



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

November 12, 2003

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BUREAU OF AIR REGULATION

Mr. Nicholas Laryea  
Environmental Manager  
Indiantown Generating Plant  
Post Office Box 1799  
Indiantown, Florida 34956

Dear Mr. Laryea:

We have reviewed your request submitted via e-mail to alter several of the test methods to be conducted in preparation for the upcoming Title V permit renewal. The requested changes are listed below followed by our opinions regarding the proposed test methods.

#### **VOC: EPA Method 25A instead of Method 25**

It is asserted that Method 25A "is better suited for this application, especially due to the lower concentrations that are expected at the PC boilers stack." Your consultant confirmed that during the tests performed at the time of original startup, typical VOC concentrations were below the Method 25 detection limit of 50 ppm. Furthermore, test data indicate that the product of the percentage of moisture and CO<sub>2</sub> in the gas stream is greater than 100, which can cause a positive bias in Method 25 results. Because of these factors, we agree that Method 25A is a suitable replacement for Method 25. Therefore, VOC emissions will be determined using both Methods 18 and 25A. Alternatively, you may use only Method 25A and assume that all measured emissions, including methane, are VOCs.

#### **Trace Metals: EPA Method 29 in lieu of Methods 12, 101, 104, and 108**

We agree that EPA Method 29 is sufficient to adequately determine emissions of lead, mercury, beryllium and arsenic.

#### **Sulfuric Acid Mist: Modified EPA Method 8**

You have requested that Method 8 be modified to allow each sample fraction (probe, filter, impinger) to be analyzed separately rather than combined into one container before analysis. The purpose of this modification would be to determine if small amounts of sulfur dioxide dissolving in the first impinger may be causing a positive bias if the permitted H<sub>2</sub>SO<sub>4</sub> limit is

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Mr. Nicholas Laryea  
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exceeded. Because the results obtained by analyzing and summing the individual sample fractions should be identical to that of a combined sample analysis, the proposed modification to the Method 8 sample analysis is acceptable.

**Ammonia: CTM-027**

You have requested to use a combined Method 5/Method 26A sampling train to determine ammonia emissions. This sampling train was apparently used during the initial testing performed at the facility. It is our opinion that EPA's conditional test method for ammonia, CTM-027, is more appropriate for this application since this method has already been validated for coal-fired boilers.

If you have any questions, please call me at 850/921-9509

Sincerely,



Errin Pichard, P.E., Administrator  
Emissions Monitoring Section  
Bureau of Air Monitoring  
and Mobile Sources

EP/

cc: Scott Sheplak  
Len Kozlov, Central District

**Indiantown Cogeneration, L.P.**

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

772.597.6500  
Fax: 772.597.6210

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APR 28 2003

April 22<sup>th</sup>, 2003

BUREAU OF AIR REGULATION

Mr. Scott M. Sheplak, P.E.  
Florida Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**Re: *Indiantown Cogeneration, L.P. Operating Permit  
New Insignificant Activity  
Title V Permit No.: 0850102-001-AV***

Dear Mr. Sheplak:

This letter provides documentation of a new insignificant activity at Indiantown Cogeneration. We plan to install a small emergency diesel generator. The equipment we plan to install is:

**Caterpillar Engine Model 3406 DI  
Generator Rated 375 kVA/300 KW  
Serial Number 2WB02769**

This generator will have a small diesel fuel storage tank incorporated into its base. It will be in emergency service, and will be used only during electrical outages, plus necessary testing and maintenance. Since the plant was originally designed, we have become increasingly aware of the risk of severe weather conditions affecting the off site power distribution system. This is of particular concern during the hurricane season when the utility services that ICLP depends on to maintain plant functions is vulnerable.

The generator is exempt from the requirement to obtain an air construction permit based on 62-210.300 (2)(a)20., F.A.C., which specifically exempts:

*One or more emergency generators located within a single facility provided:*

- a. None of the emergency generators is subject to the Federal Acid Rain Program; and*
- b. Total fuel consumption by all such emergency generators within the facility is limited to 32,000 gallons per year of diesel fuel, 4,000 gallons per year of gasoline, 4.4 million standard cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.*

Generator operations qualify as a Title V insignificant activity under 62-213.430(6)(b), F.A.C., which states:

*An emissions unit or activity shall be considered insignificant if all of the following criteria are met:*

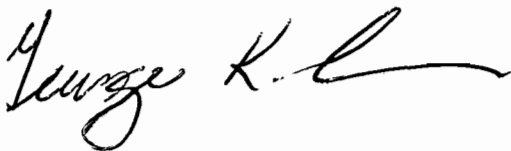
- 1. Such unit or activity would be subject to no unit-specific applicable requirement.*
- 2. Such unit or activity, in combination with other units and activities proposed as insignificant, would not cause the facility to exceed any major source threshold(s) as defined in subparagraph 62-213.420(3)(c)1., F.A.C., unless it is acknowledged in the permit application that such units or activities would cause the facility to exceed such threshold(s).*
- 3. Such unit or activity would neither emit nor have the potential to emit:*
  - a. 500 pounds per year or more of lead and lead compounds expressed as lead;*
  - b. 1,000 pounds per year or more of any hazardous air pollutant;*
  - c. 2,500 pounds per year or more of total hazardous air pollutants; or*
  - d. 5.0 tons per year or more of any other regulated pollutant.*

We know of no unit-specific applicable requirement that would apply to the generator. The generator emissions will not cause the facility to exceed any major source thresholds. Calculations are attached, sufficient to document potential emissions below the thresholds in 62-213.430(6)(b)(3).

Based on a telephone conversation between you and Nicholas Laryea of Indiantown Cogeneration on April 3, 2003, it is our understanding that this letter notification satisfies the Department's air quality regulatory requirements for installation of this source.

If you have any questions, please do not hesitate to contact Nicholas Laryea at 772-597-6500 ext. 19

Sincerely

A handwritten signature in cursive script, appearing to read "George K. Allen". The signature is written in black ink and is positioned above the typed name.

George K. "Chip" Allen  
General Manager

cc: Tom Fromm  
Nicholas Laryea  
J. Jablonowski  
File