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**RECEIVED**

February 19, 2002

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**BUREAU OF AIR REGULATION**

Palm Beach County Health Department  
901 Evernia Street  
West Palm Beach, FL 33401

Attention: Mr. A. J. Satyal

RE: OKEELANTA CORPORATION  
BOILER NO. 16  
CONTINUOUS NO<sub>x</sub> AND OPACITY MONITORS  
PERMIT NO. 0990005-009-AC; PSD-FL-169A

Dear Mr. Satyal:

On November 1, 2001, Okeelanta Corporation received air construction permit No. 0990005-009-AC; PSD-FL-169A, which authorized the modification of Boiler No. 16 to utilize natural gas as a fuel. This letter addresses issues concerning the existing continuous emission monitoring system (CEMS) for nitrogen oxides (NO<sub>x</sub>) and the existing continuous opacity monitoring system (COMS). These are discussed below.

**NO<sub>x</sub> CEMS**

Specific Condition No. 7.a of this permit sets forth requirements related to the allowable span of the continuous NO<sub>x</sub> monitor installed on Boiler No. 16. This condition reads as follows:

- a. *Monitor Certification.* The NO<sub>x</sub> CEMS shall: be certified in accordance with Performance Specification 2 in Appendix B of 40 CFR 60; comply with the monitoring requirements of 40 CFR 60.13; have dual span capability with a "low" span no greater than "0.18 pounds per mmBTU" (or equivalent) and a "high" span no greater than 0.60 pounds per mmBTU" (or equivalent); and comply with the quality assurance procedures in Appendix F of 40 CFR 60. The required RATA test shall be performed prior to the initial emissions compliance tests using EPA Method 7E of Appendix A in 40 CFR 60.

The purpose of this letter is to document the span levels that Okeelanta intends to utilize for the NO<sub>x</sub> monitor to comply with this condition. After discussions with Jeff Koerner of FDEP Tallahassee, he suggested that Okeelanta inform you in writing of the proposed plan.

Okeelanta's NO<sub>x</sub> monitor has four ranges: 0 to 10 ppm; 0 to 25 ppm; 0 to 100 ppm, and 0 to 250 ppm. For natural gas firing, the 24-hour block average NO<sub>x</sub> limit for Boiler No. 16 is 0.10 lb/MMBtu. One-hour NO<sub>x</sub> values greater than 0.18 lb/MMBtu are expected infrequently or not at all after completion of tuning the new burner and combustion control system. A NO<sub>x</sub> emission rate of 0.18 lb/MMBtu due to natural gas firing for Boiler No. 16 is equivalent to approximately 75 to 140 ppm, depending on the oxygen content of the of the flue gases. Thus, Okeelanta intends to utilize the 0 to 100 ppm range on the analyzer when burning natural gas. Therefore, the span of the

instrument would be 0 to 100 ppm, and no greater than 0.18 lb/MMBtu. The instrument would be appropriately calibrated within this range of operation.

For No. 2 fuel oil firing, the 24-hour block average NO<sub>x</sub> limit for Boiler No. 16 is 0.20 lb/MMBtu. One-hour NO<sub>x</sub> values greater than 0.20 lb/MMBtu are expected infrequently, and values greater than 0.60 lb/MMBtu are not expected at all. A NO<sub>x</sub> emission rate of 0.60 lb/MMBtu due to fuel oil firing for Boiler No. 16 is equivalent to approximately 230 to 450 ppm, depending on the oxygen content of the of the flue gases. Thus, Okeelanta intends to utilize the 0 to 250 ppm range on the analyzer when burning No. 2 fuel oil. NO<sub>x</sub> values greater than 250 ppm are not expected when burning No. 2 fuel oil. Therefore, span of the instrument would be set at 0 to 250 ppm, and no greater than 0.60 lb/MMBtu. The instrument would be appropriately calibrated within this range of operation.

### COMS

Okeelanta would also like to clarify the certification status of the existing COMS installed on Boiler No. 16. The original COMS was installed on the boiler in 1995. The COMS was tested and certified under the then existing 40 CFR 60 Appendix B - *Performance Specification 1 (PS-1)*. In August 2000, EPA issued revisions to PS-1. These revisions clarified the obligations of opacity monitor owners, operators and vendors; updated COMS design and performance requirements by incorporating reference ASTM D 6216-98; and provided equipment assurances for carrying out effective monitoring.

In the preamble to these changes, and in the revisions to PS-1, EPA made it clear that the rule was not intended to affect existing monitors, except under specific conditions. On page 48914 of the Federal Register, Vol. 65, No. 155, EPA states:

“These revisions do not change an affected facility’s applicable emission standards or requirements to monitor opacity.”....

“The revisions apply to any facility that is:

- (1) Required to install a new COMS, relocate an existing COMS, replace an existing COMS.
- (2) Required to recertify an existing COMS that has undergone substantial refurbishing (in the opinion of the enforcing agency).
- (3) Specifically required to recertify the COMS, as required in the Code of Federal Regulations”.

The actual rule language (PS-1, Section 1.2) states:

1.2 What COMS must comply with PS-1? If you are an owner or operator of a facility with a COMS as a result of this Part, then PS-1 applies to your COMS if one of the following is true:

- (1) Your facility has a new COMS installed after February 6, 2001; or
- (2) Your COMS has been replaced, relocated, or substantially refurbished (in the opinion of the regulatory authority) after February 6, 2001; or
- (3) Your COMS was installed before February 6, 2001, and is specifically required by regulatory action other than the promulgation of PS-1 to be to recertified.

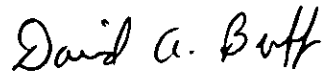
Based on these provisions and the fact that the existing COMS installed on Boiler No. 16 has previously been certified and replaced, relocated, or refurbished, it is our conclusion that the new PS-1 requirements do not apply to the COMS. Specific Condition No. 8 of the permit sets forth the

requirements for the COMS including the requirement that it must be certified in accordance with PS-1 of 40 CFR 60 Appendix B. Since the existing COMS was certified in accordance with PS-1 and the August 2001 revisions to the specification do not apply to the COMS for Boiler No. 16, we also conclude that Okeelanta has met the certification requirement of Specific Condition No. 8.

Please call me at (325) 336-5600, x 545, or Matt Capone at Okeelanta at (561)993-1658, if you have any questions or comments regarding this notification.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P.E., Q.E.P.  
Principal Engineer  
Florida P. E. #19011  
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Enclosures

cc: M. Capone  
J. Koerner

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