

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

January 25, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ricardo Lima, Vice President and General Manager
Okeelanta Power Limited Partnership
8001 U.S. Highway 27 South
South Bay, FL 33493

Re: Request for Additional Information
Project No. 0990332-014-AC (PSD-FL-196M)
Okeelanta Power L.P. Cogeneration Plant
Application to Modify CO and SO₂ Emissions Standards

Dear Mr. Lima.

On January 2, 2001 the Department received an application requesting changes to the CO and SO₂ emissions standards for the biomass boilers at Okeelanta's cogeneration plant located 6 miles south of South Bay on U.S. Highway 27. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. For each boiler during the period of 05/01/99 through 12/31/00, please provide the following information in a tabled format. Provide data for each day during a one-month period representative of operations before the violations, during the violations, and after the violations.
 - a. 24-hour averages for CO, NO_x, and SO₂ emissions. If possible, also provide line chart representing the 24-hour averages of each pollutant (on the same chart) over the entire period separately for each boiler.
 - b. Daily average of tons of bagasse fired, tons of wood fired, gallons of oil fired, and the bagasse/wood firing ratio.
 - c. The daily average steam production, power production, stack gas moisture, stack gas oxygen content, and the F-factor used.In detail, please describe the method of calculating the heat input for use in the compliance averages. What is the thermal efficiency of each boiler? Has the thermal efficiency been tested for each boiler?
2. Okeelanta speculates that the increased CO emissions result from a high moisture content of the biomass fuel due to increased rainfall. The data presented does not appear to establish any conclusive correlation between rainfall and CO emissions. However, does Okeelanta maintain a dry source of biomass fuel or attempt to prevent some biomass from being rained upon? Has Okeelanta made any provisions to attempt drying the fuel before firing in the cogeneration boilers? Please provide a list of actions taken by Okeelanta to adjust operations in response to gradually increasing CO emissions. Has Okeelanta researched changes in equipment or processes that could be implemented to correct the elevated levels of CO emissions?
3. From the information provided, the samples of bagasse appear to be within the range of sulfur contents stated in the initial application. Most samples of the wood materials show sulfur contents within the range stated in the initial application. However, several samples of the wood materials show sulfur contents as much as two to three times higher than expected. Please describe the plan for sampling the biomass fuels and analyzing for the sulfur content. When a sample indicates an unusually high sulfur content, what provisions does Okeelanta make to separate the shipment and proportionally blend with lower sulfur biomass to comply with the SO₂ standards? What other methods are used or could be used to adjust operations for biomass fuels detected to have high sulfur contents? Has Okeelanta evaluated the option of using a lime/activated carbon product for additional SO₂ control?

"More Protection, Less Process"

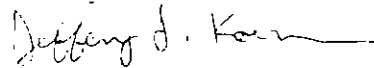
Printed on recycled paper

requested) SO₂ emission rates are higher, please revise the PSD significant impact analysis, Class I and Class I increment consumption, and the AAQS analysis accordingly. Please provide a report of the revised modeling effort as well as the modeling files for review.

- c. If additional modeling is necessary and indicates a significant impact, the Department is considering new short-term SO₂ limits. If revised modeling indicates an insignificant impact, the Department is considering providing the short-term SO₂ emission rates in the revised permit for informational purposes
6. As the Department has pointed out during previous permitting actions, the initial PSD air construction permit authorized the installation of coal handling facilities and the firing of low sulfur coal. However, the coal handling facilities were never constructed and coal has never been fired at this plant. Okeelanta Power L.P. must obtain new authorization from the Department (through a permit modification) to fire any coal in the future. At the very least, such a request shall evaluate current "Best Available Control Technologies" for each significant pollutant. Also, it is inappropriate to use the "potential emissions" for a fuel (coal) that is no longer authorized and has never been fired as emissions decreases to offset increases in actual emissions from the proposed project. Please revise the request accordingly.
7. The Department intends to update the PSD permit to incorporate all of the previous revisions. Please include any other requests for amendments at this time.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Material changes to the application should also be accompanied by a new certification statement by the authorized representative or responsible official. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days. If there are any questions, please call me at 850/414-7268.

Sincerely,



Jeffery F. Koerner, P.E.
New Source Review Section

AAL/jfk

cc: Mr. Ricardo Lima, Okeelanta Power
Mr. James Meriwether, Okeelanta Power
Mr. David Buff, Golder Associates
Mr. David Knowles, SD
Mr. Darrel Graziani, PBCHD
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

SENDER: COMPLETE THIS SECTION:

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 Mr. Ricardo Lima
 Vice President & General Mgr.
 8001 US Highway 27 South
 South Bay, FL 33493

2. Article Number (Copy from service label)
 7099 3400 0000 1453 2535

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

D. McPHEE 01/29/94

C. Signature Agent
 Addressee

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:
 Mr. Ricardo Lima

Postage	\$	Okeelanta Power
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	Postmark Here

Name (Please Print Clearly) (to be completed by mailer)
 Mr. Ricardo Lima
 Street, Apt. No., or PO Box No.
 8001 U.S. Highway 27 South
 City, State ZIP+4
 South Bay, FL 33493

7099 3400 0000 1453 2535