prevention of Significant Deterioration of Air quality (PSD), for emissions of particulate matter (PM/PM10). The applicant's name and address are CPV Gulfcoast Ltd., 35 Bristol Road, Suite 101, Easton, Massachusetts 02375.

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An air quality impact analysis was conducted. Maximum impacts due to proposed emissions from the project are less than the applicable PSD Class II significant impact levels for all applicable pollutants. Therefore no increment consumption analysis was required. Emissions from the facility will not cause or contribute to a violation of any state or federal ambient air quality standards. The

**Legals 4995**

project has no significant impact on the PSD Class Chassahowitzka National Wilderness Area.

The Department will issue the FINAL permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of "Public Notice of Intent to Issue Air Construction Permit." Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice sections 120.60F(3) of the Florida statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition, within fourteen

days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28.106.205 of the Florida Administrative Code.

A petition that disputes the material facts upon which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) a concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this

**Legals 4995**

notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file 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:

**Dept. of Environmental Protection Bureau of Air Regulation**  
111 S. Magnolia Dr. Ste 4  
Tallahassee, FL 32301  
Ph. (850) 488-1344  
Fax: (850) 922-6979

**Dept. of Environmental Protection Southwest District Office**  
3804 Coconut Drive  
Tampa, FL 33619-8218  
Ph. (813) 744-6100

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information. The Department's technical evaluations and Draft Permit can be viewed at [www.dep.state.fl.us/air/permitting.htm](http://www.dep.state.fl.us/air/permitting.htm) by clicking on Utility and Other Facility Permits. 9/14/01



The Law Offices of  
**MOYLE  
FLANIGAN  
KATZ  
KOLINS  
RAYMOND  
& SHEEHAN  
P.A.**

**THE PERKINS HOUSE  
118 NORTH GADSDEN STREET  
TALLAHASSEE, FLORIDA 32301**

**TELEPHONE (850) 681-3828  
FACSIMILE (850) 681-8788**

West Palm Beach Office  
Telephone (561) 659-7500  
Facsimile (561) 659-1789

PETER L. BRETON  
JOHN R. EUBANKS, JR.  
JOHN F. FLANIGAN  
MYRA GENDEL  
MARTIN V. KATZ  
RONALD K. KOLINS  
PAUL A. KRASKER  
JON C. MOYLE  
JON C. MOYLE, JR.  
MARK E. RAYMOND  
MICHAEL J. SABATELLO, IV  
THOMAS A. SHEEHAN, III  
ROBERT J. SNIFFEN  
MARTA M. SUAREZ-MURIAS  
WILTON L. WHITE  
BRIAN L. WOLINETZ

OF COUNSEL:  
WILLIAM J. PAYNE  
CATHY M. SELLERS

June 18, 2001

VIA HAND DELIVERY

RECEIVED

JUN 18 2001

BUREAU OF AIR REGULATION

Mr. Alvaro A. Linero  
Administrator,  
New Source Review Section  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blairstone Road  
Tallahassee, FL 32399-2400

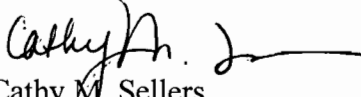
Re: CPV Gulfcoast, Ltd., DEP File No. 0810194-002-AC and PSD-FL-300  
Proof of Publication of Public Notice of Intent to Issue Air Construction Permit

Dear Mr. Linero:

On behalf of CPV Gulfcoast, Ltd., please find attached for your files the Proof of Publication for the Public Notice of Intent to Issue Air Construction Permit, which was published in the legal notices section of the Bradenton Herald on June 14, 2001, and the related Affidavit of Publication.

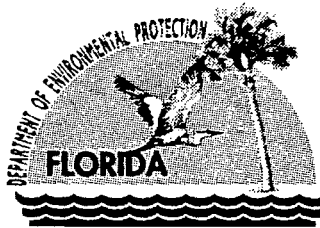
Please contact me if you have any questions.

Sincerely,

  
Cathy M. Sellers

cc: Sean Finnerty, CPV Gulfcoast Ltd.

*J. Heron*  
*C. Halladay*  
*B. Thomas, SWD*  
*D. Worley, EPA*  
*G. Benyah, NPS*



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

June 4, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Gary Lambert, Executive Vice President  
CPV Gulfcoast, Ltd  
35 Bristol Road, Suite 101  
Easton, MA 023750

Re: DEP File No. 0810194-002-AC (PSD-FL-300A)  
CPV Gulfcoast Power Generating Facility  
Zero Liquid Discharge System

Dear Mr. Lambert:

Enclosed is one copy of the Technical Evaluation and Preliminary Determination, and Draft Permit Modification, for the CPV Gulfcoast Power Generating Facility to be located near Piney Point in Manatee County. The Department's Intent to Issue Air Construction Permit and the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" are also included.

The "PUBLIC NOTICE" must be published one time only as soon as possible in a newspaper of general circulation in the area affected, pursuant to Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (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.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any questions, please call Teresa Heron at 850/921-9529.

Sincerely,

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

CHF/th

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

In the Matter of an  
Application for Permit by:

Mr. Gary Lambert, Executive Vice President  
CPV Gulfcoast, Ltd.  
45 Bristol Road, Suite 101  
Easton, MA 02375

DEP File No. 0810194-002-AC and PSD-FL-300A  
Zero Liquid Discharge System  
Manatee County

---

### INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit (copy of DRAFT Permit attached) for the proposed project, detailed in the application specified above and the attached Technical Evaluation and Preliminary Determination, for the reasons stated below.

The applicant, CPV Gulfcoast, Ltd, applied on April 19, 2001, to the Department to construct/install a Zero Liquid Discharge System (ZLD) as part of the already permitted combined cycle facility. The project will be located at this facility new site near Piney Point in Manatee County.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit is required to perform proposed work. The Department intends to issue this air construction permit based on the belief that the applicant has provided reasonable assurances to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "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. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114 / Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of Public Notice of Intent to Issue Air Construction Permit. Written comments and requests for public meetings should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that 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 such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Mediation is not available in this proceeding. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of

the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.



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

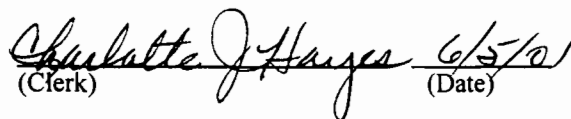
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AIR CONSTRUCTION PERMIT (including the PUBLIC NOTICE, Technical Evaluation and Preliminary Determination, and the DRAFT permit) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 6/5/01 to the person(s) listed:

Gary Lambert, CPV Gulfcoast, Ltd.\*  
Gregg Worley, EPA  
John Bunyak, NPS  
Cathy Sellers, Esquire  
Bill Thomas, DEP SWD  
Chair, Manatee County BCC\*  
Marion Forthoffer, Manatee County EMD  
Scott Sumner, P.E.

Clerk Stamp

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

  
(Clerk) (Date)

**PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT**

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0810194-002-AC and PSD-FL-300A

CPV Gulfcoast Power Generating Facility  
Zero Liquid Discharge (ZLD) System

Manatee County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to CPV Gulfcoast Ltd. The permit is to construct a Zero Liquid Discharge (ZLD) System at the CPV electrical power generating plant near Piney Point in Manatee County. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C., Prevention of Significant Deterioration of Air Quality (PSD), for emissions of particulate matter (PM/PM<sub>10</sub>). The applicant's name and address are CPV Gulfcoast Ltd., 35 Bristol Road, Suite 101, Easton, Massachusetts 02375.

The project consists of the installation of a Zero Liquid Discharge (ZLD) System. The ZLD system will result in an additional source of particulate emissions. These additional emissions will result from the waste water treatment system, which includes two mechanical forced draft cooling towers. As with the already permitted five-cell cooling tower, the waste water towers will experience cooling tower drift with attendant emissions of dissolved solids contained in the water droplet drift. Although the waste water towers will be equipped with state-of-the-art drift eliminators designed to achieve a drift rate of 0.0005% of the circulating water flow, the higher dissolved solids concentration in the circulating water results in higher emission rates. Total annual emissions for the ZLD system are predicted to be 4.11 tons/yr.

An air quality impact analysis was conducted. Maximum impacts due to proposed emissions from the project are less than the applicable PSD Class II significant impact levels for all applicable pollutants. Therefore no increment consumption analysis was required. Emissions from the facility will not cause or contribute to a violation of any state or federal ambient air quality standards. The project has no significant impact on the PSD Class I Chassahowitzka National Wilderness Area.

The Department will issue the FINAL permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of "Public Notice of Intent to Issue Air Construction Permit." Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station # 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent

intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that 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 such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file 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:

Dept. of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida, 32301  
Telephone: (850)488-1344  
Fax: (850)922-6979

Dept. of Environmental Protection  
Southwest District Office  
3804 Coconut Drive  
Tampa, Florida 33619-8218  
Telephone: (813)744-6100  
Fax: (813)744-6084

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information. The Department's technical evaluations and Draft Permit can be viewed at [www.dep.state.fl.us/air/permitting.htm](http://www.dep.state.fl.us/air/permitting.htm) by clicking on Utility and Other Facility Permits.

TECHNICAL EVALUATION  
AND  
PRELIMINARY DETERMINATION

CPV Gulfcoast, Ltd.

Zero Liquid Discharge System for a  
245-Megawatt Combined Cycle Unit

Manatee County

Facility I.D. No. 0810194-002-AC  
PSD-FL-300A

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

May 25, 2001



# TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

## 1. APPLICATION INFORMATION

### 1.1 Applicant Name and Address

CPV Gulfcoast, Ltd.  
 35 Bristol Road, Suite 101  
 Easton, MA 02375

Authorized Representative: Mr. Gary Lambert, Executive Vice President

### 1.2 Reviewing and Process Schedule

04-19-01: Date of Receipt of Application  
 05-14-01: Received Additional information  
 05-24-01: Intent to Issue PSD Permit

## 2. FACILITY INFORMATION

### 2.1 Facility Location

Refer to Figure 1. This new facility will be located on a 160-acre tract at the intersection of Buckeye and Bud Rhoden Roads, southeast of Piney Point in Manatee County. This site is approximately 120 kilometers south of the Chassahowitzka National Wilderness Area, a Class I PSD Area. The UTM coordinates are Zone 17; 348.5 km E; 3057.0 km N.



Figure 1 – Location of Piney Point

Figure 2 – Vicinity of Piney Point

### 2.2 Standard Industrial Classification Codes (SIC)

Industry Group No.	49	Electric, Gas, and Sanitary Services
Industry No.	4911	Electric Services

# TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

## 2.3 Facility Category

The recently permitted CPV facility is a nominal 245 MW combined cycle plant. Key components include:

- One nominal 170-MW gas-fired combustion turbine-electrical generator with an unfired heat recovery steam generator (HRSG) and 150-foot stack;
- A selective catalytic reduction unit located within the HRSG;
- A 1-million gallon storage tank for backup No. 2 distillate fuel oil;
- A steam-electrical generator;
- A five-cell mechanical draft cooling tower; and

Ancillary facilities including equipment including buildings, ammonium storage, demineralized water storage, fire water storage, diesel-fired fire water pump, and a 500 kW emergency generator. The combustion turbine will be fired primarily with natural gas as the primary fuel, with distillate fuel as backup.

The facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM<sub>10</sub>), sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), or volatile organic compounds (VOC) exceeds 100 TPY.

The facility is within an industry included in the list of the 28 Major Facility Categories per Table 212.400-1, F.A.C. This facility is also classified as a Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD).

This facility is also subject to the Title IV Acid Rain Program, 40 CFR 72 and must apply for an Acid Rain Permit at least 24 months prior to start up.

## 3. PROJECT DESCRIPTION

This permit modification addresses the following emissions unit:

EMISSION UNIT	SYSTEM	EMISSION UNIT DESCRIPTION
002	Water Cooling	Two Mechanical Forced Draft Cooling Towers

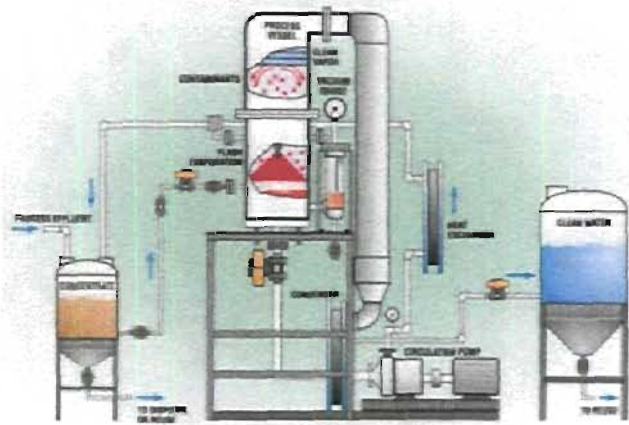
Competitive Power Ventures (CPV), Gulfcoast Ltd proposes to construct a Zero Liquid Discharge (ZLD) system. This system will result in an additional source of Particulate matter (PM) emissions, most of which are expected to be below 10 micrometers in size. These additional emissions will result from the waste water treatment system, which includes two mechanical forced draft cooling towers. As with the previously permitted five-cell cooling towers (CT), the waste water towers (WWTs) will experience cooling tower drift with attendant emissions of dissolved solids contained in the water droplet drift. Although the WWTs will be equipped with state-of-the-art drift eliminators designed to achieve a drift rate of 0.0005 percent of the circulating water flow rate, the higher dissolved solids concentration in the circulating water results in higher emissions rate, compared to the fresh water CT.

This permitting action is an addendum to the PSD permit, PSD-FL-300, issued for this facility on February 5, 2001.

# TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

## 4. PROCESS DESCRIPTION

Zero liquid discharge (ZLD) systems are being installed at many projects throughout Florida in conjunction with power plant projects. Installations include the Tallahassee Purdom Unit 8 project and the Cedar Bay project in Jacksonville. These applications involve sophisticated unit operations aimed at minimizing water consumption and promoting maximum reuse. The following discussion is primarily from the application. A photograph of the system (from the Ionics website) incorporating evaporation and crystallization at Cedar Bay follows. A conceptual diagram of a similar process (from the Castion website) is included.



### 4.1. **Staged Cooling Zero Liquid Discharge System**

Staged Cooling is a proven, in service, high recycle evaporative cooling technology that maximizes water reuse and recycle while minimizing operator attention and energy requirements through waste heat utilization. Staged Cooling systems are engineered for specific applications unlike end of pipe equipment based systems.

All chemicals and minerals entering the plant in raw water, scrubbed from the air by the cooling towers, or added in water treatment processes are ultimately converted by dewatering and crystallization to drip free solids for offsite disposal. Most of the plant wastewater, including boiler blowdown is reused and evaporated in the primary and waste water cooling towers with the remainder being evaporated in crystallizer.

The primary cooling tower accomplishes over 98% of the cooling system heat rejection for the plant. Blowdown from the primary cooling loop is softened in a Reactor/Clarifier. A portion (Approx. 80 to 85%) of the treated effluent is recycled back to the primary cooling loop. The balance (Approx. 15 to 20 %) is used as makeup for the waste water cooling tower (WWT) in a two stage ZLD system. The sludge from the clarifier is collected, thickened, dewatered, and is trucked off site as solid waste for disposal.

Plant cooling is accomplished by these two (2) separate and hydraulically isolated cooling loops operating in parallel. At times depending on the water analysis of the site an additional third stage can be added to the system. A small portion of the condenser discharge cooling water from the primary circulating water loop is passed through a titanium plate and frame heat exchanger where heat is extracted to drive wastewater evaporation in the WWT.

# TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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Highly concentrated blowdown from the WWT flows to brine surge tank, which feeds the brine to an evaporative crystallizer where it is concentrated to drip free salts. The salts are dewatered and trucked off site as solid waste for disposal. Solids production depends on plant water supply chemistry and cooling system evaporation rates.

For plant start-ups, downtimes and maintenance periods, weak wastewater that normally goes to the main cooling tower can be diverted to a 100,000-gallon weak waste tank. The weak wastewater is consumed by the ZLD system during normal operation.

## 4.2 Staged Cooling System Typical Hardware Description

Following is a brief description of the typical hardware components found in a typical staged cooling ZLD system:

### *Main Cooling Tower*

In addition to rejecting 98 % of the plant heat load the main cooling tower is the first stage of the ZLD system. It reduces and minimizes weak wastewater by evaporation using waste heat utilization.

### *Reactor/Clarifier*

The reactor/clarifier is used to control hardness and silica levels in the primary and waste tower cooling loops. The reactor/clarifier replaces calcium and magnesium ions with sodium ions. Soluble silica is removed by adsorption in the sludge. Lime, soda ash, and polymers are used to aid in this process.

Clarifier bottoms flow by gravity to a concrete sludge sump from the reactor/clarifier through timer based sludge blowdown valves. It is then pumped to a gravity thickener tank where it is concentrated, pumped to, and dewatered in a filter press. Water recovered from the thickener and filter press is recovered and returned to the reactor/clarifier inlet.

### *Aging Tank and Pumps*

The treated clarifier effluent overflows the clarifier and is transferred to an Aging Tank by gravity. A small amount of sulfuric acid is added to the effluent to inhibit post precipitation of minerals in the effluent. From the aging tank the treated effluent is then transferred by the aging tank pumps to the waste tower as make-up or recycled back to the main cooling tower. The ratio is approximately 80 to 85 % of the effluent to the main tower as recycle and 15 to 20 % on to the waste tower as make-up the amounts will vary depending on the plant and climate conditions.

### *Sludge Sump*

Clarifier bottoms typically flow to the concrete sludge sump from the reactor/clarifier. The sludge sump is typically a sub grade epoxy coated concrete sump. Air is used to keep the sludge in suspension while pumping it to the thickener tank.

### *Sludge Thickener Tank*

The lined carbon steel gravity thickener is internally baffled to promote solid/liquid separation. The bottom of the thickener is a 60-degree sloping cone and the thickener is a totally passive configuration. Sludge from the reactor/clarifier is pumped from the sludge sump into the top of the thickener. On the opposite side of the baffle system, clear effluent gravity flows from the top of the thickener to the reactor/clarifier reaction zone. The settled sludge is pumped from the bottom of the thickener to the filter press.

# TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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## *Filter Press*

The filter press is a plate and frame type usually sized for 25% expansion. The press is normally mounted on a raised platform for solids collection into a dumpster positioned under the press. Sludge pumped to the press from the sludge thickener bottoms is dewatered in the press. The filtrate flows to the reaction zone of the primary reactor/clarifier. The plate and frame filter press is sized for the peak summer, non-upset operating conditions with an operating pressure of 100 psig and a minimum time between dumps of eight (8) hours

## *Plate and Frame Heat Exchanger*

The titanium plate and frame counterflow heat exchanger transfers heat from the primary cooling loop to the WWT brine circulation loop. Hot cooling water tapped downstream of the condenser exit is pumped through one side of the HX where it is cooled and returned to the primary cooling loop. This transfer of a small portion of the plant heat load drives WWT evaporation.

## *Waste Cooling Tower (WWT)*

The WWT tower is a special duty crossflow-cooling tower designed to operate in a high salinity environment. Double FRP louvers (outer and inner) and PVC double drift eliminators are used to minimize locations where soluble salts can precipitate and to minimize drift rates. Cell fan(s) typically have variable frequency drives for speed control.

## *Crystallizer*

The crystallizer is designed to evaporate concentrated brine to drip free salts. The crystallizer uses low-pressure steam from the steam generation facility to heat the evaporator contents above the boiling point of the solution. Solids are continually harvested by gravity to a salt basket or by an automatic batch to a dewatering pressure filter. After the salts are dewatered they are collected in a dumpster and trucked off site as solid waste.

## *Tanks*

Tanks of various configurations are provided for chemical storage, surge capacity, temporary brine storage and weak waste storage. Field containment provisions are made as required.

### **4.3 Lime and Soda Ash Feed Systems**

The Lime and soda ash feed systems each consist of a silo, solids feed system, solution mix tank and solution recirculation system. The solutions are metered from the circulation systems to the reactor/clarifier by pulse feeder valves. Feed usage will be based on peak summer usage at normal non-upset conditions.

### **4.4 Miscellaneous Chemical Feed Systems**

Miscellaneous chemical feed systems are provided for Feedwater and HRSG Boiler water treatment, the ZLD system, Cooling water as well as Auxiliary Boiler and Auxiliary cooling as required.

### **4.5 Plant Makeup Water Treatment System**

Although the Plant Makeup Water Treatment System is typically a stand-alone system the design and system configuration are an important and integral part of the plant weak wastewater management program. The system is designed to reuse and evaporate the maximum amount of weak waste while minimizing strong waste.

# TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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## 4.6 Instrument and Control System

Staged cooling uses a backward cascading flow control system, which is modulated to control cooling system chemistry. The crystallizer evaporation rate is set to maintain WWT conductivity or hardness below control values. The WWT loop blowdown flow is controlled to maintain the waste brine tank at a desired level. The waste water tower fan speed is modulated to control makeup flow to the WWT, which sets the conductivity in the primary cooling water loop.

## 5. SOURCE IMPACT ANALYSIS

### 5.1 Emissions Summary

The total annual emissions for the ZLD system (two WWTs), are predicted to be 4.11 tons/yr. The increase in annual PM<sub>10</sub> emissions is less than the major source modification threshold for PSD permitting. Therefore, this project is not subject to a PSD review.

The predicted emission rate is based on 3,750 gallon/minute circulating flow rate. Emissions are assumed to also be released on a continuous basis at a rate of 0.94 lbs/hr or 0.118g/sec.

### 5.2 Air Quality Analysis

The addition of the ZLD system at this facility will result in very small differences in air quality impacts compared to those predicted previously. Inclusion of the ZLD system to the permitted project does not constitute a PSD major modification and will not change the facility's PSD Class II ambient air quality determinations of "insignificant" impacts. The ambient air quality impact associated with the air emissions of PM<sub>10</sub> is predicted to be below the PSD Class II SILs. The results is consistent with previous modeling results and is expected to be minimal or insignificant relative to ambient air quality standards and other applicable limits. Therefore, the previously submitted application and resulting permit issuance are not materially effected by the inclusion of the ZLD system.

## 6. CONCLUSION

Based on the foregoing technical evaluation of the application and additional information submitted by the applicant, the Department has made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations.

*Teresa Heron, Engineer*

*A. A. Linero, P.E.*

*Cleve Holladay, Meteorologist*

July XX, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Gary Lambert  
Executive Vice President  
CPV Gulfcoast, Ltd  
35 Bristol Road, Suite 101  
Easton, Massachusetts 02375

Re: DEP File No. 0810194-002-AC (PSD-FL-300A)  
Zero Liquid Discharge System

Dear Mr. Lambert:

The applicant, CPV Gulfcoast, applied on April 19, 2001, to the Department for a modification to air construction permit number PSD-FL-300 for its combined cycle power plant located at Manatee, County. The modification is to construct/install a Zero Liquid Discharge (ZLD) System. The Department has reviewed the modification request. The referenced permit is hereby modified as follows:

New Specific Condition 51:

A Zero Liquid Discharge (ZLD) System may be installed as part of the combined cycle facility. The ZLD system shall comply with the characteristics described in CPV's application dated April 19, 2001.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit modification) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

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Howard L. Rhodes, Director  
Division of Air Resources  
Management

Mr. Gary Lambert  
Page 2 of 3  
July XX, 2001

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this permit modification was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on \_\_\_\_\_ to the person(s) listed:

cc: Gary Lambert, CPV  
Gregg Worley, EPA  
John Bunyak, NPS  
Cathy Sellers, Esquire  
Bill Thomas, SWD  
Marion Forthoffer, Manatee County  
Scott Sumner, P.E.





Florida Department of  
Environmental Protection

Memorandum

---

TO: Clair H. Fancy

THRU: A.A. Linero 

FROM: Teresa Heron 

DATE: May 25, 2001

SUBJECT: CPV Gulfcoast Power Generating Facility  
Zero Liquid Discharge (ZLD) System  
DEP File No.0810194-002-AC (PSD-FL-300A)

---

Attached is the draft public notice package for construction of a Zero Liquid Discharge System (ZLD) at the CPV Gulfcoast Power Generating facility near Piney Point, Manatee County.

The basic unit is the waste water treatment system which includes two mechanical forced draft cooling towers.

Emissions of particulate matter (PM/PM<sub>10</sub>) will be very low, it is estimated at 4.11 tons/yr. This increase in annual PM<sub>10</sub> emissions is less than the major source modification threshold for PSD permitting. The predicted emission rate is based on a continuous 3,750 gallons/minute circulating flow rate.

The original permit, PSD-FL-300, was issued on February 5, 2001.

Day 74 is July 1 so we are well ahead of schedule. We recommend your signature and approval of this Intent to Issue.

AAL/th

Attachments

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	A. Received by (Please Print Clearly)	B. Date of Delivery 6-8-01
	C. Signature X <i>Shawn LeBlanc</i> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee	
1. Article Addressed to:  Mr. Gary Lambert Executive Vice President CPV Pierce, Ltd. 35 Braintree Hill Office Park Suite 107 Braintree, MA 02184	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
	JUN 08 2001 3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes		
2. Article Number (Copy from service label) 7000 0600 0026 4129 8818		
PS Form 3811, July 1999	Domestic Return Receipt	102595-99-M-1789

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

7000 0600 0026 4129 8818

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Recipient's Name (Please Print Clearly) (to be completed by mailer)  
 Mr. Gray Lambert

Street, Apt. No., or PO Box No.  
 35 Braintree Hill Office Park

City, State, ZIP+4  
 Braintree, MA 02184 Ste 107

PS Form 3800, February 2000 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Joe McClash, Chair  
 Manatee County Board of  
 Commissioners  
 P.O. Box 1000  
 Bradenton, FL 34206-1000

2. Article Number (Copy from service label)  
 7000 0600 0026 4129 9341

PS Form 3811, July 1999

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) B. Date of Delivery

C. Signature *Terry L. Farnham*

X *Terry L. FARNHAM*  Agent  Addressee

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No



3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

Domestic Return Receipt

102595-99 V-1789

**U.S. Postal Service  
 CERTIFIED MAIL RECEIPT  
 (Domestic Mail Only; No Insurance Coverage Provided)**

7000 0600 0026 4129 9341

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark  
 Here

Recipient's Name (Please Print Clearly) (to be completed by mailer)

Mr. Joe McClash, Chair

Street, Apt. No., or PO Box No.

PO Box 1000

City, State, ZIP+4

Bradenton, FL 34206-1000

**DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF ADMINISTRATIVE PERMIT CORRECTION**

In the Matter of an Application for Administrative Permit Correction:

Mr. Gary Lambert, Executive Vice President  
CPV Gulfcoast, Ltd.  
35 Braintree Hill Office Park, Suite 107  
Braintree, MA 02184

DEP File No. 0810194-001-AC (PSD-FL-300B)  
245 Megawatt Combined Cycle Facility  
Manatee County

Following notification by CPV Gulfcoast, the Department has determined that a minor correction to information contained in Permit Number 0810194-001-AC and PSD-FL-300 is required. This correction is related to the carbon monoxide (CO) mass emission rate corresponding to the allowable concentration (at 25 °F) permitted by the Department's determination of Best Available Control Technology. The correction is:

SPECIFIC CONDITION 17 (first paragraph):

Carbon Monoxide (CO) Emissions:


Emissions of CO in the stack exhaust gas with the combustion turbine operating on natural gas shall exceed neither 9 ppmvd @ 15% O<sub>2</sub> nor ~~26~~ 31 lb/hr on a 3-hr block average during periods when the unit is not operating in the Power Augmentation Mode. Initial and annual stack test as specified in Specific Condition No. 33. Continuous compliance shall be determined by CEMS. [Rule 62-212.400, F.A.C, BACT Determination]

NO CHANGE FOR THE REMAINING TEXT OF THIS CONDITION.

This permit correction corrects and is a part of Permit Number 0810194-001-AC and PSD-FL-300. This permit correction is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit correction) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

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



**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

7000 2670 0000 7028 2829

**OFFICIAL USE**

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
<b>Total Postage &amp; Fees</b>	<b>\$</b>	

**Sent To**  
 Gary Lambert  
 Street, Apt. No.; or PO Box No. 107  
 35 Braintree Hill Office Park, Suite  
 City, State, ZIP+4  
 Braintree, MA 02184



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

January 26, 2001

## CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Gary Lambert  
Executive Vice President  
CPV Gulfcoast, Ltd  
35 Braintree Hill Office Park, Suite 107  
Braintree, Massachusetts 02184

Re: DEP File No. 1110101-001-AC (PSD-FL-312)  
Proposed Combined Cycle Power Plant

Dear Mr. Lambert:

On December 29, 2000 the Department received your application and complete fee for an air construction permit for a combined cycle power plant near Port St. Lucie in St. Lucie County. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form

Please submit the following information:

1. Power Augmentation: Average emission estimates appear to be based on 2000 hours per year of power augmentation. Please advise how many hours the unit will actually operate in that mode based on conditions in Florida and other technical considerations.
2. Determine what actual emissions typically occur during power augmentation (especially for CO). We have found that emissions during gas and oil firing are typically around 1 ppm for new units and much less than manufacturer guarantees. However we do not have any information obtained while such units operate in power augmentation mode. There should be information available through GE, although we recognize that their guarantees may not be negotiable at this point. If the unit operates full time in power augmentation mode, oxidation catalyst begins to appear more cost-effective based on the assumption that emissions will actually be 15 ppm under that mode.
3. Refer to EPA's letter dated December 27, 2000 for the CPV Gulfcoast project. Since these two projects are identical, please submit a response to each question related to the BACT-CO cost analysis.

*"More Protection, Less Process"*

*Printed on recycled paper.*

4. Our Southeast District used ArcView and Coordinate-corrected OrthoQuads to review the Lat/Long in ARMS. They estimate the coordinates to be: N: 27 deg, 21 min, 32 sec; W: 80 deg, 24 min, 43 sec. Please double check your estimates and reconcile and compare with the UTM values in the application. It could be that our estimates are wrong.
5. Please provide the BPIP input file on disk or by computer.
6. The comments from the National Park Service are as follow: "Given the emissions (126 TPY of NO<sub>x</sub>, 76 TPY of SO<sub>2</sub>, and 103 TPY of PM<sub>10</sub>) and the distance (180 km) from Everglades to the source location, we do not have any concerns that this source will have potential impacts on AQRVs at Everglades NP."
7. We will send you the comments from EPA Region IV as soon as they are received.

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

If there are any questions, please call me at 850/921-9519. Matters regarding modeling issues should be directed to Cieve Holladay (meteorologist) at 850/921-8986 and e-mail [cieve.holladay@dep.state.fl.us](mailto:cieve.holladay@dep.state.fl.us). Matters regarding the technical information may be directed to Teresa Heron at 850/921-9529 and e-mail [teresa.heron@dep.state.fl.us](mailto:teresa.heron@dep.state.fl.us)

Sincerely,



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

AAL/th

cc: Gregg Worley, EPA  
John Bunyak, NPS  
Isidore Goldman, SED  
Scott Sumner, P.E., TRC



7099 3400 0000 1449 4635

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
Article Sent To: Mr. Gary Lambert	
Postage \$	Postmark Here
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Name (Please Print Clearly) (to be completed by mailer) Mr. Gary Lambert	
Street, Apt. No., or PO Box No. 35 Braintree Hill Office Park-Ste 107	
City, State, ZIP+4 Braintree, MA 02184	
PS Form 3800, July 1999 See Reverse for Instructions	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Received by (Please Print Clearly) B. Date of Delivery 1:30:01</p> <p>C. Signature X <i>S. Y. Le Blanc</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p style="text-align: center;">JAN 19 2001</p>
<p>1. Article Addressed to:</p> <p>Mr. Gary Lambert Executive Vice President CPV Gulfcoast, Ltd 35 Braintree Hill Office Suite 107 Braintree, MA 02184</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number (Copy from service label) 7099 3400 0000 1449 4635</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

RECEIVED

APR 19 2001

BUREAU OF AIR REGULATION

**CPV Gulfcoast Power Generating Facility  
Application for Air Permit  
Document ID: CPV-GC**

**Supplemental Report**

Florida Department of Environmental  
Protection  
Division of Air Resources Management

***Prepared For:***

CPV Gulfcoast, Ltd.

***Prepared By:***

TRC Environmental Corporation  
Windsor, Connecticut

April 2001

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- B Engineering Drawings
- C Air Quality Modeling Input/Output

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**Section 1**

**Introduction**

## 1.0 INTRODUCTION

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CPV Gulfcoast, Ltd. (CPV) has recently submitted an application to construct a combined-cycle power generation facility near Piney Point in Manatee County, Florida. The Florida Department of Environmental Protection (FDEP) has issued a Prevention of Significant Deterioration (PSD) permit (PSD-FL-300) based on the permit application. CPV has recently included a Zero Liquid Discharge (ZLD) system in the facility design and is hereby providing the necessary data/information and supporting analysis to demonstrate that the inclusion of this system is not a major modification and will not change the facility's PSD Class II ambient air quality determination of "insignificant" impacts.

In addition to the emission sources reported in the application document titled "CPV Gulfcoast Power Generating Facility Application for Air Permit; Document ID: CPV-GC" dated September, 2000, the ZLD system proposed for the facility will result in an additional source of Particulate Matter (PM) emissions, most of which are expected to be below 10 micrometers in size, i.e., PM<sub>10</sub>. These additional emissions will result from the waste water treatment system, which includes two mechanical forced draft cooling towers. As with the already permitted 5 cell cooling towers (CT), the waste water towers (WWT) will experience cooling tower drift with attendant emissions of dissolved solids contained in the water droplet drift.

Although the WWTs will be equipped with state-of-the-art drift eliminators designed to achieve a drift rate of 0.0005 percent of the circulating water flow rate, the higher dissolved solids concentration in the circulating water results in higher emission rates, compared to the fresh water CT. Emission rates have been estimated using manufacturer design data and expected water circulation rates and dissolved solids concentrations. Table 1-1 summarizes the parameters used to calculate the resulting emission rates. The total annual emissions for the ZLD system, i.e., two WWTs, are predicted to be 4.11 tons/yr. This increase in annual PM<sub>10</sub> emissions is less than the major source modification threshold for PSD permitting. The predicted emission rate is based on a continuous 3,750 gallons/minute circulating flow rate. Consistently, emissions are assumed to also be released on a continuous basis at a rate of 0.94 lbs/hr or 0.118 g/sec.

The PM<sub>10</sub> modeling analyses previously submitted to FDEP in the above referenced report have been updated to include the WWT sources and their respective emissions. The methods employed and the resulting predicted ambient air quality impacts are discussed in the following sections.

**Table 1-1**

**Competitive Power Ventures – Gulfcoast Wastewater Tower PM Emissions Calculations**

<b>Parameter</b>	<b>Units</b>	<b>Value</b>
Cooling Tower Circulating Flow*	gal/min	3,750
Drift Fraction of Circulating Flow*	percent	0.0005
Drift Rate	gal/min	0.01875
Drift Rate	gal/hr	1.125
Water Density	lb/gal	9.163
Water Density Assumed for Cooling Water	lb/gal	9.163
Drift Rate	lb/min	0.17
Drift Rate	lb/hr	10.31
Convert lb/hr to g/s	g/s per lb/hr	0.126
Drift Rate	g/s	1.3
Dissolved & Suspended Solids in Water	mg/l	100,000
Dissolved & Suspended Solids in Water	g/l	100.0
Convert Liters to Gallons	l/gal	3.785
Dissolved & Suspended Soilds in Water	g/gal	378.50
PM Emissions	g/hr	425.8
PM Emissions	lb/hr*	0.94
PM Emissions	g/s	0.118
Number of Cells		2
PM Emissions	g/s per cell	0.059
Annual Emissions	tons/year	4.11
*1.0 lb/hr based on AEP-Proserv information		

## **Section 2**

### **Modeling Analyses**



## **2.0 MODELING ANALYSES**

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The basis for the PM<sub>10</sub> modeling analyses to include the ZLD system are the ISCST3 modeling analyses described in the above referenced permit application document. The modeling analyses were performed using the same model, i.e., ISCST3, modeling inputs for the meteorological data, i.e., Tampa International Airport, 1987-1991, emission parameters for the combined-cycle turbine stack and 5-cell cooling tower and the same location and downwash input parameters for the same. The model inputs that were added or modified to integrate the WWT emissions are described below.

### **2.1 WWT Source Parameters**

The emission rate for each WWT was assumed to be one-half of the total hourly emission rate or 0.47 lb/hr (0.059 g/sec). These emissions are assumed to be released continuously from the top of the fan opening, which is approximately 14 feet in diameter and 58 feet above ground level. The combined dimensions of the support structure for the two contiguous cells are 30 feet wide and 40 feet long. The actual height of the WWT structure is 18 feet with a 7 foot fan extension. The structure will be elevated on supports to obtain a release height of 58 feet, i.e., a height equal to the CT height. The WWT will be located approximately 165 meters due west of the 5-cell CT. Drawing number SC009 provided in Appendix A illustrates the revised project plan layout. Influences to dispersion of emissions from the WWT were evaluated using the BPIP software, as in the original analysis, to derive the direction-specific dimensions of the influencing structures. These dimensions were input to the ISCST3 model for each WWT cell.

### **2.2 Receptors**

CPV has decided to extend the secured or fenced area of the site to include all of the owned property. Therefore, the ambient air boundary designation is equal to the property line boundary. Drawing SC008, given in Appendix A, illustrates the revised fence/property boundary. To be consistent with this new ambient air boundary, receptors inside the fenced property were removed and new receptors were added at 50 meters along the fenceline parameter. Refined receptors were also added parallel to the fence line boundary in 25 meter increments out to 100

meters from the fenceline. The original Cartesian and polar grids, revised to reflect the new fenceline, were retained in the analyses. Overall, 3454 receptors were used in the analyses including 63 fenceline and 588 refined grid receptors. As with the previous analyses all receptor elevations were assumed to be zero.

## **Section 3**

### **Modeling Results**

### 3.0 MODELING RESULTS

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The ISCST3 model was run with the revisions noted to determine maximum 24-hour and annual average PM<sub>10</sub> impacts. The overall maximum 24-hour average PM<sub>10</sub> impact from all sources combined is 4.6 µg/m<sup>3</sup>. The location of the maximum value is predicted to occur southeast of the CTs, in the refined grid near the fenceline. The maximum annual average PM<sub>10</sub> impact is predicted to be 0.3 µg/m<sup>3</sup>. Table 3-1 provides a summary of the previously-predicted maximum impacts and the new maximum impacts. Compared to the applicable Class II Significant Impact Levels (SILs), the predicted impacts are below the 24-hour average SIL of 5 µg/m<sup>3</sup> and the annual average SIL of 1 µg/m<sup>3</sup>.

**Table 3-1 CPV Gulfcoast Project Summary of Applicable PM<sub>10</sub> Limits and Predicted Impacts**

Pollutant	Averaging Period	NAAQS ( $\mu\text{g}/\text{m}^3$ )		PSD Class II ( $\mu\text{g}/\text{m}^3$ )				
		Primary	Secondary	Increment	SILs	Previous Predicted Impact	Revised Predicted Impact	Significant Impact?
Particulate (PM <sub>10</sub> )	24-hour	150 <sup>c</sup>	N/A	30 <sup>a</sup>	5	3.6	4.6	NO
	Annual	50 <sup>b</sup>	N/A	17 <sup>b</sup>	1	0.07	0.3	NO

a Not to be exceeded more than once per year.

b Never to be exceeded.

c The pre-existing form is exceedance-based. The revised form is the 99<sup>th</sup> percentile.

**Section 4**

**Conclusion**

## 4.0 CONCLUSION

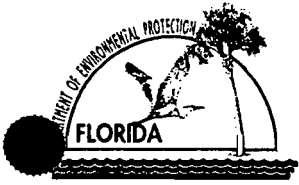
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The addition of a ZLD System at the Gulfcoast Facility, although a new source of PM<sub>10</sub>, will result in very small differences in air quality impacts compared to those predicted previously, while resulting in an overall improvement in environmental impacts. Inclusion of the ZLD system to the permitted project does not constitute a PSD major modification and will not change the facility's PSD Class II ambient air quality determination of "insignificant" impacts. The ambient air quality impact associated with the air emissions of PM<sub>10</sub> is predicted to be below the PSD Class II SILs. This result is consistent with previous modeling results and is expected to be minimal or insignificant relative to ambient air quality standards and other applicable limits. Therefore, the previously submitted application and resulting permit issuance are not materially effected by the inclusion of the ZLD system.

**Appendix A**

**Air Permit Application Forms**





# Department of Environmental Protection

## Division of Air Resources Management

### APPLICATION FOR AIR PERMIT - TITLE V SOURCE

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

#### I. APPLICATION INFORMATION

##### Identification of Facility

1. Facility Owner/Company Name: CPV Gulfcoast, Ltd.	
2. Site Name: CPV Gulfcoast	
3. Facility Identification Number: <span style="float: right;">[ X ] Unknown</span>	
4. Facility Location: Street Address or Other Locator: City: <span style="margin-left: 150px;">County: Manatee</span> <span style="float: right;">Zip Code:</span>	
5. Relocatable Facility? [ ] Yes [ X ] No	6. Existing Permitted Facility? [ ] Yes [ X ] No

##### Application Contact

1. Name and Title of Application Contact: Sean Finnerty, Director of Development	
2. Application Contact Mailing Address: Organization/Firm: CPV Gulfcoast, Ltd. Street Address: 35 Braintree Hill Office Park, Suite 107 City: Braintree <span style="margin-left: 100px;">State: MA</span> <span style="float: right;">Zip Code: 02184</span>	
3. Application Contact Telephone Numbers: Telephone: ( 781 ) <span style="margin-left: 50px;">848-0253</span> <span style="margin-left: 100px;">Fax: ( 781 )</span> <span style="float: right;">848-5804</span>	

##### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	4-19-01
2. Permit Number:	081 0194-002-AC
3. PSD Number (if applicable):	PSD-FL-300A
4. Siting Number (if applicable):	

**Purpose of Application**

**Air Operation Permit Application**

This Application for Air Permit is submitted to obtain: (Check one)

- ] Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- ] Initial Title V air operation permit 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: \_\_\_\_\_

- ] Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: \_\_\_\_\_

Operation permit number to be revised: \_\_\_\_\_

- ] Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: \_\_\_\_\_

- ] Title V air operation permit revision 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 number to be revised: \_\_\_\_\_


Reason for revision: \_\_\_\_\_

**Air Construction Permit Application**

This Application for Air Permit is submitted to obtain: (Check one)

- ] Air construction permit to construct or modify one or more emissions units.
- ] Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- ] Air construction permit for one or more existing, but unpermitted, emissions units.

**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official: Gary Lambert, Executive Vice President
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: CPV Gulfcoast, Ltd. Street Address: 35 Braintree Hill Office Park, Suite 107 City: Braintree State: MA Zip Code: 02184
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: ( 781 ) 848-0253 Fax: ( 781 ) 848-5804
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [ ], if so) or the responsible official (check here [ ], if so) 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. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. 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.</i>   _____ Signature Date 4/19/01

\* Attach letter of authorization if not currently on file.

**Professional Engineer Certification**

1. Professional Engineer Name: Scott G. Sumner Registration Number: 44352
2. Professional Engineer Mailing Address: Organization/Firm: TRC Street Address: 21 Technology Drive City: Irvine State: CA Zip Code: 92618
3. Professional Engineer Telephone Numbers: Telephone: ( 949 ) 727-9336 Fax: ( 949 ) 727-7399

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 that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and*

*(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.*

*If the purpose of this application is to obtain a Title V source air operation permit (check here [ ], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.*

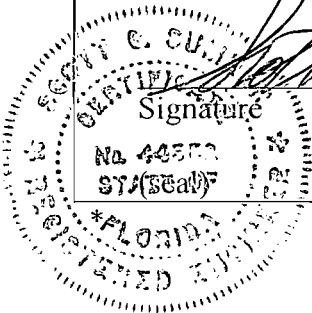
*If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [ ], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.*

*If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.*

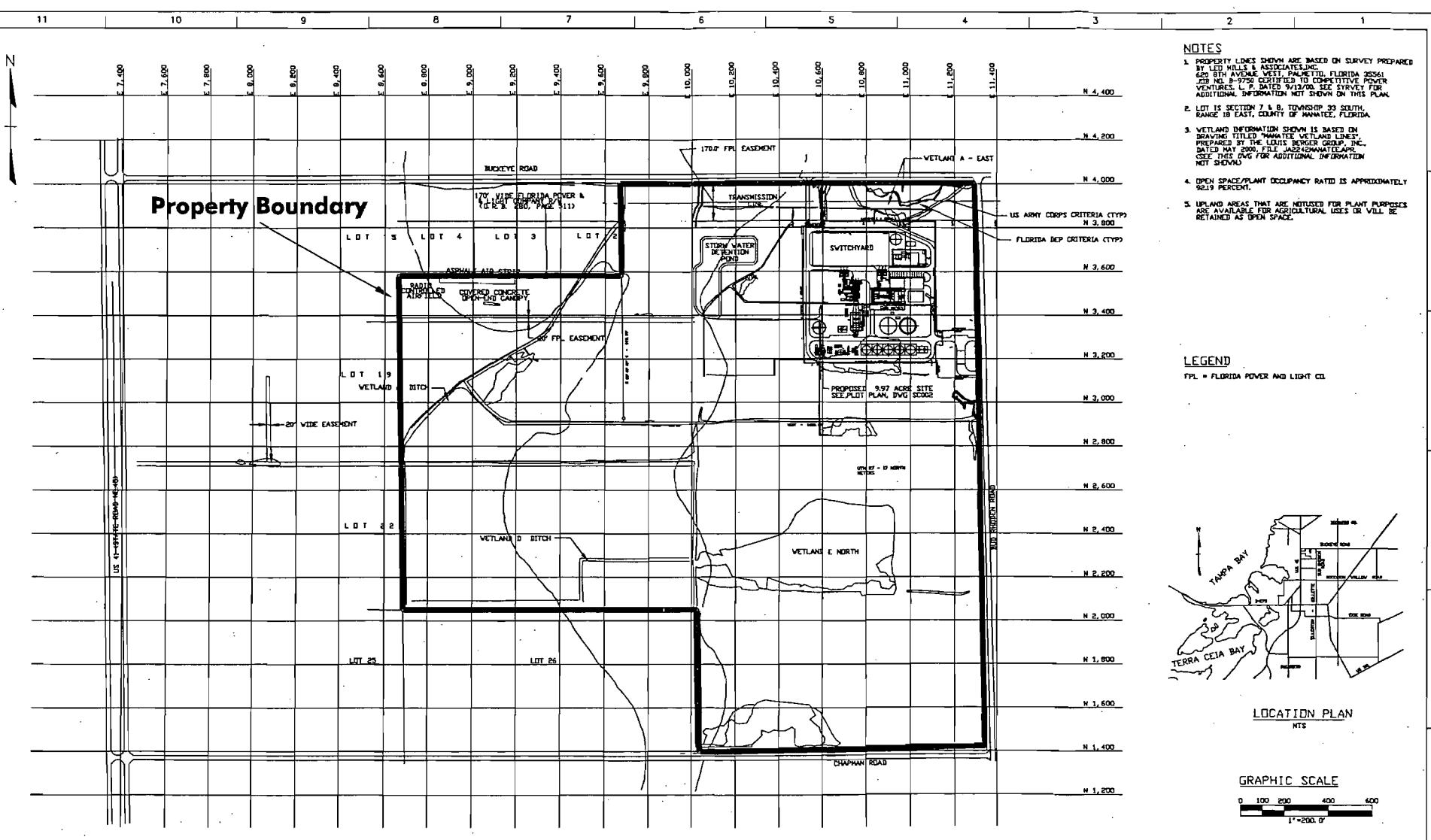
Signature

Date

4-18-01

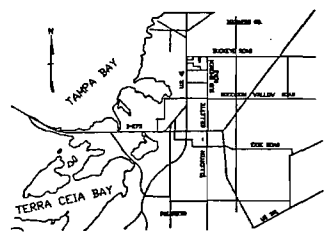


**Appendix B**  
**Engineering Drawings**

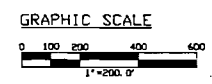


- NOTES**
- PROPERTY LINES SHOWN ARE BASED ON SURVEY PREPARED BY LEO HILLS & ASSOCIATES, INC., 620 8TH AVENUE WEST, PALMETTO, FLORIDA 33561, JOB NO. 8-9750, CERTIFIED TO COMPETITIVE POWER VENTURES, L.P., DATED 9/12/00. SEE SURVEY FOR ADDITIONAL INFORMATION NOT SHOWN ON THIS PLAN.
  - LOT IS SECTION 7 & 8, TOWNSHIP 33 SOUTH, RANGE 18 EAST, COUNTY OF HANNAH, FLORIDA.
  - WETLAND INFORMATION SHOWN IS BASED ON DRAWING TITLED "WETLAND LINES", PREPARED BY THE LOUIS BERGER GROUP, INC., DATED MAY 2000, FILE JAS234HMANATEE.APR. SEE THIS DWG FOR ADDITIONAL INFORMATION NOT SHOWN.
  - OPEN SPACE/PLANT OCCUPANCY RATIO IS APPROXIMATELY 92.19 PERCENT.
  - UPLAND AREAS THAT ARE NOTIFIED FOR PLANT PURPOSES ARE AVAILABLE FOR AGRICULTURAL USES OR WILL BE RETAINED AS OPEN SPACE.

**LEGEND**  
 FPL = FLORIDA POWER AND LIGHT CO.



**LOCATION PLAN**  
 NTS



Rev No.	Revision	Date	Des.	Chk.	Approved Chf. Eng.	Rev No.	Revision	Date	Des.	Chk.	Approved Chf. Eng.	Rev No.	Revision	Date	Des.	Chk.	Approved Chf. Eng.
C	PERMIT ISSUE																
B	PERMIT ISSUE, REVISED NOTES																
E	RELOCATED STORM WATER RETENTION POND																

Drawing Control					
Purpose	Approved By	Date	Assigned By	Date	
For Information					
For Comment					
For Construction					

Engineering Review		
Disc.	Engr.	Chf. Eng.
Disc.		
Engr.		
Chf. Eng.		
Disc.		
Engr.		
Chf. Eng.		

CPV GULF COAST POWER PROJECT FLORIDA					
SITE PLAN					
BURNS AND ROE ENTERPRISES, INC. Engineers and Constructors - Oradell, NJ					
Reviewed By	Approved for Construction	Date	Sheet No.	Drawing No.	SP No.
Manager-Design/Drngng	Chief Eng.	Engineer	2377	SC008	E



## **Appendix C**

### **Selected ISCST3 Input/Output File Pages**



CO STARTING  
 CO TITLEONE \*\*\*CPV GULFCOAST SUPPLEMENTAL CLASS II PM10 MODELING ANALYSIS \*\*\*  
 CO TITLETWO \*\*\*ADDITION OF WASTE WATER COOLING TOWER TO GULFCOAST FACILITY\*\*\*  
 CO MODELOPT DFAULT CONC RURAL NOCMPL  
 CO AVERTIME 24 ANNUAL  
 CO POLLUTID OTHER  
 CO TERRHGTS FLAT  
 CO RUNORNOT RUN  
 CO FINISHED

SO STARTING  
 SO ELEVUNIT METERS  
 SO LOCATION STACK POINT 0.0 0.0 0  
 SO SRCPARAM STACK 5.67 45.72 397.04 14.2 5.64  
 SO BUILDHGT STACK 20.72 20.72 22.86 22.86 22.86 22.86  
 SO BUILDHGT STACK 22.86 22.86 22.86 22.86 22.86 22.86  
 SO BUILDHGT STACK 22.86 22.86 22.86 20.72 20.72 20.72  
 SO BUILDHGT STACK 20.72 20.72 22.86 22.86 22.86 22.86  
 SO BUILDHGT STACK 22.86 22.86 22.86 22.86 22.86 22.86  
 SO BUILDHGT STACK 22.86 22.86 22.86 20.72 20.72 20.72  
 SO BUILDWID STACK 50.32 53.39 19.88 21.87 21.87 21.87  
 SO BUILDWID STACK 21.87 21.87 21.87 21.87 21.87 21.87  
 SO BUILDWID STACK 21.87 21.87 19.88 85.71 78.95 69.80  
 SO BUILDWID STACK 50.32 53.39 19.88 21.87 21.87 21.87  
 SO BUILDWID STACK 21.87 21.87 21.87 21.87 21.87 21.87  
 SO BUILDWID STACK 21.87 21.87 19.88 85.71 78.95 69.80  
 SO LOCATION CELL1 POINT 13.66 -19.60 0  
 SO SRCPARAM CELL1 .02 17.68 -10.00 7.86 10.00  
 SO BUILDHGT CELL1 20.72 20.72 20.72 20.72 20.72 12.50  
 SO BUILDHGT CELL1 12.50 12.50 12.50 12.50 12.50 12.50  
 SO BUILDHGT CELL1 22.86 22.86 22.86 20.72 20.72 20.72  
 SO BUILDHGT CELL1 20.72 20.72 20.72 20.72 20.72 12.50  
 SO BUILDHGT CELL1 12.50 12.50 12.50 12.50 12.50 12.50  
 SO BUILDHGT CELL1 22.86 22.86 22.86 20.72 20.72 20.72  
 SO BUILDWID CELL1 67.79 63.72 57.71 54.62 52.74 49.25  
 SO BUILDWID CELL1 38.77 27.11 14.63 27.11 38.77 49.25  
 SO BUILDWID CELL1 21.28 21.28 19.88 85.71 78.95 45.72  
 SO BUILDWID CELL1 50.32 53.39 54.83 54.62 52.74 49.25  
 SO BUILDWID CELL1 38.77 27.11 14.63 27.11 38.77 49.25  
 SO BUILDWID CELL1 21.28 21.28 19.88 85.71 78.95 69.80  
 SO LOCATION CELL2 POINT 28.29 -19.60 0  
 SO SRCPARAM CELL2 .02 17.68 -10.00 7.86 10.00  
 SO BUILDHGT CELL2 20.72 20.72 20.72 20.72 12.50 12.50  
 SO BUILDHGT CELL2 12.50 12.50 12.50 12.50 12.50 22.86  
 SO BUILDHGT CELL2 22.86 22.86 22.86 20.72 20.72 20.72  
 SO BUILDHGT CELL2 20.72 20.72 20.72 20.72 12.50 12.50  
 SO BUILDHGT CELL2 12.50 12.50 12.50 12.50 12.50 22.86  
 SO BUILDHGT CELL2 22.86 22.86 22.86 20.72 20.72 20.72  
 SO BUILDWID CELL2 67.79 63.72 57.71 54.62 58.23 49.25  
 SO BUILDWID CELL2 38.77 27.11 14.63 27.11 38.77 24.68  
 SO BUILDWID CELL2 23.79 22.17 19.88 53.39 50.32 45.72  
 SO BUILDWID CELL2 50.32 53.39 54.83 54.62 58.23 49.25  
 SO BUILDWID CELL2 38.77 27.11 14.63 27.11 38.77 24.68  
 SO BUILDWID CELL2 23.79 22.17 19.88 53.39 78.95 69.80  
 SO LOCATION CELL3 POINT 42.92 -19.60 0  
 SO SRCPARAM CELL3 .02 17.68 -10.00 7.86 10.00  
 SO BUILDHGT CELL3 20.72 20.72 20.72 12.50 12.50 12.50

SO BUILDHGT	CELL3	12.50	12.50	12.50	12.50	22.86	22.86
SO BUILDHGT	CELL3	22.86	22.86	22.86	20.72	20.72	20.72
SO BUILDHGT	CELL3	20.72	20.72	20.72	12.50	12.50	12.50
SO BUILDHGT	CELL3	12.50	12.50	12.50	12.50	22.86	20.72
SO BUILDHGT	CELL3	22.86	22.86	20.72	20.72	20.72	20.72
SO BUILDWID	CELL3	67.79	63.72	54.83	65.44	58.23	49.25
SO BUILDWID	CELL3	38.77	27.11	14.63	27.11	24.82	24.68
SO BUILDWID	CELL3	23.79	22.17	19.88	53.39	50.32	45.72
SO BUILDWID	CELL3	50.32	53.39	54.83	65.44	58.23	49.25
SO BUILDWID	CELL3	38.77	27.11	14.63	27.11	24.82	85.84
SO BUILDWID	CELL3	23.79	22.17	54.83	85.71	78.95	69.80
SO LOCATION	CELL4	POINT 57.55	-19.60	0			
SO SRCPARAM	CELL4	.02	17.68	-10.00	7.86	10.00	
SO BUILDHGT	CELL4	20.72	12.50	12.50	12.50	12.50	12.50
SO BUILDHGT	CELL4	12.50	12.50	12.50	12.50	22.86	22.86
SO BUILDHGT	CELL4	22.86	22.86	20.72	20.72	20.72	20.72
SO BUILDHGT	CELL4	20.72	12.50	12.50	12.50	12.50	12.50
SO BUILDHGT	CELL4	12.50	12.50	12.50	12.50	20.72	20.72
SO BUILDHGT	CELL4	20.72	20.72	12.50	12.50	20.72	20.72
SO BUILDWID	CELL4	67.79	73.74	70.67	65.44	58.23	49.25
SO BUILDWID	CELL4	38.77	27.11	14.63	27.11	24.82	24.68
SO BUILDWID	CELL4	23.79	22.17	54.83	53.39	50.32	45.72
SO BUILDWID	CELL4	50.32	73.74	70.67	65.44	58.23	49.25
SO BUILDWID	CELL4	38.77	27.11	14.63	27.11	79.15	85.84
SO BUILDWID	CELL4	89.93	54.62	70.67	73.74	78.95	69.80
SO LOCATION	CELL5	POINT 72.18	-19.60	0			
SO SRCPARAM	CELL5	.02	17.68	-10.00	7.86	10.00	
SO BUILDHGT	CELL5	12.50	12.50	12.50	12.50	12.50	12.50
SO BUILDHGT	CELL5	12.50	12.50	12.50	12.50	22.86	22.86
SO BUILDHGT	CELL5	22.86	20.72	20.72	20.72	20.72	20.72
SO BUILDHGT	CELL5	12.50	12.50	12.50	12.50	12.50	12.50
SO BUILDHGT	CELL5	12.50	12.50	12.50	12.50	20.72	20.72
SO BUILDHGT	CELL5	20.72	12.50	12.50	12.50	20.72	20.72
SO BUILDWID	CELL5	74.58	73.74	70.67	65.44	58.23	49.25
SO BUILDWID	CELL5	38.77	27.11	14.63	27.11	24.82	24.68
SO BUILDWID	CELL5	23.79	54.62	54.83	53.39	50.32	45.72
SO BUILDWID	CELL5	74.58	73.74	70.67	65.44	58.23	49.25
SO BUILDWID	CELL5	38.77	27.11	14.63	27.11	79.15	85.84
SO BUILDWID	CELL5	52.74	65.44	70.67	73.74	78.95	69.80
SO LOCATION	WASTE1	POINT -46.55	-20.15	0.0			
SO SRCPARAM	WASTE1	.059	17.68	-5.56	6.5	4.26	
SO BUILDHGT	WASTE1	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDHGT	WASTE1	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDHGT	WASTE1	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDHGT	WASTE1	0.00	0.00	0.00	22.86	22.86	22.86
SO BUILDHGT	WASTE1	22.86	12.50	12.50	12.50	0.00	0.00
SO BUILDHGT	WASTE1	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDWID	WASTE1	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDWID	WASTE1	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDWID	WASTE1	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDWID	WASTE1	0.00	0.00	0.00	22.17	23.79	24.68
SO BUILDWID	WASTE1	24.82	27.11	14.63	27.11	0.00	0.00
SO BUILDWID	WASTE1	0.00	0.00	0.00	0.00	0.00	0.00
SO LOCATION	WASTE2	POINT -46.55	-14.60	0.0			
SO SRCPARAM	WASTE2	.059	17.68	-5.56	6.5	4.26	
SO BUILDHGT	WASTE2	0.00	0.00	0.00	22.86	22.86	0.00
SO BUILDHGT	WASTE2	0.00	0.00	0.00	0.00	0.00	0.00

SO BUILDHGT WASTE2	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDHGT WASTE2	0.00	0.00	0.00	22.86	22.86	22.86	22.86
SO BUILDHGT WASTE2	22.86	0.00	12.50	12.50	0.00	0.00	0.00
SO BUILDHGT WASTE2	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDWID WASTE2	0.00	0.00	0.00	22.17	23.79	0.00	0.00
SO BUILDWID WASTE2	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDWID WASTE2	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDWID WASTE2	0.00	0.00	0.00	22.17	23.79	24.68	24.68
SO BUILDWID WASTE2	24.82	0.00	14.63	27.11	0.00	0.00	0.00
SO BUILDWID WASTE2	0.00	0.00	0.00	0.00	0.00	0.00	0.00

SO SRCGROUP ALL  
SO SRCGROUP 1 CELL1 CELL2 CELL3 CELL4 CELL5  
SO SRCGROUP 2 WASTE1 WASTE2  
SO FINISHED

ME STARTING  
ME INPUTFIL 12842-ALL.OUT  
ME ANEMHGHT 10.  
ME SURFDATA 12842 1987 TAMPA, FL  
ME UAIRDATA 12842 1987 TAMPA, FL  
ME FINISHED

\*\*\* THE MAXIMUM 50 24-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL \*\*\*  
 INCLUDING SOURCE(S): STACK , CELL1 , CELL2 , CELL3 , CELL4 , CELL5 , WASTE1 ,

WASTE2 ,

\*\* CONC OF OTHER IN MICROGRAMS/M\*\*3 \*\*

RANK (XR, YR) OF TYPE	CONC (YYMMDDHH) AT RECEPTOR (XR, YR) OF TYPE	RANK	CONC (YYMMDDHH) AT RECEPTOR
1.	4.61744 (91021524) AT ( 168.61, -88.41) DC	26.	2.96506 (88012824) AT ( -466.86, -408.75) DC
2.	4.54582 (91021524) AT ( 194.09, -113.37) DC	27.	2.94879 (90102724) AT ( -652.66, -369.87) DC
3.	4.48742 (91021524) AT ( 201.20, -100.60) DC	28.	2.94292 (91021524) AT ( 220.04, -163.32) DC
4.	4.18722 (91021524) AT ( 219.09, -113.33) DC	29.	2.93541 (88012824) AT ( -516.50, -434.05) DC
5.	4.07727 (91021524) AT ( 193.61, -88.37) DC	30.	2.92113 (88092824) AT ( -341.86, -408.00) DC
6.	3.86871 (91021524) AT ( 219.56, -138.32) DC	31.	2.92095 (87033124) AT ( 219.56, -138.32) DC
7.	3.80803 (91021524) AT ( 244.57, -138.28) DC	32.	2.87836 (87033124) AT ( 169.56, -138.40) DC
8.	3.50274 (91021524) AT ( 244.09, -113.29) DC	33.	2.87831 (91021524) AT ( 270.52, -188.23) DC
9.	3.45528 (91021524) AT ( 194.56, -138.36) DC	34.	2.87323 (90102724) AT ( -701.66, -419.87) DC
10.	3.41158 (91021524) AT ( 269.57, -138.24) DC	35.	2.85377 (87033124) AT ( 220.04, -163.32) DC
11.	3.40788 (91021524) AT ( 270.05, -163.24) DC	36.	2.84962 (91021524) AT ( 269.10, -113.25) DC
12.	3.36348 (91021524) AT ( 218.61, -88.33) DC	37.	2.84862 (87111224) AT ( -491.86, -408.90) DC
13.	3.32691 (91021524) AT ( 245.04, -163.28) DC	38.	2.84154 (88012824) AT ( -541.50, -434.20) DC
14.	3.27851 (90102724) AT ( -627.66, -369.86) DC	39.	2.84150 (87112324) AT ( -630.69, -219.89) DC
15.	3.22241 (88012824) AT ( -442.22, -383.60) DC	40.	2.81751 (91121724) AT ( -442.22, -383.60) DC
16.	3.20906 (87033124) AT ( 194.09, -113.37) DC	41.	2.81142 (91021524) AT ( 301.80, -201.20) DC
17.	3.19392 (87033124) AT ( 168.61, -88.41) DC	42.	2.80594 (87111224) AT ( -442.22, -383.60) DC
18.	3.15532 (87033124) AT ( 194.56, -138.36) DC	43.	2.80029c(88012524) AT ( 195.03, -163.36) DC
19.	3.13205 (88012824) AT ( -491.86, -408.90) DC	44.	2.78688 (87033124) AT ( 195.03, -163.36) DC
20.	3.10614 (88012824) AT ( -492.21, -383.90) DC	45.	2.77273 (90102724) AT ( -704.10, -402.30) DC
21.	3.09277 (88012824) AT ( -502.90, -402.30) DC	46.	2.75780 (91110524) AT ( -342.22, -383.00) DC
22.	3.01474 (90102724) AT ( -677.16, -394.87) DC	47.	2.75745 (88012824) AT ( -541.15, -459.20) DC
23.	2.99856 (90102724) AT ( -652.16, -394.86) DC	48.	2.75435 (90102724) AT ( -726.66, -419.87) DC
24.	2.97677 (88012824) AT ( -516.86, -409.05) DC	49.	2.74885 (91030424) AT ( 168.61, -88.41) DC
25.	2.96806c(88012524) AT ( 169.56, -138.40) DC	50.	2.74053 (88012824) AT ( -491.50, -433.90) DC

\*\*\* RECEPTOR TYPES: GC = GRIDCART  
 GP = GRIDPOLR  
 DC = DISCCART  
 DP = DISCPOLR  
 BD = BOUNDARY

\*\*MODELOPTS:  
 CONC

RURAL FLAT DFAULT

PAGE 322  
 NOCMPL

\*\*\* THE MAXIMUM 50 24-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: 1 \*\*\*  
 INCLUDING SOURCE(S): CELL1 , CELL2 , CELL3 , CELLA , CELL5

\*\* CONC OF OTHER IN MICROGRAMS/M\*\*3 \*\*

RANK (XR, YR) OF TYPE	CONC (YYMDDHH) AT	RECEPTOR (XR, YR) OF TYPE	RANK	CONC (YYMDDHH) AT	RECEPTOR
1.	2.68265 (87033124) AT (	168.61, -88.41) DC	26.	1.66300 (87012224) AT (	194.56, -138.36) DC
2.	2.38147 (91042124) AT (	168.61, -88.41) DC	27.	1.64233 (87033124) AT (	169.56, -138.40) DC
3.	2.35095 (91030424) AT (	168.61, -88.41) DC	28.	1.62336 (87120424) AT (	201.20, -100.60) DC
4.	2.34865 (91021524) AT (	168.61, -88.41) DC	29.	1.62040 (91021524) AT (	219.09, -113.33) DC
5.	2.27916 (87033124) AT (	194.09, -113.37) DC	30.	1.61680 (88031924) AT (	194.56, -138.36) DC
6.	2.14057 (87120424) AT (	168.61, -88.41) DC	31.	1.58887c (88012524) AT (	195.03, -163.36) DC
7.	2.04153 (87012224) AT (	168.61, -88.41) DC	32.	1.58082 (87120424) AT (	194.09, -113.37) DC
8.	2.01634 (91030424) AT (	194.09, -113.37) DC	33.	1.56913 (87111124) AT (	168.61, -88.41) DC
9.	1.96669 (87033124) AT (	194.56, -138.36) DC	34.	1.55761 (87033124) AT (	219.09, -113.33) DC
10.	1.93272 (88031924) AT (	168.61, -88.41) DC	35.	1.53547 (87033124) AT (	220.04, -163.32) DC
11.	1.92187c (88012524) AT (	169.56, -138.40) DC	36.	1.52780 (87012224) AT (	169.56, -138.40) DC
12.	1.87119 (91021524) AT (	193.61, -88.37) DC	37.	1.52035c (88012524) AT (	220.04, -163.32) DC
13.	1.84841 (87033124) AT (	219.56, -138.32) DC	38.	1.50002 (88031024) AT (	169.56, -138.40) DC
14.	1.84437 (91030424) AT (	194.56, -138.36) DC	39.	1.48700 (87012224) AT (	219.56, -138.32) DC
15.	1.84435 (91021524) AT (	201.20, -100.60) DC	40.	1.48635 (87033124) AT (	245.04, -163.28) DC
16.	1.81004 (87012224) AT (	194.09, -113.37) DC	41.	1.47793 (91042124) AT (	219.09, -113.33) DC
17.	1.78068c (88012524) AT (	194.56, -138.36) DC	42.	1.46904 (87120424) AT (	193.61, -88.37) DC
18.	1.76920 (88031924) AT (	169.56, -138.40) DC	43.	1.46526 (90030324) AT (	193.61, -88.37) DC
19.	1.75867 (91021524) AT (	194.09, -113.37) DC	44.	1.46111 (87033124) AT (	193.61, -88.37) DC
20.	1.75100 (91042124) AT (	194.09, -113.37) DC	45.	1.46040 (90102524) AT (	169.56, -138.40) DC
21.	1.72261 (87033124) AT (	201.20, -100.60) DC	46.	1.45830 (87033124) AT (	244.57, -138.28) DC
22.	1.72051 (91042124) AT (	193.61, -88.37) DC	47.	1.45539 (91030424) AT (	169.56, -138.40) DC
23.	1.71977 (88031924) AT (	194.09, -113.37) DC	48.	1.44609 (87120424) AT (	219.09, -113.33) DC
24.	1.71826 (91042124) AT (	201.20, -100.60) DC	49.	1.43649 (88031424) AT (	168.61, -88.41) DC
25.	1.67316 (91030424) AT (	219.56, -138.32) DC	50.	1.43309 (90030324) AT (	168.61, -88.41) DC

\*\*\* RECEPTOR TYPES: GC = GRIDCART  
 GP = GRIDPOLR  
 DC = DISCCART  
 DP = DISCPOLR  
 BD = BOUNDARY

\*\*MODELPTS:  
 CONC

RURAL FLAT DFAULT

PAGE 323  
 NOCMPL

\*\*\* THE MAXIMUM 50 24-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: 2 \*\*\*  
 INCLUDING SOURCE(S): WASTE1 , WASTE2 ,

\*\* CONC OF OTHER IN MICROGRAMS/M\*\*3 \*\*

RANK (XR, YR) OF TYPE	CONC	(YYMMDDHH) AT	RECEPTOR (XR, YR) OF TYPE	RANK	CONC	(YYMMDDHH) AT	RECEPTOR
1.	3.25036	(90102724) AT (	-627.66, -369.86) DC	26.	2.64662	(89111224) AT (	-341.86, -408.00) DC
2.	3.19837	(88012824) AT (	-442.22, -383.60) DC	27.	2.64456	(87111224) AT (	-502.90, -402.30) DC
3.	3.10769	(88012824) AT (	-491.86, -408.90) DC	28.	2.64419	(88092824) AT (	-366.50, -433.15) DC
4.	3.08531	(88012824) AT (	-492.21, -383.90) DC	29.	2.63844	(89111224) AT (	-342.22, -383.00) DC
5.	3.06946	(88012824) AT (	-502.90, -402.30) DC	30.	2.61448	(87112324) AT (	-655.70, -219.90) DC
6.	2.97864	(90102724) AT (	-677.16, -394.87) DC	31.	2.60432	(91121724) AT (	-466.86, -408.75) DC
7.	2.96613	(90102724) AT (	-652.16, -394.86) DC	32.	2.58472	(91110524) AT (	-341.86, -408.00) DC
8.	2.95243	(88012824) AT (	-516.86, -409.05) DC	33.	2.58443	(89111224) AT (	-366.50, -433.15) DC
9.	2.94034	(88012824) AT (	-466.86, -408.75) DC	34.	2.58421	(90102724) AT (	-702.17, -394.87) DC
10.	2.91760	(90102724) AT (	-652.66, -369.87) DC	35.	2.58393	(88111524) AT (	-342.22, -383.00) DC
11.	2.90793	(88092824) AT (	-341.86, -408.00) DC	36.	2.56309	(90102724) AT (	-676.65, -419.86) DC
12.	2.90706	(88012824) AT (	-516.50, -434.05) DC	37.	2.55874	(88012824) AT (	-565.79, -484.35) DC
13.	2.84125	(87111224) AT (	-491.86, -408.90) DC	38.	2.54522	(87112324) AT (	-680.20, -244.90) DC
14.	2.83168	(90102724) AT (	-701.66, -419.87) DC	39.	2.54303	(90102724) AT (	-726.16, -444.87) DC
15.	2.82246	(87112324) AT (	-630.69, -219.89) DC	40.	2.53957	(87111224) AT (	-466.86, -408.75) DC
16.	2.81300	(88012824) AT (	-541.50, -434.20) DC	41.	2.53930	(88012824) AT (	-590.79, -484.50) DC
17.	2.81243	(91121724) AT (	-442.22, -383.60) DC	42.	2.52146	(91121724) AT (	-491.86, -408.90) DC
18.	2.79966	(87111224) AT (	-442.22, -383.60) DC	43.	2.51929c	(89110524) AT (	-491.86, -408.90) DC
19.	2.75541	(91110524) AT (	-342.22, -383.00) DC	44.	2.51316	(91110524) AT (	-366.86, -408.15) DC
20.	2.73179	(90102724) AT (	-704.10, -402.30) DC	45.	2.51281	(88012824) AT (	-516.15, -459.05) DC
21.	2.72491	(88012824) AT (	-541.15, -459.20) DC	46.	2.51083	(88012824) AT (	-541.86, -409.20) DC
22.	2.71289	(88012824) AT (	-491.50, -433.90) DC	47.	2.50243c	(89091324) AT (	-342.22, -383.00) DC
23.	2.70809	(90102724) AT (	-726.66, -419.87) DC	48.	2.49411	(87111224) AT (	-541.15, -459.20) DC
24.	2.67380	(88012824) AT (	-566.15, -459.35) DC	49.	2.49136	(87112324) AT (	-655.19, -244.89) DC
25.	2.66449	(87111224) AT (	-516.50, -434.05) DC	50.	2.49094	(88012824) AT (	-566.50, -434.35) DC

\*\*\* RECEPTOR TYPES: GC = GRIDCART  
 GP = GRIDPOLR  
 DC = DISCCART  
 DP = DISCPOLR  
 BD = BOUNDARY

\*\*MODELOPTs:  
 CONC

RURAL FLAT DFAULT

NOCMPL

\*\*\* THE SUMMARY OF MAXIMUM ANNUAL ( 5 YRS) RESULTS \*\*\*

\*\* CONC OF OTHER IN MICROGRAMS/M\*\*3 \*\*

GROUP ID	AVERAGE CONC	RECEPTOR (XR, YR, ZELEV, ZFLAG)	OF TYPE	NETWORK GRID-ID
ALL	1ST HIGHEST VALUE IS 0.29512 AT (	-442.22, -383.60, 0.00, 0.00)	DC	NA
	2ND HIGHEST VALUE IS 0.27526 AT (	-466.86, -408.75, 0.00, 0.00)	DC	NA
	3RD HIGHEST VALUE IS 0.27525 AT (	-492.21, -383.90, 0.00, 0.00)	DC	NA
	4TH HIGHEST VALUE IS 0.27257 AT (	-491.86, -408.90, 0.00, 0.00)	DC	NA
	5TH HIGHEST VALUE IS 0.26896 AT (	-629.68, -269.88, 0.00, 0.00)	DC	NA
	6TH HIGHEST VALUE IS 0.26795 AT (	-502.90, -402.30, 0.00, 0.00)	DC	NA
	7TH HIGHEST VALUE IS 0.26479 AT (	-592.21, -384.50, 0.00, 0.00)	DC	NA
	8TH HIGHEST VALUE IS 0.26268 AT (	-628.67, -319.87, 0.00, 0.00)	DC	NA
	9TH HIGHEST VALUE IS 0.26220 AT (	-627.66, -369.86, 0.00, 0.00)	DC	NA
	10TH HIGHEST VALUE IS 0.26162 AT (	-542.21, -384.20, 0.00, 0.00)	DC	NA
1	1ST HIGHEST VALUE IS 0.05638 AT (	168.61, -88.41, 0.00, 0.00)	DC	NA
	2ND HIGHEST VALUE IS 0.04426 AT (	169.56, -138.40, 0.00, 0.00)	DC	NA
	3RD HIGHEST VALUE IS 0.04300 AT (	194.09, -113.37, 0.00, 0.00)	DC	NA
	4TH HIGHEST VALUE IS 0.04002 AT (	194.56, -138.36, 0.00, 0.00)	DC	NA
	5TH HIGHEST VALUE IS 0.03881 AT (	193.61, -88.37, 0.00, 0.00)	DC	NA
	6TH HIGHEST VALUE IS 0.03785 AT (	201.20, -100.60, 0.00, 0.00)	DC	NA
	7TH HIGHEST VALUE IS 0.03392 AT (	195.03, -163.36, 0.00, 0.00)	DC	NA
	8TH HIGHEST VALUE IS 0.03342 AT (	219.56, -138.32, 0.00, 0.00)	DC	NA
	9TH HIGHEST VALUE IS 0.03226 AT (	219.09, -113.33, 0.00, 0.00)	DC	NA
	10TH HIGHEST VALUE IS 0.03119 AT (	220.04, -163.32, 0.00, 0.00)	DC	NA
2	1ST HIGHEST VALUE IS 0.29211 AT (	-442.22, -383.60, 0.00, 0.00)	DC	NA
	2ND HIGHEST VALUE IS 0.27176 AT (	-466.86, -408.75, 0.00, 0.00)	DC	NA
	3RD HIGHEST VALUE IS 0.27170 AT (	-492.21, -383.90, 0.00, 0.00)	DC	NA
	4TH HIGHEST VALUE IS 0.26872 AT (	-491.86, -408.90, 0.00, 0.00)	DC	NA
	5TH HIGHEST VALUE IS 0.26399 AT (	-502.90, -402.30, 0.00, 0.00)	DC	NA
	6TH HIGHEST VALUE IS 0.26377 AT (	-629.68, -269.88, 0.00, 0.00)	DC	NA
	7TH HIGHEST VALUE IS 0.25923 AT (	-592.21, -384.50, 0.00, 0.00)	DC	NA
	8TH HIGHEST VALUE IS 0.25718 AT (	-542.21, -384.20, 0.00, 0.00)	DC	NA
	9TH HIGHEST VALUE IS 0.25696 AT (	-628.67, -319.87, 0.00, 0.00)	DC	NA
	10TH HIGHEST VALUE IS 0.25688 AT (	-441.86, -408.60, 0.00, 0.00)	DC	NA

\*\*\* RECEPTOR TYPES: GC = GRIDCART  
 GP = GRIDPOLR  
 DC = DISCCART  
 DP = DISCPOLR  
 BD = BOUNDARY

\*\*MODELOPTs:  
 CONC

RURAL FLAT DFAULT

NOCMPL

\*\*\* THE SUMMARY OF HIGHEST 24-HR RESULTS \*\*\*

\*\* CONC OF OTHER IN MICROGRAMS/M\*\*3

GROUP ID	AVERAGE CONC	DATE (YYMMDDHH)	RECEPTOR (XR, YR, ZELEV, ZFLAG)	OF TYPE	NETWORK GRID-ID
ALL	HIGH 1ST HIGH VALUE IS 4.61744	ON 91021524: AT (	168.61, -88.41, 0.00,	0.00) DC	NA
1	HIGH 1ST HIGH VALUE IS 2.68265	ON 87033124: AT (	168.61, -88.41, 0.00,	0.00) DC	NA
2	HIGH 1ST HIGH VALUE IS 3.25036	ON 90102724: AT (	-627.66, -369.86, 0.00,	0.00) DC	NA



**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

7000 0600 0026 4129 8818

--	--

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
<b>Total Postage &amp; Fees</b>	\$	

*Recipient's Name (Please Print Clearly) (to be completed by mailer)*  
**Mr. Gary Lambert**

*Street, Apt. No.; or PO Box No.*  
**35 Braintree Hill Office Park**

*City, State, ZIP+4*  
**Braintree, MA 02184 Ste 107**

PS Form 3811, July 1999 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1 Article Addressed to:

Mr. Gary Lambert  
 Executive Vice President  
 CPV Pierce, Ltd.  
 35 Braintree Hill Office Park  
 Suite 107  
 Braintree, MA 02184

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by *(Please Print Clearly)* B. Date of Delivery  
 C. Signature *Sharon LeBlanc*  Agent  Addressee  
 D. Is delivery address different from item 1?  Yes  No  
 If YES, enter delivery address below:

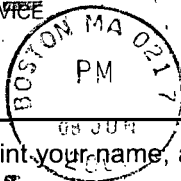
**JUN 08 2001**

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? *(Extra Fee)*  Yes

2 Article Number *(Copy from service label)*  
 7000 0600 0026 4129 8818

UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Dept. of Environmental Protection  
Division of Air Resources Mgt.  
Bureau of Air Regulation, NSR  
2600 Blair Stone Rd., MS 5505  
Tallahassee, FL 32399-2400

RECEIVED

JUN 12 2001

BUREAU OF AIR REGULATION

32399-2400

Postnet barcode

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

7000 0600 0026 4129 9204

Mr. Gary Lambert

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark  
Here

*Recipient's Name (Please Print Clearly) (to be completed by mailer)*  
 CPV Gulfcoast Ltd.  
 Street, Apt. No., or PO Box No.  
 35 Braintree Hill Office Park ste. 107  
 City, State, ZIP+4  
 Braintree, MA 02184

PS Form 3800, February 2000 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1 Article Addressed to:  
 Mr. Gary Lambert  
 Executive Vice President  
 CPV Gulfcoast, Ltd.  
 35 Braintree Hill Office Park  
 Suite 107  
 Braintree, MA 02184

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) B. Date of Delivery  
 C. Signature *x C. R. V.*  Agent  Addressee  
 D. Is delivery address different from item 1?  Yes  No  
 If YES, enter delivery address below:  
 3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.  
 4. Restricted Delivery? (Extra Fee)  Yes



2 Article Number (Copy from service label)  
 7000 2870 0000 7028 2829

UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box

Dept. of Environmental Protection  
Division of Air Resources Mgt.  
Bureau of Air Regulation, NSR  
2600 Blair Stone Rd., MS 5505  
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

NOV 26 2001

RECEIVED



7099 3400 0000 1449 4635

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
Article Sent To: Mr. Gary Lambert	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>
Name (Please Print Clearly) (to be completed by mailer) Mr. Gary Lambert	
Street, Apt. No., or PO Box No. 35 Braintree Hill Office Park-Ste 107	
City, State, ZIP+4 Braintree, MA 02184	
PS Form 3800, July 1999 <span style="float: right;">See Reverse for Instructions</span>	

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
Mr. Gary Lambert  
Executive Vice President  
CPV Gulfcoast, Ltd  
35 Braintree Hill Office  
Suite 107  
Braintree, MA 02184

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) B. Date of Delivery  
1-30-01

C. Signature  
X *S. Y. LeBlanc*  Agent  
 Addressee

D. Is delivery address different from item 1?  Yes  
If YES, enter delivery address below:  No

JAN 30 2001  
PS 02184-993

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

2. Article Number (Copy from service label)  
7099 3400 0000 1449 4635

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
 Mr. Joe McClash, Chair  
 Manatee County Board of  
 Commissioners  
 P.O. Box 1000  
 Bradenton, FL 34206-1000

2. Article Number (Copy from service label)  
 7000 0600 0026 4129 9341

PS Form 3811, July 1999

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) *Terry L. Farnham*  
 B. Date of Delivery  
 C. Signature *Terry L. FARNHAM*  Agent  Addressee  
 X  *Terry L. FARNHAM*

D. Is delivery address different from item 1?  Yes  No  
 If YES, enter delivery address below:



3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

Domestic Return Receipt

102595-99 M-1789

**U.S. Postal Service  
 CERTIFIED MAIL RECEIPT  
 (Domestic Mail Only; No Insurance Coverage Provided)**

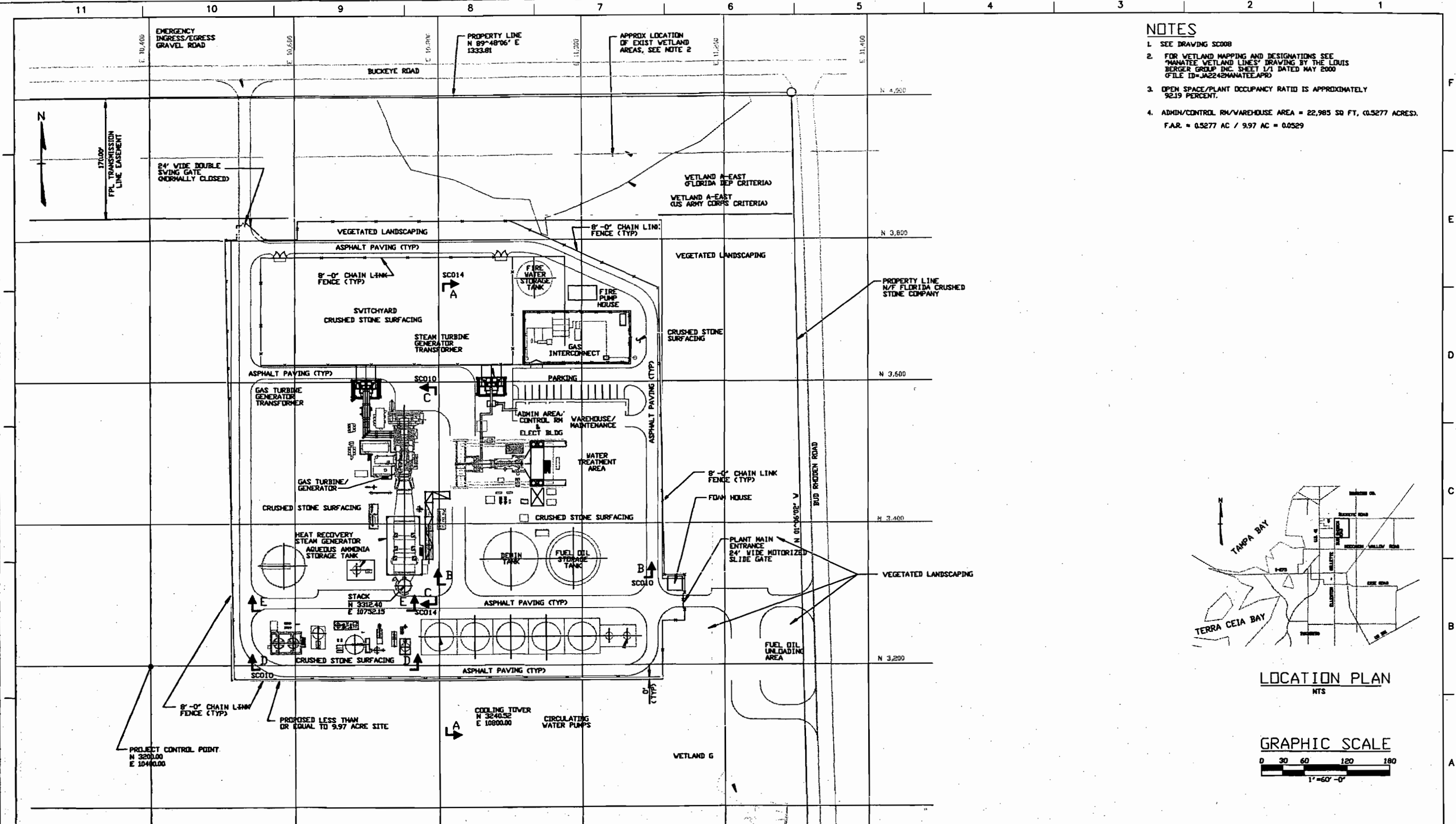
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[Redacted]

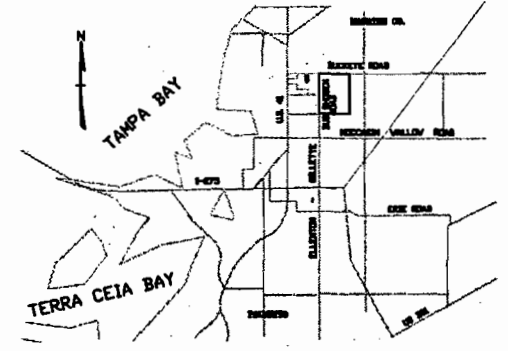
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark  
 Here

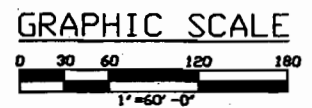
Recipient's Name (Please Print Clearly) (to be completed by mailer)  
 Mr. Joe McClash, Chair  
 Street, Apt. No., or PO Box No.  
 PO Box 1000  
 City, State, ZIP+4  
 Bradenton, FL 34206-1000



- NOTES**
1. SEE DRAWING SC008
  2. FOR WETLAND MAPPING AND DESIGNATIONS SEE "MANATEE WETLAND LINES" DRAWING BY THE LOUIS BERGER GROUP INC. SHEET 1/1 DATED MAY 2000 (FILE ID=JA2242MANATEEAPR)
  3. OPEN SPACE/PLANT OCCUPANCY RATIO IS APPROXIMATELY 92.19 PERCENT.
  4. ADMIN/CONTROL RM/WAREHOUSE AREA = 22,985 SQ FT, (0.5277 ACRES).  
F.A.R. = 0.5277 AC / 9.97 AC = 0.0529



LOCATION PLAN  
MTS

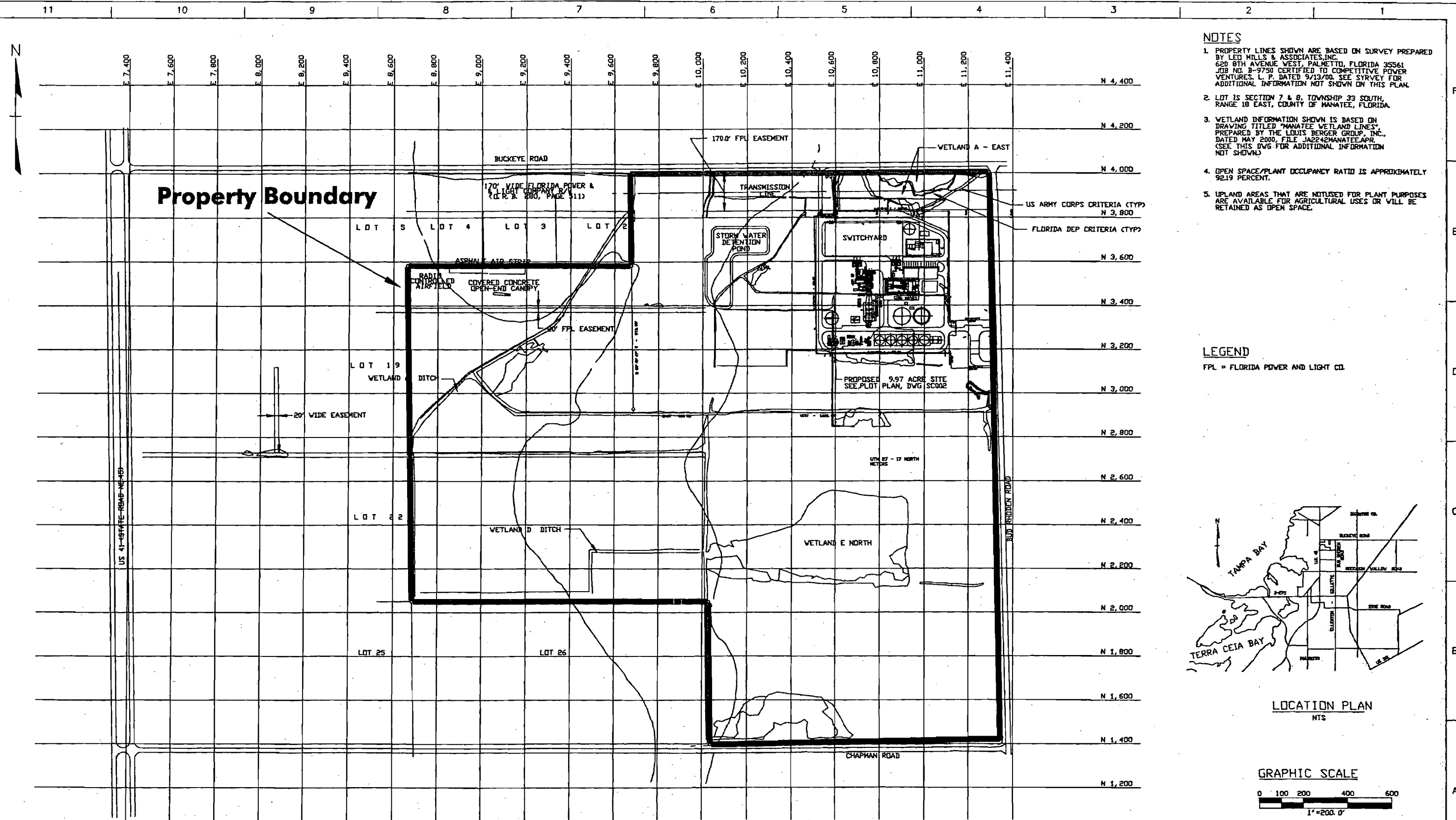


Rev No	Revision	Date	Des	Chkd	Approved Chief Engr	Rev No	Revision	Date	Des	Chkd	Approved Chief Engr	Rev No	Revision	Date	Des	Chkd	Approved Chief Engr	Drawing Control				Engineering Review					
																			Purpose	Approved By	Date	Released By	Date	Disc	Engr	Date	
																			For Information								
																			For Comment								
																			For Bid								
																			For Construction								
																			Reviewed By	Approved for Construction	Date	Work Order	Drawing No	Sh	Rev		
																			Manager-Design/Drafting	Chief Engr	Engineer	Scale	2377	SC009		K	

CPV GULFCOAST POWER PROJECT  
FLORIDA

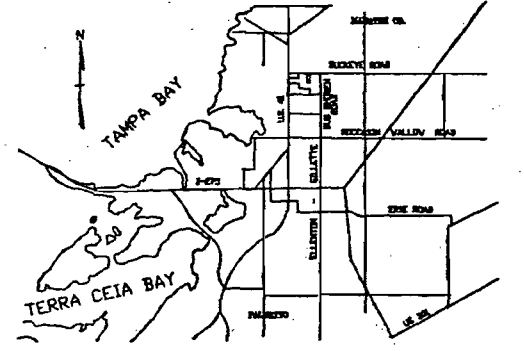
PROJECT PLOT PLAN

BURNS AND ROE ENTERPRISES, INC.  
Engineers and Constructors - Oradell, NJ

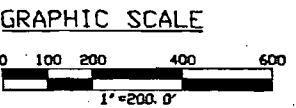


- NOTES**
- PROPERTY LINES SHOWN ARE BASED ON SURVEY PREPARED BY LED HILLS & ASSOCIATES, INC. 620 8TH AVENUE, WEST, PALMETTO, FLORIDA 33561. JOB NO. B-9750. CERTIFIED TO COMPETITIVE POWER VENTURES, L.P. DATED 9/13/00. SEE SURVEY FOR ADDITIONAL INFORMATION NOT SHOWN ON THIS PLAN.
  - LOT IS SECTION 7 & 8, TOWNSHIP 33 SOUTH, RANGE 18 EAST, COUNTY OF MANATEE, FLORIDA.
  - WETLAND INFORMATION SHOWN IS BASED ON DRAWING TITLED "MANATEE WETLAND LINES", PREPARED BY THE LOUIS BERGER GROUP, INC., DATED MAY 2000, FILE JA2242MANATEE.APR. (SEE THIS DWG FOR ADDITIONAL INFORMATION NOT SHOWN).
  - OPEN SPACE/PLANT OCCUPANCY RATIO IS APPROXIMATELY 92.19 PERCENT.
  - UPLAND AREAS THAT ARE NOT USED FOR PLANT PURPOSES ARE AVAILABLE FOR AGRICULTURAL USES OR WILL BE RETAINED AS OPEN SPACE.

**LEGEND**  
 FPL = FLORIDA POWER AND LIGHT CO.



**LOCATION PLAN**  
 NTS



Rev No	Revision	Date	Des	Chkd	Approved Chief Engr	Rev No	Revision	Date	Des	Chkd	Approved Chief Engr	Drawing Control				Engineering Review			CPV GULFCOAST POWER PROJECT FLORIDA					
												Purpose	Approved By	Date	Revised By	Date	Disc	Engr	Date	SITE PLAN				
C	PERMIT ISSUE											For Information							BURNS AND ROE ENTERPRISES, INC. Engineers and Constructors - Oradell, NJ					
B	PERMIT ISSUE, REVISED NOTES											For Comment							Approved for Construction: Date Work Order Drawing No Sh Rev					
E	RELOCATED STORM WATER RETENTION POND											For Construction							Manager-Design/Drafting Chief C&E Engineer S&C 2377 SC008 E					
												2377-001/SC008.DWG (200)				STATUS: 4/6/2001								