



**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION**

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SECRETARY

*Electronic Mail – Received Receipt Requested*

[mcutshaw@fpuc.com](mailto:mcutshaw@fpuc.com)

P. Mark Cutshaw, Director, System Planning and Engineering  
Eight Flags Energy, LLC  
911 South Eighth Street  
Fernandina Beach, Florida 32034

Re: **Request for Additional Information**  
Project No. 0890441-001-AC  
Eight Flags Energy  
Gas Turbine Cogeneration System

Dear Mr. Cutshaw:

On October 14, 2014, we received your application for an air construction permit to construct a gas turbine cogeneration system to produce electrical power and steam. The facility is located in Nassau County on Gum Street in Fernandina Beach, Florida. The application indicates that the project is subject to general preconstruction review pursuant to rule 62-212.300 of the Florida Administrative Code (F.A.C.). The application is incomplete. In order to continue processing your application, please provide the additional information requested below. Should your response to any of the requested items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Feed water input: Please provide an estimate of the temperature and flow rate of feed water to Eight Flags for time periods with and without supplemental gas firing in the heat recovery steam generator.
2. Anticipated bypass stack usage: Please provide an estimate of the annual hours of operation during which exhaust from the gas turbine will be routed to the bypass stack, instead of the heat recovery steam generator.
3. Generator usage: The application states that an emergency generator may be a mobile unit, to be brought on-site as necessary. If it has been decided whether a mobile or stationary engine will be used, please provide this information. Additionally, the application refers to the engine as an emergency generator, though it states that usage of 500 hours per year was assumed for emissions estimates. However, 40 CFR 60, Subpart IIII, requires that an engine be used for less than 100 hours per year in non-emergency situations (with no limit on usage in emergency situations) to be classified as an emergency engine. Please clarify whether this should be considered an emergency engine or a non-emergency engine and provide corresponding updated emissions estimates if necessary.
4. Project Schematic: Please provide a schematic of the Eight Flags Energy project showing the power and steam relationships between Eight Flags Energy, Rayonier Performance Materials (RPF) and Florida Public Utilities (FPU).
5. Existing Contracts: Please provide any existing contracts with regard to steam generation between Eight Flags Energy, LLC and RPF. Please provide any existing contracts with regard to power generation between Eight Flags Energy, LLC and RPF and FPU. If necessary, this information can be treated as confidential information by the Department.

The above information is requested pursuant to the following F.A.C. regulations: Rule 62-4.050 (Procedures to Obtain Permits and Other Authorizations; Applications); 62-4.055 (Permit Processing); 62-4.070 (Standards for Issuing or Denying Permits; Issuance; Denial); 62-4.120 (Construction Permits); 62-204.800 (Federal Regulations Adopted by Reference); 62-212.300 (Permits Required); 62-210.370 (Emissions Computations and Reporting); 62-210.900 (Forms and Instructions); 62-212.300 (General Preconstruction Review); and 62-212.400 (Prevention

## REQUEST FOR ADDITIONAL INFORMATION

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of Significant Deterioration). All applications for a Department permit must be certified by a professional engineer registered in the State of Florida pursuant to Rule 62-4.050(3), F.A.C. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official.

We will continue processing your application while awaiting the the requested information. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or to provide a written request for an additional period of time to submit the information. If you have any questions regarding this matter, please contact the project engineer, John Dawson, at 850/717-9085 or email, [john.dawson@dep.state.fl.us](mailto:john.dawson@dep.state.fl.us).

Sincerely,

David Read, Environmental Administrator  
Office of Permitting and Compliance  
Division of Air Resource Management

This letter was sent to the following people by electronic mail with received receipt requested.

Mr. P. Mark Cutshaw, Director, System Planning and Engineering, Eight Flags Energy: [mcutshaw@fpuc.com](mailto:mcutshaw@fpuc.com)

Mr. Kevin Webber, V.P., Business Development and Operations, Eight Flags Energy: [kwebber@fpuc.com](mailto:kwebber@fpuc.com)

Mr. David Buff, P.E., Golder Associates Inc.: [dbuff@golder.com](mailto:dbuff@golder.com)

Ms. Heather Ceron, US EPA Region 4: [ceron.heather@epa.gov](mailto:ceron.heather@epa.gov)

Mr. Richard Rachal, Administrator, DEP NED: [Richard.rachal@dep.state.fl.us](mailto:Richard.rachal@dep.state.fl.us)

Ms. Lynn Scarce, DEP OPC: [lynn.scarce@dep.state.fl.us](mailto:lynn.scarce@dep.state.fl.us)

DLR/jpd