Indiantown Cogeneration, L.P.

RECEIVED

APR 04 2006

Indiantown Cogeneration, L.P. P.O. Box 1799 13303 SW Silver Fox Lane Indiantown, FL 34956

772.597.6500 Fax: 772.597.6210

BUREAU OF AIR REGULATION

April 03, 2006

Mr. Al Linero Florida Department of Environmental Protection, SED Bureau of Air Regulation 2600 Blair Stone Road. Tallahassee, FL 32399-2900

Subject:

Indiantown Cogeneration, L.P. Notification of Removal

Package Boiler

Facility I.D. No. 0850102

Dear Mr. Linero:

As a follow up to the letter dated February 27, 2006 to the Department, this letter provides notification that ICLP has removed the rental boiler from the facility. Pursuant to Conditions B.56. to B.63. of our Title V Permit, 0850102-007-AV, we are providing this notice.

We have met all the applicable conditions B56 to B63 of our Title V Permit, specifically:

- 1. The boiler operated with no visible emissions (except visible emissions not exceeding 20% opacity for up to 3 minutes in any one-hour period), and with no objectionable odor. We followed the manufacturer's guidelines. (B.56.)
- 2. The boiler was fired on natural gas or propane only. Usage was kept below 150 MMSCF and was tracked to be included in the annual throughput of the auxiliary boilers. (B.57.)
- 3. We notified you of delivery of the boiler and we are notifying you of the removal per this letter. (B.58.)
- 4. The boiler was onsite less than 90 days, and operated less than 60 days. (B.59.)
- 5. The boiler met ASME and pressure vessel code accreditation and utilizes an ASME code symbol stamp. (B.60.)

- 6. The boiler was guaranteed to meet a NOx emission limit of 0.15 lb/MMBtu. **(B.61.)**
- 7. The boiler did not be operated at the same time as both auxiliary boilers. **(B.62.)**
- 8. The boiler was disconnected and removed within 15 days of the date that either the main PC boiler or both auxiliary boilers become operable. (B.63.)

Please contact Nicholas Laryea at 772-597-6500 ext. 19 if you have any questions or comments.

Sincerely,

Gary E. Willer

General Manager

Day E. Willes

cc: Darrel Graziani Nicholas Laryea

File



Department of Environmental Protection

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

Colleen M. Castille Secretary

Certified Mail -- Return Receipt Requested

May 11, 2004

Mr. Rick Grubb Responsible Official Indiantown Cogeneration, L.P. P.O. Box 1799 Indiantown, Florida 34956

Re:

DRAFT Title V Permit No. 0850102-007-AV

Indiantown Cogeneration Plant

Dear Mr. Grubb:

Thank you for your response to our letter dated March 24, 2004, in reference to your application for renewal of the Title V Permit for this facility. However, we must deem your application *still incomplete*, because we need further information relative to the compliance assurance monitoring (CAM) plan for the pulverized coal boiler baghouse.

- 1. Please provide us with all long-term opacity records kept at the facility, and include a definition of the data elements and units of measurement of all recorded information. Please also provide us with the percentage of time that the continuous opacity monitoring system (COMS) has recorded a 6-minute average opacity reading in excess of 2.5%. Please provide these percentages based on a daily timeframe.
- 2. Please provide us with your operating procedures for identifying bag problems, and any written procedures that describe your bag maintenance and repair program.
- 3. What are the mechanisms and procedures for measuring pressure drop across the baghouse? Is the measurement done on a continuous basis?

When we receive this information, we will continue processing your application. If you have any questions, please contact Tom Cascio at 850-921-9526.

Sincerely,

A. A. Linero, P.E.

Program Administrator Permitting South Section

Cc: Mr. George Lipka, P.E., Earth Tech, 196 Baker Avenue, Concord, MA 01742

Mr. Nicholas Laryea, Indiantown Cogeneration, L.P.

"More Protection, Less Process"

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY		
 Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Frint 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 cn the front if space permits. 	A. Signature X		
1. Article Addressed to: Mr. Rick Grubb Responsible Official Indiantown Cogeneration, L.P. P.O. Box 1799	D. Is delivery address different from item 1? ☐ Yes If YES, enter delivery address below: ☐ No		
Indiantown, Florida 34956	3. Service Type Certified Mail		
2. Article Number 7001 1140	0002 1578 1208		
PS Form 3811 August 2001 Domestic Pa	eturn Receipt 100505.00 M 1540		

	U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)					
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70	City, State, ZiP+ 4 Indiantown, Florida 34956					
	PS Form 3800, January 2001 See Reverse for Instructions					

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Department of Environmental Protection

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

David B. Struhs Secretary

Certified Mail -- Return Receipt Requested

March 24, 2004

Mr. Rick Grubb Responsible Official Indiantown Cogeneration, L.P. P.O. Box 1799 Indiantown, Florida 34956

Re:

DRAFT Title V Permit No. 0850102-007-AV

Indiantown Cogeneration Plant

Dear Mr. Grubb:

We have begun the review of your recent application for renewal of the Title V Permit for this facility. However, we must deem your application *incomplete*, because we need further information relative to the compliance assurance monitoring (CAM) plan included with the application. Specifically, the following comments/questions are a result of our review of the submitted CAM plan for the Indiantown Cogeneration Plant.

Pulverized Coal (PC) Boiler

- 1. CAM is applicable for monitoring the control of particulate matter (PM) emissions from the baghouse. However, the proposal to use the continuous opacity monitoring system (COMS) and recorded opacity as an indicator of compliance with the PM emissions limit is not the best choice. Experience has shown that there is not a consistent and reliable correlation between opacity and actual PM emissions. It could be considered for use if a demonstration is presented that verifies a direct relationship between the COMS readings and the actual PM emission rates. To do so, please provide a table of data that documents the tested PM emission rate, the simultaneous opacity reading from the COMS, the test date, the operational rate during the test, and the allowable capacity of the unit. Include the compliance test results from at least the past 5 years (i.e., 15 test runs minimum) in order to demonstrate a correlation. It should be noted that with normal opacity readings in the range of 2.5 - 6%, the definition of an excursion as "5 consecutive 6 minute averages of opacity greater than 9%" is not acceptable, considering that the visible emissions (VE) limit is 10% opacity with a six-minute average. Depending on the correlation demonstrated in the test data, an acceptable indicator range could be as low as one 6-minute average greater than 5% opacity.
- 2. If a direct correlation cannot be demonstrated between the opacity and PM readings, you should consider the possibility of using the pressure drop across the baghouse as an indicator range instead of opacity. If this appears to be more reliable, please identify an

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indicator range for the pressure drop across the baghouse (maximum and minimum) and provide a table of data that documents the tested PM emission rate, the simultaneous pressure drop across the baghouse, the test date, the operational rate during the test, and the allowable capacity of the unit. Include the compliance test results from at least the past 5 years (i.e., 15 test runs minimum) in order to demonstrate a correlation.

- 3. CAM is applicable for monitoring the control of sulfur dioxide (SO₂) emissions from the use of the spray dryer absorber. If the SO₂ continuous emissions monitoring system (CEMS) is chosen to be utilized as a continuous compliance determination method, then the unit could be exempted from the CAM requirements. The SO₂ CEMS is currently only required for monitoring purposes. Please either *provide a certified statement* that Indiantown Cogeneration, L.P., wishes to use the CEMS as a continuous compliance determination method, or provide a complete CAM plan for SO₂ emissions.
- 4. CAM is applicable for monitoring the control of nitrogen oxides (NO_X) emissions from the use of the selective catalytic reduction system. If the NO_X CEMS is chosen to be utilized as a continuous compliance determination method, then the unit could be exempted from the CAM requirements. The NO_X CEMS is currently only required for monitoring purposes. Please either *provide a certified statement* that Indiantown Cogeneration, L.P., wishes to use the CEMS as a continuous compliance determination method, or provide a complete CAM plan for NO_X emissions.

When we receive this information, we will continue processing your application. If you have any questions, please contact Tom Cascio at 850-921-9526.

Sincerely,

A. A. Linero, P.E.

Program Administrator Permitting South Section

Cc: Mr. George Lipka, P.E., Earth Tech, 196 Baker Avenue, Concord, MA 01742

Mr. Nicholas Laryea, Indiantown Cogeneration, L.P.

COMPLETE THIS SECTION ON DELIVERY **SENDER: COMPLETE THIS SECTION** ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ☐ Agent Print your name and address on the reverse ☐ Addressee so that we can return the card to you. C. Date of Delivery ■ Attach this card to the back of the mailpiece. or on the front if space permits. ☐ Yes D. Is delivery address different from item 1? 1. Article Addressed to: □ No If YES, enter delivery address below: Mr. Rick Grubb Responsible Official Indiantown Cogeneration, L.P. P. O. Box 1799 3. Service Type Certified Mail Indiantown, FL 34956 ☐ Express Mail ☐ Registered ☐ Return Receipt for Merchandise ☐ Insured Mail ☐ C.O.D. 4. Restricted Delivery? (Extra Fee) ☐ Yes 2. Article Number 7001 1140 0002 1578 0805 (Transfer from service label) PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

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70	City, State, ZIP+4 Indiantown, FL 34956							
	PS Form 3800, January 2001 See Reverse for Instructions				tions			

Identification of Facility



Environmental Protection Division of Air Resource Management



RESPONSIBLE OFFICIAL NOTIFICATION FORM

Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.

1. Facility Owner/Company Name:					
	INDIANTOWN COGENERATION LIMITED PARTNERSHIP 2. Site Name: INDIANTOWN 3. County: MARTIN				
	COGENERATION L.P.				
		blank for initial Title V applications):			
Notification Type	c (Check one or more)				
☐ INITIAL:	INITIAL: Notification of responsible officials for an initial Title V application.				
☐ RENEWAL:	RENEWAL: Notification of responsible officials for a renewal Title V application.				
* CHANGE:					
• ••	Effective date of change in response	onsible official(s) 10/10/06			
Primary Respons	sible Official				
	ition Title of Responsible Officia	1:			
GARY E. WILL	ER/GENERAL MANAGER				
, <u>-</u>	Official Mailing Address:				
-	Organization/Firm: INDIANTOWN COGENERATION L.P.				
Street Addres	Street Address: 13303 S.W. SILVER FOX LANE(P.O. BOX 1799)				
City: INDIAN	NTOWN State: FLORIDA Zip	Code:34956			
3. Responsible C	Official Telephone Numbers:				
Telephone:	Telephone: (772) 597-6500 Fax:(772)-597-6210				
4. Responsible C	Official Qualification (Check one of	or more of the following options, as applicable):			
[] For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.					
[x] For a partnership or sole proprietorship, a general partner or the proprietor, respectively.					
[] For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.					
[] The designated representative at an Acid Rain source.					
Responsible C	official Statement:				
addressed in th inquiry, that the	is notification. I hereby certify, based statements made in this notification	ned in Rule 62-210.200, F.A.C., of the Title V source I on information and belief formed after reasonable are true, accurate and complete. Further, I certify that I sible officials, if any, for purposes of Title V permitting.			
Signature		Date			

DEP Form No. 62-213.900(8)

Effective: 6-02-02