

We have also included a check for \$250. Based on our review of the permit fee schedule in Rule 62-4, this is our best interpretation of the appropriate fee for a permit modification of this type. If a different fee (or no fee) should be submitted, please contact us.

If you have any questions, please contact myself at (561) 597-6500 or A.J. Jablonowski, consultant with Earthtech at (978) 371-4339.

Sincerely,



Steve Sorrentino
Plant Director

Enclosure: 1

bc: V. Zambito
B. Veech
M. Golden
V. Gill

cc: Hamilton "Buck" Owen, FDEP, Tallahassee
Tom Tittle, FDEP, SE District
Doc. Control No.: 980522
Project File: 6.3.1.5

cc: J. Cascio, BARR

Indiantown Cogeneration, L.P.

sent check back 11 Mar. '98

March 10, 1998

RECEIVED

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

MAR 11 1998

BUREAU OF
AIR REGULATION

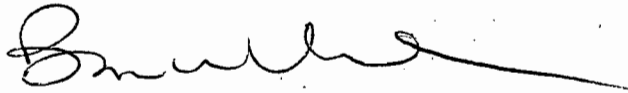
VIA FACSIMILE/FEDERAL EXPRESS OTHERWISE DELETE

Re: Amendment Fee

Dear Mr. Linero:

Enclosed is the \$250.00 fee for the Permit to Construct Amendment. The Permit to Construct Amendment paperwork has been forwarded to you previously.

Sincerely,



Byron Veech
Environmental, Safety and Health Coordinator

Enclosure: 1



P 265 659 311

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

PS Form 3800, April 1995

Sent to	
Bryan Veetch	
Street & Number	
Indian Town Cogen	
Post Office, State, & ZIP Code	
Indian town, FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	3-11-98

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address
2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Bryan Veetch Environmental
Safety & Health Coordinator
Indian town Cogen
PO Box 1799
Indian town, FL
34956

4a. Article Number

P 265 659 311

4b. Service Type

- Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery

8. Addressee's Address (Only if requested and fee is paid)

5. Received By: (Print Name)

G.K. FALLIN

6. Signature (Addressee or Agent)

X

PS Form

ne-

m Receipt

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Print your name, address, and ZIP Code in this box •

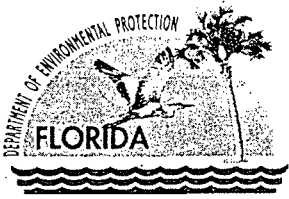
AIR REGULATION
BUREAU OF

MAR 16 1998

RECEIVED

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation, NSRS
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400





Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

March 11, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Byron Veech
Environmental, Safety & Health Coordinator
Indiantown Cogeneration, L.P.
Post Office Box 1799
19140 Southwest Warfield Blvd.
Indiantown, Florida 34956

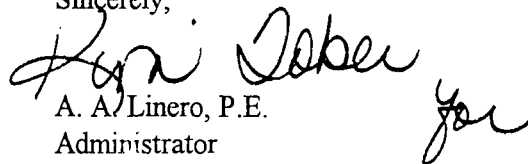
Dear Mr. Veech:

RE: Amendment Fee - Indiantown Cogen Facility

The Bureau of Air Regulation received your March 11 letter concerning the above referenced facility. Since this request is being reviewed under site certification, no further processing fee is required for the Permit to Construct amendment. Enclosed is your check number 0745 for \$250 which was submitted with your request.

If you have any questions, please call Kim Tober at (850)921-9533.

Sincerely,



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

AAL/kt

cc: M. Costello, BAR

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Stephen A. Sorrentino
 Indiantown Cosen
 PO Box 1799
 Indiantown, FL
 34956

4a. Article Number
 P265 659 108

4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery
 12/23/96

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)
 X *Stephanie Helton*

Thank you for using Return Receipt Service.

P 265 659 108

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to
 Stephen Sorrentino
 Street & Number
 Indiantown Cosen
 Post Office, State, & ZIP Code
 Indiantown, FL

Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$

PS Form 3800, April 1995

Postmark or Date
 P50-F1-168 12-18-96

Memorandum

Florida Department of Environmental Protection

Is your RETURN ADDRESS completed on the reverse side?

SENDER: ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
3. Article Addressed to: Steve Sorrentino, Plant Dir IndianTown Cogen 19140 SW Warfield Blvd IndianTown, FL 34956	4a. Article Number P 265 659 333	4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD
5. Received By: (Print Name) KATHRYN DAVIES		
6. Signature: (Addressee or Agent) X <i>Kathryn Davies</i>	7. Date of Delivery 4-15-98	
8. Addressee's Address (Only if requested and fee is paid)		

Thank you for using Return Receipt Service.

PS Form 3811, December 1994 Domestic Return Receipt

P 265 659 333

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to		Steve Sorrentino
Street & Number		IndianTown Cogen
Post Office, State, & ZIP Code		IndianTown, FL
Postage	\$	
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, & Addressee's Address		
TOTAL Postage & Fees	\$	
Postmark or Date		4-13-98

PS Form 3600, April 1995



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

April 9, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Steve Sorrentino, Plant Director
Indiantown Cogeneration, L.P.
19140 Southwest Warfield Blvd.
Indiantown, Florida 34956

Re: Final Permit Amendment to PSD-FL-168
Indiantown Coal Fired Boiler
Opacity Limits

Dear Mr. Sorrentino

The Department has reviewed your February 27, 1998 letter requesting that an exception of 27% opacity for one six minute period per hour is authorized in the New Source Performance Standard Subpart Da applicable to the Indiantown Cogeneration coal fired boiler. Specific Condition No. 8 of the permit is hereby amended as follows:

Visible Emissions (VE) from each baghouse exhaust shall not exceed 10% opacity (six minute average) except for one six minute period per hour of not more than 27 percent opacity. No VE during lime silo loading operations (i.e., less than 5% opacity). VE from the ash handling baghouse shall not exceed a particulate limit of 0.010 grains/acf and VE of 5% opacity.

A person whose substantial interests are affected by this permit amendment may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 850/488-9730, fax: 850/487-4938. Petitions must be filed within fourteen days of receipt of this permit amendment. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code. Mediation is not available for this action.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the 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 the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the action or proposed action.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this permit amendment. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this permit amendment.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

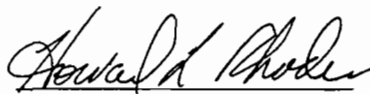
Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permit amendment is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit amendment will not be effective until further order of the Department.

When the Order (Permit Amendment) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Executed in Tallahassee, Florida.



Howard L. Rhodes, Director
Division of Air Resources Management

Florida Department of
Environmental Protection

Memorandum

BAR

TO: Howard L. Rhodes
THRU: Clair Fancy *CF*
FROM: Martin Costello *mc*
DATE: April 2, 1998
SUBJECT: Final Permit Amendment No. PSD-FL-168
Indiantown Coal Fired Boiler
Opacity Limits

Attached for your approval and signature is a letter that will amend the construction permit. This amendment authorizes an exception to the 10% opacity limit for this coal fired boiler which has a baghouse. The BACT does not specify an opacity limit in this case but Specific Condition #8 limits opacity to 10%.

Because Subpart Da allows a 27% opacity for one six minute period per hour to allow for sootblowing or bag cleaning, I think the exception is appropriate in this case. The current permit is silent on whether the NSPS exceptions to the opacity limit are authorized.

I recommend your approval and signature. If you have any questions, Marty Costello or I will be glad to discuss the details.

AAL/mc

Clair/Howard - As a separate matter, these guys have the only baghouse + the first SCR system on a coal-fired plant in Florida. It is an excellent facility.
Al

Department of Environmental Protection

RECEIVED

DIVISION OF AIR RESOURCES MANAGEMENT

MAR 10 1998

APPLICATION FOR AIR PERMIT - LONG FORM

**BUREAU OF
AIR REGULATION**

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

This section of the Application for Air Permit form identifies the facility and provides general information on the scope and purpose of this application. This section also includes information on the owner or authorized representative of the facility (or the responsible official in the case of a Title V source) and the necessary statements for the applicant and professional engineer, where required, to sign and date for formal submittal of the Application for Air Permit to the Department. If the application form is submitted to the Department using ELSA, this section of the Application for Air Permit must also be submitted in hard-copy.

Identification of Facility Addressed in This Application

Enter the name of the corporation, business, governmental entity, or individual that has ownership or control of the facility; the facility site name, if any; and the facility's physical location. If known, also enter the facility identification number.

1. Facility Owner/Company Name: Indiantown Cogeneration, L.P.	
2. Site Name: Indiantown Cogeneration Plant	
3. Facility Identification Number: [] Unknown 0850102	
4. Facility Location: Street Address or Other Locator: 19140 SW Warfield Blvd. City: Indiantown County: Martin Zip Code: 34956	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [X] Yes [] No

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	March 10, 1998
2. Permit Number:	
3. PSD Number (if applicable):	PSD-FI-168
4. Siting Number (if applicable):	

Purpose of Application and Category

Check one (except as otherwise indicated):

Category I: All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, F.A.C.

This Application for Air Permit is submitted to obtain:

- Initial air operation permit under Chapter 62-213, F.A.C., for an existing facility which is classified as a Title V source.
- Initial air operation permit under Chapter 62-213, F.A.C., for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

- Air operation permit renewal under Chapter 62-213, F.A.C., for a Title V source.

Operation permit to be renewed: _____

- Air operation permit revision for a Title V source to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit to be revised: _____

- Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. Also check Category III.

Operation permit to be revised/corrected: _____

- Air operation permit revision for a Title V source for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit to be revised: _____

Reason for revision: _____

Category II: All Air Operation Permit Applications Subject to Processing Under Rule 62-210.300(2)(b), F.A.C.

This Application for Air Permit is submitted to obtain:

- Initial air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.

Current operation/construction permit number(s): _____

- Renewal air operation permit under Rule 62-210.300(2)(b), F.A.C., for a synthetic non-Title V source.

Operation permit to be renewed: _____

- Air operation permit revision for a synthetic non-Title V source. Give reason for revision; e.g., to address one or more newly constructed or modified emissions units.

Operation permit to be revised: _____

Reason for revision: _____

Category III: All Air Construction Permit Applications for All Facilities and Emissions Units

This Application for Air Permit is submitted to obtain:

- Air construction permit to construct or modify one or more emissions units within a facility (including any facility classified as a Title V source).

Current operation permit number(s), if any: Preconstruction PSD-FL-168

- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

Current operation permit number(s): _____

- Air construction permit for one or more existing, but unpermitted, emissions units.

Application Processing Fee

Check one:

[] Attached - Amount: \$ 250.00 [] Not Applicable.

Construction/Modification Information

<p>1. Description of Proposed Project or Alterations:</p> <p>Modification to opacity requirement for pulverized coal-fired main boiler.</p> <p>Original permit did not have an opacity provision for exceptional circumstances (spike provision).</p> <p>Requested modification allows the same 10% opacity for normal operation, plus one 6-minute period per hour of opacity up to 27%.</p>
<p>2. Projected or Actual Date of Commencement of Construction:</p> <p>Equipment is in operation. Opacity limit will take effect upon approval.</p>
<p>3. Projected Date of Completion of Construction:</p> <p>Equipment is in operation. Opacity limit will take effect upon approval.</p>

Professional Engineer Certification

<p>1. Professional Engineer Name: George S. Lipka Registration Number: 0050359</p>
<p>2. Professional Engineer Mailing Address:</p> <p>Organization/Firm: Earth Tech Street Address: 196 Baker Avenue City: Concord State: MA Zip Code: 01742</p>
<p>3. Professional Engineer Telephone Numbers: Telephone: 978-371-4000 Fax: 978-371-2468</p>

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

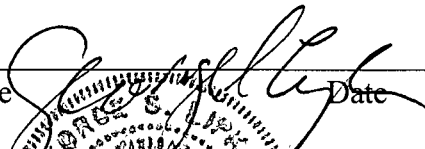
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

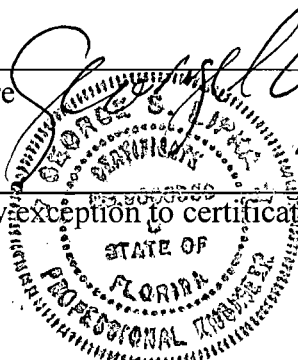
If the purpose of this application is to obtain a Title V source air operation permit (check here [] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature  Date 3/2/98 # 0050359
(seal)

* Attach any exception to certification statement.



Application Contact

1. Name and Title of Application Contact:

Byron Veech
Environmental, H&S Director

2. Application Contact Mailing Address:

Organization/Firm: Indiantown Cogeneration, LP
Street Address: PO Box 1620
City: Indiantown State: FL Zip Code: 34956

3. Application Contact Telephone Numbers:

Telephone: 561-597-6500 Fax: 561-597-6520

Application Comment

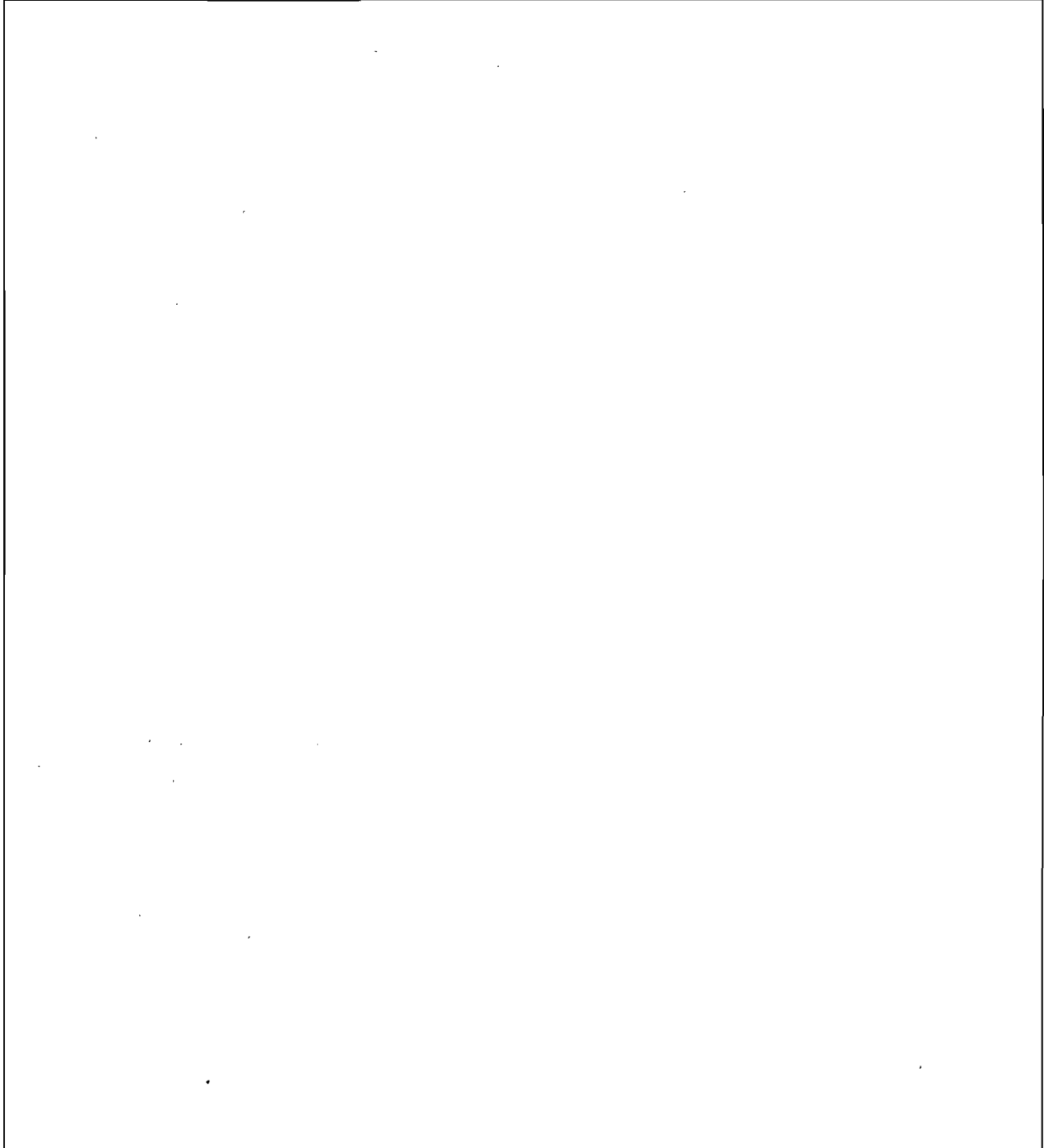
The Title V Operating Permit Application for this facility is under review by FDEP. Per discussions with Tom Cascio, we are requesting that this application be reviewed in time for incorporation of the condition change into the Title V Operating Permit Application.

Facility Regulatory Classifications

1. Small Business Stationary Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown
2. Title V Source? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3. Synthetic Non-Title V Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
4. Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5. Synthetic Minor Source of Pollutants Other than HAPs? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
6. Major Source of Hazardous Air Pollutants (HAPs)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7. Synthetic Minor Source of HAPs? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
8. One or More Emissions Units Subject to NSPS? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9. One or More Emission Units Subject to NESHAP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
10. Title V Source by EPA Designation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
11. Facility Regulatory Classifications Comment (limit to 200 characters): Major source of HAPs based on current estimates of HCl emissions.

B. FACILITY REGULATIONS

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)



List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

62-210.300	
62-210.350	
62-210.370	
62-210.500	
62-210.550	
62.210-700	
62-212.300	
62-212.400 (PSD-FL-168)	
62-212.410	
62-212.500	
62-213	
62-273.300	
62-297	

D. FACILITY POLLUTANT DETAIL INFORMATION

Facility Pollutant Detail Information: Pollutant ___ of ___

1. Pollutant Emitted:		
2. Requested Emissions Cap:	(lb/hour)	(tons/year)
3. Basis for Emissions Cap Code:		
4. Facility Pollutant Comment (limit to 400 characters):		

Facility Pollutant Detail Information: Pollutant ___ of ___

1. Pollutant Emitted:		
2. Requested Emissions Cap:	(lb/hour)	(tons/year)
3. Basis for Emissions Cap Code:		
4. Facility Pollutant Comment (limit to 400 characters):		

E. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements for All Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
2. Facility Plot Plan: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
3. Process Flow Diagram(s): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
6. Supplemental Information for Construction Permit Application: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested

Additional Supplemental Requirements for Category I Applications Only

7. List of Proposed Exempt Activities: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
8. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input type="checkbox"/> Not Applicable
9. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
10. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

<p>11. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable</p>
<p>12. Compliance Assurance Monitoring Plan: <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable</p>
<p>13. Risk Management Plan Verification:</p> <p><input type="checkbox"/> Plan Submitted to Implementing Agency - Verification Attached, Document ID:_____</p> <p><input type="checkbox"/> Plan to be Submitted to Implementing Agency by Required Date</p> <p><input type="checkbox"/> Not Applicable</p>
<p>14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable</p>
<p>15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID:_____ <input type="checkbox"/> Not Applicable</p>

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through L as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application. Some of the subsections comprising the Emissions Unit Information Section of the form are intended for regulated emissions units only. Others are intended for both regulated and unregulated emissions units. Each subsection is appropriately marked.

A. TYPE OF EMISSIONS UNIT (Regulated and Unregulated Emissions Units)

Type of Emissions Unit Addressed in This Section

1. Regulated or Unregulated Emissions Unit? Check one:

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

2. Single Process, Group of Processes, or Fugitive Only? Check one:

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

**B. GENERAL EMISSIONS UNIT INFORMATION
(Regulated and Unregulated Emissions Units)**

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Pulverized Coal Fired Main Boiler		
2. Emissions Unit Identification Number: [001] No Corresponding ID []		
3. Emissions Unit Status Code: A	4. Acid Rain Unit? [] Yes [X] No	5. Emissions Unit Major Group SIC Code: 49
6. Emissions Unit Comment (limit to 500 characters): Equipment is in operation. Date of first solid fuel fire 01-Jul-1995		

Emissions Unit Control Equipment

A.

1. Description (limit to 200 characters): Air Preheater
2. Control Device or Method Code: 27

B.

1. Description (limit to 200 characters): Low NOx Burners
2. Control Device or Method Code: 24

Emissions Unit Information Section 1 of 1

C.

1. Description (limit to 200 characters): Overfire Air
2. Control Device or Method Code: 25

D.

1. Description (limit to 200 characters): Combustion Controls / O2 Control
2. Control Device or Method Code: 33

E.

1. Description (limit to 200 characters): Ammonia Injection (Part of SCR system)
2. Control Device or Method Code: 32

F.

1. Description (limit to 200 characters): Catalytic Reduction (Part of SCR system)
2. Control Device or Method Code: 65

G.

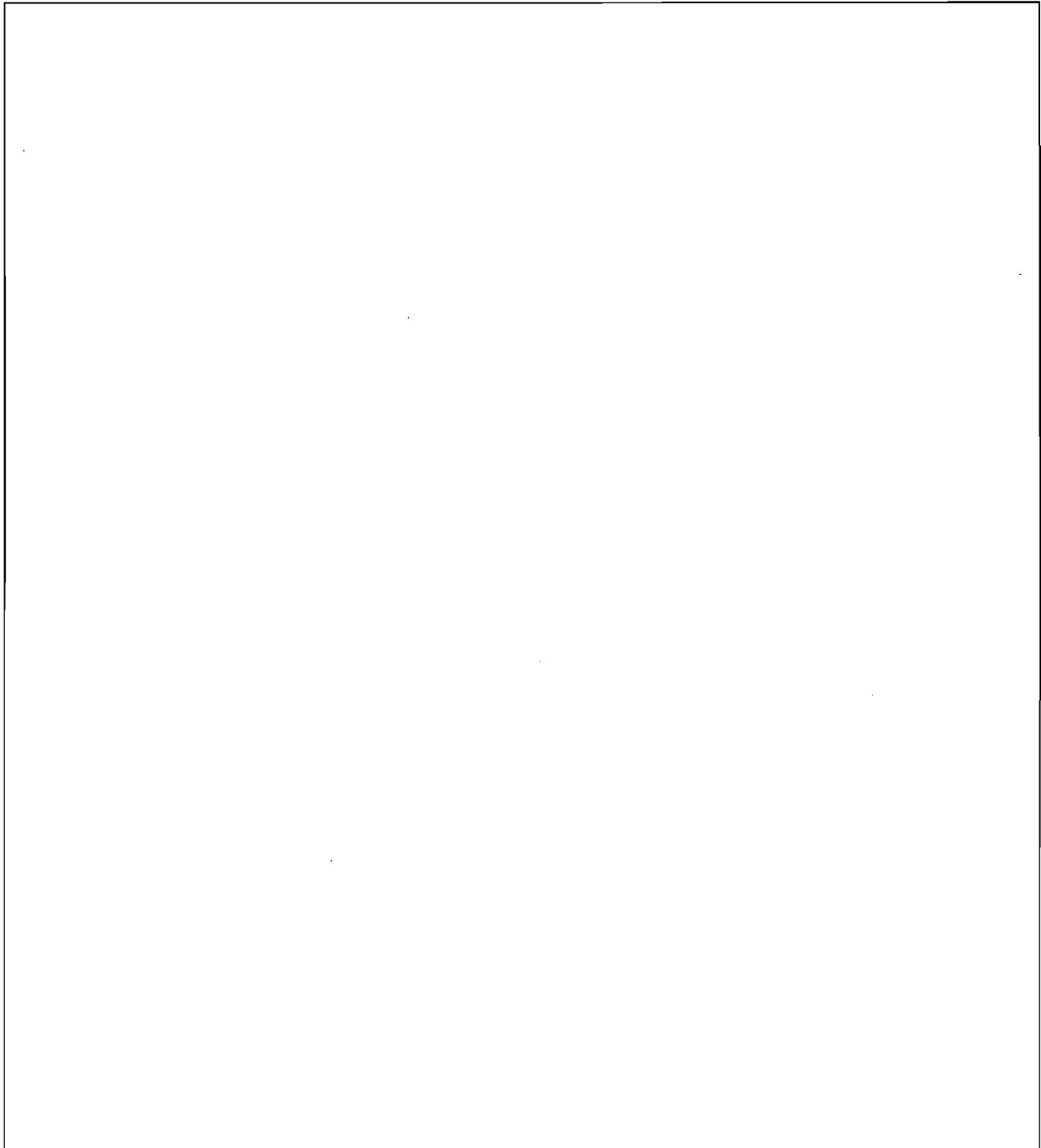
1. Description (limit to 200 characters): Spray Dryer Absorber (SDA)
2. Control Device or Method Code: 67

H.

1. Description (limit to 200 characters): Fabric Filter Baghouse
2. Control Device or Method Code: 17

**D. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)



List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

40 CFR 60.1-60.15	
40 CFR 60.17	
40 CFR 60.19	
40 CFR 60.40a	
40 CFR 60.41a	
40 CFR 60.42a (a), (b)	
40 CFR 60.43a (a)(2), (b)(2), (g), (h)(2)	
40 CFR 60.44a(a), (c)	
40 CFR 60.46a (a-c, e-h)	
40 CFR 60.47a (a), (b)(3), (c-j)	
40 CFR 60.48a (a-e)	
40 CFR 60.4a (a-c, f-I)	

**E. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram:	
01	
2. Emission Point Type Code:	
<input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
3. Descriptions of Emissions Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):	
01 Main Stack - PC Boiler	
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:	
001 PC Boiler	
5. Discharge Type Code:	
<input type="checkbox"/> D <input type="checkbox"/> F <input type="checkbox"/> H <input type="checkbox"/> P <input type="checkbox"/> R <input checked="" type="checkbox"/> V <input type="checkbox"/> W	
6. Stack Height:	495 feet
7. Exit Diameter:	16.0 feet
8. Exit Temperature:	~140 °F

Emissions Unit Information Section 1 of 1

9. Actual Volumetric Flow Rate:	~1123700 acfm
10. Percent Water Vapor :	~15%
11. Maximum Dry Standard Flow Rate:	dscfm
12. Nonstack Emission Point Height:	feet
13. Emission Point UTM Coordinates: Zone: East (km): North (km):	
14. Emission Point Comment (limit to 200 characters): airflow in dscfm not listed because the PC boiler has no emission limits in grains/dscfm.	

**F. SEGMENT (PROCESS/FUEL) INFORMATION
(Regulated and Unregulated Emissions Units)**

Segment Description and Rate: Segment 1 of 4

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): Coal Firing	
2. Source Classification Code (SCC): 1-01-001-01	
3. SCC Units: Tons burned (all solid fuels)	
4. Maximum Hourly Rate: 145	5. Maximum Annual Rate: 1,270,200
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur: 2	8. Maximum Percent Ash: 12
9. Million Btu per SCC Unit: 24	
10. Segment Comment (limit to 200 characters):	

Emissions Unit Information Section 1 of 1

Segment Description and Rate: Segment 2 of 4

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): No. 2 Oil Firing	
2. Source Classification Code (SCC): 1-01-005-01	
3. SCC Units: Thousand Gallons Burned (all liquid fuels)	
4. Maximum Hourly Rate: 12.7	5. Maximum Annual Rate: 111,135
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur: 0.05	8. Maximum Percent Ash:
9. Million Btu per SCC Unit: 135	
10. Segment Comment (limit to 200 characters): PC Boiler does not currently fire No. 2 oil. No. 2 oil would be fired during startup, shutdown, and load changes. Firing capacity no more than 50% rated boiler heat input.	

Emissions Unit Information Section 1 of 1

Segment Description and Rate: Segment 3 of 4

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): Natural Gas Firing	
2. Source Classification Code (SCC): 1-01-006-01	
3. SCC Units: Million Cubic Feet Burned (all gaseous fuels)	
4. Maximum Hourly Rate: 1.8	5. Maximum Annual Rate: 15,777
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur:	8. Maximum Percent Ash:
9. Million Btu per SCC Unit: 950	
10. Segment Comment (limit to 200 characters): Fired during startup, shutdown, and load changes. Firing capacity no more than 50% rated boiler heat input.	

Emissions Unit Information Section 1 of 1

Segment Description and Rate: Segment 4 of 4

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): Propane (LPG) Firing	
2. Source Classification Code (SCC): 1-01-010-02	
3. SCC Units: Thousand Gallons Burned (all liquid fuels)	
4. Maximum Hourly Rate: 18.9	5. Maximum Annual Rate: 165,617
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur:	8. Maximum Percent Ash:
9. Million Btu per SCC Unit: 90	
10. Segment Comment (limit to 200 characters): Fired during startup, shutdown, and load changes. Firing capacity no more than 50% rated boiler heat input.	

**G. EMISSIONS UNIT POLLUTANTS
(Regulated and Unregulated Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
CO	025	033	EL
PB	017		EL
NOX	032	065	EL
PM	017		EL
PM10	017		EL
SO2	067	017	EL
VOC	025	033	EL
SAM	067	017	EL
H021	017		EL
H114		067	EL
FL	067	017	EL
H015	017		EL
H106	067	017	EL

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information:

1. Pollutant Emitted: CO			
2. Total Percent Efficiency of Control:			%
3. Potential Emissions:	376.00	lb/hour	1,649.00 tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: Reference:			
7. Emissions Method Code: <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5			
8. Calculation of Emissions (limit to 600 characters): Limit per PSD permit.			
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): Limit per PSD limit.			

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

Emissions Unit Information Section 1 of 1

(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Pollutant Detail Information:

1. Pollutant Emitted: PB			
2. Total Percent Efficiency of Control:	99.00		%
3. Potential Emissions:	0.03	lb/hour 0.15	tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: Reference:			
7. Emissions Method Code: <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5			
8. Calculation of Emissions (limit to 600 characters): Limit per PSD permit. Control efficiency not used to calculate potential emissions.			
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): Limit per PSD limit.			

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information:

1. Pollutant Emitted: NOx			
2. Total Percent Efficiency of Control:	37.00		%
3. Potential Emissions:	582.00	lb/hour	2,549.00 tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: Reference:			
7. Emissions Method Code: <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5			
8. Calculation of Emissions (limit to 600 characters): Limit per PSD permit. Control efficiency not used to calculate potential emissions.			
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): Limit per PSD limit.			

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information:

1. Pollutant Emitted: PM			
2. Total Percent Efficiency of Control:	99.70		%
3. Potential Emissions:	61.60	lb/hour 270.00	tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: Reference:			
7. Emissions Method Code: <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5			
8. Calculation of Emissions (limit to 600 characters): Limit per PSD permit. Control efficiency not used to calculate potential emissions.			
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): Limit per PSD limit.			

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information:

1. Pollutant Emitted: PM10			
2. Total Percent Efficiency of Control:	99.70		%
3. Potential Emissions:	61.60	lb/hour 270.00	tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: Reference:			
7. Emissions Method Code: <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5			
8. Calculation of Emissions (limit to 600 characters): Limit per PSD permit. Control efficiency not used to calculate potential emissions.			
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): Limit per PSD limit.			

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information:

1. Pollutant Emitted: SO2			
2. Total Percent Efficiency of Control:	95.00		%
3. Potential Emissions:	582.00	lb/hour 2,549.00	tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: Reference:			
7. Emissions Method Code: <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5			
8. Calculation of Emissions (limit to 600 characters): Limit per PSD permit.			
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): Limit per PSD limit.			

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information:

1. Pollutant Emitted: VOC			
2. Total Percent Efficiency of Control:			%
3. Potential Emissions:	12.32	lb/hour	54.00 tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: Reference:			
7. Emissions Method Code: <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5			
8. Calculation of Emissions (limit to 600 characters): Limit per PSD permit.			
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): Limit per PSD limit.			

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information:

1. Pollutant Emitted: SAM			
2. Total Percent Efficiency of Control:	95.00		%
3. Potential Emissions:	1.45	lb/hour	6.51 tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: Reference:			
7. Emissions Method Code: <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5			
8. Calculation of Emissions (limit to 600 characters): Limit per PSD permit. Control efficiency not used to calculate potential emissions.			
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): Limit per PSD limit.			

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information:

1. Pollutant Emitted: H021			
2. Total Percent Efficiency of Control:	99.00	%	
3. Potential Emissions:	0.01	lb/hour	0.04 tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: Reference:			
7. Emissions Method Code: <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5			
8. Calculation of Emissions (limit to 600 characters): Limit per PSD permit. Control efficiency not used to calculate potential emissions.			
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): Limit per PSD limit.			

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information:

1. Pollutant Emitted: H114			
2. Total Percent Efficiency of Control:			%
3. Potential Emissions:	0.04	lb/hour	0.17 tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: Reference:			
7. Emissions Method Code: <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5			
8. Calculation of Emissions (limit to 600 characters): Limit per PSD permit.			
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): Limit per PSD limit.			

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information:

1. Pollutant Emitted: FL			
2. Total Percent Efficiency of Control:	95.00		%
3. Potential Emissions:	5.08	lb/hour 22.30	tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: Reference:			
7. Emissions Method Code: <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5			
8. Calculation of Emissions (limit to 600 characters): Limit per PSD permit. Control efficiency not used to calculate potential emissions.			
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): Limit per PSD limit.			

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information:

1. Pollutant Emitted: H015			
2. Total Percent Efficiency of Control:	99.00		%
3. Potential Emissions:	0.18	lb/hour 0.77	tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: Reference:			
7. Emissions Method Code: <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5			
8. Calculation of Emissions (limit to 600 characters): Limit per PSD permit. Control efficiency not used to calculate potential emissions.			
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): Limit per PSD limit.			

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information:

1. Pollutant Emitted: H106			
2. Total Percent Efficiency of Control:	95.00		%
3. Potential Emissions:	10.70	lb/hour	47.00 tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: Reference:			
7. Emissions Method Code: <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5			
8. Calculation of Emissions (limit to 600 characters): Mass balance on 2/96 grab sample tests for chlorine content in coal. Chlorine weight fraction times maximum expected coal firing rate, assume all chlorine becomes HCl, assume 97% control in spray dryer/baghouse. See Table 4-3 in Title V operating permit application text.			
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): 			

Emissions Unit Information Section 1 of 1

Allowable Emissions (Pollutant identified on front of page)

A.

1. Basis for Allowable Emissions Code:		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lb/hour	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

B.

1. Basis for Allowable Emissions Code:		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lb/hr	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

**I. VISIBLE EMISSIONS INFORMATION
(Regulated Emissions Units Only)**

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE			
2. Basis for Allowable Opacity:		<input checked="" type="checkbox"/> Rule	<input type="checkbox"/> Other
3. Requested Allowable Opacity:			
Normal Conditions:	10 %	Exceptional Conditions:	27 %
Maximum Period of Excess Opacity Allowed:	6		min/hour
4. Method of Compliance: Continuous opacity meter			
5. Visible Emissions Comment (limit to 200 characters): Required by 40 CFR 60.42a(b) (NSPS Subpart Da) 20% opacity allowed, 27% for one 6 minute period per hour. Startup and shut down periods excluded, not to exceed 2 hours per 62-210.700, except as provided in 62-210.700.			

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:			
2. Basis for Allowable Opacity:		<input type="checkbox"/> Rule	<input type="checkbox"/> Other
3. Requested Allowable Opacity:			
Normal Conditions:	%	Exceptional Conditions:	%
Maximum Period of Excess Opacity Allowed:			min/hour
4. Method of Compliance:			
5. Visible Emissions Comment (limit to 200 characters):			

**K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT
TRACKING INFORMATION
(Regulated and Unregulated Emissions Units)**

PSD Increment Consumption Determination

1. Increment Consuming for Particulate Matter or Sulfur Dioxide?

If the emissions unit addressed in this section emits particulate matter or sulfur dioxide, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for particulate matter or sulfur dioxide. Check the first statement, if any, that applies and skip remaining statements.

-] The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.
-] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.
-] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.
-] For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.
-] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

Emissions Unit Information Section 1 of 1

2. Increment Consuming for Nitrogen Dioxide?

If the emissions unit addressed in this section emits nitrogen oxides, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for nitrogen dioxide. Check first statement, if any, that applies and skip remaining statements.

-] The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.
-] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.
-] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.
-] For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.
-] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

3. Increment Consuming/Expanding Code:			
PM	<input checked="" type="checkbox"/>] C	<input type="checkbox"/>] E	<input type="checkbox"/>] Unknown
SO2	<input checked="" type="checkbox"/>] C	<input type="checkbox"/>] E	<input type="checkbox"/>] Unknown
NO2	<input checked="" type="checkbox"/>] C	<input type="checkbox"/>] E	<input type="checkbox"/>] Unknown
4. Baseline Emissions:			
PM	0.0000	lb/hour	0.0000 tons/year
SO2	0.0000	lb/hour	0.0000 tons/year
NO2			0.0000 tons/year
5. PSD Comment (limit to 200 characters):			
Emission Unit underwent PSD review prior to obtaining permit PSD-FL-168.			

**L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements for All Applications

1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously submitted, Date: <u> 3/96 </u> <input type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Supplemental Requirements for Category I Applications Only

10. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Acid Rain Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

- a) The bag clamps were all loosened and removed in a individual compartment.
- b) The new stainless steel clamps were put on the collar of the bag and then positioned on the thimble of the lower plenum.
- c) The individual at the bottom of the bag then used an electric screw driver to tighten the clamp until the entire assembly was tight enough to position next to the locking collar of the thimble.
- d) The individual at the top of the bag placed the tensioning device in position on the bag spring and removed the lower locking pin on the tensioning assembly.
- e) Using (110 - 115 psig) plant air a pressure of 54 pounds is applied to the tensioning device resulting in a force of 75 psi to the spring of the tensioning assembly.
- f) The individual at the top of the filter assembly then radios the individual at the lower end of the assemble to check the position and do the final tightening of the clamp.
- g) Once this is complete the lower retaining clip is replaced on the tensioning assembly and the air is bleed from the tensioning device.
- h) After the work on a section was complete the area was inspected.

2. *What type of procedure is used to guide operations in determining a problem in the emissions and taking the proper actions?*

Response: All ICLP plant personnel have been training on the operating limits of the plant, specifically the air emission limitations. In the control room, at the operator control station is a copy of the plant current emission limits.

In addition to this the plant has developed an Environmental action level response guide for the plant personnel to use in such situations in the future.

3. *How many prior failures of bag were a result of clamps coming loose?*

Response: In reviewing the history of the last year and one-half of the plant's operation, the first bag clamp failure occurred on November 11, 1997 when a carbon steel clamp in a compartment corroded and failed. The failure mechanism of the January incident involved a release of the clamp rather than a failure of the clamp's integrity.

RECEIVED

4. *What is the schedule for the replacement of the remained of compartments.* APR 16 1997

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AIR REGULATION

Response: The current plan is to begin this project after our spring outage is completed. The remaining seven compartments should be completed in three to four months based on plant operations and system needs.

Summary

The events of January 18 and 19, did result in the plant exceeding the permitted opacity limit of 10% during the four periods in question. The maximum six-minute average experienced during any of the events was 18.7% opacity. This occurred when the plant experienced failures in two compartments with one compartment already out of service for repairs. During this time the plant staff made every reasonable effort to minimize the impact and return the plant to an in compliance condition as soon as possible. These efforts included; dropping the plant to minimum load, switching over to natural gas as a fuel to minimize the particulate loading, and calling out overtime for repairs. These efforts indicate the plant took the incident very seriously and did react in an appropriate and timely manner to control the incident.

However, it is beyond our complete control to ensure that during the repair of the remaining compartments and in the future when maintenance is required, that this type of event will not reoccur. We will, always use best management practices to ensure maximum compliance with our existing limits. Due to the nature of this process not all responses to environmental incidents can occur instantaneously. Time must be allowed in order for the staff to make an appropriate and safe response to the myriad of possible events we are confronted with.

ICLP thanks you for this opportunity to further elaborate on this incident and if you have any further questions, please contact Byron Veech or myself at (407) 597-6500.

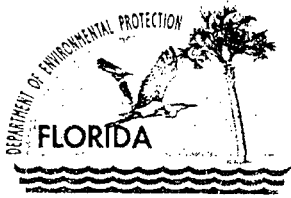
Sincerely,



Douglas Bullock
Engineering Manager

Enclosure 1

cc: Rich Hofman, FDEP
Martin Costello, FDEP ✓
J. Heron, BAR
M. Harley, BAMMS
B. Olen, PPS



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

December 2, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Stephen A. Sorrentino
Environmental Coordinator
Indiantown Cogeneration
Post Office Box 1799
Indiantown, Florida 34956

Re: Amendment of Permit: PSD-FL-168
Indiantown Cogeneration Project
Removal of H₂SO₄ test requirement due to interferences

Dear Mr. Sorrentino:

The Department has reviewed Indiantown Cogeneration's November 2 letter requesting to withdraw the recent Amendment to Standard Procedure (ASP) and amend the above referenced permit, by removing Specific Condition 19, "Method 8 for Sulfuric acid mist from stationary source". Your request was justified based on initial testing using Method 8 which produced erratic results due to flue gas conditions and probable interferences from ammonia and chlorides. Since the applicability section for Reference Method 8 warns of interferences due to ammonia, this method should not have been specified for this source which is equipped with a selective catalytic reduction (SCR) system. The Department hereby withdraws your request for an ASP and amends Specific Condition 19 by removing the testing requirement for sulfuric acid mist, Method 8.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 904/488-9730, fax: 904/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the 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

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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 the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources Management

HLD/hh

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this AMENDMENT was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 12-18-96 to the person(s) listed:

Mr. Hamilton Oven, Siting
Mr. Thomas Tittle, SED
Mr. Mike Harley, EMS

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52(7), Florida
Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged.

Kuni Jaker
(Clerk)

12-18-96
(Date)

Memorandum

at line over top of envelope
 or address

Is your RETURN ADDRESS completed on the reverse side?

SENDER: ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
3. Article Addressed to: Stephen A. Sorrentino IndianTown Cosen PO Box 1799 IndianTown, FL 34956	4a. Article Number P265 659 108	Thank you for using Return Receipt Service.
5. Received By: (Print Name) _____	4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
6. Signature: (Addressee or Agent) X <i>Stephanie Weldon</i>	7. Date of Delivery 12/23/96	
PS Form 3811, December 1994		Domestic Return Receipt

P 265 659 108

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Send to	<i>Stephen Sorrentino</i>	
Street & Number	<i>IndianTown Cosen</i>	
Post Office, State, & ZIP Code	<i>IndianTown, FL</i>	
Postage	\$	
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, & Addressee's Address		
TOTAL Postage & Fees	\$	
Postmark or Date	<i>PSD-FI-168 12-18-96</i>	

PS Form 3800, April 1995

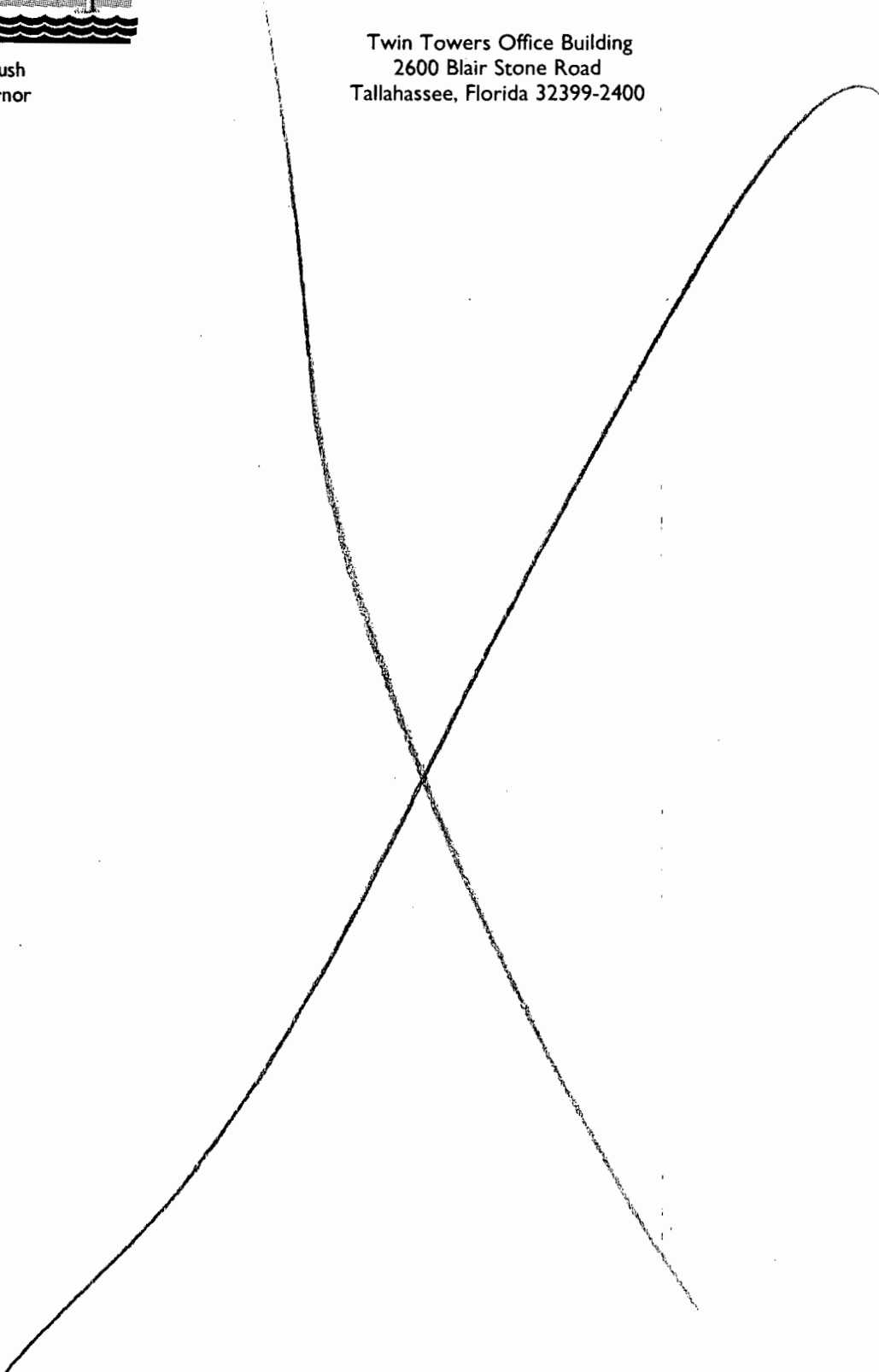


Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary



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Indiantown Cogeneration, L.P.

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NOV 14 1996
BUREAU OF
AIR REGULATION

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*

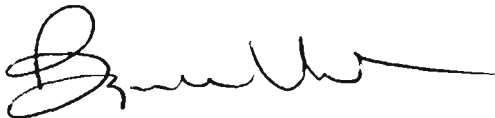
Dear Tom:

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



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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, PE.
Administrator, Siting
Coordination 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

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 SO₂ 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.



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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_2SO_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_2SO_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.

Mr. Fancy
November 2, 1996
Page 3

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

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NOV 12 1996

**BUREAU OF
AIR REGULATION**

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

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

RECEIVED

NOV 05 1996

BUREAU OF
AIR REGULATION

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 SO₂ 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.



Mr. Fancy
November 2, 1996
Page 2

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 (H₂ SO₄) 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 H₂ SO₄ 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 SO₂ 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.

Mr. Fancy
November 2, 1996
Page 3

cc: Hamilton "Buck" Owen 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.

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JUL 19 1995
Bureau of
Air Regulation

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



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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Mr. Costello
June 8, 1995
Page two

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**

Amend

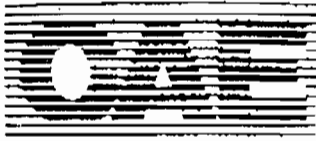
Amend

Amend

*Guidance memo
States ASP is
Required*

<u>Permit</u>	<u>Protocol</u>	<u>Explanation</u>
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.
3	3 & 3A	Because of the methods approved, method 3A is more appropriate for use during SO ₂ , NO _x & VOC tests
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 .
18 or 25	18 and 25A	Method 18 will be used for methane. Method 25A will be used for total hydrocarbons. 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).

BEST AVAILABLE COPY



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 ³ Arsenic ³	EPA 104 EPA 108	3 3	120 min. 120 min.	60 dscf 60 dscf
	Bag Filters ¹	Opacity Fugitive Emissions	EPA 9 EPA 22	3 5	60 min. 15 min.	NA NA
4	Stack	Oxygen Carbon Dioxide Sulfur Dioxide ² Nitrogen Oxide ² Carbon Monoxide ² Methane ² Total Hydrocarbons ² Lead ³ Fluorides ³	EPA 3A EPA 3A EPA 6C EPA 7E EPA 10 EPA 18 EPA 25A EPA 12 EPA 13B	3 3 3 3 3 3 3 3 3	60 min. 60 min. 60 min. 60 min. 60 min. 60 min. 60 min. 120 min 60 min.	continuous continuous continuous continuous continuous 3 liter continuous 60 dscf 30 dscf
5	Stack	Particulate/Ammonia ³ Sulfuric Acid Mist ³ Opacity	EPA 5/NH ₃ (draft) EPA 8 EPA 9	3 3 3	120 min 60 min. 60 min.	60 dscf 30 dscf 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 analyzed 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.



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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.

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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.

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2

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

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March 6, 1995

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

RECEIVED

MAR 6 1995

**Bureau of
Air Regulation**

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 be resubmitting its 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 H₂SO₄ 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

Hamilton S. Oven, Jr., Administrator
March 6, 1995
Page 5

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.

Ammonia Interference 5.7

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).

Ammonia Interference IC

— 6.

We request that DARM review the proposed test method and determine whether or not it is acceptable. If approved - NH_3 Test for use, this method should be referenced in COC (1)B.3.b. (and PSD S.C. 19).

IC to revert delete Cond 1

✓ 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.

NO
Action

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.

NSPS for
Limits firing
Gas

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.

modify
PSD

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

cc: Clair Fancy
Tom Tittle
Doug Roberts
Richard Donelan

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August 25, 1994

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AUG 26 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;

Mr. Clair Fancy
August 25, 1994
Page 2

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 ₂ SO ₄	0.0004	1.45	6.51
Beryllium	0.00000273	0.0094 <u>0.0093</u>	0.041
Mercury	0.0000114	0.039	0.172

Mr. Clair Fancy
 August 25, 1994
 Page 3

Lead	0.0000187	0.064	0.280
Fluorides	0.0015 <u>0.002</u>	5.08 <u>7.26</u>	22.3 <u>22.26</u>
Arsenic	0.000051 <u>1</u>	0.18 <u>0.175</u>	0.77 <u>0.765</u>

* 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

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/year</u>
NO _x	68.0 <u>68.4</u>	34
SO ₂	18.0 <u>17.8</u>	9
PM	1.4 <u>1.40</u>	0.70
PM ₁₀	1.4 <u>1.40</u>	0.70
CO	48.0 <u>47.3</u>	24
VOC	0.620 <u>0.63</u>	0.31
Be	4.0 x 10⁻⁵ <u>4.1 x 10⁻⁵</u>	2.0 x 10 ⁻⁵
Hg	5.2 x 10⁻⁴ <u>5.1 x 10⁻⁴</u>	2.6 x 10 ⁻⁴
Pb	3.6 x 10 ⁻²	1.8 x 10 ⁻²
As	6.8 x 10 ⁻³	3.4 x 10 ⁻³

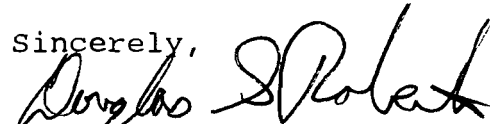
The proposed changes should not result in any increase in air quality impacts. Conforming these emission limitations will insure consistency during the upcoming initial stack tests and future compliance testing on the project.

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

Mr. Clair Fancy
August 25, 1994
Page 4

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 $\mu\text{g}/\text{m}_3$
 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

Mr. Stephen A. Sorrentino
Page 2 of 6
Amendment to PSD-FL-168

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

Mr. Stephen A. Sorrentino
 Page 3 of 6
 Amendment to PSD-FL-168

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 ₂ SO 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 ₂ SO 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

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/year</u>
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 x 10 ⁻⁵	2.0 x 10 ⁻⁵
Hg	5.2 x 10 ⁻⁴	2.6 x 10 ⁻⁴
Pb	3.6 x 10 ⁻²	1.8 x 10 ⁻²
As	6.8 x 10 ⁻³	3.4 x 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 x 10 ⁻⁵	2.0 x 10 ⁻⁵
Hg	5.2 x 10 ⁻⁴	2.6 x 10 ⁻⁴
Pb	3.6 x 10 ⁻²	1.8 x 10 ⁻²
As	6.8 x 10 ⁻³	3.4 x 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

Mr. Stephen A. Sorrentino
Page 6 of 6
Amendment to PSD-FL-168

- 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

BEFORE THE GOVERNOR AND CABINET
STATE OF FLORIDA
SITTING AS THE SITING BOARD

IN RE:
APPLICATION FOR POWER PLANT
SITE CERTIFICATION OF
INDIANTOWN COGENERATION
PROJECT, PA 90-31

DOAH CASE NO. 90-8072EPP

FINAL ORDER APPROVING CERTIFICATION

On February 4, 1992, this matter came before the Governor and Cabinet, sitting as the Siting Board, pursuant to the Florida Electrical Power Plant Siting Act (PPSA), Section 403.501, et seq., Florida Statutes (1991), for final agency action concerning a Recommended Order dated December 24, 1991, attached as Exhibit 1, which recommends site certification for the Indiantown Cogeneration Project Power Plant. On September 24, 1991, the Board adopted a previous Recommended Order in this case which concluded that the proposed project was consistent with all applicable zoning ordinances and land use plans. The Public Service Commission entered a Final Order certifying the need for the proposed project on March 21, 1991.

No exceptions to the Recommended Order have been filed. Having reviewed the Recommended Order and having otherwise been fully advised, it is **ORDERED**:

1. Pursuant to Section 120.57(1)(b)10, Florida Statutes (1991), the Recommended Order dated December 24, 1991, (Exhibit 1) is **APPROVED** and **ADOPTED** by the Board.

2. The Board hereby **APPROVES** certification of the location, construction, and operation of the Indiantown Cogeneration Project at the proposed site, subject to the Conditions of Certification contained in Appendix A of Exhibit 1.

3. The Board hereby **DELEGATES** to the Department of Environmental Regulation the authority to assure and enforce compliance by Indiantown Cogeneration Partnership and its agents with all of the Conditions of Certification.

NOTICE OF RIGHTS

Any party to this certification proceeding has the right to seek judicial review of this Order pursuant to Section 120.68, Florida Statutes, by the filing of a notice of appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Siting Board in the Department of Environmental Regulation Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy with the appropriate District Court of Appeal. The notice of appeal must be filed within 30 days from the date this Final Order is filed with the Clerk of the Siting Board.

DONE and ORDERED this 6th day of February, 1992, in Tallahassee, Florida, pursuant to the vote of the Governor and Cabinet sitting as the Siting Board, at a duly-noticed and constituted Cabinet meeting on February 4, 1992.

THE GOVERNOR AND CABINET
SITTING AS THE SITING BOARD

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to S120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

BY: *Lawton Chiles*
THE HONORABLE LAWTON CHILES

Andy L. Carter 2-7-92
Clerk Date

Indiantown Cogeneration Project
DER Case No. PA 90-31
DOAH Case No. 90-8072EPP

CONDITIONS OF CERTIFICATION

TABLE OF CONTENTS

PART I - ADMINISTRATIVE CONDITIONS

(1)	Entitlement	1
(2)	Scope of License	1
(3)	Jurisdictional Agencies	1
(4)	Definitions	1
(5)	Transfer of Certification	2
(6)	Severability	2
(7)	Professional Certification	2
(8)	Right of Entry	3
(9)	Design Standards	3
(10)	Liability	3
(11)	Property Rights	3
(12)	Compliance	4
(13)	Post-Certification Review	5
(14)	Proprietary Documents or Information	5
(15)	Commencement of Construction	5
(16)	Commencement of Operation	6
(17)	Operational Contingency Plans	6
(18)	Revocation or Suspension	6
(19)	Civil and Criminal Liability	7
(20)	Enforcement	7
(21)	Five-Year Review	7
(22)	Modification of Conditions	7
(23)	Federal Annual Operating Fees and Permits	7

PART II - DEPARTMENT OF ENVIRONMENTAL REGULATION 9

(1)	Air	9
(2)	Wetlands	17
(3)	Discharges to Surface Waters	21
(4)	Groundwater	22
(5)	Sanitary Wastes	27
(6)	Solid/Hazardous Wastes	28
(7)	Operational Safeguards	29
(8)	Protection of Vegetation	29

PART II

DEPARTMENT OF ENVIRONMENTAL REGULATION

(1) AIR

The construction and operation of the Indiantown Cogeneration Project (ICP) shall be in accordance with all applicable provisions of Chapter 17-2, 17-256, and 17-702, Florida Administrative Code, except for SO₂ and NO_x during startup, shutdown, and malfunction, then 40CFR60 shall apply.

A. Construction

1. General

a. Construction shall reasonably conform to the plans and schedule given in the application.

b. The permittee shall report any delays in construction and completion of the project which would delay commercial operation by more than 90 days to the DER Southeast District office in West Palm Beach.

2. Equipment Identification

The Licensee shall submit at least four copies of complete information as to the make and model numbers of the selected pulverized coal and auxiliary boilers, all pollution control and continuous emissions monitoring devices, operation and maintenance manuals and calibration procedures, updated process flow diagrams showing mass/energy/heat balances and ammonia injector locations and rates, and related equipment, to the DER Bureau of Air Regulation at least 90 days prior to commencing on-site construction of that particular item.

3. Stack Height and Design

The height of the boiler exhaust stack for ICL shall not be less than 495 ft. above grade. Detailed stack drawings showing sampling locations shall be submitted to the DER Bureau of Air Regulation at least 90 days prior to commencing on-site construction of the affected equipment or feature.

4. Fugitive Dust and Odors

The Licensee shall employ proper odor and dust-control techniques to minimize odor and fugitive dust emissions. Precautions to prevent fugitive particulate emissions during construction shall be to coat the roads and construction sites used by contractors, regrass or water areas of disturbed soils. Control techniques shall be sufficient to prevent nuisance conditions on adjoining property.

12/09/91

5. Open Burning

Open burning in connection with initial land clearing shall be in accordance with Chapter 17-256, F.A.C., Chapter 5I-2, F.A.C., Uniform Fire Code Section 33.101 Addendum, and any other applicable regulations of Martin or Okeechobee Counties, as applicable.

No open burning of construction generated material, after initial land clearing shall be allowed.

B. Operation

1. Boilers

The Pulverized Coal (PC) boiler is permitted to operate at a maximum of 3422 MMBtu/hr heat input (nominal 330 MW). This facility shall be allowed to operate continuously (8,760 hrs/yr). In addition to the PC boiler, the facility has an auxiliary boiler rated at up to 342 MMBtu/hr (#2 Fuel Oil) and 358 MMBtu/hr (Natural Gas or propane) which operates a maximum of 5,000 hours with up to 1000 hrs/yr on #2 Fuel Oil and the balance on natural gas or propane.

2. Emissions Limitations

a. Pulverized Coal Boiler

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

i. Combustion Emissions

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 at 7% O ₂	0.0036	12.30	54
H ₂ SO ₄	0.0004	1.450	6.350
Beryllium	0.00000273	0.0093	0.041

12/09/91

Mercury	0.0000114	0.039	0.172
Lead	0.0000187	0.064	0.280
Fluorides	0.002	7.26	22.26
Arsenic	0.0000511	0.175	0.765

*24 hour daily block average (midnight to midnight)

ii. NH₃ (Ammonia) - Slip from exhaust gases shall not exceed 50 ppmv.

iii. *VE (Visible Emissions)

- VE from each baghouse exhaust shall not exceed 10% opacity (six minute average).

- No VE during lime silo loading operations (i.e., less than 5% opacity).

- VE from the ash handling baghouse shall not exceed a particulate limit of 0.010 grains/acf and VE of 5% opacity.

b. Auxilliary Boiler

The auxilliary boiler, rated at up to 358 MMBtu/hr (Natural Gas and propane) and 342 MMBtu/hr (#2 Fuel Oil), shall be limited to a maximum of 5000 hours/year with up to 1000 hrs/yr firing #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 #2 fuel oil:

MAXIMUM EMISSIONS

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/year</u>
NO _x	68.4	34
SO ₂	17.8	9
PM	1.40	0.70
PM ₁₀	1.40	0.70
CO	47.30	24
VOC	0.63	0.31
Be	4.1 x 10 ⁻⁵	2.0 x 10 ⁻⁵
Hg	5.1 x 10 ⁻⁴	2.6 x 10 ⁻⁴
Pb	3.6 x 10 ⁻²	1.8 x 10 ⁻²
As	6.8 x 10 ⁻³	3.4 x 10 ⁻³

12/09/91

c. Particulate emissions from the coal, and limestone handling facilities:

i) All conveyors and conveyor transfer points will be enclosed to preclude PM emissions (except those directly associated with the coal stacker/reclaimer for which an enclosure is operationally infeasible). Fugitive emission shall be tested as specified in conditions 1.B.2.e.

ii) Inactive coal storage piles shall be shaped, compacted, and oriented to minimize wind erosion, and covered.

iii) Water sprays or 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%.

iv) The lime handling system including the lime silos shall be maintained at a negative pressure while operating and the exhaust vented to a control system.

v) The fly ash handling system (including transfer and silo storage) shall be totally enclosed and vented (including pneumatic system exhaust) through fabric filters; and

vi) The Licensee shall submit to the Department, Bureau of Air Regulation in Tallahassee within thirty (30) days after it becomes available, copies of technical data pertaining to the selected particulate emissions control for the coal, and lime handling facilities. These data shall include, but not be limited to guaranteed efficiency and emission rates, and major design parameters such as air/cloth ratio and flow rate. The Department may, upon review of these data, disapprove the use of any such device if the Department determines the selected control device to be inadequate to meet the emission limits specified in COC-(1)B.2.d. below. Such disapproval shall be issued within 30 days of receipt of the technical data.

d. Particulate emissions from bag filter exhausts from the following facilities shall be limited to 0.010 gr/acf: coal, lime and flyash handling systems. A visible emission reading of 5% opacity or less may be used to establish compliance with this emission limit. A visible emission reading greater than 5% opacity will not create a presumption that the 0.010 gr/acf emission limit is being violated. However, a visible emission reading greater than 5% opacity will require the permittee to perform a stacktest, as