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June 22, 2010

Florida Department of Environmental Protection
ATTN: Mr. Jeffery Koerner, P.E., Air Permitting North
2600 Blair Stone Road, MS #5505
Tallahassee, FL 32399-2400

**RE: NEW HOPE POWER COMPANY
PROJECT NOS. 0990005-016-AC AND 0990005-017-AV
TITLE V PERMIT RENEWAL AND CONCURRENT AIR CONSTRUCTION PERMIT REVISION**

Dear Mr. Koerner:

New Hope Power Company (NHPC) and Okeelanta Corporation (NHPC/Okeelanta) have received Florida Department of Environmental Protection's (FDEP's) draft air construction permit and Title V operating permit and related documents. NHPC/Okeelanta have published the public notice in a local newspaper, and the public comment period has begun. The purpose of this correspondence is to provide written comments to FDEP on the draft permit documents. The comments are attached.

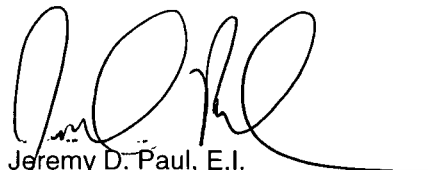
Thank you for consideration of this information. If you have any questions, please do not hesitate to call me at (352)336-5600.

Sincerely,

GOLDER ASSOCIATES INC.

David A. Buff

David A. Buff, P.E., Q.E.P.
Principal Engineer


Jeremy D. Paul, E.I.
Staff Engineer

cc: Bill Tarr
Matt Capone
Ricardo Lima
David Dee
Jose Garcia, PBCHD
Ajaya Satyal, DEP Ft. Myers

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Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, FL 32607 USA

Tel: (352) 336-5600 Fax: (352) 336-6603 www.golder.com

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COMMENTS FOR DRAFT TITLE V PERMIT NO. 0990005-017-AV

Section 1. FACILITY INFORMATION (DRAFT)

REGULATORY CATEGORIES

Last bullet referring to Subpart DDDDD: only Boiler 16 was subject to the previous Subpart DDDDD. The cogeneration boilers were not subject to Subpart DDDDD since they were classified as electric utility boilers. Please clarify the wording. Note the latest PSD permit for the cogeneration boilers [PSD-FL-196(P)] also states that the boilers may become subject to Subpart DDDDD, so this may also need to be corrected.

Section 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. Cogeneration Boilers

Specific Condition 7 on page 9 of 37 included the change from "O₂" to "CO₂" monitoring. However, Section III, Condition 6, and Section IV, Appendix E, Condition 2, of Permit No. 0990332-017-AC/PSD-FL-196(P) also need to be revised to reflect this same change.

Specific Condition 11 on page 10 of 37 did not include the revised wording of Permit No. 0990005-016-AC. Therefore, Condition 11. should be revised as follows:

11. Auxiliary Fuel: The cogeneration boilers shall fire only distillate oil and natural gas as auxiliary fuels. The maximum sulfur content of distillate oil is limited to 0.05% by weight. In addition to the primary authorized fuels, Each boiler may startup solely on natural gas or distillate oil. The firing of all fossil fuels (distillate oil and natural gas) shall be less than 25% of the total heat input to each cogeneration boiler during any calendar quarter. The permittee shall abide by the Ash and Fuel Management Plans specified in Appendices AM and FM of this permit.

Specific Condition 19.e. (Test Methods) was revised to include EPA Method 30B for mercury testing as requested by NHPC. NHPC also requests the addition of mercury test Method 30B to Specific Condition 13.g. on page 12 of 37 by revising the first sentence of Condition A.13.g. as follows:

- g. Compliance with the mercury standards shall be determined by the average of three test runs conducted in accordance with EPA Method 101A, ~~or 29,~~ or 30B.

Specific Condition 17.c.1 on page 13 of 37 did not include the revised wording of Permit No. 0990005-016-AC. Therefore, condition A.17.c.1 should be revised as follows:

- 1) Natural gas or distillate oil shall be fired during startup prior to energizing the electrostatic precipitator (ESP). The ESP shall be placed on line at the earliest possible time during the startup period, consistent with the manufacturer's recommendations, operating experience, and safety practices. ~~Once the operating temperature recommended by the ESP manufacturer is maintained (approximately 340° F to 350° F), it shall be is placed on line,~~ and the boiler shall comply with the specified opacity standard. The ESP shall be on line and functioning properly before firing any biomass. The opacity limit does not apply when the ESP is off line due to warm startup, cold startup, or shutdown. No more than twenty 6-minute block averages of opacity monitoring data shall be excluded in a 24-hour period due to documented malfunctions.

In order to maintain consistency with the revised wording of Permit No. 0990005-016-AC and revised Specific Condition 17.c.1 above, the startup procedures of Specific Condition 18.a.3 on page 14 of 37 need to be updated as well. Therefore, condition A.18.a.3) should be revised as follows:

a. Startup Procedures.

- 1) The ESP air flushing system and heater are placed in service at least eight hours prior to boiler light off.
- 2) The boiler is started up on natural gas or distillate oil prior to energizing the ESP.
- 3) The ESP shall be placed on line at the earliest possible time during the startup period, consistent with the manufacturer's recommendations, operating experience, and safety practices. Once the operating temperature recommended by the ESP manufacturer is maintained (approximately 340° F to 350° F), the ESP is placed in service, the boiler shall comply with the specified opacity standard. The ESP shall be on line and functioning properly before firing any biomass.

Specific Condition 20.a.3 on page 16 of 37 did not include the revised wording of Permit No. 0990005-016-AC modifying the performance specification reference for a CO₂ continuous monitor instead of an O₂ monitor. Therefore, Condition A.20.a.3 should be revised as follows:

- 3) The CO₂ CEMS shall comply with Performance Specification 3 in Appendix B of 40 CFR 60. The CO₂ reference method for the annual RATA shall be EPA Method 3A Appendix A of 40 CFR 60.

Similarly, Specific Condition 20.b, second paragraph, sixth sentence should be revised to read as follows:

The CO₂ CEMS shall express the 1-hour averages in terms of "percent by volume".

B. Material Handling and Storage Operations – Cogeneration Plant

TEST REQUIREMENTS

In Specific Condition 8, page 20 of 37, the second sentence should be revised as follows: "Due to infrequent use, the baghouse vent for the fly ash silo shall be tested during any federal fiscal year in which the fly ash silo operates more than 400 hours per year, and the baghouse vent for the activated carbon silos shall be tested during any federal fiscal year in which the activated carbon injection system operates more than 400 hours per year."

C. Boiler No. 16 – Sugar Mill/Refinery

40 CFR 63 Subpart DDDDD NESHAP is listed as a primary applicable requirement on page 21 of 37. Okeelanta requests that the reference to Subpart DDDDD be deleted since this regulation was vacated and remanded to EPA for reconsideration.

D. Sugar Refinery

The second paragraph under Miscellaneous Process Descriptions on page 25 of 37 lists the design capacity of the primary sugar drying system (Fluidized Bed Dryer/Cooler) as approximately 1,200 tons per day. Please correct the description to state that the design capacity of the Fluidized Bed Dryer/Cooler is approximately 1,350 tons per day.

Specific Condition 5.b.2 on page 27 of 37: the phrase "Cooler No. 2 (EU-024)" should be revised as follows: "Cooler No. 2 (with Rotoclone No. 4, EU-024)".

F. Distillate Oil Storage Tanks

Specific Condition 1 on page 34 of 37 has not been revised to be consistent with Permit No. 0990005-016-AC, page 4 of 4. The new condition from -016-AC should be incorporated to clarify that the storage tanks are not subject to the NSPS Subpart Kb provisions in 40 CFR 60.

Section 4. APPENDIX AM (DRAFT) Ash Management Plan

Two minor edits to the Ash Management Plan are requested on page AM-1. The revisions requested are in the first two paragraphs of the Quality Control Measures section. The beginning of the first two paragraphs of the Quality Control Measures section should be revised as follows:

Quality Control Measures

Samples of mixed bottom and fly ash are obtained from the storage bunker weekly for four weeks. Each weekly sample is a composite of mixed ash grab samples from three to five locations of the ash plies plies in the storage bunker. ...

If the fly ash is being collected in the silo, weekly fly ash grab samples are obtained ~~(also by the Chemical Technician) weekly~~ from the transfer point between the collecting fly ash chain conveyor and the bucket elevator conveyor, as ash is loaded into the silo. Additionally, grab samples of the bottom ash are obtained weekly from the bottom ash piles in the storage bunker.

Section 4. APPENDIX CP

Sugar Processing Lines 0 – 9 (EU019)

This should be entitled "Sugar Packaging Lines 0 – 9".

Section 4. APPENDIX HI (DRAFT) Permit History

The description of emissions units for the Okeelanta Cogeneration Plant on Page HI-5 needs to be revised to be consistent with the PSD permit and Title V permit. Therefore, the table on page HI-5 should be revised as follows:

The description of EU 004 needs to be changed from Fuel Storage Tank to Material Handling and Storage.

Add EU 005, Cogeneration Plant – Miscellaneous Support Equipment.

Delete EU 006 from Appendix HI.

(Note: EU 005 includes the unregulated fuel storage tank for the Cogeneration Plant as shown in Appendix UI)

Section 4. APPENDIX SS (DRAFT) Summary of Standards

PERMIT SUBSECTION 3A – COGENERATION BOILERS

Page SS-1 lists emissions unit EU 006 – Miscellaneous support equipment in this section for the Cogeneration Boilers. The miscellaneous support equipment for the cogeneration plant (EU 005) is unregulated. Therefore, the table at the top of page SS-1 should be revised as follows: 005 – Miscellaneous support equipment.

Delete EU 006.

PERMIT SUBSECTION 3D – SUGAR REFINERY

In order to be consistent with the standards and limitations of subsection 3D and Permit No. 0990005-021-AC, the following revisions need to be made to the Summary of Standards for the refinery on page SS-5:

Facility ID No. 0990005 – Okeelanta Corporation Sugar Mill and Refinery

EU No.	Emissions Unit Description
021	<u>Rotary Dryer, Central Dust Collection System No. 1 with Rotoclone No. 1</u>
022	Central Dust Collection System No. 2 with Rotoclone <u>No. 2</u>
023	Cooler No. 1 with wet cyclone <u>Rotoclone No. 3</u>
024	Cooler No. 2 with wet cyclone <u>Rotoclone No. 3</u>
025	Fluidized Bed Dryer/ <u>Cooler</u> with Baghouse
034	Bulk Load-Out Operation
035	Transfer Bulk Load-out Station
043	Isopropyl <u>Sugar Refinery alcohol usage</u>

Permitted Capacities: Hours of operation are not restricted. Refined sugar production shall not exceed ~~1500 tons/per day and 490,000 tons/consecutive 12 months~~ 52 weeks. Sugar refinery equipment is limited as follows:

- Fluidized Bed Dryer (EU-025) ≤ ~~4200~~490,000 tons of refined sugar/~~day consecutive 52 weeks~~.
- Rotary Dryer/Cooler System ≤ ~~4200 tons of refined sugar/day and 130,000 tons of refined sugar/year consecutive 52 weeks~~.
- Bulk Load-Out Operation (EU-034) ≤ ~~447~~139,000 tons of refined sugar/~~year consecutive 52 weeks~~.
- Transfer Bulk Load-Out Station (EU-035) ≤ ~~273~~351,000 tons of refined sugar/~~year consecutive 52 weeks~~.
- ~~Isopropyl~~ Sugar Refinery alcohol usage (EU-043) ≤ 78,040 pounds/~~year consecutive 52 weeks~~.

Section 4. APPENDIX UI (DRAFT) Unregulated and Insignificant Emissions Units and/or Activities

On March 15, 2010, Okeelanta Corporation submitted an exemption notification to FDEP for a specialty sugar project consisting of a gas-fired boiler and sugar receiving bin dust collector. The request was submitted by David Buff, P.E., of Golder Associates on behalf of Okeelanta Corporation and included a request to list the gas boiler and receiving bin collector as insignificant emissions units in the Title V permit pursuant to Rule 62-213.430(6) F.A.C. Okeelanta received a letter of acknowledgement from FDEP dated April 14, 2010 for this specialty sugar project. Therefore, Okeelanta requests that these units be included as insignificant on page UI-3 as follows:

The following activities ~~is~~ are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

- Hi-Vac industrial vacuum system
- 300 horsepower Cleaver Brooks Model CB-LE gas-fired boiler
- Dust Collector for Specialty Sugar Receiving Bin in refined sugar Warehouse # 3