Indiantown Cogeneration, L.P.

November.7, 1996

Mr. Thomas Tittle
Florida Dept. of Environmental Protection
P.O. Box 15425
400 Congress Avenue
West Palm Beach, FL 33416

Re: Arsenic Audit Samples - PSDFL-168 & SCA 90-31
Doc. Control No. 6152

Dear Tom:

Based upon our discussion at our meeting on September 12, 1996, Indiantown Cogeneration, L.P. (ICL), is submitting to you the documentation from USEPA, Air Measurement Research Division indicating that no arsenic audit samples are available at this time or will be in the future.

Based upon this information and our discussion, Indiantown Cogeneration, L.P. (ICL) will not be performing the retest of the method 108 (arsenic) performance test.

If you have any questions or comments, please contact me at 561-597-6500, extension 19.

Sincerely,

Byron W. Veech
Environmental Safety & Health Coordinator

/kld

Enclosure

cc: Martin Costello, FDEP (BAR)
Raisa Neginsky, FDEP (SE District)
H. "Buck" Oven, FDER
Proj. File 6.3.1.2
Chron File

"Doing Business in Florida as Indiantown Cogeneration, L.P. Limited Partnership"
P.O. Box 1799 • 19140 SW Warfield Blvd. • Indiantown, Florida 34956 • 561-597-6500 • Fax 561-597-6210

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 13, 1996

Mr. Stephen A. Sorrentino
Indiantown Cogeneration, L.P.
Post Office Box 1799
Indiantown, Florida 34956

Re: Indiantown Cogeneration Project, PA 90-31

Dear Mr. Sorrentino:

I have reviewed your November 2, 1996, letter to Mr. Clair Fancy concerning the deletion of EPA Method 8 for stack testing. While such a deletion from PSD-FL 168 may be approvable by the Division of Air Resources Management, the corresponding deletion from the Conditions of Certification requires a modification process. If you wish to proceed with a modification on this matter, you may wish to also include the following modification as well that will make amendments to a PSD permit automatically modify the corresponding Conditions of Certification:

> This certification shall be automatically modified to conform to any subsequent amendments, modifications, or renewals made by DEP under a federally delegated or approved program to any separately issued Prevention of Significant Deterioration (PSD) permit, Title V Air Permit, or National Pollutant Discharge elimination System (NPDES) permit for the certified facility. ICL shall send each party to the original certification proceedings (at the party's last known address as shown in the record of such proceeding) notice of requests submitted by ICL for modifications or renewals of the above listed permits if the request involves a relief mechanism (e.g., mixing zone, variance, etc.) from state standards, a relaxation of conditions included in the permit due to state permitting requirements, or the inclusion of less restrictive air emission limitations in the air permits. DEP shall notify all parties to the certification proceeding of any intent to modify conditions under this section prior to taking final agency action.

Please confirm that you would like to proceed with the Method 8 modification and the generic federal permit modification.

Sincerely,

Hamilton S. Oven

Hamilton S. Oven, PE.
Administrator, Siting
Coordination Office

November 2, 1996

Mr. Clair Fancy
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blairstone Road
Tallahassee, FL 32399-2400

VIA FEDERAL EXPRESS

Re: Administrative Modification to Permit PSD-FL 168 & PA 90-31

Dear Mr. Fancy

Indiantown Cogeneration L.P.(ICLP), has identified the need to modify our existing PSD permit. Based on conversations with Martin Costello of the Bureau of Air Regulation, we have determined that PSD Specific Condition 19, requiring ICLP to perform Sulfuric Acid Mist testing, is not applicable.

Background

As you will recall, this facility was designed to burn a medium to low sulfur coal with a dry scrubber unit producing a reduction in SO_2 significantly greater than 70 % . During the initial performance testing of the plant in December 1995, ICLP made several attempts using EPA Method 8 as required by Specific Condition 19. After three runs with erratic results it was determined that due to flue gas conditions and probable interferences from ammonia and chlorides in the flue gas, the standard Method 8 approach would not produce valid results. The testing contractor Clean Air Engineering (CAE) had experience with these types of interferences and recommended an alternate approach using a Modified Method 8. ICLP requested that CAE run a Modified Method 8 at that time to attempt to achieve a valid result, which was reported along with the test results from the initial testing using the reference method.

In discussions with the FDEP Southeast District Office, it was determined that since the modified method was not approved and no audit samples were run, the test was not accepted. The SE District has suggested that ICLP request approval of the Modified Method 8 procedure and run the test during the scheduled 4th quarter 1996, performance testing.

Upon submitting the Amendment to Standard Procedure (ASP) for the modified method, Byron Veech was contacted by Martin Costello to discuss the application. After reviewing the issues, test results and the design of the plant with Mr. Costello, it was determined that the original requirement for ($H_2 SO_4$) acid mist testing should not have been included in the PSD permit.

Request:
ICLP is thereby requesting that the ASP application for a Modified Method 8 be withdrawn and that a minor amendment be made to the Indiantown Cogeneration L. P. permit, PSD-FL-168. Specifically, we are requesting that the PSD permit be modified to remove Specific Condition 19 for $H_2 SO_4$ acid mist testing from the list of required emission limitation standards. ICLP is enclosing a check for $250.00 for this modification as required by 62-4.050(4)(r)(5).

Rationale:
ICLP has based this request on the fact that EPA Method 8 was developed for sulfuric acid plants at which the flue gas is dry and free of interference. The use of this method at a coal fired plant with high flue gas moisture content, low backend temperature and interference such as ammonia and chlorides does not provide valid results. Additionally, since the plant performance in terms of SO_2 reduction is more than adequate because of the low sulfur content and the high level of emissions control, the expected level of this pollutant is well below required levels.

If you have any questions regarding this request please contact, Byron Veech or me at (561) 597-6500.

Sincerely,

Stephen A. Sorrentino
Project Director

BWV

Enclosure - $250.00 for minor modification fee.

cc: Hamilton "Buck" Oven FDEP
M. Harley FDEP BAR
M. Costello FDEP BAR
T. Tittle FDEP SE. District Office
R. Neginsky FDEP SE District Office

Indiantown Cogeneration, L.P.

November 2, 1996

Mr. Clair Fancy
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blairstone Road
Tallahassee, FL 32399-2400

VIA FEDERAL EXPRESS

RECEIVED
NOV 05 1996
BUREAU OF
AIR REGULATION

Re: Administrative Modification to Permit PSD-FL 168 & PA 90-31

Dear Mr. Fancy

Indiantown Cogeneration L.P.(ICLP), has identified the need to modify our existing PSD permit. Based on conversations with Martin Costello of the Bureau of Air Regulation, we have determined that PSD Specific Condition 19, requiring ICLP to perform Sulfuric Acid Mist testing, is not applicable.

Background

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If you have any questions regarding this request please contact, Byron Veech or me at (561) 597-6500.

Sincerely,

Stephen A. Sorrentino
Project Director

BWV

Enclosure - $250.00 for minor modification fee.

Indiantown Cogeneration, L.P.

Document Control No. 3701
File No. 6.3.1.10

July 14, 1995

CERTIFIED MAIL

Mr. Winston A. Smith, Director
Air Pesticides and Toxic Substance Management Division
Region IV
Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: Initial Firing of Main Boiler
PSD-FL-168

Dear Mr. Smith:

Indiantown Cogeneration L.P. (ICLP) hereby notifies you that the main boiler at this facility has fired coal for the first time on July 1, 1995. This fulfills the requirements of 40 CFR 60.7(a)(3), Notification of the Actual Initial Startup within 15 days of such date.

Please call me at (301) 718-6973 if you have any questions.

Sincerely,

Michelle Griffin
Environmental Specialist

MG/kil

cc: Clair Fancy, FDEP
Thomas Tittle, FDEP-WPB
Hamilton S. Oven, Jr., FDEP

Doing business in Florida as Indiantown Cogeneration, L.P., Limited Partnership
7500 Old Georgetown Road • Bethesda, Maryland 20814-6161 • 301-718-6800 • Fax 301-718-6900
An affiliate of U.S. Generating Company

U.S. Generating Company

Indiantown Generating Plant

RECEIVED
JUN 9 1995
Bureau of
Air Regulation

Martin Costello
Department of Environmental Protection
Bureau of Air Regulation
Blair Stone Road
Tallahassee, FL

Re: Indiantown Generating Facility
PSD-FL-168
PA 90-31

Dear Mr. Costello:

Indiantown Cogeneration, L.P. (ICL) has previously submitted emissions test as protocol to FDEP on April 17, 1995. The protocol outlines the test methods to be used for demonstration of compliance in accordance with Special Condition 19 of the PSD permit (Condition of Certification II (1) A.3.b).

As we have discussed, the protocol contains several minor deviations from the list provided at Special Condition 19. The attached table presents the permit requirement versus the proposed method with an explanation for the deviation.

As we discussed previously, these are minor changes and the Method 25A change will improve the accuracy of the compliance test. As a minor change to the permit, a $250.00 application fee is required. A check in this amount is enclosed.

First coal fire is anticipated to occur June 19, 1995 starting the 180 day clock for completing compliance testing. ICL expects to reach full load, shortly thereafter, starting the 60 day clock. Thus, we need approval to complete our compliance tests by mid August in order to maintain compliance with the requirements of Special Condition 18, Condition of Certification II (1)A3a, and 40 CFR 60.8. I look forward to working with you to obtain approval of these methods and the emission test protocol.

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P.O. Box 1620 • 19140 SW Warfield Blvd. • Indiantown, Florida 34956 • 407-597-6200 • Fax 407-597-6210

In addition to the EPA guidance document and application fee, I have enclosed revised tables from the protocol to more accurately reflect our testing program. Enclosed please find revised tables 1-1 and 3-1. Please call me at (301) 718-6973 if you have any questions or concerns.

Sincerely,

Michelle Griffin

cc: H. S. Oven, Jr., FDEP
C. H. Fancy, FDEP

Indiantown Generating Facility
Emissions Test Method Changes

	Permit	Protocol	Explanation
Amend	7, 7C or 19	7E	We believe that this is a typographical error in the permit and that FDEP intended to approve 7E. 7C is not usual for coal fired facilities.
Amend	3	3 & 3A	Because of the methods approved, method 3A is more appropriate for use during SO_2, NO_x & VOC tests
Amend	201 or 201A	5	Because the permit limit for PM_{10} is the same, ICL proposes to use the Methods results for PM and PM_{10}.
Guidance memo is States ASP Required	18 or 25	18 and 25A	Method 18 will be used for methane. Method 25A will be used for total hydro carbons. Recent guidance from EPA recommends use of 25A for sources emitting less than 50 ppm VOC as carbon. EPA recommends Method 18 in conjunction with Method 25. (Guidance document enclosed).

Clean Air Engineering

Parkway West Industrial Park • 1601 Parkway View Drive • Pittsburgh, PA 15205

Phone 412/787-9130 • Fax 412/787-9138

Mr. William D. Harper, P.E.
Bechtel Power Corporation
9801 Washingtonian Boulevard
Gaithersburg, Maryland 20878-5356

PROTOCOL FOR COMPLIANCE TESTING

To be performed for:
BECHTEL POWER CORPORATION

Conducted at:
INDIANTOWN GENERATING PLANT
MARTIN COUNTY, FLORIDA

Client Reference No: 22019-TSC-007
CAE Project No: 7454-2P
Revision 0: March 31, 1995
Revision 1: April 14, 1995
Revision 2: May 11, 1995

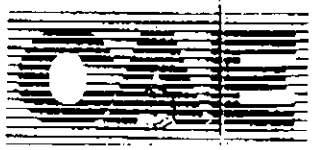
3. SCHEDULE OF ACTIVITIES

The following schedule is proposed for the compliance testing program:

Table 3-1: Schedule of Activities

Day	Location	Activity	Test Method	Runs	Duration	Sample Volume
1-2		Mobilize to Project site Set up test equipment				
3	Stack	Beryllium [1]	EPA 104	3	120 min.	60 dscf.
		Arsenic [1]	EPA 108	3	120 min.	60 dscf
	Bag Filters [1]	Opacity	EPA 9	3	60 min	NA
		Fugitive Emissions	EPA 22	5	15 min.	NA
4	Stack	Oxygen	EPA 3A	3	60 min.	continuous
		Carbon Dioxide	EPA 3A	3	60 min.	continuous
		Sulfur Dioxide [2]	EPA 6C	3	60 min.	continuous
		Nitrogen Oxide [2]	EPA 7E	3	60 min.	continuous
		Carbon Monoxide [2]	EPA 10	3	60 min.	continuous
		Methane [2]	EPA 18	3	60 min.	3 liter
		Total Hydrocarbons [2]	EPA 25A	3	60 min.	continuous
		Lead [3]	EPA 12	3	120 min	60 dscf
		Fluorides [1]	EPA 13B	3	60 min.	30 dscf
5	Stack	Particulate/Ammonia [3]	EPA 5/NH_3 (draft)	3	120 min	60 dscf
		Sulfuric Acid Mist [3]	EPA 8	3	60 min.	30 dscf
		Opacity	EPA 9	3	60 min.	N/A
6		Dismantle test equipment Return to basing point				

[1] Coal, limestone and flyash handling bag filters visible emissions will be determined while each specific process is operating at required conditions.
[2] Pounds per hour emission rates for instrumental methods will be calculated using the volumetric flow determined from EPA Method 12 and EPA Method 13B.
[3] EPA Method 3 samples will be collected and analyzer with an Orsat® analyzer to determine the molecular weight of the flue gas.



1. PROJECT OVERVIEW (CONTINUED)

1.2 Scope (continued)

The air sampling program is summarized below:

Table 1-1: PC Boiler Stack Test Program Scope

Parameter	Methodology	Test Duration	Replicates
oxygen [1]	EPA 3		
carbon dioxide [1]	EPA 3		
oxygen	EPA 3A	60 min.	3
carbon dioxide	EPA 3A	60 min.	3
total particulate (PM and PM_{10})	EPA 5	120 min.	3
sulfur dioxide	EPA 6C	60 min.	3
nitrogen oxides	EPA 7E	60 min.	3
sulfuric acid mist	EPA 8	60 min.	3
opacity	EPA 9	60 min.	3
carbon monoxide	EPA 10	60 min.	3
lead	EPA 12	120 min.	3
fluoride	EPA 13B	60 min.	3
non-methane hydrocarbons	EPA 18 and 25A	60 min.	3
mercury	EPA 101A	120 min.	3
beryllium	EPA 104	120 min.	3
arsenic	EPA 108	120 min.	3
ammonia	EPA Ammonia (Draft)	120 min.	3

[1] EPA Method 3 will be conducted simultaneously with EPA Methods 5, 8, 12, 13B, 101A, and 108.

Table 1-2: Coal, Limestone and Flyash Test Program Scope

Parameter	Methodology [1]	Test Duration	Replicates
opacity	EPA 9	60 min.	3
fugitive emissions	EPA 22	15 min.	5

[1] Each source may not require both visible and fugitive emissions to demonstrate compliance.

EMISSION MEASUREMENT TECHNICAL INFORMATION CENTER
GUIDELINE DOCUMENT

Applicability of Methods 25 and 25A

SUMMARY

State regulations sometimes require testers to measure VOC emissions from sources where the concentration of VOC is less than 50 ppm as carbon. We recommend that Method 25A be used to measure the concentration of VOC emissions from these kind of sources.

DISCUSSION

There are three EPA test methods that are appropriate for measuring total VOC emissions. These are Methods 25, 25A, and 25B. Method 25 is designed to measure the destruction efficiency of incinerators used to control VOC emissions from coating sources. While it would be generally applicable to any source, it has a relatively high minimum detectable level of 50 ppm, as carbon. This would limit its usefulness at sources where VOC emissions are less than 50 ppm.

We recommend that testers use Method 25A for measuring VOC emissions from sources that have VOC emissions that are below the minimum detectable level of Method 25. This approach is not without problems. When Method 25A is used to measure unknown VOC emissions, there is a potential negative bias in the results. In addition, if methane is present in the source emissions, a separate method would be required to measure the methane and subtract it from total organic emissions measured by Method 25A to determine VOC. Despite these problems, Method 25A is the only EPA procedure that can measure total VOC at the levels present at some sources.

Prepared by Gary McAlister, Emission Measurement Branch
Technical Support Division, OAQPS, EPA

EMTIC GD-011
January 25, 1991

EMISSION MEASUREMENT TECHNICAL INFORMATION CENTER
GUIDELINE DOCUMENT

MEMORANDUM

SUBJECT: EPA's VOC Test Methods 25 and 25A

FROM: John B. Rasnic, Director
Stationary Source Compliance Division
Office of Air Quality Planning and Standards

TO: Air, Pesticides, and Toxics Management Division Directors
Regions I and IV

Air and Waste Management Division Director
Region II

Air, Radiation, and Toxics Division Director
Region III

Air and Radiation Division Director
Region V

Air, Pesticides, and Toxics Division Director
Region VI

Air and Toxics Division Directors
Regions VII, VIII, IX and X

As a result of requests from industry, Regional Offices and State programs, we have reviewed our guidance regarding the use of Methods 25 and 25A for measuring gas stream volatile organic compounds (VOC) concentration. Information obtained during this review has resulted in the following revised guidance, which is effective immediately and which supersedes all previous guidance on this matter. This revision has been coordinated with the other divisions within the Office of Air Quality Planning and Standards.

The EPA has decided to add an option 3 to permit further the use of Method 25A in lieu of Method 25 under certain conditions. Therefore, our new guidance is as follows. The EPA mandates the use of Method 25 for measuring gas stream VOC concentration when determining the destruction efficiency (DE) of afterburners. it also allows the use of Method 25A, in lieu of Method 25, under any of the following circumstances: 1) when the applicable regulation limits the exhaust VOC concentration to less than 50 ppm; 2) when the VOC concentration at the inlet of the control system and the required level of control are such to result in exhaust VOC concentrations of 50 ppm or less; or 3) if, because of the high efficiency of the control device, the anticipated VOC concentration at the control system exhaust is 50 ppm or less, regardless of the inlet concentration.

Further, if a source elects to use Method 25A under option 3, above, the exhaust VOC concentration must be 50. ppm or less and the required DE must be met for the source to have demonstrated compliance. If the Method 25A test results show that the required DE apparently has been met, but the exhaust concentration is above 50 ppm, this is an indicator that Method 25A is not the appropriate test method and that Method 25 should be used.

Prepared by Vishnu S. Katari
(202) 564-4004
Emissions Measurement Center, OAQPS

EMTIC GD-32

April 4, 1995

BACKGROUND

The primary industry impacted by this policy is the printing industry, which has consistently claimed that the Method 25 test procedure is too expensive and cumbersome to be used as a compliance demonstration tool. They have stated that current state-of-the-art technology afterburners routinely achieve 98-99 percent destruction efficiency, generally significantly greater than is required by regulations. As a result, control system outlet VOC concentrations are commonly less than 50 ppm, regardless of the inlet concentration.

Regulations which specify performance requirements for the subject control systems have typically been based on older technology, which was less efficient than current technology. We agree with the printing industry's claim that VOC destruction technology currently available can perform at greater levels than as specified by the regulations. It is therefore appropriate to revise our guidance on the usage of these compliance demonstration methods.

This guidance specifies the circumstances under which Method 25 and Method 25A are to be used. It will reduce the administrative burden on a significant number of regulated industrial sources but will not reduce the stringency of any currently applicable regulatory requirements.

cc: OAQPS Division Directors

HOPPING GREEN SAMS & SMITH
PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS
123 SOUTH CALHOUN STREET
POST OFFICE BOX 6526
TALLAHASSEE, FLORIDA 32314
(904) 222-7500
FAX (904) 224-8551
FAX (904) 425-3415

March 6, 1995

JAMES S. ALVES
BRIAN H. BIBEAU
KATHLEEN BLIZZARD
ELIZABETH C. BOWMAN
RICHARD S. BRIGHTMAN
PETER C. CUNNINGHAM
RALPH A. DEMEO
THOMAS M. DEROSE
WILLIAM H. GREEN
WADE L. HOPPING
FRANK E. MATTHEWS
RICHARD D. MELSON
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DOUGLAS S. ROBERTS
LISA K. RUSHTON
R. SCOTT RUTH
JULIE R. STEINMEYER

OF COUNSEL
CARLOS ALVAREZ
W. ROBERT FOKES

Hamilton S. Oven, Jr., Administrator
Office of Siting Coordination
Department of Environmental Protection
3800 Commonwealth Boulevard, Rm. 953-A
Tallahassee, Florida 32399-3000

Re: Indiantown Cogeneration Project;
Modification for Certification;
Response to Agency Questions

Dear Mr. Oven:

This is to respond to the issues raised in your September 29, 1994, letter to Michelle Griffin of U.S. Generating Company concerning the requested modification of certification for the Indiantown Cogeneration Project (ICP). This letter also follows up the Tuesday, October 18, 1994, conference call with you and other Departmental staff. I apologize for the delay in getting this reply to you.

The following responses address each of the 18 questions or comments raised in your September 29, 1994, letter.

1. You were to review a copy of ICP's separately-submitted alternate sampling procedure (ASP) to determine whether it also required a modification of the site certification for the ICP. Upon your determination of whether this ASP requires a modification, ICP would submit an appropriate request for that approval as part of this modification or to be granted as a future modification upon approval of the ASP by the Department's Bureau of Air Regulation and the United States EPA.

   U.S. Generating Company has recently discussed with USEPA its letter requesting additional information on the proposed ASP for the ICP. It appears that USEPA is inclined to grant an ASP that is consistent with the similar ASP for US Generating Co.'s Chambers, New Jersey project. ICP will being resubmitting it's ASP request to USEPA to comply with this approach. A copy of that revised request will be submitted to the Department.

Bruce Mitchell of the Bureau of Air Regulation (BAR) was also concerned that any approved alternate sampling procedure or alternate test methods be incorporated as an amendment to the separate PSD permit for the project.

2. We discussed a revision to the reference to "Specific Condition 1" contained in Condition of Certification (1)B.3.b. ICP wishes to change that reference to "Condition of Certification (1)B.2.a" to cover the emission tests for the Pulverized Coal Boiler. However, to make that change would subject the gas-fired auxiliary boilers to the same compliance tests as the coal-fired main boilers, which would be unnecessary for many of the auxiliary boiler emissions. ICP therefore suggests that, in accord with Item No. 9 below, once the Department establishes appropriate limits for the auxiliary boilers, that necessary test methods then be identified and listed in the permit approvals.

3. It was agreed that Condition of Certification (1)B.3.b. and PSD Specific Condition 19 would be modified to reflect that EPA Method 108 would be used to test for Arsenic. The necessity for periodic retesting for arsenic would be addressed as part of the upcoming Title V permit.

4. Participants in the phone conference agreed that there was no need to add any reference to the Conditions of Certification or the PSD permit for the main baghouse associated with the ICP boiler. This baghouse had been identified as part of the original certification application and the PSD permit application.

5. You proposed that the modified EPA Method 8 for analyzing collected samples be submitted as an alternate sampling procedure to the Department. This should be handled as a separate matter under the PSD permit and, in your view, did not require a separate modification of the certification.

6. It was agreed that approval for the appropriate compliance test methods for Ammonia would be addressed as part of the compliance test protocol to be submitted by ICP to the Department in the future. There was no need to modify either the site certification or PSD permit to reflect this since the separately approved test protocol would adequately address this issue.

7. No participant in the conference call objected to deleting the requirement to monitor the 12 month rolling average capacity factor. There was no other basis in the permit to justify this, and all agreed it should be deleted as part of the revisions to the PSD permit and modification of the site certification.

8. It was agreed that there was, at this time, no need to incorporate the various provisions of 40 CFR 60, Subpart Db concerning the auxiliary boiler. These issues could be addressed in the upcoming Title V permit.

9. The Department indicated it would look further into the issue of whether NO_x emissions for the auxiliary boiler need to be established in the permit for burning of natural gas or propane. The approvals currently only address emission limits for oil firing. This was a matter to be investigated by Bruce Mitchell.

10. It was agreed that EPA Test Method 108 would also be relied on for testing for Arsenic during the compliance test of the auxiliary boilers.

11. Consistent with the response to Number 8 above, ICP does not believe it is necessary to incorporate the limits of Subpart Db for the auxiliary boiler into the permit, since those are already independently applicable and will likely be addressed through the Title V permit, as suggested by the Department. However, in our discussion, Bruce Mitchell indicated he would look further into this matter.

12. The proposed additional language from the Department for clarification of initial and annual testing of fugitive sources of the site is acceptable to ICP. The other participants also concurred in making this clarification to the PSD permit and the Conditions of Certification.

13. It was agreed that the BAR would look further at the issue of concurrent testing for PM and VE for flyash handling systems. It was generally agreed that this issue could be dealt with in the separate initial compliance test protocol to be submitted by ICP. A modification of the Conditions of Certification or PSD permit does not seem to be warranted.

14. As with question 12 above, this clarification is acceptable to ICP.

15. The Department indicated a preference to conform the emission limits in the site certification conditions to those in the PSD permit, and not the reverse, as ICP had proposed. Bruce Mitchell indicated that the BAR would also take a look at this issue, based on the prior permitting documents.

    ICP and Bechtel have reviewed the original computation of the emission limits for the Project, including the pound per hour VOC limit to determine which limits are more appropriate: the one in the Conditions of Certification, or the slightly different limit in the PSD permit. ICP now agrees with the Department that the limits in the PSD permit should be the applicable limits in the certification conditions as well, except for the limit

for lead (Pb). The original emission basis for lead was 0.0000187 lb/MMBtu and was based upon the boiler manufacturer's guaranteed emission rate for lead, based upon the specified range of lead in the coal. This value was apparently rounded downward in the preparation of the PSD permit, resulting in lower lb/hr and ton per year emission limits. ICP therefore requests that the emission limits for the Pulverized Coal Boiler in Condition of Certification IIB.1.a. be revised as indicated on the attached table.

16. It was agreed that the pound per hour limit for H_2SO_4 in the Conditions of Certification would be conformed to the parallel PSD permit of 1.45 pounds per hour. This would avoid any future confusion over compliance with these limits.

17. It was agreed to identify a consistent value for the lb/mmBTU basis for Arsenic in the certification and in the PSD permit. ICP and the BAR were both to look into this value.

18. The Department staff expressed a general desire to resolve this issue, for issuance of future permits, both as to the number of significant digits to be used in expressing values in the permits and the inclusion of the basis for calculation of emission limits when preparing permits.

Pursuant to recent discussions with Tom Tittle, ICP suggests that the approvals be clarified to allow the two auxiliary boilers to operate an aggregate of 1,000 hours per year. This would allow one auxiliary boiler to be operated more than 500 hours, but would correspondingly reduce the available operating hours of the other boiler. This will provide operational flexibility for the plant without increasing total emissions or air quality impacts.

We trust that this summary of our discussion adequately reflects the Department's view as well. Should you or any other person at the Department have a contrary view of the matters above, please contact me so that we may clarify this. In addition, for the open matters as identified above, U.S. Generating will be providing the additional information primarily on its proposed emission limits between the Conditions of Certification and the PSD Permit.

We are available to continue discussions with the Department on those matters which the Department wishes to investigate further. In any event, it is U.S. Generating Company's desire to proceed with resolution of these issues in the near future. Therefore, should there be any additional information that may be provided, please do not hesitate to contact either Michelle Griffin of U.S. Generating Company at (301) 718-6973, or me.

Sincerely,

Douglas S. Roberts

cc: Bruce Mitchell, DEP BAR
Martin Costello, DEP BAR
Tom Tittle, DEP SED
Richard Donelan, DEP OGC
Michelle Griffin, U.S. Generating Co.

Florida Department of
Environmental Protection

Lawton Chiles
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Virginia B. Wetherell
Secretary

September 29, 1994

Michelle Griffin
Indiantown Cogeneration, L.P.
7500 Old Georgetown Road
Bethesda, Maryland 20814-6161

RE: Modifications to Indiantown Cogeneration Project
PA 90-31

Dear Ms Griffin:

Please Address the following comments relating to your request for modification of the Conditions of Certification for the Indiantown facility:

1. Your proposed alternate sampling proposal includes information on the QA procedures. As we understand it, the supplier will collect 3 samples of the oil when shipped. One will be analyzed by the supplier, one will be sent to the facility for analyzing if they wish, and the third will be retained by the supplier as a referee sample in case there is a disagreement. It seems that the facility should be taking a sample at the receiving end instead of relying on the supplier to take the sample for them at the shipping end. The facility should also be required to analyze a minimum percentage of the samples each year. We suggest that their alternative sampling proposal include such measures, and that appropriate wording be incorporated into the COC (and the PSD permit), if the alternative method is approved.

   If your alternate method is approved and the proposed language is used, we would lose the information necessary for determining the percent of SO2 reduction on a daily basis (as currently stated in COC (1)B.2.i.; COC (1)C.1.f. also hints to the ability to monitor the efficiency of control devices in order to make timely action in case of malfunctions). Since there does not appear to be a limit on the minimum reduction required for SO2, this may not be a problem. Therefore, if the alternate method is approved and the inlet SO2 monitor is not required, then COC (1)C.1.b. (and PSD S.C. 24.) should also be changed accordingly to only require the outlet SO2 monitor.

2. COC (1)B.3.b. refers to "Specific Condition 1". for the emission standards. The emission standards are actually in condition 2. of that part. We suggest that in COC (1)B.3.b. the phrase "Specific Condition 1" be replace with "COC (1)B.2."

3. Modify COC (1)B.3.b. (and PSD S.C. 19) to reflect Method 108 for Arsenic. Also, if COC (1)B.3.b. is interpreted as requiring only initial testing, and if there is no other requirement for periodical retesting, then the testing frequency may be inadequate to assure long-term compliance with the emission limit. If we do not increase the frequency to at least once every 5 years (or more often) at this time, I believe we will be forced to do so under Title V permits, since testing for compliance with emission limiting standards is required in the year prior to permit renewals.

4. Previous comments by the SE District reflected that they were not aware that the PC boiler was to be equipped with a baghouse. You clarified this in a recent conversation. There is no reference to the PC boiler having a baghouse in either the COC or the PSD permit. Therefore, we recommend the following language be added to COC (1)C.1.a. (and PSD S.C. 23) to clarify this point and to provide for adequate monitoring of the PC boiler baghouse: "...The facility shall install, operate and maintain continuous monitors to record the inlet temperature and the pressure drop across the PC boiler baghouse." These items may be committed to already in the facility's proposal for installing a predictive emission monitoring system. Without such language, there are no continuous monitoring requirements for the PC boiler baghouse.

5.7 DARM should evaluate the facility's request to use a modified EPA Method 8 procedure to analyze the samples collected. It appears that this would be tantamount to an Alternate Sampling Procedure request. If approved, the modification to Method 8 should be reflected in COC (1)B.3.b. (and PSD S.C. 19).

6. We request that DARM review the proposed test method and determine whether or not it is acceptable. If approved for use, this method should be referenced in COC (1)B.3.b. (and PSD S.C. 19).

7. Apparently the requirement to monitor the 12 month rolling average capacity factor is only in PSD S.C. 1. If there is no justification for this requirement, we recommend it be deleted. If there is a need for this requirement, it should also be included in the COC.

8. For the Auxiliary boiler considerable modifications to the COC (and the PSD permit) are needed to reflect the 40 CFR 60, Subpart Db, requirements (including emission limitations and continuous monitoring requirements). We do not feel that simply referring to Subpart Db will be sufficient.

9. Your response on Auxiliary Boilers points out a problem with the COC and the PSD permit. We expect that NOx emissions would be greater with natural gas and propane than it would be with oil as the fuel. But, it appears there are no emission limitations indicated for when the boilers are burning natural gas or propane (lb/hr and tons per year). 40 CFR 60, Subpart Db, may help to adequately resolve this problem; but if it doesn't, appropriate NOx limits, in NSPS units as well as lb/hr and tons/yr, (and possibly for other pollutant emission limits - at least for determining an upper ton/yr level for all fuels combined) need to be specified for these boilers when burning natural gas or propane.

10. For the Auxiliary Boilers consider comment No. 3.

11. For the Auxiliary Boilers we need to modify the COC and PSD permit to reflect the VE limits of 40 CFR 60, Subpart Db. Also make sure the COC and PSD permit specify the test method and frequency.

12. For Coal Handling we agree with the facility that annual testing is not required for the inactive storage piles. However, COC (1)B.2.c.iii) requires additional measures be taken to control fugitive emissions from the coal pile and other non-traditional sources and specifies a 5% opacity limit for uncovered storage piles when not adding, moving or removing coal from the coal pile, with 20% opacity applying when such activity occurred. The 5% opacity limit applies to roads and handling equipment at all times. This paragraph in turn would mean that initial testing for compliance is required pursuant to COC (1)B.3.e. for all these fugitive sources by EPA Method 9.

We do not believe it was the Department's intent to require the facility to conduct compliance testing by Method 9 for these fugitive sources. Rather, we believe the requirement to be a tool for the Department inspector to determine whether or not the facility is taking adequate measures to control fugitive emissions from these sources. We also feel that the intent was to allow chemical wetting agents to be used as long as they were environmentally acceptable. We suggest a practical resolution would be to change COC (1)B.3.e. (and PSD S.C. 10) to read in part: "... Water sprays or DEP-approved chemical wetting agents and stabilizers

shall be applied to uncovered storage piles, roads, handling equipment, etc. during dry periods and as necessary to all facilities to maintain an opacity of less than or equal to 5 percent, except when adding, moving or removing coal from the coal pile, which would be allowed no more than 20%. Initial and annual testing is not required for these sources.

13. For Flyash Handling - DARM needs to clarify whether an initial concurrent testing for PM and VE will be required for the flyash handling system. The facility and the District are not in agreement. DARM should also clarify whether the subsequent annual VE in lieu of PM stack testing is to be conducted over a half-hour, one-hour or three-hour period. Also have DARM clarify how the observed opacity data is to be reduced. EPA Method 9 requires the highest 6-minute average opacity to be used to determine compliance. The facility believes that averaging three one-hour opacity tests should be the method of determining whether or not the 5% limit is achieved. The District does not recommend the approach proposed by the facility. However, if the facility's approach is approved, the COC and PSD permit should reflect this modified EPA Method 9 only for the flyash handling system.

12 OK. 14. For Uncovered Storage Piles, Roads, Handling Equipment, etc. - adding or removing coal from piles - See comments under No 12.

15. The lb/hr VOC limit for the main boiler also differs between the Conditions of Certification (COC) and the PSD permit. The COC provides a 12.30 lb/hr VOC limit and the PSD permit provides a 12.32 lb/hr limit. Furthermore, in the COC the VOC limit is established (we assume for the lb/mmBtu value) at 7% O2. There is no such correction indicated for VOC in the PSD permit. The applicant is asking that the limits established in each document be the same. The applicant needs to address the VOC differences to complete his request to make the documents consistent.

16. A difference exists between the COC and the PSD limits on lb/hr of H2SO4 in the number of significant digits of the limits. To avoid confusion as to the compliance status if test results show emissions to be 1.454 lbs/hr (a violation of the COC but not the PSD), we suggest that both standards need to be expressed to the same number of significant digits. Since this application is seeking to make the emission limits of both documents the same, we feel that the request cannot be fulfilled without this item being addressed with the other limits.

17. Similarly for arsenic, the applicant addressed the differences in the lb/hr and tons/yr values of the two documents, but failed to address the difference in the lb/mmBTU limit. The COC limit is 0.0000511 and the PSD limit is .000051.

18. General Comments:

All values (lb/mmBtu, lb/hr and tons/yr) in all COC's and permits should be expressed whenever possible to no less than two or three significant digits (as opposed to the number of decimal places) in both documents (some of these are not addressed in the applicants request). Therefore, the value for Fluorides should be expressed as 0.0015 or 0.0020 lb/mmBTU. (NOTE: The lb/mmBtu values for the main boiler are indicated as being the "Basis" and only the lb/hr and TPY values are indicated as being emission limitations in both documents. For the auxiliary boilers, there are no lb/mmBtu values stated as the "Basis" or otherwise. This same "Basis" item is in the COC and PSD for the FPL Martin Project. We are concerned that this language ("Basis") allows the sources at a facility to emit the amount indicated in the lb/hr columns regardless of the operational load of the units. FP&L has expressed to us that this is how they interpret such language in their COC and their PSD permit. The EPA and DEP rules have traditionally required process related emission limitations (lb/dscf, lb/mmBtu, lb/Ton product, etc.) in order to minimize emissions when the source is operating at less than capacity levels. We could also potentially have a situation where the lb/hr limits were being complied with, but an underlying NSPS limit in lb/mmBtu was being violated at lower operational rates.

If you have questions on any of these items, please contact Tom Tittle (407) 433-2650.

Sincerely,

Hamilton S. Oven

Hamilton S. Oven, P.E.
Administrator, Siting
Coordination Office

cc: Clair Fancy
Tom Tittle
Doug Roberts
Richard Donelan

HOPPING BOYD GREEN & SAMS

ATTORNEYS AND COUNSELORS

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JULIE R. STEINMEYER

OF COUNSEL
W. ROBERT FOKES

August 25, 1994

RECEIVED

AUG 2[illegible] 1994

Bureau of
Air Regulation

BY HAND DELIVERY

Mr. Clair Fancy, Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

Re: Indiantown Cogeneration, L.P.
Indiantown Cogeneration Project
PSD-FL-168, Martin County

Dear Mr. Fancy:

On behalf of Indiantown Cogeneration, L.P., I wish to request that the Department of Environmental Protection (DEP) make minor amendments to the above-referenced PSD permit. This permit was originally issued on March 26, 1992, with a subsequent amendment on July 16, 1992. In addition to this request to amend the PSD permit, ICL has also submitted to DEP a request to modify the separate power plant site certification for the project, addressing the issues below as well as other matters concerning the project. The appropriate fee for the requested certification modification is being submitted to the Siting Coordination Office.

The first project change affecting the PSD permit is an increase in the height of the auxiliary boiler stack from 200 feet to 215 feet (AGL). This stack serves the two auxiliary boilers that were installed pursuant to the July, 1992 PSD permit amendment. Review of the top elevation of the boiler building and of the stack indicated that this stack height was level with the top of the boiler building and thus, should be raised further to minimize potential impacts to personnel working at the top of the boiler building. As indicated by the attached Table 2, this increase in stack height will serve to further reduce air quality impacts from the project. With the exception of the increased stack height, all other stack parameters, described in the PSD permit and previous PSD amendment request remain the same. Thus, the increase in stack height will have no air quality impacts. This design change is submitted to inform DEP of this increase;

actual revision to the text of the permit does not seem necessary to approve this change.

Specific Conditions 5 and 9 of the PSD permit, as amended on July 16, 1992, establish certain emission limitations for the main boiler and the auxiliary boilers, respectively. Several of the emission limitations vary slightly from the emission limitations established in Conditions of Certification II(1)B.2.a. Pulverized Coal Boiler, and b. Auxiliary Boiler in the Site Certification Order. (Copies of these two sets of emissions tables are attached.) The variances seem to be due to a difference in rounding between the computation of the two sets of emission limitations. As recommended by the Southeast District office, ICL is requesting that the emission limitations in Specific Condition 5 and 9 be revised to conform to the emission limitations in the Site Certification. ICL is therefore requesting that the emissions limitations for the main boiler and the auxiliary boiler set forth in the PSD permit be revised as follows:

Specific Condition 5 (as amended July 16, 1992)

5. Based on a permitted heat input of 3422 MMBtu/hr, the stack emissions from the main boiler shall not exceed any of the following limitations:

Pollutant	Basis lb/MMBtu	Emission lb/hr	Limitation TPY
SO_2	0.170*	582*	2549
NO_x	0.170*	582*	2549
PM	0.018	61.6	270
PM_{10}	0.018	61.6	270
CO	0.110	376*	1649
VOC	0.0036	12.32	54.0
H_2SO_4	0.0004	1.45	6.51
Beryllium	0.00000273	~~0.0094~~ **0.0093**	0.041
Mercury	0.0000114	0.039	0.172

Lead	0.0000187	0.064	0.280
Fluorides	~~0.0015~~ **0.002**	~~5.08~~ **7.26**	~~22.3~~ **22.26**
Arsenic	0.0000511	~~0.18~~ **0.175**	~~0.77~~ **0.765**

* 24 hour daily block average (midnight to midnight)

Specific Condition 9 (as amended July 16, 1992)

The auxiliary boiler or auxiliary boilers rated at a combined total of up to 358 MMBtu/hr (Natural gas and propane) and 342 MMBtu/hr (No. 2 fuel oil), shall be limited to a maximum of 5000 hours/year at the combined total heat input rates with up to 1000 hrs/yr firing No. 2 fuel oil with 0.05% sulfur, by weight, and the balance firing natural gas or propane. The maximum total annual emissions from the auxiliary boiler or boilers will be as follows when firing No. 2 fuel oil for 1000 hrs/yr:

EMISSION LIMITATION

Pollutant	lbs/hr		tons/year
NO_x	~~68.0~~	**68.4**	34
SO_2	~~18.0~~	**17.8**	9
PM	~~1.4~~	**1.40**	0.70
PM_{10}	~~1.4~~	**1.40**	0.70
CO	~~48.0~~	**47.3**	24
VOC	~~0.620~~	**0.63**	0.31
Be	~~4.0 x 10^{-5}~~	**4.1 x 10^{-5}**	2.0×10^{-5}
Hg	~~5.2 x 10^{-4}~~	**5.1 x 10^{-4}**	2.6×10^{-4}
Pb	3.6×10^{-2}		1.8×10^{-2}
As	6.8×10^{-3}		3.4×10^{-3}

The proposed changes should not result in any increase in air quality impacts. Conforming these emission limitations will insure consistency during the upcoming initial stack tests and future compliance testing on the project.

Your attention to this request is appreciated. Should you or your staff have any questions on this matter, please do not

hesitate to contact either Michelle Griffin at U.S. Generating Co., telephone number (301) 718-6973 or me.

Sincerely,

Douglas S. Roberts

DSR/gs

cc: Bruce Mitchell, DEP/BAR Tlh
Tom Tittle, DEP, SED WPB
Hamilton S. Oven
Richard T. Donelan

TABLE 2. ICL STACK SOURCES AT MAXIMUM IMPACT LOCATIONS

(AUXILIARY BOILERS AT 100% LOAD)

Pollutant	Average Period	SCA Mod. July 1994 Aux. Boilers (Ht. 215)'	SCA Mod. July 1994 Total (Ht. 215')	SCA Mod. July 1992 Total (Ht. 200')	Original SCA Total (Ht. 90')
SO_2	3-hour	14.1 (0.30,050)	23.2 (2.2,310)	23.2 (2.2,310)	24.7 (0.25,100)
	24-hour	6.2 (0:25,330)	6.2 (0.25,330)	7.5 (0.25,330)	11.6 (0.25,110)
	Annual	0.76 (0.25,340)	0.76 (0.25,340)	0.94 (0.25,340	1.15 (0.25,100)

(AUXILIARY BOILERS AT 50% LOAD)

Pollutant	Average Period	SCA Mod. July 1994 Aux. Boilers (Ht. 215')	SCA Mod. July 1994 Total (Ht. 215')	SCA Mod. July 1992 Total (Ht. 200')	Original SCA Total (Ht. 90')
SO_2	3-hour	9.0 (0.25,350)	22.7 (2.2,310)	22.7 (2.2,310)	24.7 (0.25,100)
	24-hour	3.3 (0.25,330)	6.0 (3.2,310)	6.0 (3.2,310)	11.6 (0.25,110)
	Annual	0.53 (0.25,340)	0.64 (3.0,310)	0.64 (3.0,310)	1.15 (0.25,100)

Note: Concentrations are in $\mu g/m_3$
Distance and direction are shown in km and degree, respectively relative to the main stack in parenthesis
Total = Main Boiler + Auxiliary Boilers

Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

July 16, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Stephen A. Sorrentino
Indiantown Cogeneration, L.P.
7475 Wisconsin Avenue
Bethesda, MD 20814-3422

Re: Martin County - A.P.
Indiantown Cogeneration, L.P.
PSD-FL-168; Permit Modification

Dear Mr. Sorrentino:

The Department has received a request from Mr. Douglas Roberts on May 28, 1992, for minor modifications to the recently issued permit for the above referenced project. The Department concurs with your request and will allow you to split the auxiliary boiler into two boilers, use propane fuel, and change the lead (Pb) standards.

The Department grants the following amendments to the above referenced permit:

Project Description, 3rd Paragraph, Page 1 of 13

FROM:

The proposed facility includes one main boiler and one steam generator, and an auxiliary boiler operated during lightoff and startup of the main boiler or if the main boiler is down and process steam is required for Caulkins Citrus Processing. The primary source of air emissions will be the main boiler, firing coal. Secondary air emission sources include the auxiliary boiler firing natural gas or No. 2 fuel oil, and the material handling systems. The operation of these units will result in significant net emissions increases of regulated air pollutants over the current emissions levels and thus, is subject to review by the Department under the prevention of significant deterioration (PSD) regulations (Rule 17-2.500, Florida Administration Code).

TO:

The proposed facility includes one main boiler and one steam generator, and **one or two 50% capacity** auxiliary boilers operated during lightoff and startup of the main boiler or if the main

boiler is down and process steam is required for Caulkins Citrus Processing. The primary source of air emissions will be the main boiler, firing coal. Secondary air emission sources include the auxiliary boilers firing natural gas, **propane** or No. 2 fuel oil, and the material handling systems. The operation of these units will result in significant net emissions increases of regulated air pollutants over the current emissions levels and thus, is subject to review by the Department under the prevention of significant deterioration (PSD) regulations (Rule 17-2.500, Florida Administration Code).

Specific Condition No. 2:

FROM: Only coal, natural gas or No. 2 fuel oil shall be fired in the pulverized coal (PC) boiler and auxiliary boiler.

TO: Only coal, natural gas, **propane** or No. 2 fuel oil shall be fired in the pulverized coal (PC) boiler and auxiliary boilers.

Specific Condition No. 3:

FROM: The maximum heat input to the PC boiler shall not exceed 3422 MMBtu/hr while firing coal. The auxiliary boiler shall not exceed 342 MMBtu/hr while firing No. 2 fuel oil and 358 MMBtu/hr firing natural gas or propane.

TO: The maximum heat input to the PC boiler shall not exceed 3422 MMBtu/hr while firing coal. The **one or two** auxiliary boilers shall not exceed **a combined total of** 342 MMBtu/hr while firing No. 2 fuel oil and **a combined total of** 358 MMBtu/hr firing natural gas or propane.

Specific Condition No. 4:

FROM: The PC boiler shall be allowed to operate continuously (8760 hrs/yr). The auxiliary boiler shall operate a maximum of 5000 hrs with up to 1000 hrs/yr on No. 2 fuel oil with 0.05% sulfur, by weight, and the balance on natural gas or propane. Fuel consumption must be continuously measured and recorded by fuel type (coal, natural gas or No. 2 fuel oil) for both the PC boiler and auxiliary boiler.

TO: The PC boiler shall be allowed to operate continuously (8760 hrs/yr). The auxiliary boiler **or boilers** shall operate a maximum of 5000 hrs **at the combined total heat input rates** with up to 1000 hrs/yr on No. 2 fuel oil with 0.05% sulfur, by weight, and the balance on natural gas or propane. Fuel consumption must be

continuously measured and recorded by fuel type (coal, natural gas, propane or No. 2 fuel oil) for both the PC boiler and auxiliary boilers.

Specific Condition No. 5:

FROM: Based on a permitted heat input of 3422 MMBtu/hr, the stack emissions from the main boiler shall not exceed any of the following limitations:

Pollutant	Basis lb/MMBtu	Emission Limitation lb/hr	TPY
SO_2	0.170*	582*	2549
NOx	0.170*	582*	2549
PM	0.018	61.6	270
PM_{10}	0.018	61.6	270
CO	0.110	376*	1649
VOC	0.0036	12.32	54.0
H_2SO_4	0.0004	1.45	6.51
Beryllium	0.0000027	0.0094	0.041
Mercury	0.0000114	0.039	0.17
Lead	0.00001	0.034	0.15
Fluorides	0.0015	5.08	22.3
Arsenic	0.000051	0.18	0.77

*24 hour daily block average (midnight to midnight)

TO: Based on a permitted heat input of 3422 MMBtu/hr, the stack emissions from the main boiler shall not exceed any of the following limitations:

Pollutant	Basis lb/MMBtu	Emission Limitation lb/hr	TPY
SO_2	0.170*	582*	2549
NOx	0.170*	582*	2549

PM	0.018	61.6	270
PM_{10}	0.018	61.6	270
CO	0.110	376*	1649
VOC	0.0036	12.32	54.0
H_2SO_4	0.0004	1.45	6.51
Beryllium	0.0000027	0.0094	0.041
Mercury	0.0000114	0.039	0.17
Lead	**0.0000187**	**0.064**	**0.280**
Fluorides	0.0015	5.08	22.3
Arsenic	0.000051	0.18	0.77

*24 hour daily block average (midnight to midnight)

Specific Condition No. 9

FROM: The auxiliary boiler, rated at up to 358 MMBtu/hr (Natural Gas and propane) and 342 MMBtu/hr (No. 2 fuel oil), shall be limited to a maximum of 5000 hours/year with up to 1000 hrs/yr firing No. 2 fuel oil with 0.05% sulfur, by weight, and the balance firing natural gas or propane. The maximum annual emissions will be as follows when firing No. 2 fuel oil for 1000 hrs/yr:

EMISSION LIMITATION

Pollutant	lbs/hr	tons/year
NO_x	68.0	34
SO_2	18.0	9
PM	1.4	0.70
PM_{10}	1.4	0.70
CO	48.0	24
VOC	0.620	0.31
Be	4.0×10^{-5}	2.0×10^{-5}
Hg	5.2×10^{-4}	2.6×10^{-4}
Pb	3.6×10^{-2}	1.8×10^{-2}
As	6.8×10^{-3}	3.4×10^{-3}

TO: The auxiliary boiler **or auxiliary boilers rated at a combined total of** up to 358 MMBtu/hr (Natural gas and propane) and 342

MMBtu/hr (No. 2 fuel oil), shall be limited to a maximum of 5000 hours/year at the combined total heat input rates with up to 1000 hrs/yr firing No. 2 fuel oil with 0.05% sulfur, by weight, and the balance firing natural gas or propane. The maximum total annual emissions from the auxiliary boiler or boilers will be as follows when firing No. 2 fuel oil for 1000 hrs/yr:

EMISSION LIMITATION

Pollutant	lbs/hr	tons/year
NO_x	68.0	34
SO_2	18.0	9
PM	1.4	0.70
PM_{10}	1.4	0.70
CO	48.0	24
VOC	0.620	0.31
Be	4.0×10^{-5}	2.0×10^{-5}
Hg	5.2×10^{-4}	2.6×10^{-4}
Pb	3.6×10^{-2}	1.8×10^{-2}
As	6.8×10^{-3}	3.4×10^{-3}

All other conditions remain as issued. This letter must be attached to the PSD-FL-168 permit and shall become a part of the permit.

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

The Petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File

Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

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

Sincerely,

Carol M. Browner
Secretary

CMB/MB/plm

cc: Jewell A. Harper, EPA
Isidore Goldman, SED
James W. Coleman, Jr., NPS
Steve Jelinek, ENSR