

Indiantown Cogeneration, L.P.

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July 2, 2007

073-87554

Florida Department of Environmental Protection
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

JUL 03 2007

DIVISION OF AIR
RESOURCES MANAGEMENT

Attention: Mr. Joseph Kahn, Director

Re: Indiantown Cogeneration, L.P.
Construction Permit No. 0850102-009-AC
Railcar Lime Unloading System

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JUL 05 2007

BUREAU OF AIR REGULATION

Dear Mr. Kahn:

Indiantown Cogeneration, L.P. (Indiantown) and Golder Associates Inc. (Golder) have reviewed the Florida Department of Environmental Protection's (FDEP) construction permit for Indiantown's Cogeneration Plant located at 13303 SW Silver Fox Lane in Indiantown, Florida. Our comments concerning the construction permit are addressed below. We apologize that these comments were not submitted during the public comment period. However, we believe the comments are significant enough to bring them to the Department's attention, so that the permit can be revised.

CONSTRUCTION PERMIT

Section 3. Emissions Units Specific Conditions

Equipment and Performance Restrictions.

Condition 2 The second paragraph states "The modified Lime Handling System includes an existing lime silo bin vent filter baghouse, a new filter receiver baghouse, and a new surge hopper baghouse."

The new surge hopper does not have a baghouse. The new surge hopper has a cartridge filter. Therefore, we request that the condition be reworded as follows: "The modified Lime Handling System includes an existing lime silo bin vent filter baghouse, a new filter receiver baghouse, and a new surge hopper cartridge filter."

Emissions Standards

- Condition 3 The permit states "Visible Emissions from each of the three handling system baghouses shall not exceed 5% opacity." We request that the condition be reworded as follows: "Visible Emissions from the two lime handling system baghouses and the cartridge filter shall not exceed 5% opacity."
- Condition 4 The permit states "Particulate matter emissions from each bag filter exhaust of the lime handling system shall be limited to 0.010 grains per actual cubic foot." We request that the condition be reworded as follows: "Particulate matter emissions from each bag filter and the cartridge filter exhaust of the lime handling system shall be limited to 0.010 grains per actual cubic foot."

Emissions Performance Testing

- Condition 6 The first sentence of the condition in the permit states "Each unit shall be tested to demonstrate initial compliance with the VE and PM emissions standards specified in this permit." Because Specific Condition 4 states that a VE test of 5% opacity or less may be used to establish compliance with the PM emissions standards, we request that the condition be reworded as follows: "Each unit shall be tested to demonstrate initial compliance with the VE standards specified in this permit."
- Condition 11 The permit states "EPA Method 5 shall be used to determine initial compliance with the particulate matter emissions limitation specified in Specific Condition 4. Thereafter, the annual VE test shall serve as a surrogate for the PM emissions test."

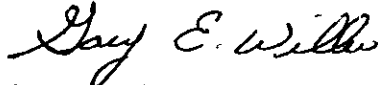
We believe it was intended that the PM compliance test be waived since a 5% VE limit is imposed, per Rule 62-297.620(4), F.A.C., which states:

"In the case of an emissions unit which has the potential to emit less than 100 tons per year of particulate matter and is equipped with a baghouse, the Secretary or the appropriate Director of District Management may waive any particulate matter compliance test requirements for such emissions unit specified in any otherwise applicable rule, and specify an alternative standard of 5% opacity. The waiver of compliance test requirements for a particulate emissions unit equipped with a baghouse, and the substitution of the visible emissions standard, shall be specified in the permit issued to the emissions unit. If the department has reason to believe that the particulate weight emission standard applicable to such an emissions unit is not being met, it shall require that compliance be demonstrated by the test method specified in the applicable rule."

The wording of this condition makes it appear that an initial PM test is required. Therefore we request the condition be reworded as follows: "A VE test using EPA Method 9 shall determine initial compliance with the particulate matter emissions limitation specified in Specific Condition 4. Thereafter, the annual VE test shall serve as a surrogate for the PM emissions test."

Thank you for your consideration of these comments. If you have any questions, please do not hesitate to call me at (772) 597-6500.

Sincerely,



Gary E. Willer
General Manager

GW

Enclosures

cc: Nicholas Laryea
David Buff