

196 Baker Avenue, Concord, Massachusetts 01742

261097-halpin.doc

March 13, 2000

Mr. Michael Halpin
 Florida Department of Environmental Protection
 Bureau of Air Regulation
 2600 Blair Stone Road
 Tallahassee, FL 32399-2400

Subject: Indiantown Cogeneration, L.P. Air Permit Modifications
Permit No.: PSD-FL-168, 0850102-001-AV

Dear Mr. Halpin:

On behalf of Indiantown Cogeneration, L.P., I am writing to request that you to proceed with review and permitting of the proposed CO₂ recovery plant and that you hold review of the proposed MW increase in abeyance

We understand through your conversations with us and with David Dee of Landers and Parsons that the submittal regarding the CO₂ plant is sufficient, so FDEP can proceed with it, but the submittal regarding the MW increase is not sufficient and will delay everything else, unless the MW issues are set aside for now. Please do set aside the MW increase issues for now; we do not wish to delay other portions of the submittals.

ICLP is conducting an internal review of the feasibility of the proposed MW increase. Depending on the results of that review, we will supply you with further information to continue your review of that portion of the project.

We also ask that the review and approval process continue for the other air quality portions of the proposed Modification and the proposed Amendments.

Thank you for your time and consideration. If you have any questions or comments, please feel free to contact me at 978-371-4339, David Burrage of ICLP at 561-597-6500 extension 19, or David Dee of Landers and Parsons at 850-681-0311.

Very truly yours,

Earth Tech



Andrew Jablonowski, P.E.
 Senior Engineer

cc: D. Burrage, S. Sorrentino, D. Bullock, Indiantown Cogeneration LP
 Michelle Golden, PG&E Generating
 David Dee, Landers & Parsons

Telephone

978-371-4000

Facsimile

978-371-2468

EARTH  TECH



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

January 31, 2000

Mr. Stephen Sorrentino
General Manager
Indiantown Cogeneration, L.P.
P.O. Box 1799
Indiantown, Florida 34956

RECEIVED
FEB 01 2000
BUREAU OF AIR REGULATION

Re: Indiantown Cogeneration Project, PA 90-31

Dear Mr. Sorrentino:

The Department and the South Florida Water Management District have reviewed your request for amendments and modifications to the Conditions of Certification for the Indiantown Cogeneration Project. In order to complete the processing of your requests the following information needs to be provided:

The Bureau of Air Regulation requests that you please update the original BACT Determination based upon current technology. This should include an evaluation of ammonia slip.

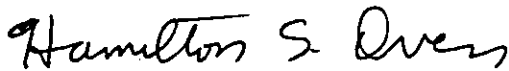
1. The Department notes that the (currently permitted) pollutant emissions use only lb/hr (on a 24-hour block average) rather than lb/MMBtu for compliance purposes. According to EPA guidance (New Source Review Workshop Manual) "...express the emission limits in two different ways, (e.g., lbs/hr) and...(e.g., lbs/MMBtu).... The source must comply with both values to demonstrate compliance." The proposed BACT should address recommended compliance averaging times as well as measurement units.
2. The Department presumes that limestone, coal and ash-handling related emissions will increase (PTE vs. actual) as a result of the requested heat input increase. Please quantify these increases and include appropriately within the modeling as well as BACT proposal.
3. Please provide information from the boiler, steam turbine and generator manufacturers, indicating the continuous and peak ratings. Additionally provide information on the limiting factors for coal handling capacity. Where ratings are time (or otherwise) limited, please provide those limits as well. The Department is interested in nameplate models and related data, where available.
4. Please submit the required PSD modeling analyses for both the Class I and Class II areas.

Indiantown Cogen
Jan. 31, 2000
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The Department will provide the U.S. Park Service and EPA comments as soon as they are available. You may contact Mike Halpin at 850/921-9530 regarding the above questions. Additionally, Cleve Holladay can be contacted at 921-8986 concerning any modeling questions.

A copy of the South Florida Water Management District request for information is attached

Sincerely,

A handwritten signature in cursive script that reads "Hamilton S. Oven".

Hamilton S. Oven, P.E.

Attach:

cc: Mike Halpin, BAR
James Golden, SFWMD
Scott Goorland, Esq.
David Dee, Esq.



South Florida Water Management District

LAN 04-06

January 31, 2000

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

Paul
 Dear Mr. Oven:

**Subject: Indiantown Cogeneration Project, PA 90-31
 Proposed Modification & Amendments to Site Certification**

South Florida Water Management District (SFWMD) staff has reviewed the applications submitted by Indiantown Cogeneration, L.P. (ICLP), outlining the proposed modifications and amendments to the above-referenced project, as required by Sections 403.501-539, F.S., and Chapter 62-17, F.A.C.

As a result of that review, we have identified a number of outstanding issues and sufficiency questions which must be addressed in order for the SFWMD to complete its review of this project. Please include the following questions/comments in your sufficiency letter on this project.

PROPOSED MODIFICATIONS

Addition of Carbon Dioxide Recovery Plant

Under the existing Site Certification for this project, the Floridan Aquifer is the approved backup water supply source for this project. The Floridan Aquifer must be used when water is unavailable from Taylor Creek/Nubbin Slough/L-63N due to drought conditions. During the 1999 dry season, the water levels in L-63N approached 17.5' NGVD. The 17.5' NGVD elevation was established by the SFWMD as the lowest acceptable stage at which water withdrawals could occur without adversely impacting the SFWMD's ability to maintain minimum flows in the canal and adversely impacting any existing legal users or wetlands in the vicinity of the withdrawal facilities. During the 1999 drought, ICLP had concerns that the poor quality of the Floridan Aquifer wells would prevent their effective use as a backup water supply source. At that time, ICLP advised SFWMD staff that they would evaluate other options for future drought events. Please submit a detailed evaluation of alternative backup water supply sources.

Governing Board:

Michael Collins, Chairman
 Michael D. Minton, Vice Chairman
 Mitchell W. Berger

Vera M. Carter
 Gerardo E. Fernandez
 Patrick J. Gleason

Nicolas J. Gutierrez, Jr.
 Harkley R. Thornton
 Trudi K. Williams

Frank R. Finch, P.E., Executive Director
 Michael Slayton, Deputy Executive Director
 Trevor Campbell, Deputy Executive Director

Mr. Hamilton S. Oven, Jr., P.E.
January 31, 2000
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The applicant indicates that detailed construction plans for the recovery plant are unavailable at this time. Please note that the applicant must submit detailed paving/grading/drainage plans and supporting calculations signed and sealed by a Florida registered engineer prior to the SFWMD issuing a letter authorizing construction of any proposed new facilities, pursuant to the existing applicable Conditions of Certification.

Addition of Chilled Water Plant

The applicant indicates that detailed construction plans for the chilled water plant are unavailable at this time. Please note that the applicant must submit detailed paving/grading/drainage plans and supporting calculations signed and sealed by a Florida registered engineer prior to the SFWMD issuing a letter authorizing construction of any proposed new facilities, pursuant to the existing applicable Conditions of Certification.

Changes in Plant Output Rating

The proposed modifications are non-jurisdictional to the SFWMD. Consequently, we have no objections to approval of the proposed modifications.

Changes in Cooling Water Storage Pond Elevation

Section 1.2.2 of Appendix 6 of the District's Basis of Review (BOR) defines a minor impoundment as one where "depths above the surrounding ground level would be generally limited to four feet." If it is the desire of the applicant to have the cooling water storage pond treated as something other than a minor impoundment, additional topographic information in the vicinity of the pond will be required to demonstrate that the water elevations within the pond are generally limited to the elevation of the surrounding topography.

Section 2.2.2.2 of Appendix 6 of the SFWMD's Basis of Review (BOR) requires that minor impoundments provide freeboard "equal to the maximum water depth dimension but not less than 2 feet, nor more than 3 feet." Based on the information provided, it appears that the subject impoundment would require a minimum of 3.0' of freeboard. What new elevation is proposed for the working level of both the north and south sections of the pond? How much freeboard is proposed between this elevation and the emergency overflow elevation where discharge will occur? What will the design storm elevation be and how much will the pond discharge during the design storm? In addition, please explain how the proposed changes will meet the intent of Section 2.2.2.2 of the BOR.

Mr. Hamilton S. Oven, Jr., P.E.
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Clarification of Auxiliary Boiler Operating Requirement

The proposed modifications are non-jurisdictional to the SFWMD. Consequently, we have no objections to approval of the proposed modifications.

Modifications to Reflect Revised Water Allocation Plan with the SFWMD

The SFWMD has previously reviewed and approved these changes, as outlined in the correspondence in Attachment G.

Modifications of Groundwater Monitoring Requirements

We have no objections to approval of the proposed modifications.

Consistency Among PSD, Title V, NPDES, and COC Conditions

We have no objections to approval of the proposed modifications.

NPDES Discharges

We have no objections to approval of the proposed modifications.

Changes to Air Permit Requirements

The proposed modifications are non-jurisdictional to the SFWMD. Consequently, we have no objections to approval of the proposed modifications.

PROPOSED AMENDMENTS

Additional Steam Use by Steam Host

Please be advised that a Modification to Caulkins Citrus surface water management permit will likely be required prior to construction if the chilled water plant and related equipment is ultimately located on their property.

Water Treatment System Operating Flexibility

The proposed modifications are non-jurisdictional to the SFWMD. Consequently, we have no objections to approval of the proposed modifications.

Mr. Hamilton S. Oven, Jr., P.E.
January 31, 2000
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Site Plan Changes Reflecting As-Built Conditions

Staff is having difficulty locating the additional pavement near the lime storage system, around the power block, and in the area between the baghouse and the existing roadway. Please submit a copy of the as-built drawing in which these areas have been highlighted to identify the new areas of pavement. What is the total area of this pavement?

Section 2.3.4 of the application indicates that the paving near the open shed area is 240 square feet. Is this the total of the areas described in the above question? If not, please highlight this area as well.

Although the submitted calculations appear to address the increase in runoff associated with the site plan revisions, they do not address the loss in-site storage also associated with the site plan revisions. Please submit detailed paving/grading/drainage plans and supporting calculations signed and sealed by a Florida registered engineer for staff's review and approval, pursuant to the existing applicable Conditions of Certification.

Alternative Cover For Emergency Coal Pile

The proposed modifications are non-jurisdictional to the SFWMD. Consequently, we have no objections to approval of the proposed modifications.

Completion of Ambient Air Quality Monitoring

The proposed modifications are non-jurisdictional to the SFWMD. Consequently, we have no objections to approval of the proposed modifications.

Continuous Emissions Monitor Span Range

The proposed modifications are non-jurisdictional to the SFWMD. Consequently, we have no objections to approval of the proposed modifications.

Hazardous Waste Storage Retention Time

The proposed modifications are non-jurisdictional to the SFWMD. Consequently, we have no objections to approval of the proposed modifications.

In addition to the above, the SFWMD's review of the 1999 Dam Inspection Program Report for this project indicates that there was an increase in elevation for the wastewater

Mr. Hamilton S. Oven, Jr., P.E.
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storage pond. However, it is not clear whether the increase is associated with the water elevation or the elevation of the spillway. The increase in elevation may be an issue that needs to be addressed in this application or a future application.

We appreciate this opportunity to comment. Please give me a call at (561) 682-6862 if any of the above requires additional clarification.

Sincerely,



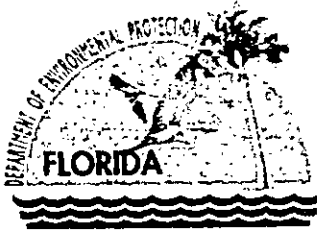
James J. Golden, AICP
Senior Planner
Environmental Resource Regulation

/jig

c: Steve Sorrentino, ICLP
David Burrage, ICLP

Mr. Hamilton S. Oven, Jr., P.E.
January 31, 2000
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bc: Terrie Bates (4210)
Tony Waterhouse (4220)
Maria Clemente (4220)
John Shaffer (4220)
Rob Robbins (4250)
Don Medellin (4250)
Brent Nicholas (4250)
Ken Ammon (4310)
Scott Burns (4320)
Jeff Rosenfeld (4320)
Lisa Ullman (4320)
Claudia Kugler (4210)
Bob Brown (4230)
Ken Todd (4230)
Jeff Gronborg (4230)
Terry Clark (4350)
Mark Elsner (4350)
Tommy Strowd (5610)
Doug MacLaughlin (1430)
Luna Ergas (1430)
Paul Millar (2147)



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
January 6, 2000

David B. Struhs
Secretary

Mr. Gregg Worley, Chief
Air, Radiation Technology Branch
Preconstruction/HAP Section
U.S. EPA – Region IV
61 Forsyth Street
Atlanta, Georgia 30303

Re: Indiantown Site Certification Modification, PA 90-31

Dear Mr. Worley:

Enclosed for your review and comment is an application for the above-mentioned project. It consists of a request to add a carbon dioxide recovery and chilled water plant, an increase to the heat input and additional miscellaneous changes.

We request your review and opinion of the project, particularly related to the revisitation of BACT for each specific pollutant. Your comments can be forwarded to my attention at the letterhead address or faxed to me at (850) 922-6979. If you have any questions, please contact Mike Halpin at (850) 921-9530.

Sincerely,

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

AAL/mph/kt

Enclosures

cc: Mike Halpin, BAR



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

January 6, 2000

Mr. John Bunyak, Chief
Policy, Planning & Permit Review Branch
NPS-Air Quality Division
Post Office Box 25287
Denver, CO 80225

Re: Indiantown Cogeneration Site Certification Modification, PA 90-31

Dear Mr. Bunyak:

Enclosed for your review and comment is an application for the above-mentioned project. It consists of a request to add a carbon dioxide recovery and chilled water plant, an increase to the heat input and additional miscellaneous changes.

We request your review and opinion of the project, particularly related to the revisitation of BACT for each specific pollutant. Your comments can be forwarded to my attention at the letterhead address or faxed to me at (850) 922-6979. If you have any questions, please contact Mike Halpin at (850) 921-9530.

Sincerely,

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

AAL/mph/kt

Enclosures

cc: Mike Halpin, BAR

Indiantown Cogeneration, L.P.

December 22, 1999

Indiantown Cogeneration, L.P.
P.O. Box 1799
19140 SW Warfield Blvd.
Indiantown, FL 34956
Tel: 561.597.6500
Fax: 561.597.6210

Hamilton S. Oven, P.E.
Administrator, Siting Coordination Office
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED
DEC 30 1999
BUREAU OF AIR REGULATION

RE: ICLP's Amendments and Request for Modifications

Dear Mr. Oven:

Indiantown Cogeneration L.P. (ICLP) hereby submits the following two documents for review and approval by the Florida Department of Environmental Protection (DEP):

- Amendments to the Site Certification Application for the Indiantown Cogeneration Facility (Facility); and
- Application for Modifications of the Site Certificate for the Indiantown Cogeneration Facility.

The Amendments to the Site Certification Application (the Amendments) are being provided to inform the Department of certain changes to the Facility's design and operation. The Amendments do not require changes to the Conditions of Certification for the Facility. The Amendments also do not involve any significant, additional adverse environmental impacts that would require new environmental permits or approvals.

ICLP's Application for Modifications of the Site Certificate (the Modifications) describes several other proposed changes to the Facility's design and operations. The Modifications will require changes to the Conditions of Certification, in accordance with Section 403.516(1)(b), Florida Statutes.

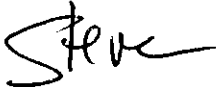
Copies of the Amendments and Modifications also are being sent to the people identified in the attached Distribution List.

Attached to this letter is ICLP's check in the amount of \$10,000, payable to the Florida Permit Fee Trust Fund. This check is being submitted to pay DEP's fee for a modification, in accordance with DEP Rule 62-17.293(1)(c), F.A.C.

ICLP would like to meet with you at your earliest convenience to discuss the Amendments and Modifications for ICLP's Facility. In the interim, please call me or David Burrage at 561-597-6500 if you have any questions regarding these submissions.

Thank you for your assistance with this issue.

Sincerely,



Stephen Sorrentino
General Manager

Distribution List for Amendments to the
Site Certification Application for the Indiantown Cogeneration Facility
and the Application for Modification of the Site Certificate for the
Indiantown Cogeneration Facility

<p>Hamilton S. "Buck" Oven, Jr., P.E. Administrator Office of Siting Coordination Department of Environmental Protection 2600 Blair Stone Road, MS: 48 Tallahassee, Florida 32399-3000 (3 copies)</p>	<p>John Fumero (3 copies) General Counsel South Florida Water Management District P.O. Box 24680 West Palm Beach, Florida 33416-4680</p>
<p>Cathy Carter Agency Clerk Office of General Counsel Department of Environmental Protection 3900 Commonwealth Blvd., MS: 35 Tallahassee, Florida 32399-3000</p>	<p>Michael Busha Executive Director Treasure Coast Regional Planning Council 301 E. Ocean Blvd., Suite 300 Stuart, Florida 34994</p>
<p>Scott Goorland Assistant General Counsel Office of General Counsel Department of Environmental Protection 3900 Commonwealth Blvd., MS: 35 Tallahassee, Florida 32399-3000</p>	<p>Gary K. Oldehoff County Attorney Martin County 2401 Southeast Monterey Road Stuart, Florida 34996</p>
<p>Clair Fancy Bureau Chief Bureau of Air Regulation Department of Environmental Protection 2400 Blair Stone Road, MS: 5505 Tallahassee, Florida 32399-2400</p>	<p>R. Douglas Leonard Executive Director Central Florida Regional Planning Council P.O. Box 2089 Bartow, Florida 33831</p>
<p>Cari Roth General Counsel Office of General Counsel Department of Community Affairs 2555 Shumard Oak Blvd. Tallahassee, Florida 32399</p>	<p>George Long County Administrator Okeechobee County 304 N.W. 2nd Street Okeechobee, Florida 34972</p>
<p>Pam Leslie General Counsel Department of Transportation 605 Suwannee Street, MS: 58 Tallahassee, Florida 32399-0458</p>	<p>Cathy Beddell Acting General Counsel Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399</p>

<p>Sandra Whitmire Intergovernmental Coordination & Review Coordinator Department of Transportation 605 Suwannee Street, MS: 28 Tallahassee, Florida 32399-0450</p>	<p>Jim Antista General Counsel Florida Fish and Wildlife Conservation Commission 620 S. Meridian Street Tallahassee, Florida 32399-1600</p>
<p>Melissa L. Meeker (3 copies) Director District Management Department of Environmental Protection Southeast District Office 400 North Congress Avenue West Palm Beach, Florida 33401</p>	<p>Michelle Golden (2 copies) PG&E Generating 7500 Old Georgetown Road Bethesda, Maryland 20814</p>
<p>David S. Dee (2 copies) Attorney at Law Landers & Parsons, P.A. P.O. Box 271 Tallahassee, Florida 32302-0271 (Counsel for Applicant)</p>	<p>David Burrage (2 copies) Indiantown Cogeneration, L.P. P.O. Box 1799 Indiantown, Florida 34956</p>
<p>Andrew Jablonowski, P.E. George Lipka, P.E. Earth Tech 196 Baker Avenue Concord, Massachusetts 01742-2167 (Consultant for Applicant)</p>	