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August 6, 2007

0637539/587

Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Attention: Ms. Trina Vielhauer, Chief

RE: DRAFT TITLE V RENEWAL PERMIT NO. 0990005-017-AV
DRAFT AIR CONSTRUCTION PERMIT NO. 0990005-016-AC
OKEELANTA CORPORATION SUGAR MILL AND REFINERY
NEW HOPE POWER PARTNERSHIP COGENERATION PLANT

Dear Ms. Vielhauer:

New Hope Power Partnership has received Draft Air Permits No. 0990005-016-AC and 0990005-017-AV, dated May 3, 2007, from the Florida Department of Environmental Protection (FDEP). The draft permit package is for the renewal of the Title V air operation permit for the Okeelanta Corporation Sugar Mill and Refinery (Okeelanta) and the New Hope Power Cogeneration Plant (New Hope), and for the draft air construction permit for Okeelanta. New Hope/Okeelanta have specific comments regarding the permit package, as presented in this letter.

New Hope/Okeelanta also note that on June 8, 2007, the U.S. Court of Appeals for the District of Columbia Circuit issued an order vacating the Maximum Achievable Control Technology (MACT) standards in Title 40, Part 63 of the Code of Federal Regulations (40 CFR 63), Subpart DDDDD for industrial boilers. See Natural Resources Defense Council v. U.S. Environmental Protection Agency (EPA), (Case No. 04-1385). At this time it is unclear whether EPA or others will file post-hearing motions and thus attempt to persuade the court to leave the Subpart DDDDD regulations in effect. If the court's decision to vacate Subpart DDDDD is not modified, it appears that FDEP will need to revise the Title V renewal permit for New Hope/Okeelanta by removing all of the provisions concerning Subpart DDDDD.

DRAFT AIR CONSTRUCTION PERMIT NO. 0990005-016-AC

Technical Evaluation and Preliminary Determination

1. Page 3 of 4, Subsection 3. **Farm Operations:** Change "Farm Operations" to "Okeelanta Shop" to more accurately describe the activity.

2. Page 3 of 4, Subsection 3. **Farm Operations:** item 4, first paragraph, first line: Change "farm operations" to "agriculture shop".

3. Page 3 of 4, Subsection 3. **Farm Operations:** item 4, second paragraph, first line: Change "other vehicles" to "other vehicles or facility equipment".

4. Page 4 of 4, Subsection 3. **Fuel Tanks:** item 5, emissions unit table for ARMS ID No. 0990005 Okeelanta Corporation's Sugar Mill & Refinery: Delete EU No. 040 Fuel Farm since it was not previously identified as being subject to NSPS Subpart Kb provisions. Recommend adding the paragraph at the end of Section 8 in the Title V Statement of Basis concerning the Fuel Farm.

Draft Permit

1. Page 2 of 3, **Emissions Units:** Please add to the table of affected refinery units, per the table below, to include all the refinery units.

EU No.	Emissions Unit Description	Process Area
048	Paint Booth	Okeelanta Shop
021	Central Dust Collection System No. 1	Sugar Refinery
022	Central Dust Collection System No. 2	Sugar Refinery
023	Cooler No. 1	Sugar Refinery
024	Cooler No. 2	Sugar Refinery
025	Fluidized Bed Dryer	Sugar Refinery
015	Distillate Oil Storage Tank (29,500 gallons)	Sugar Mill and Refinery
016	Distillate Oil Storage Tank, (29,500 gallons)	Sugar Mill and Refinery
017	Distillate Oil Storage Tank (29,500 gallons)	Sugar Mill and Refinery
040	Fuel Farm	Sugar Mill

2. Page 3 of 3, Revision of Permit No. 0990005-015-AC: Reword as follows:

   For the drive-through paint spray booth (EU-048) in the ~~farm operations~~ **agriculture shop** at the Okeelanta Sugar Mill, Condition No. 2 of this permit is revised as follows:

   "Method of Operation. Paint shall only be applied to agricultural equipment, trailers, and other vehicles **or facility equipment**..... "

STATEMENT OF BASIS FOR DRAFT PERMIT NO. 0990005-017-AV

1. Page 3 of 13, **Regulated Emissions Units. EU 048**: Change the process area from "Farm Operations" to "**Okeelanta Shop**".

2. Page 3 of 13, under **"Unregulated and/or insignificant Emissions Units and/or Activities", EU 043, Sugar Refinery (Unregulated Activities):** Note that EU 043 is already assigned to "Sugar Refinery Alcohol Usage" under the regulated emissions units. Therefore, the unregulated Sugar Refinery activities should be assigned a new EU number (049?).

3. Page 3 of 13, under **"Unregulated and/or insignificant Emissions Units and/or Activities – ARMS ID No. 0990005"**: Add **EU 044, Transshipment Facility (Unregulated Activities).**

4. Page 3 of 13, under **ARMS ID No. 0990332**: Add "**EU 006, Cogeneration Plant Miscellaneous support equipment**".

5. Page 4 of 13, **Processing Schedule.** The application was complete on May 1, 2007, not 5/1/09.

6. Page 5 of 13, **Cogeneration Boilers,** first bullet: Please note that the unit of measure should read that the total power input to the ESP is less than 23 kW.

7. Page 6 of 13, Table 3A, Line 014. Control is **FGR** (flue gas recirculation), not FGD.

8. Page 9 of 13, **Specific Federal Regulations**, fourth bullet: Subpart DDDDD requirements should be added for Boiler No. 16 (notification only).

9. Page 9 of 13, **Section 6. Sugar Refinery, Process Description**: The first sentence needs to be revised by deleting the second "the." In the third sentence, change the maximum design capacity of the Fluidized Bed Dryer (EU 025) from 36.3 tons per hour to **1,200 tons per day (TPD).**

10. Page 10 of 13, first full sentence: Please note that the baghouse stack exhaust is **93** feet above grade. Okeelanta verified all the stack heights for the refinery sources in mid-2006, and this reflects the latest information.

11. Page 10 of 13, first full paragraph: Change the Rotary Dryer design capacity from 35.4 tons per hour to **1,200 TPD**. In the last sentence, please note that wet Rotoclone No. 1 exhausts 89 feet above grade. Okeelanta verified all the stack heights for the refinery sources in mid-2006, and this reflects the latest information.

12. Page 10 of 13, second paragraph, first sentence: Change the design capacity for the rotary coolers from 35.4 tons per hour to **1,200 TPD.**

13. Page 10 of 13, second paragraph, second sentence: Please note that the exhaust from Cooler No. 1 controlled by Rotoclone No. 3, is vented **80** feet above grade. Okeelanta verified all the stack heights for the refinery sources in mid-2006, and this reflects the latest information.

14. Page 10 of 13, second paragraph, third sentence: Please note that the exhaust from Cooler No. 2 controlled by Rotoclone No. 4, is vented **80** feet above grade. Okeelanta verified all the stack heights for the refinery sources in mid-2006, and this reflects the latest information.

15. Page 10 of 13, third paragraph, second sentence: Please note that Rotoclone No. 2 exhausts **86** feet above grade. Okeelanta verified all the stack heights for the refinery sources in mid-2006, and this reflects the latest information.

16. Page 10 of 13, fourth paragraph: Change the Bulk Load-Out Operation (EU 034) design capacity from 12.5 tons per hour to **600 TPD**.

17. Page 10 of 13, fifth paragraph: Change the Transfer Bulk Load-Out Station (EU 035) design capacity from 26.7 tons per hour to **1,200 TPD**.

18. Page 10 of 13, sixth paragraph, first sentence: revise the first sentence to read, "The **expansion of the** sugar refinery **added a** building (40 feet by 80 feet) **which** houses….."

19. Page 10 of 13, seventh paragraph: Please note that the sugar refinery is regulated in accordance with **one** air construction permit, which is Permit No. 0990005-005-AC. Please delete reference to Permit No. 0990005-002-AC which is obsolete.

20. Page 10 of 13, **Capacities**. First paragraph, second sentence: change "during any consecutive 12 months" to "**per year**", consistent with Permit No. 0990005-005-AC.

21. Page 11 of 13, **Capacities**. For each bullet, change "during any consecutive 12 months" to "**per year**", consistent with Permit No. 0990005-005-AC.

22. Page 13 of 13, **9. PAINT SPRAY BOOTH IN THE FARM OPERATIONS**. Change to "**PAINT SPRAY BOOTH IN THE OKEELANTA SHOP**".

DRAFT PERMIT NO. 0990005-017-AV

Table of Contents

1. Item 3.G., change "Paint Spray Booth – Farm Operations" to "Paint Booth – **Okeelanta Shop**".

2. Appendices: Change "Appendix SS. Summary of Standards" to "**Appendix S1**".

3. Please include: Appendix GC. Good Combustion Practices for Cogeneration Boilers.

Section 1. Facility Information

4. Page 2 of 29, table under **ARMS ID No. 0990005:** For EU ID 014, Boiler No. 14: under Process Area, change "Sugar Mill' to "Sugar Mill **& Refinery**".

5. Page 3 of 29, table under **ARMS ID No. 0990332:** For EU ID 048, Paint Booth: under Process Area, change "Farm Operations" to "**Okeelanta Shop**".

6. Page 3 of 29, table under **Unregulated Emissions Units and/or Activities** for ARMS ID No. 0990005:
    i. For EU 042, Sewer Vent: change to "Sewer **Plant**".
    ii. Add EU 049, "**Sugar Refinery (Unregulated Activities)**".
    iii. Add EU 044, "**Transshipment Facility (Unregulated Activities)**".

7. Page 3 of 29, table under ARMS ID No. 0990332: Please add a line for EU 006: "Cogeneration Plant Miscellaneous, Support Equipment, Cogeneration Plant."

8. Page 4 of 29: 2nd paragraph – change Appendix SS to "Appendix **S1**".

Section 2. Facility-wide Conditions (Draft)

9. Page 6 of 29, condition No. 17: Wording is incomplete; left out the part of the rule where it has to be specified in the permit. As written, all the listed precautions would be required, in addition to those specified in other conditions in Section 3 of the permit.

10. Page 7 of 29, condition No. 20: Please include Appendix GC. Good Combustion Practices for Cogeneration Boilers.

11. Page 7 of 29, condition No. 20: change Appendix SS to "Appendix **S1**".

Section 3. Emissions Unit Specific Conditions (Draft)

12. Page 8 of 29, **Acid Rain** paragraph: revise to: "However, to maintain the exemption as a qualifying cogeneration facility, total electrical generation may not exceed 219,000 MWe-hours per unit per year on a 3-year average."

13. Page 8 of 29, **EQUIPMENT SPECIFICATIONS, condition No. 1**: The construction of the 65 MW steam turbine electric generator was completed and started up in August 2006. The Bureau of Air Regulation was informed of this in a letter from Golder dated February 6, 2007, which was a response to an RAI from FDEP for the Title V renewal application. Commercial operation of the new turbine generator commenced on January 1, 2007. Therefore, please remove the requirements to notify FDEP.

14. Page 11 of 29, **condition 13.c.**: actually, the correct SO_2 emission limit under Subpart Da is 1.2 lb/MMBtu, which is for "resource recovery units" under 60.43Da(d)(2).

15. Page 17 of 29, **EU 004** Table: Delete ", and storage tanks" from Description, as storage tanks are not covered under this Section B.

16. Page 17 of 29, **EQUIPMENT SPECIFICATIONS, 1. Equipment:** under paragraph b., include the following activities: mechanical dust collector hoppers, mixed (bottom and fly) ash conveyor belt, and mixed ash bunker. Also, add the following permitting note:

    "Note: The fly ash storage silo, fly ash pug-mill conditioners and the fly ash truck loadout have not operated for a number of years as the plant has sent fly ash to the mixed ash conveyor belt and then to the mixed ash bunker."

17. Page 17 of 29, **EQUIPMENT SPECIFICATIONS, 2. Baghouses**: Please revise to clarify: "The fly ash storage silo shall be controlled by a baghouse, and the three activated carbon silos shall be controlled by a single, common baghouse. Each baghouse shall be designed and operated to ....." Also, add the following permitting note:

    "Note: The fly ash silo and fly ash silo baghouse have not operated for a number of years as the plant has sent this ash to the mixed ash conveyor belt and then to the mixed ash bunker. Also, the activated carbon silos have not been used for a number of years since the mercury emission limit can be met without injection of activated carbon."

18. Page 17 of 29, **EQUIPMENT SPECIFICATIONS, condition No. 3. "Fuel Management Plan:"** should read "Fuel and Ash Management Plans:". Also, please revise verbiage to indicate that the Ash Management Plan is specified in Appendix AM and the Fuel Management Plan is specified in Appendix FM.

19. Page 18 of 29, **Condition No. 8. Baghouse Vents:** for clarification, please revise to read:

    "At least once during each federal fiscal year (October 1 through September 30), the permittee shall test each silo baghouse vent in accordance with EPA Method 9. Due to infrequent use, the baghouse vent for the fly ash storage silo and the baghouse vent for the activated carbon silos shall be tested during any federal fiscal year in which the baghouses operated more than 400 hours. The baghouse vent for the activated carbon silo shall be tested during a delivery of activated carbon."

20. Page 19 of 29, EU No. 14 table. The name of the Emission Unit referenced should read "Boiler No. 16".

21. Page 19 of 29, first sentence after the EU Description table: The name of Emission Unit should read "Boiler No. 16" instead of "cogeneration boilers".

22. Page 20 of 29, **startup, shutdown, and malfunction, condition No. 8. Startup/Shutdown Plan:, condition a.4):** Please replace the comma after "150 psig" with a period.

23. Page 21 of 29, **condition No. 10**, sentence 3: Please revise grammatical to read "The permittee shall conduct compliance tests…".

24. Page 21 of 29, **condition No. 11:** At the end of the first sentence, add the phrase "utilizing fuel oil" to clarifying the test requirement. Also, the Ash Management Plan does not apply to Boiler No. 16. Please revise last sentence to read "The permittee shall abide by the Fuel Management Plan specified in Appendix FM."

25. Page 22 of 29, **Subsection D, Miscellaneous Process Descriptions,** first paragraph: Change the maximum design capacity of the Fluidized Bed Dryer (EU-025) from 36.3 tons per hour to 1,200 TPD. The baghouse stack exhausts 93 feet above grade. Okeelanta verified all the stack heights for the refinery sources in mid-2006, and this reflects the latest information.

26. Page 22 of 29, **Subsection D, Miscellaneous Process Descriptions,** second paragraph: Change the Rotary Dryer design capacity from 35.4 tons per hour to 1,200 TPD. The Rotoclone No. 1 exhausts **89** feet above grade. Okeelanta verified all the stack heights for the refinery sources in mid-2006, and this reflects the latest information.

27. Page 22 of 29, **Subsection D, Miscellaneous Process Descriptions**, third paragraph: first sentence – Change the design capacity of the two coolers from 35.4 tons per hour to 1,200 TPD; second sentence – the exhaust from Cooler No. 1 controlled by Rotoclone No. 3 is vented 80 feet above grade; third sentence – the exhaust from Cooler No. 2 controlled by Rotoclone No. 4 is vented 80 feet above grade. Okeelanta verified all the stack heights for the refinery sources in mid-2006, and this reflects the latest information.

28. Page 22 of 29, **Subsection D, Miscellaneous Process Descriptions**, fourth paragraph: second sentence – the exhaust from Rotoclone No. 2 is vented 86 feet above grade. Okeelanta verified all the stack heights for the refinery sources in mid-2006, and this reflects the latest information.

29. Page 22 of 29, **Subsection D, Miscellaneous Process Descriptions**, fifth paragraph: Change the Bulk Load-Out Operation (EU 034) design capacity from 12.5 tons per hour to 600 TPD.

30. Page 22 of 29, **Subsection D, Miscellaneous Process Descriptions**, sixth paragraph: Change the Transfer Bulk Load-Out Station (EU 035) design capacity from 26.7 tons per hour to 1200 TPD.

31. Page 22 of 29, **Subsection D, Miscellaneous Process Descriptions**, seventh paragraph: revise the first sentence to read "The expansion of the sugar refinery added a building (40 feet by 80 feet), which houses….."

32. Page 23 of 29, **Subsection D., Sugar Refinery**: Throughout this section, all references to Permit No. 0990005-002-AC should be deleted, since this permit has been replaced by Permit No. 0990005-005-AC.

33. Page 23 of 29, **Subsection D, EQUIPMENT SPECIFICATIONS, condition 2.**: Delete the pressure drop column in the table. Okeelanta can "operate and maintain" the rotoclones in a manner that will comply with the minimum specification for the Water Injection Rate. However, Okeelanta cannot comply with the Pressure Drop Specification. The pressure drops vary widely, depending on the production throughput (loading) and the positioning of the dampers, which depends on the type of specialty sugar being produced. Okeelanta discussed this issue in the December 15, 2005, letter submittal to the Department concerning the Title V renewal application. Also delete the reference to Permit No. 0990005-002-AC, as this condition is not based on any prior permit condition.

34. Page 23 of 29, **Subsection D, CAPACITY AND PERFORMANCE RESTRICTIONS, condition 3. Permitted Capacities**: second sentence – change "during any consecutive 12 months" to "per year", consistent with Permit No. 0990005-005-AC.

35. Page 23 of 29, **Condition 3.b.**: Revise wording as follows: "The Rotary Drying System (EU 021, 023, and 024) shall not process…"

36. Page 23 of 29, **Condition 3.b, c, d and e**: Change "during any consecutive 12 months" to "per year".

37. Page 24 of 29, **Condition 14**: The reference to Permit No. 0990005-019-AC is for the Transshipment Facility, and should be deleted or changed to "Permit No. 0990005-005-AC".

38. Page 26 of 29, **Subsection E**, EU 046 table: Change stack/vent height to 42.

39. Page 28 of 29, **Subsection F**, equipment capacities, condition No. 1.b: Please remove the reference to "and 040" from the parenthetical list of distillate oil storage tanks.

40. Page 29 of 29, **Subsection G**, EU 48 table: Please replace "Paint Booth for the Farm Operations" with "Paint Booth"., and replace "Cogeneration Plant" with "Okeelanta Shop" under column titled Process Area.

41. Page 29 of 29, **Subsection G**, emissions limiting and performance restrictions: After condition No. 4, please add a reference to Specific Conditions 7 & 9 of the AC Permit.

42. Page 29 of 29, **Subsection G**, emissions limiting and performance restrictions: After condition No. 5, please add a reference to Specific Condition 12 of the AC Permit.

Section 4. Appendices

43. **Contents**: Please include **Appendix GC. Good Combustion Practices for Cogeneration Boilers.**

44. **Contents:** Please change Appendix SS to **Appendix S1**.

45. **Appendix AM, page AM-1, Ash Spreading:** Please delete the "Ash Spreading" paragraph and replace with:

    "Ash Disposal".
    All of the ash generated by the facility has been and will continue to be taken to a Class I landfill for disposal.

46. **Appendix AM, page AM-1, Quality Control Measures:** Please delete first paragraph and replace with:

    "Analysis of a mixed ash sample generated at the plant is conducted on a monthly basis. Results from the analyses are used to confirm that the specified air permit limits on the concentration of copper, chromium, and arsenic in the biomass combusted at the plant are being met".

47. **Appendix CM, page CM-4, CAM Plan for Cogeneration Boilers:**

    The Department has issued a draft CAM Plan based on power input to the electrostatic precipitator (ESP). The indicator range is 23 kW as a 3-hour block average. This level appears to be based on the lowest power input during any stack test on the cogeneration boilers that demonstrated compliance with the PM emission limit (based on stack testing conducted from 2002 through 2005).

    NHPP has reviewed 18 months of historic ESP power input data for the three cogeneration boilers. The review reveals that Unit B experiences frequent periods of ESP power input below 23 kW on a 3-hour block average, with Unit C also experiencing a significant number of such events. In the December 2005 RAI response submittal, it was described that NHPP believed that power input to the ESPs was not an accurate indicator of PM emissions, as demonstrated by the test data. In that response letter, NHPP proposed opacity as the CAM indicator parameter, and a 20 percent opacity level as the parameter value. After review of the ESP power input data, we still believe this is the appropriate parameter for CAM.

    NHPP has recently been experiencing opacity exceedances. These exceedances have occurred while operating at higher loads with the new turbine generator while also burning greater proportions of wood chips. As a result of these exceedances, the Department and Palm Beach County were notified. NHPP is currently undergoing a complete evaluation of the causes of the high opacity levels, including boiler combustion and operation practices, wood fuel characteristics, mechanical collector operation, ESP operation and ash removal systems. This evaluation should be completed within the next month, and at that time any corrective actions will be determined.

    In light of the above developments, it is requested that a revised proposed CAM Plan be developed by NHPP and submitted in the future, once the above activities are complete and additional information regarding opacity levels and/or ESP power levels are available with the changes. Therefore, NHPP requests that the requirement to develop a revised CAM Plan be incorporated into the Compliance Plan (Appendix CP) of the Title V permit.

48. **Appendix FM, page FM-1:** Change the appendix number to **Appendix FM**.

49. **Appendix FM, Fuel Management Plan: Page FM-1, BAGASSE, Description,** fifth paragraph concerning fire systems:

    This paragraph should be removed from the bagasse fuel section and included in the wood fuel section. The facility fire hydrant loop is located on the north side of the bagasse fuel storage area. We also have an auxiliary fire water tank, diesel powered fire water pump and fire hydrant located on the northwest corner of the bagasse fuel storage areas. Water wagons from the sugar mill supplement fire protection on the south side of the bagasse fuel storage area. NHPP also utilizes a mobile diesel powered irrigation pump which is used for fire protection in the bagasse fuel storage area.

50. Page FM-1, **BAGASSE, Permit Conditions, 3. Bagasse – Firing Records**:

    This paragraph requires that the bagasse firing rate be based upon the measured heating values for bagasse from sampling and analysis conducted throughout the year "and" the difference between the total calculated annual heat input from steam and the total calculated heat input from wood chips and distillate oil. Neither the wood or oil firing rates require the use of steam input for calculating heat input, rather they are based upon the measured heating values from sampling and analysis conducted throughout the year. We would like to see the requirement to calculate heat input of bagasse from steam calculations removed from this paragraph.

51. Page FM-2, **WOOD MATERIAL, Quality Control Procedures**, second paragraph, last sentence: Please delete the following:

    > "The wood material suppliers will collect and test a representative sample from each load of wood. One third of the sample will be available to Okeelanta for confirmation test. Tests will be conducted in accordance with ASTM E870-82 or successor standard. If the supplier's and Okeelanta's test results differ by more than 5% then a third sample will be submitted to an independent laboratory".

    Note: this appears to be a new requirement. NHPP receives approximately 125 wood shipments per day, this requirement is impractical.

52. Page FM-3: Please delete the first paragraph that begins, "In accordance with the air permit, tests will be conducted on a weekly basis for the first year of operation....." This is obsolete language.

53. Page FM-3, **Supply Sites,** third paragraph: Delete the requirement to conduct monthly fuel supplier unannounced site inspections.

    Note: NHPP has approximately 35 wood fuel suppliers from Tampa, Orlando to Daytona and south of these areas. It is impractical to visit each of these suppliers on a monthly basis.

54. Page FM-4, **Correlation of Wood/Ash Analysis Results:** Delete "bottom ash, fly ash and combined fly/bottom ash" from first sentence and replace with "mixed ash".

55. Page FM-4, **Records:** Delete "written inspection reports (state findings) of unannounced site visits to wood material suppliers to determine adequacy of their material segregation operations."

    Note: NHPP has approximately 35 wood fuel suppliers from Tampa, Orlando to Daytona and south of these areas. It is impractical to visit each these suppliers on a monthly basis.

56. Page FM-5, **Permit Conditions – (2) Oil-Firing Records**:

    Note: These conditions do not apply to NHPP. Please remove.

    NHPP has a quarterly cap on fossil fuel firing and the total annual heat input rate from oil firing shall be calculated based on the annual firing rate and the measured heating values as determined from the sampling and analysis conducted throughout the year.

57. **Appendix S1, page S1-3**: Change EU Description, first sentence to read "**hoppers, and silos.**" (removing storage tanks from list). The storage tanks are no longer included in this EU.

58. **Appendix S1, page S1-5**: Please change all references to "consecutive 12-months" to "**year**".

59. **Appendix S1, page S1-8**: Change "Paint Spray Booth – Farm Operations" to "Paint Booth – **Okeelanta Shop**".

60. **Appendix UI, page UI-3, ID No. 043 (continuation of table), Activities/Equipment column**: Please remove Isopropyl Alcohol Usage in Vacuum Pans (seventh bullet), as this activity is regulated.

61. **Appendix UI, page UI-3, ID No. 045**: Please change EU ID number to **EU 044**.

62. **Appendix UI, Page UI-3, ID No. 09900332 Table, EUs 004 and 005**: Delete reference to distillate oil tanks, since this EU 004 does not contain these, and since distillate fuel oil tanks are included addressed in Section F of the permit.

63. **Appendix 63DDDDD, Page 63DDDDD-1**: Only subject to notification – is the entire appendix necessary?

64. **Appendix AM, page AM-1, "Ash Spreading"**: This section should be deleted. New Hope/Okeelanta have not spread ash from the cogeneration facility on farm fields in the past and there is no plan to do so in the future.

65. **Appendix AM, page AM-2, "Palm Beach County Zoning Requirements for Ash Management"**: Since the Palm Beach County zoning requirements now refer to the Title V permit for the procedures to be followed, this section should be revised to read as follows:

    "The Zoning Plan approved by Palm Beach County requires that NHPP revise the ash management plan to incorporate the revised testing procedures for the ash as submitted to the Palm Beach County Health Department. NHPP must also request that the revised ash management plan be included in the Title V operating permit (Petition DOA 1992-014B and Condition 11 of Resolution R-2004-1372). This Appendix AM of the Title V permit satisfies the County requirement."

66. **Appendix FM, Fuel Management Plan, page FM-4, "Palm Beach County Provisions"**: Since the Palm Beach County zoning requirements now refer to the Title V permit for the procedures to be followed, this section should be revised to read as follows:

    "The Zoning Plan approved by Palm Beach County requires that NHPP revise the fuel management plan to incorporate the "Inclement Weather Operating Procedures" and "Wood, Bagasse, and Ash Inspection and Testing Plan" as submitted to the Palm Beach

County Health Department. NHPP must also request that the revised fuel management plan be included in the Title V operating permit (Petition DOA 1992-014B and Condition 11 of Resolution R-2004-1372). This Appendix FM of the Title V permit satisfies the County requirement."

Thank you for your consideration of these comments. 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

DB/all

Cc: J. Meriweather
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