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May 20, 2005

0537537

Florida Department of Environmental Protection
2600 Blair Stone Road, MS #5505
Tallahassee, FL 32399-2400

Attention: Mr. A. A. Linero, Air Permitting South

RE: OKEELANTA CORPORATION/NEW HOPE POWER PARTNERSHIP
TITLE V PERMIT NO. 0990005-012-AV
APPLICATION TO RENEW TITLE V PERMIT
CAM PLAN

Dear Mr. Linero:

Please find enclosed four (4) copies of the Compliance Assurance Monitoring (CAM) Plan for Okeelanta Corporation and New Hope Power Partnership (NHPP). The CAM Plan should be inserted at the end of the Title V renewal application submitted to your office on April 23, 2005. 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, P.E., Q.E.P.
Principal Engineer

DB/nav

Enclosures

cc: Bill Tarr
Matt Capone
James Meriwether
David Dee
Jose Garcia, PBCHD
Darrel Graziani, SED

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COMPLIANCE ASSURANCE MONITORING PLAN
(CAM PLAN)

for

Okeelanta Corporation

Okeelanta Sugar Mill and New Hope Power Partnership Cogeneration Facilities

May 18, 2005

0537537

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1.0 EMISSION UNITS REQUIRING CAM PLANS

1.1 CAM RULE APPLICABILITY DEFINITION

On October 24, 2000, the Florida Department of Environmental Protection (FDEP) issued the initial Title V air operation permit (Permit No. 0990005-003-AV) to Okeelanta Corporation (Okeelanta) for the operation of the Okeelanta sugarcane processing and sugar refining operations and the adjacent New Hope Power Partnership's (NHPP's) power generation operations. The permit was revised on March 18, 2004, and issued as Permit No. 0990005-012-AV. This permit expires on October 24, 2005, and the renewal application is due to FDEP by April 24, 2005.

As part of the Title V renewal application, a Compliance Assurance Monitoring (CAM) Plan must be submitted as required by regulations adopted in Title 40, Part 64 of the Code of Federal Regulations (40 CFR 64). This regulation has been incorporated by reference in Rule 62-204.800, Florida Administrative Code (F.A.C.), and implemented in Rule 62-213.440, F.A.C.

CAM Plans are required for all Title V permitted emissions units using control devices to meet federally enforceable emission limits or standards, and that have pre-control emissions greater than "major" source thresholds. The term "major" is defined as in the Title V regulations (40 CFR 70), but applied on a source-by-source basis. For most non-hazardous pollutants, the major source threshold is 100 tons per year (TPY). For hazardous air pollutants (HAPs), the threshold is 10 TPY for an individual HAP, and 25 TPY for total HAPs combined.

The CAM Rules contain specific exemptions from applicability of the CAM Rule. Specifically exempted from the CAM Rule are emission limitations or standards promulgated under Stratospheric Ozone Regulations contained in 40 CFR 82, the Acid Rain Program contained in 40 CFR 72, or that are part of an emissions cap included in the Title V Permit. Also exempt are emission limitations or standards proposed after November 15, 1990, under New Source Performance Standards (NSPS) contained in 40 CFR 60, and National Emission Standards for Hazardous Air Pollutants (NESHAPs) promulgated in 40 CFR 63, as these limitations and standards have equivalent monitoring requirements included as part of the standard.

Inherent process equipment (IPE), or equipment that may have the effect of controlling emissions but is installed for the primary purpose of product recovery or raw material recovery, is also exempt from

CAM (40 CFR 64.1). In addition, CAM does not apply to any emission limit or standard for which the Title V permit specifies a continuous compliance determination method [40 CFR 64.2(b)(1)(vi)], provided that the method does not include an assumed control device emission reduction factor that could be affected by the actual operation and maintenance of the control device.

1.2 EMISSIONS UNITS REQUIRING CAM PLANS

A review of emissions units at the Okeelanta sugar mill and sugar refinery, including packaging and transshipment activities, and NHPP's cogeneration facility, was conducted to determine the applicability of the CAM Rule. This evaluation was conducted for each emissions unit and regulated pollutant. First, the existence of a "control device" as defined by the CAM Rule was determined on a source-by-source basis for each pollutant. Those emissions units without control devices were eliminated from further consideration. The remaining emissions units were then evaluated on a pollutant-by-pollutant basis to determine if a control device was used to meet a federally enforceable emission limit or standard.

Each pollutant without a federally enforceable emission limit or standard, emitted from a given emissions unit, was eliminated from further consideration. Uncontrolled annual emissions were then calculated for each remaining source-pollutant combination. If uncontrolled emissions for a pollutant emitted from a given emissions unit were below major source thresholds, as defined by the CAM Rule, that pollutant was not further considered.

A summary of the results of this evaluation process is presented in Table 1. Supporting information is presented in Tables 2 through 6. Specific exemptions to the applicability of the CAM Rule were also considered in this evaluation.

Each pollutant-specific emissions unit at Okeelanta Sugar Mill and NHPP, and its applicability to CAM is described below.

1.2.1 OKEELANTA MILL BOILER NO. 16

Okeelanta operates Boiler No. 16 at the Okeelanta sugar mill, which is a Babcock and Wilcox Model No. FM 120-97 package boiler with a maximum steam production rate of 150,000 pounds per hour (lb/hr) (24-hour average). Boiler No. 16 has a maximum heat input rate of 211 million British

thermal units per hour (MMBtu/hr) when firing natural gas and 202 MMBtu/hr when firing very low sulfur distillate oil.

The only control device Boiler No. 16 has is the flue gas recirculation (FGR) system, which controls nitrogen oxides (NO_x) emissions. The boiler has emission limits set for carbon monoxide (CO) and NO_x. Emissions of CO are not controlled by any control device, and therefore a CAM Plan for CO is not required. Since NO_x is controlled by a control device and as presented in Table 2, uncontrolled NO_x emissions are more than the major source threshold of 100 TPY, NO_x was initially determined to be a pollutant that requires CAM. However, Boiler No. 16 has a continuous emission monitoring system (CEMS), per Specific Condition No. A.10 of Permit No. 0090005-012-AV, to measure and record the emissions of NO_x from the boiler and demonstrate compliance with the CEMS. The CAM Rule contained in 40 CFR 64 specifies that emission limitations or standards for which a Part 70 or 71 permit specifies a continuous compliance demonstration method are exempt from the requirements of CAM [40 CFR 64.2(b)(1)(vi)]. Therefore, a CAM Plan for NO_x is not required.

1.2.2 OKEELANTA SUGAR TRANSSHIPMENT FACILITY

The Transshipment Facility at the Okeelanta sugar mill consists of multiple emissions units: the vacuum system baghouse (EU 018), the packaging lines baghouse (EU 019), the grinder baghouse (EU 20), three Sugar Silo baghouses (EUs 026, 027, and 028), the powdered sugar dryer/cooler baghouse (EU 045), the powdered sugar hopper baghouse (EU 046), and the new packaging lines baghouse (EU 047). These emission points are control devices to reduce the potential total particulate matter (PM) emissions from the facility. Maximum throughput rate of the facility is 865 tons of refined sugar per day.

Each emissions unit at the Transshipment Facility has a control device and a federally enforceable emission limit for PM in tons per year. As shown in Table 1, none of the Transshipment Facility sources (EUs 018, 019, 020, 026, 045, 046, and 047) is required to have a CAM Plan. The justification for this conclusion for each emissions unit is presented below.

The Central Vacuum System (EU 018) is designed to allow manual pickup of sugar dust from a number of pickup points located throughout the facility as needed. Based on engineering judgment, it is assumed that the amount of dust picked up by the Central Vacuum System does not exceed 100 TPY. Therefore, a CAM Plan for PM is not required for the Central Vacuum System.

Detailed descriptions of the baghouses controlling the Packaging Lines (EUs 019 and 047) and the Sugar Silos (EUs 026, 027, and 028) are provided in Attachment OC-EU2-I3 of the Title V operating permit renewal application for Okeelanta (refer to Attachment B3). Control efficiency information for the baghouses is not available as the manufacturers provided outlet grain loading without inlet grain loading information. In order to estimate the uncontrolled emission rates from these sources, continuous or batch drop emission factors from AP-42, Section 13.2.4, were computed and used wherever appropriate.

In the Sugar Silos, bucket elevators drop sugar into the silos directly. Any air displaced by the sugar is vented through a baghouse. The "drop" equation was appropriately used to estimate uncontrolled PM/particulate matter with aerodynamic size less than 10 micrometers (PM_{10}) emissions from the sugar silos. There are a total of three sugar silos, with one transfer point per silo. However, the sugar effectively only experiences one drop since it is loaded into one of the three silos.

Similarly, the drop equation was also used to estimate uncontrolled PM and PM_{10} emissions from the Packaging Lines. Three transfer points were used in the calculation, as the maximum number of transfer points on any packaging line is three. In reality, only one packaging line has three transfer points and all the rest have one or two points. The Packaging Lines baghouse (EU 019) controls Packaging Lines 1 through 9 and the new Packaging Lines baghouse (EU 047) controls Packaging Lines 11 through 14.

For the purpose of emissions calculation, the combined annual packaging capacity of 315,725 TPY was prorated among EUs 019 and 047 based on the number of packaging lines in each group. In all, the emissions calculations using the drop equation was used, with a refined sugar moisture content of 0.25 percent, which is the lowest rating for which the drop equation has an "A" rating. Since the transfer points are enclosed, a wind speed of 1.3 mph was used, the lowest wind speed for which the drop equation has an "A" rating.

The emissions calculations are presented in Table 3, and as demonstrated, the uncontrolled PM and PM_{10} emissions from the Packaging Lines 1 through 9 baghouse (EU 019), Sugar Silos 1, 2, and 3 (EU 026, 027, and 028), and Packaging Lines 11 through 14 baghouse (EU 047) are less than 100 TPY. As a result, these emission units are not subject to the CAM requirements.

The Grinder (EU 020) and the Powdered Sugar Hopper (EU 046), as well as the baghouse associated with each unit, are designed in such a way that all the material from the unit either falls or is pulled into the baghouse. The baghouses act as collection mechanisms for powdered sugar and are an integral part of the process. Since these baghouses are considered part of the process, they are not considered control equipment, and as a result, the Grinder (EU 020) and the Powdered Sugar Hopper (EU 046) are not subject to the CAM requirements since they have no control device.

PM emissions from the Powdered Sugar Dryer/Cooler are controlled by a baghouse (EU 045), which is located after a cyclone. The cyclone is part of the process equipment and removes the larger PM. Based on engineering judgment, it is assumed that the sugar dust that leaves the cyclone does not exceed 100 TPY. Therefore, the powdered sugar dryer/cooler is not subject to CAM for PM.

1.2.3 OKEELANTA SUGAR REFINERY

The Sugar Refinery unit at the Okeelanta sugar mill and refinery consists of multiple emissions units: two Central Dust Collection Systems (EU 021 and 022); the Fluidized Bed Dryer (EU 025), used as the primary sugar drying system; Cooler Nos. 1 and 2 (EU 023 and 024), used to cool dried sugar leaving the rotary dryer; the Bulk Load-out operation (EU 034), used to load sugar into either trucks or railcars; and the Transfer Bulk Load-out station (EU 035), used to supply sugar to the Transshipment Facility. Four wet rotoclones, one baghouse, and process enclosures reduce the PM emissions from the sugar refinery. Refined sugar production in the refinery is limited to 390,000 TPY and 1,500 tons per day (TPD).

EU 034 (Bulk Load-out operation) and EU 035 (Transfer Bulk Load-out operation) have no control devices and, therefore, are exempt from the CAM requirements. Each of the EUs 021, 022, 023, 024, and 025 at the sugar refinery has a control device and federally enforceable emission limits for PM and PM_{10} on a tons-per-year basis. The derivation of uncontrolled emissions from these units is described below and summarized in Table 1.

Controlled and uncontrolled emission rates from the sugar refinery emission units are presented in Attachment OC-EU3-F1.8 of the Title V operating permit renewal application submitted with this document. Maximum emission rates for each emission unit from the three scenarios, using the rotary drying system, using the fluidized bed drying system, and using both rotary and fluidized bed drying

systems, are summarized in Table 4. Uncontrolled emissions of PM or PM/PM_{10} from the two Central Dust Collection Systems (EU 021 and 022), the Fluidized Bed Dryer (EU 025), and Cooler Nos. 1 and 2 (EU 023 and 024) are more than 100 TPY, and therefore, CAM for PM or PM/PM_{10} is required for these units.

1.2.4 PAINT SPRAY BOOTH

Okeelanta operates a paint spray booth at the sugar mill facility, which is used to repaint farm equipment that is used in the agricultural fields, trailers for the delivery of the cane to the mill, as well as other vehicles. The paint spray booth has glass fiber paint arrestor pads, which are used to reduce PM emissions.

The paint spray booth emits volatile organic compounds (VOC) and PM and has a federally enforceable emission limit for VOC. Since there are no control devices for VOC, CAM is not required for VOC. There is a control device for PM, but no emission limits. Therefore, a CAM Plan is not required for PM.

1.2.5 NHPP COGENERATION BOILERS A, B, AND C

Cogeneration Boilers A, B, and C at the NHPP cogeneration facility are biomass-fired spreader stoker steam boilers manufactured by Zurn and designed to produce approximately 506,100 lb/hr of steam at 1,500 pounds per square inch (psig) and 975 degrees Fahrenheit (°F). The boilers have a maximum heat input rate of 760 MMBtu/hr when firing bagasse, 605 MMBtu/hr when firing natural gas, and 490 MMBtu/hr when firing very low sulfur distillate oil.

The boilers have several control devices: a selective non-catalytic reduction system (SNCR) to reduce NO_x emissions, mechanical dust collectors and an electrostatic precipitator (ESP) to reduce PM emissions, and an activated carbon injection system to reduce potential mercury (Hg) emissions. Each of the boilers is also subject to federally enforceable emission limits for CO, NO_x, sulfur dioxide (SO_2), PM/PM_{10}, VOC, Hg, and lead (Pb). Note that the mercury control system is currently inactive and is only required to be operated in the event that the Hg emissions limit for the cogeneration boilers is exceeded. Since CO, SO_2, and VOC emissions are not controlled by any control devices, these pollutants are exempt from the requirements of CAM. As shown in Table 1, and described below, uncontrolled PM and NO_x emissions are greater than 100 TPY.

Uncontrolled NO_x, PM/PM_{10}, Hg, and Pb emissions from the NHPP boilers are estimated in Table 5. Annual emissions were calculated using the alternative fuel usage scenarios: 100-percent biomass (wood or bagasse), 75.1-percent biomass and 24.9-percent fuel oil, and 75.1-percent biomass and 24.9-percent natural gas. Uncontrolled emission factors based on fuel analysis or AP-42 were used in the calculations. In the combination fuel scenarios involving biomass and fuel oil or natural gas, the worst-case emission factors for either bagasse or wood combustion were used for each pollutant.

Since NO_x is controlled by a control device and uncontrolled NO_x emissions are more than the major source threshold of 100 TPY, NO_x was initially determined to be a pollutant that requires CAM. However, each of the cogeneration boilers has a continuous emission monitoring system (CEMS), per Specific Condition No. F.6 of Permit No. 0090005-012-AV, to measure and record the emissions of NO_x from the boiler and demonstrate compliance with the NO_x CEMS. The CAM Rules contained in 40 CFR 64 specify that emission limitations or standards for which a Part 70 or 71 permit specifies a continuous compliance demonstration method are exempt from the requirements of CAM [40 CFR 64.2(b)(1)(vi)]. Therefore, a CAM Plan for NO_x is not required for each of the cogeneration boilers.

PM/PM_{10} emissions from each of the Boilers A, B, and C are controlled by an ESP and the uncontrolled emissions are more than the major source threshold of 100 TPY. Therefore, CAM is required for PM/PM_{10}. Boilers A, B, and C are subject to the federal NESHAPs for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD, which was promulgated on September 13, 2004. The compliance date for existing sources is September 13, 2007. The Subpart DDDDD rules regulate PM emissions from existing large solid fuel boilers. The CAM Rules contained in 40 CFR 64 specify that emission limitations or standards proposed by the Administrator after November 15, 1990, pursuant to Part 111 or 112 of the Clean Air Act (CAA), are exempt from the requirements of CAM [40 CFR 64.2(b)(1)(i)]. However, there are currently no emission limits applicable to the boilers due to Subpart DDDDD, and therefore, the boilers are not exempt from CAM for PM/PM_{10}.

As shown in Table 1, uncontrolled Pb and Hg emissions from each of the Boilers A, B, and C are less than the major source threshold of 100 TPY. As a result, CAM is not required for Pb and Hg.

1.2.6 NHPP MATERIALS HANDLING AND STORAGE OPERATIONS

The materials handling and storage operations at the NHPP cogeneration facility include truck and railcar unloading operations, storage piles, transfer operations, conveyors, screens, crushers, hoppers and silos for handling and storing biomass (bagasse and wood), ash (fly and bottom), and a mercury removal agent (carbon). Baghouse control devices are used for controlling PM emissions from the fly ash and mercury control agent silos. Note that the mercury control system is currently inactive and is only required to be operated in the event that the Hg emissions limit for the cogeneration boilers is exceeded.

The fly ash and mercury control agent silos have federally enforceable emission limits for PM. As shown in Table 6, the uncontrolled PM emissions from the fly ash silo are less than 100 TPY, and therefore are not subject to the CAM Plan requirements. Similarly, uncontrolled PM emissions from the mercury removal agent silo are also less than 100 TPY; therefore, CAM is not required for the Hg control agent silo.

2.0 PM EMISSIONS FROM THE CENTRAL DUST COLLECTION SYSTEM NO. 1 (ROTOCLONE NO. 1) (EU 021)

2.1 EMISSIONS UNIT IDENTIFICATION

Central Dust Collection System No. 1 (from rotary dryer and transfer points)—EU ID No. 021

2.2 APPLICABLE REGULATIONS, EMISSIONS LIMITS, AND MONITORING REQUIREMENTS

The Central Dust Collection System No. 1, which collects dust from the rotary dryer and various transfer points, is included in the overall sugar refinery PM emission limit of 36.8 TPY and 13.39 TPY PM_{10} [Permit No. 0990005-005-AC]. The current visible emission (VE) limit is 5-percent opacity (6-minute average). Refined sugar production is limited to 390,000 TPY.

FDEP has waived the PM compliance test requirements and has specified the alternative standard of 5-percent opacity as the method for demonstrating compliance. Okeelanta is required to monitor and record the date, amount of sugar processed through the facility and through rotary and fluidized dryer beds, amount of sugar loaded out, and hours of operation on a daily basis.

2.3 CONTROL TECHNOLOGY DESCRIPTION

PM emissions from the Central Dust Collection System No. 1 are controlled by an American Air Filter Type W wet rotoclone (Rotoclone No. 1). A detailed description of the control equipment is included in the Title V renewal application, Attachment OC-EU3-I3 (see Attachment B).

2.4 MONITORING APPROACH

The monitoring approach is based on the water injection rate to the rotoclone. The monitoring approach is summarized in the table below.

	Indicator No. 1
Indicator	Water injection rate to the rotoclone.
Measurement Approach	The water injection rate is measured using a flow rate sensor.
Indicator Range	An excursion is defined as any daily average water injection rate below 2 gpm. Excursions trigger an inspection, corrective action, and a recordkeeping and reporting requirement.
Data Representativeness	The water injection rate sensor is located on the water supply line.
Verification of Operational Status	NA
QA/QC Practices and Criteria	The flow rate sensor is maintained in accordance with the manufacturer's recommendations.
Monitoring Frequency	Water flow rate is monitored once every day in a log.
Data Collection Procedures	Water flow rate data is recorded once every day.
Averaging Period	N/A

2.5 JUSTIFICATION

Both pressure drop across and water injection rate to the rotoclone are recognized parameters for controlling PM emissions from rotoclones. The pressure drop is a measure of the energy imparted to the gas stream and, therefore, the efficiency of the control process. The water injection rate is a measure of sufficient fresh water being supplied to the rotoclone and also relates to the efficiency of control. However, measuring the pressure drop continually in the rotoclones has proven to be impractical due to fouling in the instrument sample lines. Therefore, Okeelanta is requesting in the Title V permit renewal application that the pressure drop column be deleted in the construction restrictions conditions of Subsection D of Permit No. 0090005-012-AV. Okeelanta is proposing to monitor the water injection rate to the rotoclone for the purpose of assuring compliance with the PM emission standard.

The operating ranges are based on the design information and the efficiency ratings provided by the manufacturer, as well as the values experienced during the 2002 stack testing of the Rotoclone No 1. The design parameters are provided in Attachment B. VE tests results for the Rotoclone No. 1 are also included in Attachment B.

When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence, to determine the action required (if any) to correct the situation. All excursions will be documented and reported.

3.0 PM EMISSIONS FROM THE CENTRAL DUST COLLECTION SYSTEM NO. 2 (ROTOCLONE NO. 2) (EU 022)

3.1 EMISSIONS UNIT IDENTIFICATION

Central Dust Collection System No. 2—EU ID No. 022

3.2 APPLICABLE REGULATIONS, EMISSIONS LIMITS, AND MONITORING REQUIREMENTS

The Central Dust Collection System No. 2 is included in the overall sugar refinery PM emission limit of 36.8 TPY and 13.39 TPY PM_{10} [Permit No. 0990005-005-AC]. The current VE limit is 5-percent opacity (6-minute average). Refined sugar throughput of material handling is limited to 390,000 TPY.

FDEP has waived the PM compliance test requirements and has specified the alternative standard of 5-percent opacity as the method for demonstrating compliance.

3.3 CONTROL TECHNOLOGY DESCRIPTION

PM emissions from the Central Dust Collection System No. 2 are controlled by an American Air Filter Type W wet rotoclone (Rotoclone No. 2). A detailed description of the control equipment is included in the Title V renewal application, Attachment OC-EU3-I3 (see Attachment B3).

3.4 MONITORING APPROACH

The monitoring approach is based on water injection rate to the rotoclone. The monitoring approach is summarized in the table below.

	Indicator No. 1
Indicator	Water injection rate to the rotoclone.
Measurement Approach	The water injection rate is measured using a flow rate sensor.
Indicator Range	An excursion is defined as any daily average water injection rate below 2 gpm. Excursions trigger an inspection, corrective action, and a recordkeeping and reporting requirement.
Data Representativeness	The water injection rate sensor is located on the water supply line.
Verification of Operational Status	NA
QA/QC Practices and Criteria	The flow rate sensor is maintained in accordance with the manufacturer's recommendations.
Monitoring Frequency	Water flow rate is monitored once every day in a log.
Data Collection Procedures	Water flow rate data is recorded once every day.
Averaging Period	N/A

3.5 JUSTIFICATION

Both pressure drop across and water injection rate to the rotoclone are recognized parameters for controlling PM emissions from rotoclones. The pressure drop is a measure of the energy imparted to the gas stream and, therefore, the efficiency of the control process. The water injection rate is a measure of sufficient fresh water being supplied to the rotoclone and also relates to the efficiency of control. However, measuring the pressure drop continually in the rotoclones has proven to be impractical due to fouling in the instrument sample lines. Therefore, Okeelanta is requesting in the Title V permit renewal application that the pressure drop column be deleted in the construction restrictions conditions of Subsection D of Permit No. 0090005-012-AV. Okeelanta is proposing to monitor the water injection rate to the rotoclone for the purpose of assuring compliance with the PM emission standard.

The operating ranges are based on the design information and the efficiency ratings provided by the manufacturer, and in the values experienced during the 2002 stack testing of the Rotoclone No. 1. The design parameters are provided in Attachment B. Also provided in Attachment B are the results of visible emissions testing conducted on the rotoclone.

When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence, to determine the action required (if any) to correct the situation. All excursions will be documented and reported.

4.0 PM EMISSIONS FROM COOLER NO. 1 (WET CYCLONE NO. 1) (EU 023)

4.1 EMISSIONS UNIT IDENTIFICATION

Cooler No. 1—EU ID No. 023.

4.2 APPLICABLE REGULATIONS, EMISSIONS LIMITS, AND MONITORING REQUIREMENTS

Cooler No. 1 of the rotary drying system is included in the overall sugar refinery PM emission limit of 36.8 TPY and 13.39 TPY PM_{10} [Permit No. 0990005-005-AC]. The current VE limit is 5-percent opacity (6-minute average). Refined sugar production is limited to 390,000 TPY.

FDEP has waived the PM compliance test requirements and has specified the alternative standard of 5-percent opacity as the method for demonstrating compliance. Okeelanta is required to monitor and record the date, amount of sugar processed through the facility and through each cooler, and hours of operation on a daily basis.

4.3 CONTROL TECHNOLOGY DESCRIPTION

PM emissions from the rotary drying system Cooler No. 1 are controlled by a wet cyclone. A detailed description of the control equipment is included in the Title V renewal application, Attachment OC-EU3-I3 (see Attachment B3).

4.4 MONITORING APPROACH

The monitoring approach is based on water injection rate to the wet cyclone. The monitoring approach is summarized in the table below.

	Indicator No. 1
Indicator	Water injection rate to the wet cyclone.
Measurement Approach	The water injection rate is measured using a flow rate sensor.
Indicator Range	An excursion is defined as any daily average water injection rate below 24 gpm. Excursions trigger an inspection, corrective action, and a recordkeeping and reporting requirement.
Data Representativeness	The water injection rate sensor is located on the water supply line.
Verification of Operational Status	NA
QA/QC Practices and Criteria	The flow rate sensor is maintained in accordance with the manufacturer's recommendations.
Monitoring Frequency	Water flow rate is monitored once every day in a log.
Data Collection Procedures	Water flow rate data is recorded once every day.
Averaging Period	N/A

4.5 JUSTIFICATION

Both pressure drop and water injection rate to the wet cyclone are recognized parameters for controlling PM emissions from wet cyclones. The pressure drop is a measure of the energy imparted to the gas stream and, therefore, the efficiency of the control process. The water injection rate is a measure of sufficient fresh water being supplied to the wet cyclone and also relates to the efficiency of collection. However, measuring the pressure drop continually in the wet cyclone has proven to be impractical due to fouling in the instrument sample lines. Therefore, Okeelanta is requesting in the Title V permit renewal application that the pressure drop column be deleted in the construction restriction conditions of Subsection D of Permit No. 0090005-012-AV. Okeelanta is proposing to monitor the water injection rate to the wet cyclone for the purpose of assuring compliance with the PM emission standard.

The operating ranges are based on the design information and the efficiency ratings provided by the manufacturer. The design parameters are provided in Attachment B.

Results of annual VE tests conducted during normal operation of Cooler No. 1 and the associated wet cyclone demonstrated that opacity from the wet cyclone outlet is 5 percent or less, which is also the

alternative standard for demonstrating compliance with the PM standard. This shows that monitoring for the normal operation of the wet cyclone can assure compliance with the PM standard. VE test data for Cooler No. 1 are presented in Attachment B.

When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence, to determine the action required (if any) to correct the situation. All excursions will be documented and reported.

5.0 PM EMISSIONS FROM COOLER NO. 2 (WET CYCLONE NO. 2) (EU 024)

5.1 EMISSIONS UNIT IDENTIFICATION

Cooler No. 2—EU ID No. 024

5.2 APPLICABLE REGULATIONS, EMISSIONS LIMITS, AND MONITORING REQUIREMENTS

Cooler No. 2 of the rotary drying system is included in the overall sugar refinery PM emission limit of 36.8 TPY and 13.39 TPY PM_{10} [Permit No. 0990005-005-AC]. The current VE limit is 5-percent opacity (6-minute average). Refined sugar production is limited to 390,000 TPY.

FDEP has waived the PM compliance test requirements and has specified the alternative standard of 5-percent opacity as the method for demonstrating compliance. Okeelanta is required to monitor and record the date, amount of sugar processed through the facility and through each cooler, and hours of operation on a daily basis.

5.3 CONTROL TECHNOLOGY DESCRIPTION

PM emissions from the rotary drying system Cooler No. 2 are controlled by a wet cyclone. A detailed description of the control equipment is included in the Title V renewal application, Attachment OC-EU3-I3 (Attachment B3).

5.4 MONITORING APPROACH

The monitoring approach is based on water injection rate to the wet cyclone. The monitoring approach is summarized in the table below.

	Indicator No. 1
Indicator	Water injection rate to the wet cyclone.
Measurement Approach	The water injection rate is measured using a flow rate sensor.
Indicator Range	An excursion is defined as any daily average water injection rate below 24 gpm. Excursions trigger an inspection, corrective action, and a recordkeeping and reporting requirement.
Data Representativeness	The water injection rate sensor is located on the water supply line.
Verification of Operational Status	NA
QA/QC Practices and Criteria	The flow rate sensor is maintained in accordance with the manufacturer's recommendations.
Monitoring Frequency	Water flow rate is monitored once every day in a log.
Data Collection Procedures	Water flow rate data is recorded once every day.
Averaging Period	N/A

5.5 JUSTIFICATION

Both pressure drop and water injection rate to the wet cyclone are recognized parameters for controlling PM emissions from wet cyclones. The pressure drop is a measure of the energy imparted to the gas stream and, therefore, the efficiency of the control process. The water injection rate is a measure of sufficient fresh water being supplied to the wet cyclone, as well as the efficiency of PM control. However, measuring the pressure drop continually in the wet cyclone has proven to be impractical due to fouling in the instrument sample lines. Therefore, Okeelanta is requesting in the Title V permit renewal application that the pressure drop column be deleted in the construction restriction conditions of Subsection D of Permit No. 0090005-012-AV. Okeelanta is proposing to monitor the water injection rate to the wet cyclone for the purpose of assuring compliance with the PM emission standard.

The operating ranges are based on the design information and the efficiency ratings provided by the manufacturer. The design parameters are provided in Attachment B.

Results of annual VE tests conducted during normal operation of Cooler No. 2 and the associated wet cyclone demonstrated that opacity from the wet cyclone outlet is 5 percent or less, which is also the

alternative standard for demonstrating compliance with the PM standard. This shows that monitoring for the normal operation of the wet cyclone can assure compliance with the PM standard. VE test data for Cooler No. 2 are presented in Attachment B.

When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence, to determine the action required (if any) to correct the situation. All excursions will be documented and reported.

6.0 PM EMISSIONS FROM THE FLUIDIZED BED DRYER/COOLER (EU 025)

6.1 EMISSIONS UNIT IDENTIFICATION

Fluidized Bed Dryer/Cooler—EU ID No. 025

6.2 APPLICABLE REGULATIONS, EMISSIONS LIMITS, AND MONITORING REQUIREMENTS

The Fluidized Bed Dryer/Cooler of the fluidized bed drying system is included in the overall sugar refinery PM emission limit of 36.8 TPY and 13.39 TPY PM_{10} [Permit No. 0990005-005-AC]. The current VE limit is 5-percent opacity (6-minute average). Refined sugar production is limited to 390,000 TPY.

FDEP has waived the PM compliance test requirements and has specified the alternative standard of 5-percent opacity as the method for demonstrating compliance. Okeelanta is required to monitor and record the date, amount of sugar processed through the facility and through the rotary and fluidized bed dryers, amount of sugar loaded out, and hours of operation on a daily basis.

6.3 CONTROL TECHNOLOGY DESCRIPTION

PM emissions from the fluidized bed drying system are controlled by a BETH GmbH pulse jet compressed air baghouse. A detailed description of the control equipment is included in the Title V renewal application, Attachment OC-EU3-I3 (see Attachment B3).

6.4 MONITORING APPROACH

The monitoring approach is based on pressure drop across the baghouse. The monitoring approach is summarized in the table below.

	Indicator No. 1
Indicator	Pressure drop across the baghouse.
Measurement Approach	Pressure drop is monitored with a manometer.
Indicator Range	An excursion is defined as any daily average pressure drop value below 5 millibars, after steady-state operations have been achieved. Excursions trigger an inspection, corrective action, and a recordkeeping and reporting requirement.
Data Representativeness	The monitoring system consists of a manometer, which measures the pressure drop across the baghouse.
Verification of Operational Status	NA
QA/QC Practices and Criteria	The manometer is maintained in accordance with the manufacturer's recommendations.
Monitoring Frequency	Pressure drop is monitored once every day.
Data Collection Procedures	Pressure drop data is recorded once every day after steady state operations have been achieved.
Averaging Period	N/A

6.5 JUSTIFICATION

Okeelanta is proposing to monitor pressure drop across the baghouse, which is a recognized parameter for controlling PM emissions from baghouses. The pressure drop is a measure of the energy imparted to the gas stream and, therefore, the efficiency of the control process. The normal operating range of pressure drop for the Fluidized Bed Dryer/Cooler baghouse is 5 to 20 millibars. Other manufacturer design information is provided in Attachment B.

A pressure drop less than 5 millibars means a broken bag or flow bypass around the bags, which would require shutdown and replacement of bags. Results of annual VE tests conducted during normal operation of the Fluidized Bed Dryer/Cooler and the associated baghouse demonstrated that opacity from the baghouse stack is less than 5 percent, which is also the alternative standard for demonstrating compliance with the PM standard. This shows that monitoring for the normal operation of the baghouse can assure compliance with the PM standard. VE test data for the Fluidized Bed Dryer/Cooler are presented in Attachment B.

When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence, to determine the action required (if any) to correct the situation. All excursions will be documented and reported.

7.0 PM EMISSIONS FROM COGENERATION BOILERS A, B, AND C

7.1 EMISSIONS UNIT IDENTIFICATION

NHPP Cogeneration Boilers A, B, and C

7.2 APPLICABLE REGULATIONS, EMISSIONS LIMITS, AND MONITORING REQUIREMENTS

Cogeneration Boilers A, B, and C at the NHPP cogeneration facility are biomass-fired spreader stoker steam boilers manufactured by Zurn and designed to produce approximately 506,100 lb/hr of steam each. Each boiler has a PM emission limit of 0.026 lb/MMBtu or 19.8 lb/hr and a NO_x emission limit of 0.15 lb/MMBtu or 114.0 lb/hr.

Compliance with the NO_x emission standard is determined by data collected by the NO_x continuous emission measurement system (CEMS) in terms of "lb/MMBtu of heat input". Compliance with the PM standard is determined by the average of three test runs conducted in accordance with U.S. Environmental Protection Agency (EPA) Method 5. Each boiler also has a stack opacity limit of 6-minute block average opacity of 20 percent, except for one 6-minute block per hour that is less than or equal to 27-percent opacity. Compliance with the opacity standard is determined by a COMS, which measures opacity continuously at 1-minute intervals.

7.3 CONTROL TECHNOLOGY DESCRIPTION

PM emissions from each of the Boilers A, B, and C are controlled by mechanical dust collectors and an ESP. NO_x emissions are controlled by a SNCR system. A detailed description of the control equipment is included in the Title V renewal application, Attachment OC-EU5-I3 (see Attachment B3).

7.4 MONITORING APPROACH

The monitoring approach is based on monitoring opacity of each boiler stack through the existing COMS at each stack. The monitoring approach is summarized in the table below.

	Indicator No. 1
Indicator	Opacity
Measurement Approach	Continuous opacity monitoring system (COMS).
Indicator Range	An excursion is defined as any 1-hour block average of opacity greater than 20%, excluding periods of startup, shutdown, and malfunction pursuant to Rule 62-210.700, F.A.C. An excursion will trigger an evaluation of operation of the boiler and ESP. Corrective action will be taken as necessary. Excursions trigger recordkeeping and reporting requirements.
Data Representativeness	Opacity measurements are made in the stack.
Verification of Operational Status	N/A
QA/QC Practices and Criteria	Install and operate COMS according to 40 CFR Part 60 Appendix B, Performance Specification 1 and general provisions 60.13.
Monitoring Frequency	Opacity is monitored continuously.
Data Collection Procedures	One-minute averages are recorded through the DAS. Daily reports with all hourly averages are generated. One-hour block averages are determined from the average of all the valid 1-minute averages during a block hour.
Averaging Period	The averaging period for opacity observations is a 1-hour block average.

7.5 JUSTIFICATION

The CAM Rule, in 40 CFR 64.3(d)(1), states that if a COMS is required pursuant to other authority under the CAA or state or local law, the owner or operator shall use such system to satisfy the requirements of this part. NHPP is proposing to use data from the COMS at each of the Boilers A, B, and C stacks and monitor the 1-hour block average opacity to assure compliance with the PM emission standard.

The NHPP boilers are subject to CAM for PM emissions, not VE. Annual compliance tests for PM are performed via EPA Method 5 and consist of three test runs each typically exceeding 1 hour in duration each. The opacity data NHPP has used to correlate PM emissions and opacity were the average opacity for the duration of the test run (60 minutes) (see discussion below). Therefore, a

1-hour block averaging time for the CAM opacity indicator is appropriate for compliance assurance of PM emissions. As described below, at least three other power plants in Florida have received averaging times of 1-hour block duration for their CAM Plans.

NHPP has researched other CAM Plans for PM for coal-fired power plants that also use opacity as the CAM parameter. For Cedar Bay Generating Company, FDEP issued the CAM Plan based on a 10-percent opacity reading as the level defining an excursion. This level of opacity would have to be exceeded for five consecutive 6-minute averages in order to define an excursion. The rationale stated in the CAM Plan was as follows:

> "Based on available data under normal operation, the representative stack opacity of each unit is in the range of 3% to 7%. A 50% average opacity above 7% during non-startup or shutdown periods is atypical and may indicate a potential problem with the baghouse."

St. Johns River Power Park received an 18-percent opacity level as the CAM indicator, based on a 1-hour block average. The rationale stated in the CAM Plan was as follows:

> "Based on available data under normal operation, the representative stack opacity of each unit is in the range of 5% to 15%. In addition, the COMS are located upstream of the scrubber, and, as such, the opacity at the stack exit is lower than the value indicated by the COMS. Therefore, 18% opacity during non-startup or shutdown periods is atypical and may indicate a potential problem with the ESP."

Lakeland McIntosh received a 12-percent opacity level as the CAM indicator, based on a 1-hour average, excluding periods of startup, shutdown, and malfunction. Indiantown Cogeneration received a 6-percent opacity level as the CAM indicator, based on a 1-hour block average, excluding startup and shutdown.

For the NHPP boilers, compliance with the PM standard is currently determined by the average of three test runs conducted in accordance with EPA Method 5. Data for the compliance test runs from 2002 through 2005 were collected and are summarized in Table C-1. Based on the opacity data from the COMS, which were also collected during the test runs, an opacity versus PM emission rate plot was generated, which is shown in Figure C-1. The plot indicates a general increase in opacity as the PM emission rate increases. Except for one observation of 5-percent opacity at 14.6 lb/hr of PM

emission, opacities of 10 to 14 percent were observed for a PM emission rate in the range of 10 to 12 lb/hr. The PM emission limit for Boilers A, B, and C is 19.8 lb/hr at 760 MMBtu/hr heat input.

The variability in opacity versus PM emission rate is typical. A sudden and sustained step-increase in opacity usually indicates a potential problem with the ESP.

Using the same rationale as for Cedar Bay Generating Company, the indicator range for the NHPP Boilers A, B, and C should be set at 50-percent greater than 14-percent opacity (i.e., at 21-percent opacity). A 50-percent average opacity above the normal range is atypical, and setting the indicator range at 50-percent greater than 14-percent opacity (i.e., at 21-percent opacity), is an appropriate range of opacity, above which may indicate potential problems with the ESP. However, Boilers A, B, and C each have a stack opacity limit of 20 percent. Therefore, the indicator range is set at a maximum of 20 percent during non-startup, shutdown, and malfunction conditions.

When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence, to determine the action required (if any) to correct the situation. All excursions will be documented and reported.

Table 1. CAM Applicability Determination for Okeelanta Corporation and New Hope Power Partnership

Emission Source	Title V EU ID	Control Equipment	Pollutants with Emission Limits	Uncontrolled Emission Rate (TPY)	CAM Plan Required? (Yes/No)	Comments
Okeelanta Mill Boiler No. 16	014	Flue Gas Recirculation	NO_x	126.8	No	Title V permit specifies continuous compliance determination method.
		None	CO	--	No	No control device for CO.
Okeelanta Sugar Transshipment Facility						
Central Vacuum System	018	Baghouse	PM	<100	No	PM uncontrolled emissions < 100 TPY.
Packaging Lines (1-9)	019	Baghouse	PM	2.5	No	PM uncontrolled emissions < 100 TPY.
Grinder	020	None	PM	<100	No	No control device.
Sugar Silo Nos. 1, 2, and 3	026, 027, 028	Baghouse	PM	1.2	No	PM uncontrolled emissions < 100 TPY.
Powdered Sugar Dryer/Cooler	045	Baghouse	PM	<100	No	PM uncontrolled emissions < 100 TPY.
Powdered Sugar Hopper	046	None	PM	<100	No	No control device.
Packaging Lines (11 - 14)	047	Baghouse	PM	1.1	No	PM uncontrolled emissions < 100 TPY.
Okeelanta Sugar Refinery						
Central Dust Collection System No. 1	021	Rotoclone	PM	4,135.8	Yes	PM uncontrolled emissions >100 TPY.
		Rotoclone	PM_{10}	165.4	Yes	PM_{10} uncontrolled emissions >100 TPY.
Central Dust Collection System No. 2	022	Rotoclone	PM	183.4	Yes	PM uncontrolled emissions >100 TPY.
		Rotoclone	PM_{10}	7.3	No	PM_{10} uncontrolled emissions <100 TPY.
Cooler No. 1 / Rotoclone No. 3	023	Rotoclone	PM	227.5	Yes	PM uncontrolled emissions >100 TPY.
		Rotoclone	PM_{10}	9.1	No	PM_{10} uncontrolled emissions <100 TPY.
Cooler No. 2 / Rotoclone No. 4	024	Rotoclone	PM	227.5	Yes	PM uncontrolled emissions >100 TPY.
		Rotoclone	PM_{10}	9.1	No	PM_{10} uncontrolled emissions <100 TPY.
Fluidized Bed Dryer	025	Baghouse	PM	3,900.0	Yes	PM uncontrolled emissions >100 TPY.
		Baghouse	PM_{10}	156.0	Yes	PM_{10} uncontrolled emissions >100 TPY.
Bulk load-out Operations	034	None	PM	--	No	No control device.
		None	PM_{10}	--	No	No control device.
Transfer Bulk Load-out Operations	035	None	PM	--	No	No control device.
		None	PM_{10}	--	No	No control device.
Okeelanta Paint Booth	048	None	VOC	--	No	No control device.
New Hope Power Boilers A, B, C (each)	001, 002, 003	ESP	PM	7,223.5	Yes	PM uncontrolled emissions >100 TPY.
		ESP	PM_{10}	7,223.5	Yes	PM_{10} uncontrolled emissions >100 TPY.
		SNCR	NO_x	732.3	No	Title V permit specifies continuous compliance determination method.
		None	CO	--	No	No control device.
		None	SO_2	--	No	No control device.
		None	VOC	--	No	No control device.
		ESP	Pb	0.4	No	Pb uncontrolled emissions <100 TPY.
		Carbon Injection	Hg	0.018	No	Hg uncontrolled emissions <100 TPY.
New Hope Power Material Handling and Storage Operations						
Fly Ash Silo	004	Baghouse	PM	93.9	No	PM uncontrolled emissions < 100 TPY.
Mercury Reagent Silo	004	Baghouse	PM	0.1	No	PM uncontrolled emissions < 100 TPY.

Table 2. Uncontrolled NO_x Emissions from Boiler No. 16, Okeelanta Corporation

Regulated Pollutant	Natural Gas Combustion					
	Emission Factor ($lb/10^6$ scf)	Emission Factor (lb/MMBtu)	Ref.	Activity Factor[a] (MMBtu/hr)	Hourly Emissions (lb/hr)	Annual Emissions[b] (TPY)
Nitrogen oxides (NO_x)	140	0.14	1	211	28.96	126.85

References:

1. Factors for natural gas combustion from AP-42, Table 1.4-1 (7/98).
   Factors were converted to lb/MMBtu by dividing by 1,020 Btu/scf.

Footnotes:

[a] The maximum permitted heat input rate is 211 MMBtu/hr for natural gas and 202 MMBtu/hr for fuel oil.

[b] Based on maximum operation of 8,760 hours.

Sample Calculations:

Hourly Emissions = Emission Factor x Activity Factor

Annual Emissions = Hourly Emissions x hours of operation (hrs/yr) / 2,000 (lb/ton)

Table 3. Uncontrolled PM Emissions from the Transshipment Facility

Source	Control Device	Point Point ID	Type of Operation[a]	M Moisture Content (%)	U Wind Speed[b] (MPH)	Uncontrolled PM Emission Factor (lb/ton)	Annual Activity Factor[c] (TPY)	No. of Drop Points	Maximum Uncontrolled Annual PM Emissions (tons/yr)
Packaging Lines (1-9)	Baghouse	019	CONTINUOUS DROP	0.25	1.3	0.00755	218,579	3	2.5
Sugar Silo No. 1, 2, and 3	Baghouse	026, 027, 028	CONTINUOUS DROP	0.25	1.3	0.00755	315,725	1	1.2
Packaging Lines (11 - 14)	Baghouse	047	CONTINUOUS DROP	0.25	1.3	0.00755	97,146	3	1.1

Notes/References:

[a] Continuous Drop Emission Factors are computed from AP-42 (USEPA, 1995) Section 13.2.4:

$E = k \times 0.0032 \times (U/5)^{1.3} / (M/2)^{1.4}$ lb/ton, where k = 0.74 for PM.

[b] Since the transfer points are enclosed, a wind speed of 1.3 mph was used for which the equation maintains an "A" quality rating.

[c] Based on 865 tons/day sugar production, permit condition in permit No. 0990005-012-AV. Total throughput prorated through packaging lines based on number of lines.

Table 4. Annual and Short Term Uncontrolled Particulate Matter Emissions from Okeelanta Sugar Refinery
Using the Combination of the Fluidized Bed Drying System and the Rotary Drying System

Source Emission Point Description	Emission Unit ID No.	Refined Sugar Throughput (TPD)	Refined Sugar Throughput (lb/hr)	Refined Sugar Throughput (TPY)	PM Uncontrolled Emission Factor	Uncontrolled PM Emissions (TPY)
Particulate Matter (PM)						
Fluidized Bed Drying System						
Fluidized Bed Baghouse	025	1,050	87,500	260,000	1.5 %	3900.0
Rotary Drying System						
Cooler No. 1 / Wet Cyclone No. 1	023	450	37,500	130,000	0.175 %	227.5
Cooler No. 2 / Wet Cyclone No. 2	024	450	37,500	130,000	0.175 %	227.5
AAF Skimmer/Wet Rotoclone No. 1 (from dryer)	021	450	37,500	130,000	3.150 %	4095.0
Material Handling						
AAF Skimmer/Wet Rotoclone No.1 (from transfer points)	021	1,500	125,000	390,000	0.2090 lb/ton	40.8
AAF Wet Rotoclone No. 2	022	1,500	125,000	390,000	0.9407 lb/ton	183.4
Bulk and Transfer Load-Out Operations						
Bulk Load-out Operations	034	600	88,000	117,000	0.105 lb/ton	6.1
Transfer Bulk Load-out Operations	035	1,200	144,000	273,000	0.105 lb/ton	14.3
						8694.6
Particulate Matter (PM_{10})						
Fluidized Bed Drying System						
Fluidized Bed Baghouse	025	1,050	87,500	260,000	0.060 %	156.0
Rotary Drying System						
Cooler No. 1 / Wet Cyclone No. 1	023	450	37,500	130,000	0.007 %	9.1
Cooler No. 2 / Wet Cyclone No. 2	024	450	37,500	130,000	0.007 %	9.1
AAF Skimmer/Wet Rotoclone No. 1 (from dryer)	021	450	37,500	130,000	0.126 %	163.8
Material Handling						
AAF Skimmer/Wet Rotoclone No. 1 (from transfer points)	021	1,500	125,000	390,000	0.00836 lb/ton	1.6
AAF Wet Rotoclone No. 2	022	1,500	125,000	390,000	0.03763 lb/ton	7.3
Bulk and Transfer Load-Out Operations						
Bulk Load-out Operations	034	600	88,000	117,000	0.00418 lb/ton	0.2
Transfer Bulk Load-out Operations	035	1,200	144,000	273,000	0.00418 lb/ton	0.6
						347.8

Note: See Attachment OC-EU3-F1.8 of the Title V renewal application for footnotes concerning emission factors and control efficiencies.

Table 5. Maximum Annual Uncontrolled Emissions Per Boiler, New Hope Power Partnership Cogeneration Facility

Regulated Pollutant	Biomass: Uncontrolled Emission Factor (lb/MMBtu)	Biomass: Activity Factor (10^{12} Btu/yr)	Biomass: Uncontrolled Annual Emissions (TPY)	Alternate Fuel: Uncontrolled Emission Factor (lb/MMBtu)	Alternate Fuel: Activity Factor (10^{12} Btu/yr)	Alternate Fuel: Uncontrolled Annual Emissions (TPY)	Total Annual Uncontrolled Emissions Per Boiler (TPY)
100% Bagasse							
Particulate (PM)	2.17 (1)	6.658	7223.5	--	--	--	7,223.5 [a]
Nitrogen oxides	0.17 (1)	6.658	565.9	--	--	--	565.9
Lead	1.2E-04 (2)	6.658	0.399	--	--	--	0.40 [a]
Mercury	1.3E-06 (2)	6.658	0.0043	--	--	--	0.004
100% Wood							
Particulate (PM)	0.56 (3)	6.658	1864.1	--	--	--	1,864.1
Nitrogen oxides	0.22 (3)	6.658	732.3	--	--	--	732.3 [a]
Lead	4.8E-05 (3)	6.658	0.160	--	--	--	0.16
Mercury	5.4E-06 (3)	6.658	0.0180	--	--	--	0.018 [a]
75.1% Biomass / 24.9% Fuel Oil [b]							
Particulate (PM)	2.17 (1)	5.000	5424.8	0.014 (4)	1.658	11.6	5,436.45
Nitrogen oxides	0.22 (3)	5.000	550.0	0.174 (4)	1.658	144.2	694.21
Lead	1.2E-04 (2)	5.000	0.300	9.0E-06 (4)	1.658	7.46E-03	0.31
Mercury	5.4E-06 (3)	5.000	0.0135	3.0E-06 (4)	1.658	0.0025	0.016
75.1% Biomass / 24.9% Natural Gas [b]							
Particulate (PM)	2.17 (1)	5.000	5424.8	0.0075 (5)	1.658	6.2	5,431.06
Nitrogen oxides	0.22 (3)	5.000	550.0	0.186 (5)	1.658	154.2	704.15
Lead	1.2E-04 (2)	5.000	0.300	4.9E-07 (5)	1.658	4.06E-04	0.30
Mercury	5.4E-06 (3)	5.000	0.0135	2.6E-07 (5)	1.658	2.11E-04	0.014

[a] Denotes maximum annual emissions for any fuel scenario.

[b] Utilizes the worst-case emission factor for either bagasse or wood.

References

(1) Bagasse combustion in sugar mills, AP-42, Table 1.8-1.

(2) Fuel analysis data from sugar industry.

(3) Wood combustion, AP-42, Tables 1.6-1, 1.6-2, and 1.6-4.

(4) Fuel oil combustion, AP-42, Tables 1.3-1 and 1.3-10.

(5) Natural gas combustion, AP-42, Tables 1.4-1, 1.4-2, and 1.4-4.

Table 6. New Hope Power Partnership Cogeneration Facility Uncontrolled Emissions from Materials Handling and Storage Operations

SOURCE	Controlled Emission Factor		Activity Factor		Control Efficiency	Uncontrolled Emission Factor[a]		Uncontrolled Maximum Emissions[b]	
	PM (gr/acf)	PM_{10} (gr/acf)	(acfm)	Control	(%)	PM (gr/acf)	PM_{10} (gr/acf)	PM(TSP) (TPY)	PM_{10} (TPY)
Fly Ash Silo	0.01	0.00473	2,500	BAGHOUSE	99	1.0	0.473	93.9	44.4
Mercury Reagent Silo	0.01	0.00473	2,500	BAGHOUSE	99	1.0	0.473	0.11	0.05

Notes/References:

[a] Back-calculated based on controlled emission rate and control efficiency used in the controlled emission rate calculation.

[b] For Fly Ash silo, based on 8,760 hr/yr operation. For Mercury Reagent Silo, based on 8 lb/hr/unit usage @ 8,760 hr/yr (105 TPY total); 10 TPH loaded per truck (10 hrs/yr operating time).

ATTACHMENT A

SIGNATURE PAGES

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: **David A. Buff**
   Registration Number: **19011**
2. Professional Engineer Mailing Address...
   Organization/Firm: **Golder Associates Inc.****
   Street Address: **6241 NW 23rd Street, Suite 500**
   City: **Gainesville** State: **FL** Zip Code: **32653**
3. Professional Engineer Telephone Numbers...
   Telephone: **(352) 336-5600** ext.**545** Fax: **(352) 336-6603**
4. Professional Engineer Email Address: **dbuff@golder.com**
5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☐, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here ☐, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here ☐, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☒, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

David A. Buff
Signature

5/19/05
Date

(seal)

* Attach any exception to certification statement.
** Board of Professional Engineers Certificate of Authorization #00001670

ATTACHMENT B

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

Table B-1. Control Equipment Parameters and Particulate Removal Efficiencies for Sugar Dust Wet Collection Systems at Okeelanta Sugar Refinery

Name	Cooler No. 1 Wet Rotoclone	Cooler No. 2 Wet Cyclone	Wet Rotoclone No. 1	Wet Rotoclone No. 2
ID Designation	023	024	021	022
Manufacturer	Unknown	Unknown	American Air Filter (AAF)	American Air Filter (AAF)
Type/Design	Lapple [a] Wet Cyclone	Lapple [a] Wet Cyclone	Wet Rotoclone [b] Type W, Size 27	Wet Rotoclone [b] Type W, Size 27
Outlet Gas Temp (°F)	100	100	100	90
Outlet Gas Flow Rate (acfm) [c]	7,050	7,050	19,000	19,000
Water Injection Rate (gal/min) (minimum) [d]	24	24	2	2
Pressure Drop Across Device (inches H_2O) (min) [d]	1	1	6.8	6.8
Total PM Control Efficiency (%)	95.6	95.6	99.9	99.9
Total PM_{10} Control Efficiency (%)	38.6	38.6	99.0	99.0

Sample calculations:

Control efficiency (%) = [(inlet loading rate - outlet loading rate) / inlet loading rate] X 100.

Note:

[a] Control efficiency based on standard cyclone design calculations by Lapple and Shepherd.
Outlet gas flow rate based on Phelps Fan Manufacturing fan curve at 1,600 RPM and 3" static pressure.
Flow rate represents combined flow of each cyclone pair.

[b] Outlet gas flow rate based on AAF fan operating curves at 1,000 RPM.
Control efficiency is manufacturer's guarantee for PM_{10}.

[c] Typical outlet temperatures and estimated flow rates are shown. (Note: There are 2 identical wet cyclones per cooler.)

[d] Based on 2002 stack testing.

Table B-2. Control Equipment Parameters and Particulate Removal Efficiency Derivation for Fluidized Bed Dryer/Cooler Pulse Jet Baghouse (EU 025) at Okeelanta Sugar Refinery

Manufacturer	BETH GmbH, 23556 Lobeck
Type	BETHPULS 6.60 x 7.5.10
Outlet Gas Temp (°F)	115
Outlet Gas Flow Rate (acfm)	70,620
Exhaust Gas Moisture Content (%)	0.7
Cleaning Method	Pulse Jet Compressed Air
Compressed Air Consumption (cfm)	51.8
Number of Bags	420
Total Filter Media Surface Area (sq. ft)	9,041
Air to Cloth Ratio (cfm per sq ft.)	7.81
Outlet Loading (grains/dscf)	0.00348 [a]

Pollutant	Inlet[b] Loading (lb/hr)	Control[c] Efficiency (%)	Outlet Loading (lb/hr)
Particulate Matter	960	99.80	1.92

Note: All parameters are based on manufacturers design information.

Footnotes:

[a] Calculated based on expected outlet loading rate (lb/hr) and outlet gas flow rate (scfm) at operational conditions.

[b] Inlet loading to the filter specified by the fluidized bed dryer manufacturer while operating at Okeelanta's estimated maximum refined sugar production (includes a 20% design safety factor).

[c] Control efficiency based on baghouse manufacturers design information for dust content in raw gas (10g/m³ at standard conditions) and for dust content in clean gas (20 mg/m³ at standard conditions).

Sample calculations:

Outlet loading rate = inlet loading rate X [1-(control efficiency/100)].

ATTACHMENT B-3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT FOR COGENERATION BOILERS A, B, AND C

The cogeneration facility utilizes several emission control techniques to reduce emissions. A selective non-catalytic reduction (SNCR) system is used to reduce NO_x emissions. Further, the cogeneration boilers minimize CO and VOC through proper furnace design and good combustion practices, including control of combustion air and combustion temperature, distribution of fuel on the combustion grate, and control over the furnace loads and transient conditions. Particulate emissions are controlled by an electrostatic precipitator (ESP). Multiple cyclones were installed during the 2000 calendar year to improve control of particulate emissions. Mercury emissions are controlled through a carbon injection system and the ESP system.

Electrostatic Precipitator

The EPSs for the New Hope Power Partnership (NHPP) facility are manufactured by Flakt, Inc. Design specifications for the ESP (one per boiler) are provided below:

Chambers = 1

Collecting Plate = 12.30 ft L x 39.37 ft H

Fields/Chamber = 3

Specific Collection Area = 200 ft^2/1,000 acfm (minimum)

Gas Velocity = <4 ft/s

Pressure Drop = less than 2.8 inches H_2O

Operating Temperature = 350°F

Ash Handling = Trough hopper with screw conveyor

Particulate removal efficiency: >99.2%

NO_X Control System

The NO_x control system design employs a urea injection system manufactured by Nalco-Fueltech for NO_x control. The technology is a SNCR process, which reduces NO_x emissions through chemical reaction with urea. In the process, urea is injected into the flue gas stream and reacts with NO_x to form nitrogen and water vapor.

The NO_X control system includes the following major components:

- Carrier air compressors,
- Urea tank,
- Urea/air flow controls,
- Control panel,
- Injection manifolds and injectors, and
- Valves and instrumentation.

A single urea storage tank system is installed to supply urea to all three boilers. Urea for injection into the boilers is drawn from the tank. Two injection zones are used to provide injection at full and part load conditions. Each zone has six injectors. Zone switching valves will direct the urea/carrier mixture to the appropriate injection zone.

Specifications for the urea injection system to meet the NO_x emission rate of 0.15 lb/MMBtu when firing biomass or No. 2 fuel oil are provided below (on a per boiler basis):

Urea injection rate - 65 gal/hr (max)

Ammonia Slip - Biomass, No. 2 fuel oil, natural gas - 25 ppm (max)

Mercury Control System

The mercury control system is supplied by ABB Environmental Systems and Chemco, Inc. A volumetric feeder with integral supply hopper meters activated carbon for injection at a point in the ductwork between the ESP and the ID fan. This promotes turbulent mixing and provides adequate residence time. A blower system transports the carbon to the injection point. The ESP will effectively capture the activated carbon particles along with the boiler fly ash (which also contains some carbon). The system is designed to inject up to 13 lb/hr of carbon into the flue gases of each boiler.

Dust Control System

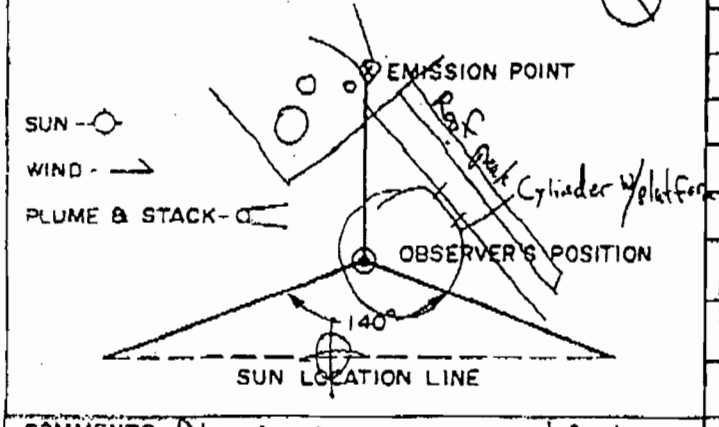
The cyclone dust collectors are supplied by Barron Industries, Model 460 Tube Base III 9K15-2023 AU. These are mechanical cyclone dust collectors which remove larger size particulate matter prior to the ESP. There are 460 cyclone tubes in all.

VISIBLE EMISSIONS OBSERVATION FORMS

VISIBLE EMISSION OBSERVATION FORM

SOURCE NAME	Florida Crystals Rotoclone #1
ADDRESS	
CITY	South Bay
STATE	FL
ZIP	
PHONE	561 993 1658
SOURCE I.D. NUMBER	0990005-003-AV-621
PROCESS EQUIPMENT	Central Dust Collection Sys #1
OPERATING MODE	Normal
CONTROL EQUIPMENT	Wet Rotoclone #1
OPERATING MODE	Normal
DESCRIBE EMISSION POINT (Circular metal stack, approx. 48" Diam, w/rain cap) START	
STOP	
HEIGHT ABOVE GROUND LEVEL START ~140' STOP ~140'	HEIGHT REL. TO OBSERVER START ~20' STOP ~20'
DISTANCE FROM OBSERVER START ~60' STOP ~80'	DIRECTION FROM OBSERVER START 3° STOP 3°
DESCRIBE EMISSIONS START None observed	STOP None observed
EMISSION COLOR START Invisible STOP Same	PLUME TYPE: CONT. ☒ FUGITIVE ☐ INTER. ☐
WATER DROPLETS PRESENT: NO ☒ YES ☐	IF WATER DROPLET PLUME: ATTACHED ☐ DETACHED ☐
POINT IN PLUME AT WHICH OPACITY WAS DETERMINED START Emission point	STOP Same
DESCRIBE BACKGROUND START Rain Cap	STOP Rain Cap
BACKGROUND COLOR START Black STOP Black	SKY CONDITIONS START Overcast STOP
WIND SPEED START 3-5 STOP 0	WIND DIRECTION START S STOP 0
AMBIENT TEMP START 88°F STOP 88°F	WET BULB TEMP 86°F / RH % 91

SOURCE LAYOUT SKETCH — DRAW NORTH ARROW



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30	0	0	0	0	60				

AVERAGE OPACITY FOR HIGHEST PERIOD	0
NUMBER OF READINGS ABOV WERE	5 / 0
RANGE OF OPACITY READINGS MINIMUM	0
MAXIMUM	0
OBSERVER'S NAME (PRINT)	Joshua Gelston
OBSERVER'S SIGNATURE	
DATE	9/11/02
ORGANIZATION	Air Consulting & Engineering
CERTIFIED BY	Easton Technical Assoc.
DATE	8/21/02
VERIFIED BY	
DATE	

COMMENTS: Polarized Black lenses per certification

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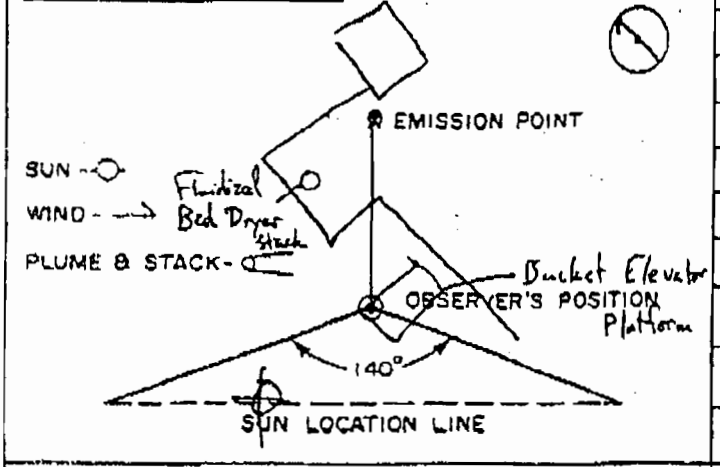
SIGNATURE

TITLE DATE

VISIBLE EMISSION OBSERVATION FORM

SOURCE NAME	Florida Crystals Rotoclone 2
ADDRESS	
CITY	South Bay
STATE	FL
ZIP	
PHONE	561 993 1656
SOURCE I.D. NUMBER	22
PROCESS EQUIPMENT	Rotoclone 2
OPERATING MODE	Normal
CONTROL EQUIPMENT	None
OPERATING MODE	None
DESCRIBE EMISSION POINT START	Circular metal stack w/rain cap near N end of bldg
DESCRIBE EMISSION POINT STOP	
HEIGHT ABOVE GROUND LEVEL START	~150'
HEIGHT ABOVE GROUND LEVEL STOP	~150'
HEIGHT REL. TO OBSERVER START	0'
HEIGHT REL. TO OBSERVER STOP	0
DISTANCE FROM OBSERVER START	~170'
DISTANCE FROM OBSERVER STOP	~170'
DIRECTION FROM OBSERVER START	~20°
DIRECTION FROM OBSERVER STOP	~20°
DESCRIBE EMISSIONS START	None observed
DESCRIBE EMISSIONS STOP	Same
EMISSION COLOR START	None
EMISSION COLOR STOP	None
PLUME TYPE: CONT.	☒
FUGITIVE	☐
INTER	☐
WATER DROPLETS PRESENT: NO	☒
WATER DROPLETS PRESENT: YES	☐
IF WATER DROPLET PLUME: ATTACHED	☐
IF WATER DROPLET PLUME: DETACHED	☐
POINT IN PLUME AT WHICH OPACITY WAS DETERMINED START	Emission Point
POINT IN PLUME AT WHICH OPACITY WAS DETERMINED STOP	Same
DESCRIBE BACKGROUND START	Mezanine Wall
DESCRIBE BACKGROUND STOP	Same
BACKGROUND COLOR START	Brown
BACKGROUND COLOR STOP	Same
SKY CONDITIONS START	Scattered
SKY CONDITIONS STOP	Scattered
WIND SPEED START	0
WIND SPEED STOP	Var
WIND DIRECTION START	None
WIND DIRECTION STOP	Var
AMBIENT TEMP START	93 F
AMBIENT TEMP STOP	93F
WET BULB TEMP	78°F
RH %	50

SOURCE LAYOUT SKETCH — DRAW NORTH ARROW



OBSERVATION DATE	9/10/02
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STOP TIME	1420

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AVERAGE OPACITY FOR HIGHEST PERIOD	0
NUMBER OF READINGS ABOV WERE	0 of 5
RANGE OF OPACITY READINGS MINIMUM	0
RANGE OF OPACITY READINGS MAXIMUM	0
OBSERVER'S NAME (PRINT)	Joshua Gelston
OBSERVER'S SIGNATURE	
DATE	9/10/02
ORGANIZATION	Air Consulting & Engineering
CERTIFIED BY	Eastern Technical Associates
DATE	9/21/02
VERIFIED BY	
DATE	

COMMENTS: Black Polarized lenses per certification

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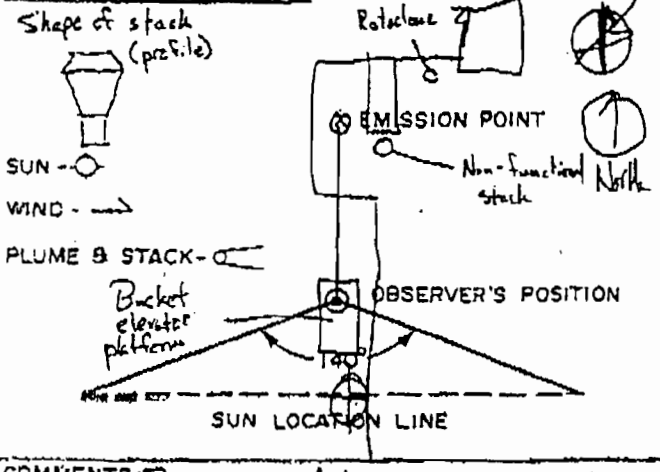
SIGNATURE

TITLE DATE

VISIBLE EMISSION OBSERVATION FORM

SOURCE NAME	Okeelanta Sugar Fluidized bed dryer
ADDRESS	
CITY	South Bay
STATE	FL
ZIP	
PHONE	561 993 1656
SOURCE I.D. NUMBER	
PROCESS EQUIPMENT	Dryer/Cooler
OPERATING MODE	Normal 25
CONTROL EQUIPMENT	None
OPERATING MODE	None
DESCRIBE EMISSION POINT	Oval shaped circular metal silver stack on N end of building
START	
STOP	
HEIGHT ABOVE GROUND LEVEL START	150'
HEIGHT ABOVE GROUND LEVEL STOP	150'
HEIGHT REL. TO OBSERVER START	8'
HEIGHT REL. TO OBSERVER STOP	8'
DISTANCE FROM OBSERVER START	150'
DISTANCE FROM OBSERVER STOP	150'
DIRECTION FROM OBSERVER START	0°
DIRECTION FROM OBSERVER STOP	0°
DESCRIBE EMISSIONS START	None
DESCRIBE EMISSIONS STOP	Same
EMISSION COLOR START	Invisible
EMISSION COLOR STOP	Same
PLUME TYPE	CONT ☒ FUGITIVE ☐ INTER ☐
WATER DROPLETS PRESENT	NO ☒ YES ☐
IF WATER DROPLET PLUME	ATTACHED ☒ DETACHED ☐
POINT IN PLUME AT WHICH OPACITY WAS DETERMINED START	Emission Point
POINT IN PLUME AT WHICH OPACITY WAS DETERMINED STOP	Emission point
DESCRIBE BACKGROUND START	Sky
DESCRIBE BACKGROUND STOP	Sky
BACKGROUND COLOR START	Blue
BACKGROUND COLOR STOP	Blue
SKY CONDITIONS START	Scattered
SKY CONDITIONS STOP	Scattered
WIND SPEED START	0
WIND SPEED STOP	Var
WIND DIRECTION START	None
WIND DIRECTION STOP	Var
AMBIENT TEMP START	73 F
AMBIENT TEMP STOP	93 F
WET BULB TEMP	74° F
RH %	30

SOURCE LAYOUT SKETCH



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OBSERVATION DATE: 9/10/02 START TIME: 1350 STOP TIME: 1420

AVERAGE OPACITY FOR HIGHEST PERIOD	0
NUMBER OF READINGS ABOVE 5 WERE	0
RANGE OF OPACITY READINGS MINIMUM	0
RANGE OF OPACITY READINGS MAXIMUM	0
OBSERVER'S NAME (PRINT)	Joshua Golston
OBSERVER'S SIGNATURE	
DATE	9/10/02
ORGANIZATION	Air Consulting & Engineering
CERTIFIED BY	Eastern Technical Associates
DATE	8/21/02
VERIFIED BY	
DATE	

COMMENTS: Black polarized lenses per certification

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TITLE DATE

AIR CONSULTING & ENGINEERING, INC

VISIBLE EMISSION OBSERVATION FORM

START TIME: 1205 END TIME: 1235

OBSERVATION DATE 9/27/02 TIME ZONE EST PAGE 1 OF 1

COMPANY NAME FL Crystals/Okeelanta

SOURCE Cyclone #1

ADDRESS

CITY South Bay STATE FL ZIP

PHONE SOURCE ID NO. 023

PROCESS | OPERATING MODE

CONTROL EQUIPMENT Cyclones (Dual) | OPERATING MODE Normal

DESCRIBE EMISSION POINT Inverted rectangular duct beside southernmost 2 of 4 cyclones on W side of building

HEIGHT OF EMISSION POINT START ~35' END ~35' | HEIGHT RELATIVE TO OBSERVER START ~1' END ~1'

DISTANCE TO EMISSION POINT START 4' END 4' | DIRECTION TO EM. PT. (DEGREES) START 5° END 5°

VERTICAL ANGLE TO OBS. PT. START ~20° END ~20° | DIRECTION TO OBS. PT. (DEGREES) START 345° END 345°

DISTANCE AND DIRECTION TO OBS. PT. FROM EM. PT. START 6' W and 2' below END Same

DESCRIBE EMISSIONS START White Sugar dust END Same

EMISSION COLOR START White END White | WATER DROPLET PLUME: NONE ATTACHED DETACHED

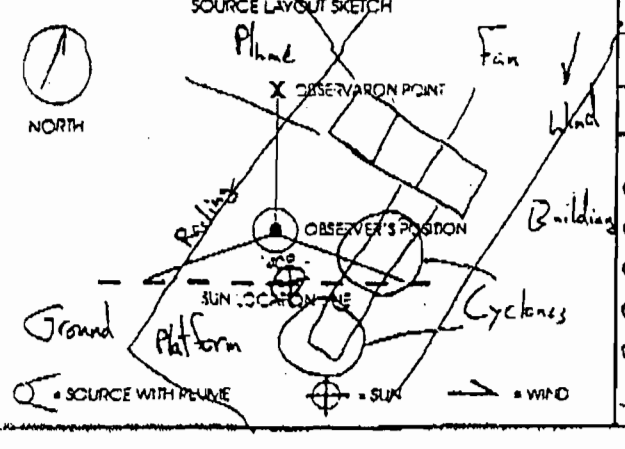
DESCRIBE PLUME BACKGROUND START Rear of railcar loading station in shadow END

BACKGROUND COLOR START Red/blue/gray END Same | SKY CONDITIONS START Scattered END Scattered

WIND SPEED START 0 END 0 5-10 | WIND DIRECTION START None END None S

AMBIENT TEMPERATURE START 91 END 91 | WET BULB TEMP. 84 | %RH 74

SOURCE LAYOUT SKETCH



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OBSERVER'S NAME (PRINT) Joshua Gelston

OBSERVER'S SIGNATURE [signature] DATE 9/27/02

ORGANIZATION Air Consulting & Engineering

CERTIFIED BY Eastern Technical Assn. DATE 9/21/02

COMMENTS Black polarized lenses per certification

AIR CONSULTING & ENGINEERING, INC

VISIBLE EMISSION OBSERVATION FORM

START TIME: 1152 END TIME: 1222

OBSERVATION DATE 11/8/02 TIME ZONE EST PAGE 1 OF 1

COMPANY NAME Florida Crystals/Okeelanta Sugar

SOURCE #2 Cooler Dual Cyclone Outlet

ADDRESS 21250 US Hwy

CITY South Bay STATE FL ZIP 33493

PHONE SOURCE ID NO.

PROCESS #2 Cyclone (Cooler) OPERATING MODE 20 tons/hr

CONTROL EQUIPMENT Dual Cyclones OPERATING MODE Normal

DESCRIBE EMISSION POINT Inverted rectangular metal duct opening on fan plenum at end of cyclones

HEIGHT OF EMISSION POINT START 40' END 40' HEIGHT RELATIVE TO OBSERVER START -3' END -3'

DISTANCE TO EMISSION POINT START 10' END 10' DIRECTION TO EM. PT. (DEGREES) START 355° END 355°

VERTICAL ANGLE TO OBS. PT. START -12° END -12° DIRECTION TO OBS. PT. (DEGREES) START 355° END 355°

DISTANCE AND DIRECTION TO OBS. PT. FROM EM. PT. START Down 1 foot END Same

DESCRIBE EMISSIONS START White dust (haze) END Same

EMISSION COLOR START White END White WATER DROPLET PLUME: NONE ATTACHED DETACHED

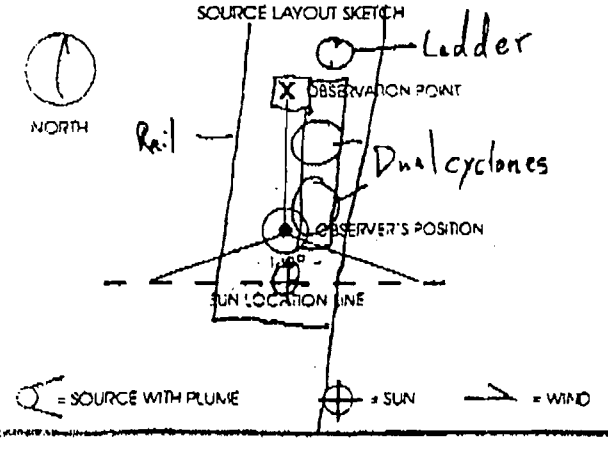
DESCRIBE PLUME BACKGROUND START Girder END Same

BACKGROUND COLOR START Brown END Same SKY CONDITIONS START Scattered END

WIND SPEED START Var END Same WIND DIRECTION START 0-3 END Same

AMBIENT TEMPERATURE START 82 END 86 WET BULB TEMP. 71 %RH 58

SOURCE LAYOUT SKETCH



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21	5	5	5	5	51				
22	5	5	5	5	52				
23	5	5	5	5	53				
24	5	5	5	5	54				
25	5	5	5	5	55				
26	5	5	5	5	56				
27	5	5	5	5	57				
28	5	5	5	5	58				
29	5	5	5	5	59				
30	5	5	5	5	60				

OBSERVER'S NAME (PRINT) Joshua Gelston

OBSERVER'S SIGNATURE [signature] DATE 11/8/02

ORGANIZATION Air Consulting & Engineering

CERTIFIED BY Eastern Technical Associates DATE 8/02

COMMENTS Black polarized lenses worn per certification; plume very faint, sun angle excellent

ATTACHMENT C

OPACITY DATA

Table C-1. NHPP Cogeneration Facility Stack Opacity Test Data Summary

Boiler	Run	Period Start	Period End	Average Opacity (%)	Average PM Emissions lb/MMBtu	Average PM Emissions lb/hr
A	Run 1	2/24/2005 1:31:00 PM	2/24/2005 2:38:00 PM	9.7	0.0138	9.27
	Run 2	2/24/2005 3:08:00 PM	2/24/2005 4:11:00 PM	10.1	0.0177	11.40
	Run 3	2/24/2005 4:47:00 PM	2/24/2005 5:45:00 PM	10.5	0.0172	11.75
	Run 1	2/16/2004 9:15:00 AM	2/16/2004 10:21:00 AM	3.4	0.0052	3.11
	Run 2	2/16/2004 11:01:00 AM	2/16/2004 12:05:00 PM	2.6	0.0080	5.10
	Run 3	2/16/2004 12:47:00 PM	2/16/2004 1:49:00 PM	2.5	0.0072	4.63
	Run 1	1/22/2003 9:43:00 AM	1/22/2003 11:42:00 AM	3.4	0.0085	6.34
	Run 2	1/22/2003 12:17:00 PM	1/22/2003 1:20:00 PM	2.4	0.0090	6.68
	Run 3	1/22/2003 2:03:00 PM	1/22/2003 3:06:00 PM	2.2	0.0093	6.91
	Run 1	2/13/2002 10:16:00 AM	2/13/2002 11:19:00 AM	5.5	0.0110	8.45
	Run 2	2/13/2002 12:09:00 PM	2/13/2002 1:13:00 PM	4.7	0.0070	5.11
	Run 3	2/13/2002 1:44:00 PM	2/13/2002 2:48:00 PM	4.2	0.0050	4.18
B	Run 1	2/23/2005 1:55:00 PM	2/23/2005 3:01:00 PM	14.2	0.0143	9.78
	Run 2	2/23/2005 3:46:00 PM	2/23/2005 4:49:00 PM	13.7	0.0174	11.49
	Run 3	2/24/2005 9:23:00 AM	2/24/2005 10:27:00 AM	7.8	0.0117	7.98
	Run 1	2/13/2004 8:52:00 AM	2/13/2004 9:54:00 AM	7.3	0.0101	6.48
	Run 2	2/13/2004 12:40:00 PM	2/13/2004 1:44:00 PM	5.5	0.0077	5.03
	Run 3	2/13/2004 2:27:00 PM	2/13/2004 3:32:00 PM	6.5	0.0115	7.62
	Run 1	1/23/2003 10:58:00 AM	1/23/2003 12:01:00 PM	3.7	0.0088	6.26
	Run 2	1/23/2003 12:31:00 PM	1/23/2003 1:34:00 PM	3.8	0.0082	5.76
	Run 3	1/23/2003 2:01:00 PM	1/23/2003 3:04:00 PM	3.5	0.0067	4.84
	Run 1	2/14/2002 9:35:00 AM	2/14/2002 10:39:00 AM	5.1	0.0110	8.12
	Run 2	2/14/2002 11:10:00 AM	2/14/2002 12:15:00 PM	4.3	0.0090	6.36
	Run 3	2/14/2002 12:49:00 PM	2/14/2002 1:54:00 PM	3.8	0.0080	5.70
C	Run 1	2/22/2005 2:15:00 PM	2/22/2005 3:19:00 PM	6.5	0.0132	5.62
	Run 3	2/23/2005 8:53:00 AM	2/23/2005 9:56:00 AM	6	0.0060	4.18
	Run 1	2/11/2004 9:50:00 AM	2/11/2004 10:54:00 AM	6.1	0.0072	4.57
	Run 2	2/11/2004 11:36:00 AM	2/11/2004 12:42:00 PM	5.7	0.0080	4.87
	Run 3	2/11/2004 1:20:00 PM	2/11/2004 2:25:00 PM	5.7	0.0062	3.90
	Run 1	1/21/2003 12:16:00 PM	1/21/2003 1:21:00 PM	0	0.0074	5.23
	Run 2	1/21/2003 2:07:00 PM	1/21/2003 3:10:00 PM	0	0.0072	5.24
	Run 3	1/21/2003 4:13:00 PM	1/21/2003 5:24:00 PM	0.2	0.0096	7.01
	Run 1	2/12/2002 10:14:00 AM	2/12/2002 11:19:00 AM	5.1	0.0190	14.63
	Run 2	2/12/2002 12:35:00 PM	2/12/2002 1:39:00 PM	3.1	0.0070	5.31
	Run 3	2/12/2002 2:11:00 PM	2/12/2002 3:15:00 PM	3.4	0.0060	4.35

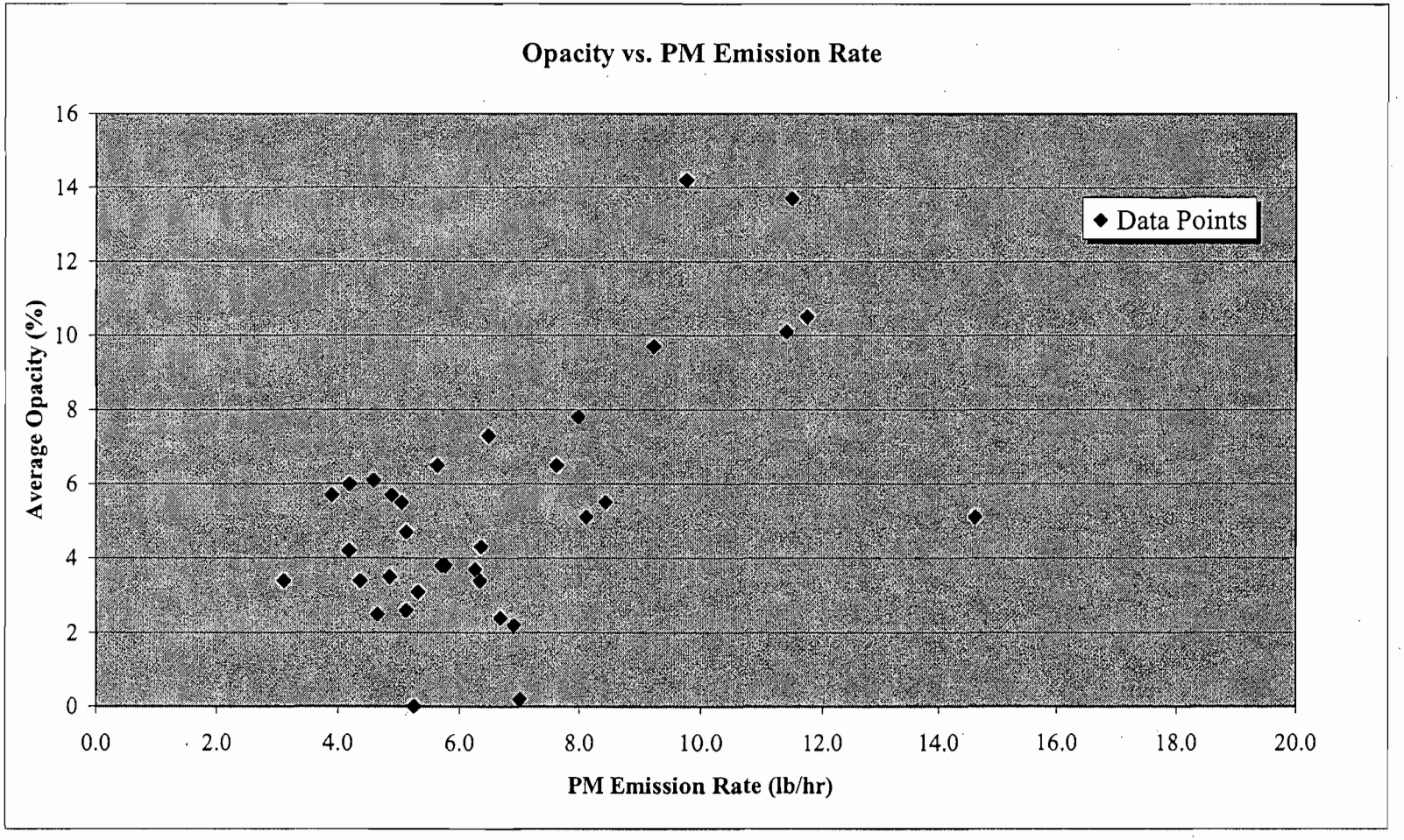

Figure C-1. Average Opacity vs. PM Emissions Plot
NHPP Cogneration Boilers A, B, and C

2005

GE Energy Services NetDAHS©
Average Values Report
Generated: 04/11/05 09:38

Company:	Okeelanta CoGen	Period Start:	02/24/2005	08:53
Plant:		Period End:	02/24/2005	09:56
City/St:	South Bay, FL	Validation Type:	1/1 min	
Source:	Stack 1	Averaging Period:	1 min	
		Type:	Block Avg	

Period Start		Average Opacity_1 %
2/24/2005	13:31	7
2/24/2005	13:32	6.8
2/24/2005	13:33	6.7
2/24/2005	13:34	6.8
2/24/2005	13:35	7
2/24/2005	13:36	7.3
2/24/2005	13:37	12.9
2/24/2005	13:38	9.6
2/24/2005	13:39	7.2
2/24/2005	13:40	7.1
2/24/2005	13:41	7.8
2/24/2005	13:42	7.7
2/24/2005	13:43	6.8
2/24/2005	13:44	7.1
2/24/2005	13:45	7.2
2/24/2005	13:46	7.3
2/24/2005	13:47	6.8
2/24/2005	13:48	6.9
2/24/2005	13:49	6.5
2/24/2005	13:50	7.4
2/24/2005	13:51	8.6
2/24/2005	13:52	9.9
2/24/2005	13:53	7.4
2/24/2005	13:54	6.8
2/24/2005	13:55	6.8
2/24/2005	13:56	8.3
2/24/2005	13:57	7.3
2/24/2005	13:58	8.2
2/24/2005	13:59	8
2/24/2005	14:00	8
2/24/2005	14:01	23.4
2/24/2005	14:02	10.3
2/24/2005	14:03	9.3
2/24/2005	14:04	8.3
2/24/2005	14:05	7.8
2/24/2005	14:06	9.9
2/24/2005	14:07	8.4
2/24/2005	14:08	15.2
2/24/2005	14:09	10.7
2/24/2005	14:10	12.1
2/24/2005	14:11	8.7
2/24/2005	14:12	9.3
2/24/2005	14:13	9.8
2/24/2005	14:14	9.8
2/24/2005	14:15	13.4
2/24/2005	14:16	10.2
2/24/2005	14:17	12.6
2/24/2005	14:18	9.7
2/24/2005	14:19	10
2/24/2005	14:20	8.6
2/24/2005	14:21	9.7
2/24/2005	14:22	9.4
2/24/2005	14:23	16.7
2/24/2005	14:24	13.8
2/24/2005	14:25	20.3
2/24/2005	14:26	10.3
2/24/2005	14:27	9.9
2/24/2005	14:28	9.2
2/24/2005	14:29	10.3
2/24/2005	14:30	15.3
2/24/2005	14:31	11.3
2/24/2005	14:32	9.2
2/24/2005	14:33	9.3
2/24/2005	14:34	8.9
2/24/2005	14:35	8.0
2/24/2005	14:36	11.6
2/24/2005	14:37	8.1
2/24/2005	14:38	21.1
Final Average*		9.7
Maximum*		23.40
Minimum*		6.50

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 04/11/05 09:40

Company:	Okeelanta CoGen		Period Start:	02/24/2005	15:08
Plant:			Period End:	02/24/2005	16:11
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 1		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
2/24/2005	15:08	6.8
2/24/2005	15:09	7.1
2/24/2005	15:10	8.2
2/24/2005	15:11	8.7
2/24/2005	15:12	8.4
2/24/2005	15:13	7
2/24/2005	15:14	7.1
2/24/2005	15:15	7.2
2/24/2005	15:16	7.4
2/24/2005	15:17	7.5
2/24/2005	15:18	7.2
2/24/2005	15:19	8.2
2/24/2005	15:20	8.3
2/24/2005	15:21	7.5
2/24/2005	15:22	7.3
2/24/2005	15:23	10.3
2/24/2005	15:24	10.2
2/24/2005	15:25	9
2/24/2005	15:26	8.8
2/24/2005	15:27	8.1
2/24/2005	15:28	10.7
2/24/2005	15:29	9.3
2/24/2005	15:30	9.1
2/24/2005	15:31	9.9
2/24/2005	15:32	9.3
2/24/2005	15:33	8.5
2/24/2005	15:34	8.1
2/24/2005	15:35	8.7
2/24/2005	15:36	11.1
2/24/2005	15:37	9.4
2/24/2005	15:38	38
2/24/2005	15:39	11.3
2/24/2005	15:40	10.2
2/24/2005	15:41	13.3
2/24/2005	15:42	14.3
2/24/2005	15:43	14.3
2/24/2005	15:44	11.3
2/24/2005	15:45	11.5
2/24/2005	15:46	11.2
2/24/2005	15:47	9.3
2/24/2005	15:48	9.8
2/24/2005	15:49	13.7
2/24/2005	15:50	9.6
2/24/2005	15:51	13
2/24/2005	15:52	10.5
2/24/2005	15:53	9.7
2/24/2005	15:54	10.3
2/24/2005	15:55	9.5
2/24/2005	15:56	11.5
2/24/2005	15:57	9.9
2/24/2005	15:58	9.5
2/24/2005	15:59	11.1
2/24/2005	16:00	10.6
2/24/2005	16:01	8.9
2/24/2005	16:02	9.6
2/24/2005	16:03	11.4
2/24/2005	16:04	9.7
2/24/2005	16:05	8.8
2/24/2005	16:06	9.8
2/24/2005	16:07	9.7
2/24/2005	16:08	10.8
2/24/2005	16:09	9.1
2/24/2005	16:10	9
2/24/2005	16:11	10
Final Average*		10.1
Maximum*		38.0
Minimum*		6.8

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 04/11/05 09:41

Company:	Okeelanta CoGen		Period Start:	02/24/2005	16:47
Plant:			Period End:	02/24/2005	17:45
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 1		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
2/24/2005	16:47	7.5
2/24/2005	16:48	8.4
2/24/2005	16:49	8.3
2/24/2005	16:50	8.1
2/24/2005	16:51	11.6
2/24/2005	16:52	10.7
2/24/2005	16:53	8.1
2/24/2005	16:54	7.3
2/24/2005	16:55	8.3
2/24/2005	16:56	8.6
2/24/2005	16:57	9
2/24/2005	16:58	9
2/24/2005	16:59	8.9
2/24/2005	17:00	11.7
2/24/2005	17:01	9.1
2/24/2005	17:02	8.8
2/24/2005	17:03	8.1
2/24/2005	17:04	8.7
2/24/2005	17:05	7.6
2/24/2005	17:06	8.5
2/24/2005	17:07	7.9
2/24/2005	17:08	7.5
2/24/2005	17:09	7.6
2/24/2005	17:10	8.2
2/24/2005	17:11	7.8
2/24/2005	17:12	9.3
2/24/2005	17:13	9.5
2/24/2005	17:14	10
2/24/2005	17:15	12.2
2/24/2005	17:16	10.7
2/24/2005	17:17	10.8
2/24/2005	17:18	9.8
2/24/2005	17:19	10.1
2/24/2005	17:20	9.7
2/24/2005	17:21	11
2/24/2005	17:22	11.2
2/24/2005	17:23	11.1
2/24/2005	17:24	12.8
2/24/2005	17:25	13.9
2/24/2005	17:26	12.2
2/24/2005	17:27	12
2/24/2005	17:28	12.3
2/24/2005	17:29	13.1
2/24/2005	17:30	14.3
2/24/2005	17:31	12.1
2/24/2005	17:32	12.8
2/24/2005	17:33	11.9
2/24/2005	17:34	11.3
2/24/2005	17:35	11
2/24/2005	17:36	13.9
2/24/2005	17:37	12.5
2/24/2005	17:38	12.8
2/24/2005	17:39	13.2
2/24/2005	17:40	12.1
2/24/2005	17:41	12.1
2/24/2005	17:42	12
2/24/2005	17:43	12.2
2/24/2005	17:44	17.9
2/24/2005	17:45	12.3
Final Average*		10.5
Maximum*		17.9
Minimum*		7.3

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 04/08/05 08:25

Company:	Okeelanta CoGen	Period Start:	02/23/2005 13:55
Plant:		Period End:	02/23/2005 15:01
City/St:	South Bay, FL	Validation Type:	1/1 min
Source:	Stack 2	Averaging Period:	1 min
		Type:	Block Avg

Period Start		Average Opacity_1 %
2/23/2005	13:55	8.1
2/23/2005	13:56	7.9
2/23/2005	13:57	7.4
2/23/2005	13:58	7.5
2/23/2005	13:59	7.8
2/23/2005	14:00	11.6
2/23/2005	14:01	13.4
2/23/2005	14:02	13.9
2/23/2005	14:03	10
2/23/2005	14:04	11.5
2/23/2005	14:05	11.6
2/23/2005	14:06	10.7
2/23/2005	14:07	14.9
2/23/2005	14:08	11.7
2/23/2005	14:09	11.8
2/23/2005	14:10	14.7
2/23/2005	14:11	15
2/23/2005	14:12	11.3
2/23/2005	14:13	13.4
2/23/2005	14:14	11.7
2/23/2005	14:15	12.3
2/23/2005	14:16	17.9
2/23/2005	14:17	17.9
2/23/2005	14:18	12.2
2/23/2005	14:19	16.9
2/23/2005	14:20	13.9
2/23/2005	14:21	13
2/23/2005	14:22	16.4
2/23/2005	14:23	17.3
2/23/2005	14:24	13.7
2/23/2005	14:25	14.8
2/23/2005	14:26	22.9
2/23/2005	14:27	21.9
2/23/2005	14:28	23.4
2/23/2005	14:29	23.9
2/23/2005	14:30	18.2
2/23/2005	14:31	24.2
2/23/2005	14:32	28.9
2/23/2005	14:33	19.7
2/23/2005	14:34	19.4
2/23/2005	14:35	27.2
2/23/2005	14:36	19.6
2/23/2005	14:37	22.1
2/23/2005	14:38	32.2
2/23/2005	14:39	23.2
2/23/2005	14:40	12.7
2/23/2005	14:41	15.1
2/23/2005	14:42	12.2
2/23/2005	14:43	10.6
2/23/2005	14:44	11.7
2/23/2005	14:45	9.5
2/23/2005	14:46	9.9
2/23/2005	14:47	13.2
2/23/2005	14:48	11.3
2/23/2005	14:49	10.2
2/23/2005	14:50	9.8
2/23/2005	14:51	14.6
2/23/2005	14:52	9.9
2/23/2005	14:53	10.5
2/23/2005	14:54	10.3
2/23/2005	14:55	9.1
2/23/2005	14:56	8.2
2/23/2005	14:57	7.5
2/23/2005	14:58	8.5
2/23/2005	14:59	10.0
2/23/2005	15:00	10.9
2/23/2005	15:01	8.7
Final Average*		14.2
Maximum*		32.20
Minimum*		7.40

*Does not include Invalid Averaging Periods ("N/A")

GE Energy Services NetDAHS©
Average Values Report
Generated: 04/08/05 08:28

Company:	Okeelanta CoGen		Period Start:	02/23/2005	15:46
Plant:			Period End:	02/23/2005	16:49
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 2		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
2/23/2005	15:46	10.1
2/23/2005	15:47	8.6
2/23/2005	15:48	8.4
2/23/2005	15:49	9.6
2/23/2005	15:50	13.9
2/23/2005	15:51	16.1
2/23/2005	15:52	11.3
2/23/2005	15:53	8.3
2/23/2005	15:54	8.7
2/23/2005	15:55	10.6
2/23/2005	15:56	11.9
2/23/2005	15:57	9.4
2/23/2005	15:58	9.4
2/23/2005	15:59	12
2/23/2005	16:00	11.3
2/23/2005	16:01	10.7
2/23/2005	16:02	14
2/23/2005	16:03	10.5
2/23/2005	16:04	11.4
2/23/2005	16:05	11.6
2/23/2005	16:06	11
2/23/2005	16:07	15.4
2/23/2005	16:08	27.3
2/23/2005	16:09	12.1
2/23/2005	16:10	12.2
2/23/2005	16:11	21.5
2/23/2005	16:12	18.8
2/23/2005	16:13	13.8
2/23/2005	16:14	11.8
2/23/2005	16:15	12.9
2/23/2005	16:16	12.1
2/23/2005	16:17	11.8
2/23/2005	16:18	13.5
2/23/2005	16:19	15.2
2/23/2005	16:20	15.9
2/23/2005	16:21	13.5
2/23/2005	16:22	11.2
2/23/2005	16:23	11.1
2/23/2005	16:24	17.2
2/23/2005	16:25	14.2
2/23/2005	16:26	11.9
2/23/2005	16:27	18.3
2/23/2005	16:28	16.3
2/23/2005	16:29	11.8
2/23/2005	16:30	11.5
2/23/2005	16:31	13.5
2/23/2005	16:32	16.6
2/23/2005	16:33	11.9
2/23/2005	16:34	12.4
2/23/2005	16:35	10.8
2/23/2005	16:36	12
2/23/2005	16:37	19.9
2/23/2005	16:38	19.4
2/23/2005	16:39	15.1
2/23/2005	16:40	13.4
2/23/2005	16:41	10.7
2/23/2005	16:42	14.1
2/23/2005	16:43	14.7
2/23/2005	16:44	13.5
2/23/2005	16:45	18.9
2/23/2005	16:46	17.6
2/23/2005	16:47	23.3
2/23/2005	16:48	17.8
2/23/2005	16:49	19
Final Average*		13.7
Maximum*		27.30
Minimum*		8.30

*Does not include Invalid Averaging Periods ("N/A")

GE Energy Services NetDAHS©
Average Values Report
Generated: 04/08/05 09:05

Company:	Okeelanta CoGen		Period Start:	02/24/2005	09:23
Plant:			Period End:	02/24/2005	10:27
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 2		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
2/24/2005	9:23	7.4
2/24/2005	9:24	10.5
2/24/2005	9:25	8.2
2/24/2005	9:26	7.8
2/24/2005	9:27	7.3
2/24/2005	9:28	7.6
2/24/2005	9:29	8.1
2/24/2005	9:30	7.8
2/24/2005	9:31	7.5
2/24/2005	9:32	7.3
2/24/2005	9:33	6.9
2/24/2005	9:34	6.8
2/24/2005	9:35	7
2/24/2005	9:36	7
2/24/2005	9:37	6.9
2/24/2005	9:38	6.6
2/24/2005	9:39	6.5
2/24/2005	9:40	6.7
2/24/2005	9:41	6.6
2/24/2005	9:42	6.9
2/24/2005	9:43	6.9
2/24/2005	9:44	6.8
2/24/2005	9:45	6.8
2/24/2005	9:46	9
2/24/2005	9:47	7.3
2/24/2005	9:48	7.1
2/24/2005	9:49	7.3
2/24/2005	9:50	7.1
2/24/2005	9:51	7.5
2/24/2005	9:52	7.6
2/24/2005	9:53	7.8
2/24/2005	9:54	7
2/24/2005	9:55	8
2/24/2005	9:56	6.9
2/24/2005	9:57	8.2
2/24/2005	9:58	7.4
2/24/2005	9:59	7.1
2/24/2005	10:00	6.9
2/24/2005	10:01	7.1
2/24/2005	10:02	7.5
2/24/2005	10:03	8.2
2/24/2005	10:04	7.9
2/24/2005	10:05	7.9
2/24/2005	10:06	7.4
2/24/2005	10:07	7.3
2/24/2005	10:08	7.1
2/24/2005	10:09	7.1
2/24/2005	10:10	7.4
2/24/2005	10:11	7.2
2/24/2005	10:12	7.6
2/24/2005	10:13	7.3
2/24/2005	10:14	7.7
2/24/2005	10:15	7.1
2/24/2005	10:16	7.2
2/24/2005	10:17	7.2
2/24/2005	10:18	8.3
2/24/2005	10:19	7.2
2/24/2005	10:20	6.9
2/24/2005	10:21	7.1
2/24/2005	10:22	7.1
2/24/2005	10:23	7.5
2/24/2005	10:24	7.3
2/24/2005	10:25	8.2
2/24/2005	10:26	22.2
2/24/2005	10:27	18.4
Final Average*		7.8
Maximum*		22.20
Minimum*		6.50

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 04/07/05 13:38

Company:	Okeelanta CoGen	Period Start:	02/22/2005	14:15
Plant:		Period End:	02/22/2005	15:19
City/St:	South Bay, FL	Validation Type:	1/1 min	
Source:	Stack 3	Averaging Period:	1 min	
		Type:	Block Avg	

Period Start		Average Opacity_1 %
2/22/2005	14:15	5.5
2/22/2005	14:16	5.8
2/22/2005	14:17	5.5
2/22/2005	14:18	5.7
2/22/2005	14:19	7.9
2/22/2005	14:20	15
2/22/2005	14:21	9.1
2/22/2005	14:22	5.8
2/22/2005	14:23	5.5
2/22/2005	14:24	7.5
2/22/2005	14:25	6.1
2/22/2005	14:26	5.6
2/22/2005	14:27	5.6
2/22/2005	14:28	5.8
2/22/2005	14:29	6.4
2/22/2005	14:30	5.7
2/22/2005	14:31	5.6
2/22/2005	14:32	6.5
2/22/2005	14:33	5.9
2/22/2005	14:34	5.8
2/22/2005	14:35	5.6
2/22/2005	14:36	5.6
2/22/2005	14:37	5.5
2/22/2005	14:38	5.5
2/22/2005	14:39	5.5
2/22/2005	14:40	5.5
2/22/2005	14:41	5.3
2/22/2005	14:42	5.8
2/22/2005	14:43	7
2/22/2005	14:44	5.5
2/22/2005	14:45	5.8
2/22/2005	14:46	6.1
2/22/2005	14:47	5.7
2/22/2005	14:48	5.5
2/22/2005	14:49	5.7
2/22/2005	14:50	6.3
2/22/2005	14:51	5.5
2/22/2005	14:52	5.5
2/22/2005	14:53	5.5
2/22/2005	14:54	5.7
2/22/2005	14:55	5.5
2/22/2005	14:56	5.4
2/22/2005	14:57	5.4
2/22/2005	14:58	5.4
2/22/2005	14:59	5.3
2/22/2005	15:00	5.3
2/22/2005	15:01	5.3
2/22/2005	15:02	6.2
2/22/2005	15:03	44.9
2/22/2005	15:04	9.2
2/22/2005	15:05	5.4
2/22/2005	15:06	5.4
2/22/2005	15:07	5.4
2/22/2005	15:08	5.5
2/22/2005	15:09	5.3
2/22/2005	15:10	5.3
2/22/2005	15:11	5.3
2/22/2005	15:12	5.3
2/22/2005	15:13	5.2
2/22/2005	15:14	5.3
2/22/2005	15:15	5.2
2/22/2005	15:16	5.4
2/22/2005	15:17	5.5
2/22/2005	15:18	5.5
2/22/2005	15:19	5.4
Final Average*		6.5
Maximum*		44.9
Minimum*		5.2

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 04/08/05 09:05

Company:	Okeelanta CoGen		Period Start:	02/23/2005	08:53
Plant:			Period End:	02/23/2005	09:56
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 3		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
2/23/2005	8:53	6
2/23/2005	8:54	5.9
2/23/2005	8:55	5.8
2/23/2005	8:56	5.9
2/23/2005	8:57	5.9
2/23/2005	8:58	5.7
2/23/2005	8:59	5.8
2/23/2005	9:00	5.8
2/23/2005	9:01	5.9
2/23/2005	9:02	5.8
2/23/2005	9:03	5.8
2/23/2005	9:04	5.9
2/23/2005	9:05	6
2/23/2005	9:06	5.8
2/23/2005	9:07	6
2/23/2005	9:08	5.9
2/23/2005	9:09	6.2
2/23/2005	9:10	5.8
2/23/2005	9:11	5.9
2/23/2005	9:12	5.9
2/23/2005	9:13	6
2/23/2005	9:14	6
2/23/2005	9:15	5.8
2/23/2005	9:16	5.9
2/23/2005	9:17	5.9
2/23/2005	9:18	5.9
2/23/2005	9:19	6
2/23/2005	9:20	6.3
2/23/2005	9:21	5.9
2/23/2005	9:22	6.1
2/23/2005	9:23	6
2/23/2005	9:24	6
2/23/2005	9:25	6
2/23/2005	9:26	6
2/23/2005	9:27	6
2/23/2005	9:28	6.3
2/23/2005	9:29	6.1
2/23/2005	9:30	6
2/23/2005	9:31	6.1
2/23/2005	9:32	6.4
2/23/2005	9:33	6.1
2/23/2005	9:34	6
2/23/2005	9:35	6.1
2/23/2005	9:36	6
2/23/2005	9:37	6.3
2/23/2005	9:38	6
2/23/2005	9:39	6.1
2/23/2005	9:40	6
2/23/2005	9:41	6.1
2/23/2005	9:42	6.1
2/23/2005	9:43	6.4
2/23/2005	9:44	6.4
2/23/2005	9:45	6.4
2/23/2005	9:46	6.4
2/23/2005	9:47	6.3
2/23/2005	9:48	6.2
2/23/2005	9:49	6.5
2/23/2005	9:50	6.3
2/23/2005	9:51	6.1
2/23/2005	9:52	6.1
2/23/2005	9:53	6
2/23/2005	9:54	6
2/23/2005	9:55	5.9
2/23/2005	9:56	6.1
Final Average*		6.0
Maximum*		6.5
Minimum*		5.7

*Does not include Invalid Averaging Periods ("N/A")

2004

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Average Values Report
Generated: 03/31/05 15:22

Company:	Okeelanta CoGen		Period Start:	02/16/2004	09:15
Plant:			Period End:	02/16/2004	10:21
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 1		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
2/16/2004	9:15	2.4
2/16/2004	9:16	2.4
2/16/2004	9:17	2.5
2/16/2004	9:18	2.3
2/16/2004	9:19	2.4
2/16/2004	9:20	2.3
2/16/2004	9:21	2.4
2/16/2004	9:22	2.3
2/16/2004	9:23	2.4
2/16/2004	9:24	2.4
2/16/2004	9:25	2.7
2/16/2004	9:26	2.7
2/16/2004	9:27	2.4
2/16/2004	9:28	2.5
2/16/2004	9:29	2.5
2/16/2004	9:30	2.5
2/16/2004	9:31	2.5
2/16/2004	9:32	2.5
2/16/2004	9:33	2.5
2/16/2004	9:34	2.6
2/16/2004	9:35	2.5
2/16/2004	9:36	2.5
2/16/2004	9:37	2.5
2/16/2004	9:38	2.5
2/16/2004	9:39	2.5
2/16/2004	9:40	2.5
2/16/2004	9:41	2.5
2/16/2004	9:42	2.6
2/16/2004	9:43	2.6
2/16/2004	9:44	2.7
2/16/2004	9:45	2.7
2/16/2004	9:46	2.6
2/16/2004	9:47	3.1
2/16/2004	9:48	2.7
2/16/2004	9:49	2.8
2/16/2004	9:50	2.6
2/16/2004	9:51	2.7
2/16/2004	9:52	2.8
2/16/2004	9:53	3.2
2/16/2004	9:54	2.9
2/16/2004	9:55	2.8
2/16/2004	9:56	2.8
2/16/2004	9:57	2.7
2/16/2004	9:58	3
2/16/2004	9:59	3.3
2/16/2004	10:00	3.2
2/16/2004	10:01	2.8
2/16/2004	10:02	2.7
2/16/2004	10:03	2.7
2/16/2004	10:04	2.9
2/16/2004	10:05	2.8
2/16/2004	10:06	2.8
2/16/2004	10:07	2.9
2/16/2004	10:08	3.2
2/16/2004	10:09	3.3
2/16/2004	10:10	2.8
2/16/2004	10:11	2.7
2/16/2004	10:12	2.8
2/16/2004	10:13	4.7
2/16/2004	10:14	5
2/16/2004	10:15	3.7
2/16/2004	10:16	34.1
2/16/2004	10:17	5.1
2/16/2004	10:18	6.6
2/16/2004	10:19	4
2/16/2004	10:20	3.6
2/16/2004	10:21	3.3
Final Average*		3.4
Maximum*		34.1
Minimum*		2.3

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 03/31/05 15:34

Company:	Okeelanta CoGen		Period Start:	02/16/2004	11:01
Plant:			Period End:	02/16/2004	12:05
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 1		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
2/16/2004	11:01	2.3
2/16/2004	11:02	2.4
2/16/2004	11:03	2.5
2/16/2004	11:04	2.4
2/16/2004	11:05	2.3
2/16/2004	11:06	2.4
2/16/2004	11:07	2.3
2/16/2004	11:08	2.3
2/16/2004	11:09	2.4
2/16/2004	11:10	2.3
2/16/2004	11:11	2.5
2/16/2004	11:12	2.5
2/16/2004	11:13	3
2/16/2004	11:14	2.9
2/16/2004	11:15	2.3
2/16/2004	11:16	2.4
2/16/2004	11:17	2.4
2/16/2004	11:18	2.5
2/16/2004	11:19	2.6
2/16/2004	11:20	2.4
2/16/2004	11:21	2.4
2/16/2004	11:22	2.2
2/16/2004	11:23	2.3
2/16/2004	11:24	2.3
2/16/2004	11:25	2.3
2/16/2004	11:26	2.4
2/16/2004	11:27	2.3
2/16/2004	11:28	2.2
2/16/2004	11:29	2.1
2/16/2004	11:30	2.1
2/16/2004	11:31	2.3
2/16/2004	11:32	3.5
2/16/2004	11:33	2.3
2/16/2004	11:34	2.9
2/16/2004	11:35	2.4
2/16/2004	11:36	2.6
2/16/2004	11:37	2.6
2/16/2004	11:38	2.3
2/16/2004	11:39	2.2
2/16/2004	11:40	2.2
2/16/2004	11:41	2.4
2/16/2004	11:42	2.3
2/16/2004	11:43	2.7
2/16/2004	11:44	2.5
2/16/2004	11:45	3.1
2/16/2004	11:46	2.5
2/16/2004	11:47	2.6
2/16/2004	11:48	2.9
2/16/2004	11:49	2.9
2/16/2004	11:50	2.7
2/16/2004	11:51	2.8
2/16/2004	11:52	2.6
2/16/2004	11:53	3.4
2/16/2004	11:54	3.2
2/16/2004	11:55	3
2/16/2004	11:56	3
2/16/2004	11:57	3
2/16/2004	11:58	3.9
2/16/2004	11:59	2.9
2/16/2004	12:00	2.9
2/16/2004	12:01	3
2/16/2004	12:02	3.1
2/16/2004	12:03	2.7
2/16/2004	12:04	4.9
2/16/2004	12:05	2.3
Final Average*		2.6
Maximum*		4.9
Minimum*		2.1

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 03/31/05 15:40

Company:	Okeelanta CoGen	Period Start:	02/16/2004 12:47
Plant:		Period End:	02/16/2004 13:49
City/St:	South Bay, FL	Validation Type:	1/1 min
Source:	Stack 1	Averaging Period:	1 min
		Type:	Block Avg

Period Start		Average Opacity_1 %
2/16/2004	12:47	2.4
2/16/2004	12:48	2.3
2/16/2004	12:49	2.6
2/16/2004	12:50	2.5
2/16/2004	12:51	2.3
2/16/2004	12:52	2.3
2/16/2004	12:53	2.3
2/16/2004	12:54	2.2
2/16/2004	12:55	2.1
2/16/2004	12:56	2.3
2/16/2004	12:57	2.3
2/16/2004	12:58	2.3
2/16/2004	12:59	2.3
2/16/2004	13:00	2.3
2/16/2004	13:01	2.3
2/16/2004	13:02	2.2
2/16/2004	13:03	2.2
2/16/2004	13:04	2.3
2/16/2004	13:05	2.4
2/16/2004	13:06	2.4
2/16/2004	13:07	2.3
2/16/2004	13:08	2.3
2/16/2004	13:09	2.4
2/16/2004	13:10	2.2
2/16/2004	13:11	2.2
2/16/2004	13:12	2.2
2/16/2004	13:13	2.3
2/16/2004	13:14	2.3
2/16/2004	13:15	2.3
2/16/2004	13:16	2.3
2/16/2004	13:17	2.3
2/16/2004	13:18	2.4
2/16/2004	13:19	2.5
2/16/2004	13:20	2.6
2/16/2004	13:21	2.3
2/16/2004	13:22	2.4
2/16/2004	13:23	2.3
2/16/2004	13:24	2.3
2/16/2004	13:25	2.3
2/16/2004	13:26	2.4
2/16/2004	13:27	2.6
2/16/2004	13:28	2.7
2/16/2004	13:29	2.4
2/16/2004	13:30	2.6
2/16/2004	13:31	2.5
2/16/2004	13:32	2.7
2/16/2004	13:33	2.5
2/16/2004	13:34	2.4
2/16/2004	13:35	2.4
2/16/2004	13:36	2.3
2/16/2004	13:37	2.4
2/16/2004	13:38	2.4
2/16/2004	13:39	2.6
2/16/2004	13:40	2.3
2/16/2004	13:41	2.5
2/16/2004	13:42	2.5
2/16/2004	13:43	2.6
2/16/2004	13:44	4.2
2/16/2004	13:45	2.5
2/16/2004	13:46	2.3
2/16/2004	13:47	2.2
2/16/2004	13:48	2.7
2/16/2004	13:49	9.5
Final Average*		2.5
Maximum*		9.5
Minimum*		2.1

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 03/31/05 15:45

Company:	Okeelanta CoGen	Period Start:	02/13/2004 08:52
Plant:		Period End:	02/13/2004 09:54
City/St:	South Bay, FL	Validation Type:	1/1 min
Source:	Stack 2	Averaging Period:	1 min
		Type:	Block Avg

Period Start		Average Opacity_1 %
2/13/2004	8:52	5.7
2/13/2004	8:53	5.8
2/13/2004	8:54	5.9
2/13/2004	8:55	5.6
2/13/2004	8:56	6
2/13/2004	8:57	5.9
2/13/2004	8:58	5.8
2/13/2004	8:59	5.8
2/13/2004	9:00	5.9
2/13/2004	9:01	5.5
2/13/2004	9:02	5.7
2/13/2004	9:03	6
2/13/2004	9:04	6
2/13/2004	9:05	5.8
2/13/2004	9:06	5.8
2/13/2004	9:07	6.2
2/13/2004	9:08	6.3
2/13/2004	9:09	6.2
2/13/2004	9:10	6.4
2/13/2004	9:11	6.1
2/13/2004	9:12	6.4
2/13/2004	9:13	5.9
2/13/2004	9:14	6.1
2/13/2004	9:15	6.4
2/13/2004	9:16	6.1
2/13/2004	9:17	6
2/13/2004	9:18	6.1
2/13/2004	9:19	6
2/13/2004	9:20	5.9
2/13/2004	9:21	6.1
2/13/2004	9:22	6.2
2/13/2004	9:23	6.8
2/13/2004	9:24	6
2/13/2004	9:25	6.3
2/13/2004	9:26	6.6
2/13/2004	9:27	6.4
2/13/2004	9:28	6.4
2/13/2004	9:29	6.7
2/13/2004	9:30	6.8
2/13/2004	9:31	6.8
2/13/2004	9:32	6.7
2/13/2004	9:33	7
2/13/2004	9:34	7.1
2/13/2004	9:35	7.9
2/13/2004	9:36	6.8
2/13/2004	9:37	6.8
2/13/2004	9:38	8
2/13/2004	9:39	7.6
2/13/2004	9:40	7.6
2/13/2004	9:41	7.3
2/13/2004	9:42	7.6
2/13/2004	9:43	7.4
2/13/2004	9:44	6.7
2/13/2004	9:45	7.4
2/13/2004	9:46	7.1
2/13/2004	9:47	6.7
2/13/2004	9:48	6.6
2/13/2004	9:49	12.2
2/13/2004	9:50	6.7
2/13/2004	9:51	20.4
2/13/2004	9:52	27.1
2/13/2004	9:53	12.9
2/13/2004	9:54	13
Final Average*		7.3
Maximum*		27.1
Minimum*		5.5

*Does not include Invalid Averaging Periods ("N/A")

GE Energy Services NetDAHS©
Average Values Report
Generated: 03/31/05 15:47

Company:	Okeelanta CoGen		Period Start:	02/13/2004	12:40
Plant:			Period End:	02/13/2004	13:44
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 2		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
2/13/2004	12:40	4.8
2/13/2004	12:41	5
2/13/2004	12:42	5
2/13/2004	12:43	5.2
2/13/2004	12:44	5
2/13/2004	12:45	5.1
2/13/2004	12:46	4.9
2/13/2004	12:47	4.8
2/13/2004	12:48	5.9
2/13/2004	12:49	5.7
2/13/2004	12:50	5
2/13/2004	12:51	5.1
2/13/2004	12:52	5.8
2/13/2004	12:53	6
2/13/2004	12:54	5.1
2/13/2004	12:55	4.9
2/13/2004	12:56	5.1
2/13/2004	12:57	5.2
2/13/2004	12:58	5
2/13/2004	12:59	5
2/13/2004	13:00	4.9
2/13/2004	13:01	5.3
2/13/2004	13:02	5.1
2/13/2004	13:03	5.1
2/13/2004	13:04	6.3
2/13/2004	13:05	5.5
2/13/2004	13:06	5.3
2/13/2004	13:07	6.2
2/13/2004	13:08	8
2/13/2004	13:09	5.5
2/13/2004	13:10	5.3
2/13/2004	13:11	5.3
2/13/2004	13:12	5.5
2/13/2004	13:13	5.5
2/13/2004	13:14	5.3
2/13/2004	13:15	5.6
2/13/2004	13:16	5.5
2/13/2004	13:17	5.2
2/13/2004	13:18	5.2
2/13/2004	13:19	7.9
2/13/2004	13:20	6.2
2/13/2004	13:21	6.6
2/13/2004	13:22	5.5
2/13/2004	13:23	5.6
2/13/2004	13:24	6.6
2/13/2004	13:25	5.8
2/13/2004	13:26	5.3
2/13/2004	13:27	5.4
2/13/2004	13:28	5.5
2/13/2004	13:29	5.6
2/13/2004	13:30	5.6
2/13/2004	13:31	7
2/13/2004	13:32	6
2/13/2004	13:33	6
2/13/2004	13:34	5.4
2/13/2004	13:35	5.5
2/13/2004	13:36	5.4
2/13/2004	13:37	5.5
2/13/2004	13:38	5.6
2/13/2004	13:39	5.2
2/13/2004	13:40	5.6
2/13/2004	13:41	5.8
2/13/2004	13:42	5.3
2/13/2004	13:43	5.4
Final Average*		5.5
Maximum*		8
Minimum*		4.8

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 03/31/05 15:49

Company:	Okeelanta CoGen		Period Start:	02/13/2004	14:27
Plant:			Period End:	02/13/2004	15:32
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 2		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
2/13/2004	14:27	6.8
2/13/2004	14:28	8.3
2/13/2004	14:29	6.2
2/13/2004	14:30	8.6
2/13/2004	14:31	5.4
2/13/2004	14:32	5.1
2/13/2004	14:33	5.7
2/13/2004	14:34	5.8
2/13/2004	14:35	5.5
2/13/2004	14:36	5.6
2/13/2004	14:37	5.4
2/13/2004	14:38	5.7
2/13/2004	14:39	6.3
2/13/2004	14:40	5.6
2/13/2004	14:41	5.7
2/13/2004	14:42	5.5
2/13/2004	14:43	6
2/13/2004	14:44	5.5
2/13/2004	14:45	5.7
2/13/2004	14:46	5.6
2/13/2004	14:47	5.8
2/13/2004	14:48	5.9
2/13/2004	14:49	5.8
2/13/2004	14:50	6.2
2/13/2004	14:51	6.2
2/13/2004	14:52	5.9
2/13/2004	14:53	5.8
2/13/2004	14:54	5.5
2/13/2004	14:55	5.5
2/13/2004	14:56	5.5
2/13/2004	14:57	5.9
2/13/2004	14:58	5.9
2/13/2004	14:59	5.8
2/13/2004	15:00	7.1
2/13/2004	15:01	6.2
2/13/2004	15:02	5.7
2/13/2004	15:03	6
2/13/2004	15:04	6.1
2/13/2004	15:05	6.7
2/13/2004	15:06	5.8
2/13/2004	15:07	6.3
2/13/2004	15:08	6.1
2/13/2004	15:09	6
2/13/2004	15:10	7
2/13/2004	15:11	6
2/13/2004	15:12	6.7
2/13/2004	15:13	5.8
2/13/2004	15:14	6.6
2/13/2004	15:15	6
2/13/2004	15:16	6.5
2/13/2004	15:17	6
2/13/2004	15:18	5.9
2/13/2004	15:19	6.3
2/13/2004	15:20	7.6
2/13/2004	15:21	6.6
2/13/2004	15:22	6.5
2/13/2004	15:23	6.4
2/13/2004	15:24	6.2
2/13/2004	15:25	5.8
2/13/2004	15:26	5.9
2/13/2004	15:27	6.1
2/13/2004	15:28	11
2/13/2004	15:29	6.6
2/13/2004	15:30	6.7
2/13/2004	15:31	13.6
2/13/2004	15:32	6.4
Final Average*		6.5
Maximum*		16.4
Minimum*		5.1

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 03/31/05 15:52

Company:	Okeelanta CoGen		Period Start:	02/11/2004	09:50
Plant:			Period End:	02/11/2004	10:54
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 3		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
2/11/2004	9:50	5.9
2/11/2004	9:51	5.9
2/11/2004	9:52	5.9
2/11/2004	9:53	5.8
2/11/2004	9:54	5.9
2/11/2004	9:55	5.8
2/11/2004	9:56	5.9
2/11/2004	9:57	5.9
2/11/2004	9:58	5.9
2/11/2004	9:59	6
2/11/2004	10:00	5.9
2/11/2004	10:01	5.9
2/11/2004	10:02	5.9
2/11/2004	10:03	5.9
2/11/2004	10:04	6.2
2/11/2004	10:05	6.1
2/11/2004	10:06	6
2/11/2004	10:07	5.9
2/11/2004	10:08	6
2/11/2004	10:09	6
2/11/2004	10:10	6.1
2/11/2004	10:11	6
2/11/2004	10:12	6.1
2/11/2004	10:13	6
2/11/2004	10:14	6
2/11/2004	10:15	6.1
2/11/2004	10:16	6
2/11/2004	10:17	6
2/11/2004	10:18	6.1
2/11/2004	10:19	6.1
2/11/2004	10:20	6
2/11/2004	10:21	6
2/11/2004	10:22	5.9
2/11/2004	10:23	5.9
2/11/2004	10:24	6
2/11/2004	10:25	5.9
2/11/2004	10:26	6
2/11/2004	10:27	6
2/11/2004	10:28	6
2/11/2004	10:29	5.9
2/11/2004	10:30	6
2/11/2004	10:31	5.9
2/11/2004	10:32	5.9
2/11/2004	10:33	6
2/11/2004	10:34	5.9
2/11/2004	10:35	5.9
2/11/2004	10:36	5.9
2/11/2004	10:37	5.9
2/11/2004	10:38	5.9
2/11/2004	10:39	6
2/11/2004	10:40	6
2/11/2004	10:41	6
2/11/2004	10:42	6
2/11/2004	10:43	6
2/11/2004	10:44	6
2/11/2004	10:45	6
2/11/2004	10:46	6.1
2/11/2004	10:47	6.1
2/11/2004	10:48	6
2/11/2004	10:49	5.9
2/11/2004	10:50	7.2
2/11/2004	10:51	6.3
2/11/2004	10:52	6.5
2/11/2004	10:53	7.9
2/11/2004	10:54	9.6
Final Average*		6.1
Maximum*		9.6
Minimum*		5.8

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 03/31/05 15:55

Company:	Okeelanta CoGen		Period Start:	02/11/2004	11:36
Plant:			Period End:	02/11/2004	12:42
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 3		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
2/11/2004	11:36	6.2
2/11/2004	11:37	5.9
2/11/2004	11:38	6
2/11/2004	11:39	6
2/11/2004	11:40	5.9
2/11/2004	11:41	5.9
2/11/2004	11:42	5.9
2/11/2004	11:43	5.9
2/11/2004	11:44	5.7
2/11/2004	11:45	5.8
2/11/2004	11:46	5.8
2/11/2004	11:47	5.8
2/11/2004	11:48	5.6
2/11/2004	11:49	5.6
2/11/2004	11:50	5.7
2/11/2004	11:51	5.6
2/11/2004	11:52	5.5
2/11/2004	11:53	5.5
2/11/2004	11:54	5.5
2/11/2004	11:55	5.6
2/11/2004	11:56	5.5
2/11/2004	11:57	5.5
2/11/2004	11:58	5.5
2/11/2004	11:59	5.5
2/11/2004	12:00	5.4
2/11/2004	12:01	5.6
2/11/2004	12:02	5.6
2/11/2004	12:03	5.6
2/11/2004	12:04	5.7
2/11/2004	12:05	5.6
2/11/2004	12:06	5.6
2/11/2004	12:07	5.7
2/11/2004	12:08	5.5
2/11/2004	12:09	5.7
2/11/2004	12:10	5.6
2/11/2004	12:11	5.6
2/11/2004	12:12	5.6
2/11/2004	12:13	5.7
2/11/2004	12:14	5.5
2/11/2004	12:15	5.7
2/11/2004	12:16	5.5
2/11/2004	12:17	5.5
2/11/2004	12:18	5.5
2/11/2004	12:19	5.6
2/11/2004	12:20	5.5
2/11/2004	12:21	5.5
2/11/2004	12:22	5.5
2/11/2004	12:23	5.8
2/11/2004	12:24	5.6
2/11/2004	12:25	5.4
2/11/2004	12:26	5.5
2/11/2004	12:27	5.6
2/11/2004	12:28	5.5
2/11/2004	12:29	5.5
2/11/2004	12:30	5.4
2/11/2004	12:31	5.3
2/11/2004	12:32	5.4
2/11/2004	12:33	5.5
2/11/2004	12:34	5.6
2/11/2004	12:35	5.4
2/11/2004	12:36	6.6
2/11/2004	12:37	5.7
2/11/2004	12:38	6.4
2/11/2004	12:39	6.3
2/11/2004	12:40	6.3
2/11/2004	12:41	5.8
2/11/2004	12:42	8.8
Final Average*		5.7
Maximum*		8.8
Minimum*		5.3

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 03/31/05 15:56

Company:	Okeelanta CoGen		Period Start:	02/11/2004	13:20
Plant:			Period End:	02/11/2004	14:25
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 3		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
2/11/2004	13:20	5.6
2/11/2004	13:21	5.6
2/11/2004	13:22	5.5
2/11/2004	13:23	5.5
2/11/2004	13:24	5.6
2/11/2004	13:25	5.5
2/11/2004	13:26	5.5
2/11/2004	13:27	5.5
2/11/2004	13:28	5.5
2/11/2004	13:29	5.6
2/11/2004	13:30	5.5
2/11/2004	13:31	5.5
2/11/2004	13:32	5.5
2/11/2004	13:33	5.6
2/11/2004	13:34	5.5
2/11/2004	13:35	5.5
2/11/2004	13:36	5.5
2/11/2004	13:37	5.5
2/11/2004	13:38	5.5
2/11/2004	13:39	5.5
2/11/2004	13:40	5.5
2/11/2004	13:41	5.5
2/11/2004	13:42	5.5
2/11/2004	13:43	5.4
2/11/2004	13:44	5.4
2/11/2004	13:45	5.5
2/11/2004	13:46	5.5
2/11/2004	13:47	5.4
2/11/2004	13:48	5.5
2/11/2004	13:49	5.5
2/11/2004	13:50	5.5
2/11/2004	13:51	5.5
2/11/2004	13:52	5.5
2/11/2004	13:53	5.7
2/11/2004	13:54	5.5
2/11/2004	13:55	5.7
2/11/2004	13:56	5.5
2/11/2004	13:57	5.5
2/11/2004	13:58	5.5
2/11/2004	13:59	5.5
2/11/2004	14:00	5.6
2/11/2004	14:01	5.6

Period Start		Average Opacity_1 %
2/11/2004	14:02	5.8
2/11/2004	14:03	5.7
2/11/2004	14:04	5.5
2/11/2004	14:05	5.7
2/11/2004	14:06	5.6
2/11/2004	14:07	5.6
2/11/2004	14:08	5.5
2/11/2004	14:09	5.5
2/11/2004	14:10	5.5
2/11/2004	14:11	5.6
2/11/2004	14:12	6.2
2/11/2004	14:13	6.1
2/11/2004	14:14	5.8
2/11/2004	14:15	5.8
2/11/2004	14:16	5.6
2/11/2004	14:17	5.5
2/11/2004	14:18	5.8
2/11/2004	14:19	5.5
2/11/2004	14:20	6.8
2/11/2004	14:21	6
2/11/2004	14:22	5.9
2/11/2004	14:23	5.9
2/11/2004	14:24	9.3
2/11/2004	14:25	6.1
Final Average*		5.7
Maximum*		9.3
Minimum*		5.4

*Does not include Invalid Averaging Periods ("N/A")

2003

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Average Values Report
Generated: 04/07/05 12:22

Company:	Okeelanta CoGen	Period Start:	01/22/03 09:43
Plant:		Period End:	01/22/03 11:42
City/St:	South Bay, FL	Validation Type:	1/1 min
Source:	Stack 1	Averaging Period:	1 min
		Type:	Block Avg

Period Start		Average Opacity_1 %
1/22/2003	9:43	2.3
1/22/2003	9:44	2.3
1/22/2003	9:45	2.3
1/22/2003	9:46	2.2
1/22/2003	9:47	2.3
1/22/2003	9:48	2.3
1/22/2003	9:49	2.3
1/22/2003	9:50	2.2
1/22/2003	9:51	2.2
1/22/2003	9:52	2.3
1/22/2003	9:53	2.3
1/22/2003	9:54	2.3
1/22/2003	9:55	2.2
1/22/2003	9:56	2.1
1/22/2003	9:57	2.1
1/22/2003	9:58	2.2
1/22/2003	9:59	3.1
1/22/2003	10:00	2.7
1/22/2003	10:01	2.4
1/22/2003	10:02	2.2
1/22/2003	10:03	2.3
1/22/2003	10:04	2.3
1/22/2003	10:05	2.4
1/22/2003	10:06	2.3
1/22/2003	10:07	2.1
1/22/2003	10:08	2
1/22/2003	10:09	2
1/22/2003	10:10	2
1/22/2003	10:11	1.9
1/22/2003	10:12	1.9
1/22/2003	10:13	1.9
1/22/2003	10:14	1.9
1/22/2003	10:15	2
1/22/2003	10:16	2.1
1/22/2003	10:17	2.3
1/22/2003	10:18	2.3
1/22/2003	10:19	2.2
1/22/2003	10:20	2.1
1/22/2003	10:21	5.3
1/22/2003	10:22	6.3
1/22/2003	10:23	2.6
1/22/2003	10:24	2.1
1/22/2003	10:25	2.2
1/22/2003	10:26	2.3
1/22/2003	10:27	2.4
1/22/2003	10:28	6.5
1/22/2003	10:29	3
1/22/2003	10:30	2.5
1/22/2003	10:31	3.1
1/22/2003	10:32	13.5
1/22/2003	10:33	33.1
1/22/2003	10:34	25.8
1/22/2003	10:35	24.8
1/22/2003	10:36	16.6
1/22/2003	10:37	11.3
1/22/2003	10:38	4.6
1/22/2003	10:39	3.1
1/22/2003	10:40	3
1/22/2003	10:41	2.7
1/22/2003	10:42	3
1/22/2003	10:43	2.8
1/22/2003	10:44	2.3
1/22/2003	10:45	2.2
1/22/2003	10:46	2.4
1/22/2003	10:47	5
1/22/2003	10:48	3.1
1/22/2003	10:49	2.4
1/22/2003	10:50	2.6
1/22/2003	10:51	2.3
1/22/2003	10:52	2.7
1/22/2003	10:53	2.6
1/22/2003	10:54	2.2
1/22/2003	10:55	2.1
1/22/2003	10:56	2.2
1/22/2003	10:57	2.1
1/22/2003	10:58	2.2
1/22/2003	10:59	2.1
1/22/2003	11:00	2.2
1/22/2003	11:01	2.3
1/22/2003	11:02	2.1
1/22/2003	11:03	2.3
1/22/2003	11:04	2.1
1/22/2003	11:05	2.3
1/22/2003	11:06	2.2
1/22/2003	11:07	2.1
1/22/2003	11:08	2.3
1/22/2003	11:09	2.1
1/22/2003	11:10	2.4
1/22/2003	11:11	2.3
1/22/2003	11:12	2.2
1/22/2003	11:13	2
1/22/2003	11:14	2.3
1/22/2003	11:15	2.3
1/22/2003	11:16	2.5
1/22/2003	11:17	2.4
1/22/2003	11:18	2.5
1/22/2003	11:19	2.6
1/22/2003	11:20	2.4
1/22/2003	11:21	2.6
1/22/2003	11:22	2.3
1/22/2003	11:23	2.4
1/22/2003	11:24	2.5
1/22/2003	11:25	2.3
1/22/2003	11:26	2.3
1/22/2003	11:27	2.3
1/22/2003	11:28	2.4
1/22/2003	11:29	2.6
1/22/2003	11:30	2.4
1/22/2003	11:31	2.4
1/22/2003	11:32	2.4
1/22/2003	11:33	2.4
1/22/2003	11:34	2.3
1/22/2003	11:35	2.3
1/22/2003	11:36	2.2
1/22/2003	11:37	2.1
1/22/2003	11:38	2.5
1/22/2003	11:39	2.2
1/22/2003	11:40	5.4
1/22/2003	11:41	3.9
1/22/2003	11:42	3.5
Final Average*		3.4
Maximum*		33.1
Minimum*		1.9

*Does not include Invalid Averaging Periods ("N.

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Average Values Report
Generated: 04/07/05 12:28

Company:	Okeelanta CoGen		Period Start:	01/22/03	12:17
Plant:			Period End:	01/22/03	13:20
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 1		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
1/22/2003	12:17	2.3
1/22/2003	12:18	2.1
1/22/2003	12:19	2.4
1/22/2003	12:20	2.4
1/22/2003	12:21	2.3
1/22/2003	12:22	2.3
1/22/2003	12:23	2.3
1/22/2003	12:24	2.4
1/22/2003	12:25	2.5
1/22/2003	12:26	2.5
1/22/2003	12:27	2.6
1/22/2003	12:28	2.3
1/22/2003	12:29	2.3
1/22/2003	12:30	2.3
1/22/2003	12:31	2.2
1/22/2003	12:32	2.2
1/22/2003	12:33	2.1
1/22/2003	12:34	2.1
1/22/2003	12:35	2.2
1/22/2003	12:36	2.3
1/22/2003	12:37	2.7
1/22/2003	12:38	2.4
1/22/2003	12:39	2.3
1/22/2003	12:40	2.5
1/22/2003	12:41	2.6
1/22/2003	12:42	2.6
1/22/2003	12:43	2.7
1/22/2003	12:44	2.9
1/22/2003	12:45	2.6
1/22/2003	12:46	2.5
1/22/2003	12:47	2.4
1/22/2003	12:48	2.4
1/22/2003	12:49	2.3
1/22/2003	12:50	2.4
1/22/2003	12:51	2.4
1/22/2003	12:52	2.5
1/22/2003	12:53	2.5
1/22/2003	12:54	2.4
1/22/2003	12:55	2.5
1/22/2003	12:56	2.4
1/22/2003	12:57	2.3
1/22/2003	12:58	2.3
1/22/2003	12:59	2.2
1/22/2003	13:00	2.3
1/22/2003	13:01	2.3
1/22/2003	13:02	2.3
1/22/2003	13:03	2.4
1/22/2003	13:04	2.8
1/22/2003	13:05	2.4
1/22/2003	13:06	2.4
1/22/2003	13:07	2.4
1/22/2003	13:08	2.4
1/22/2003	13:09	2.5
1/22/2003	13:10	2.2
1/22/2003	13:11	2.3
1/22/2003	13:12	2.3
1/22/2003	13:13	2.4
1/22/2003	13:14	2.2
1/22/2003	13:15	2.8
1/22/2003	13:16	2.6
1/22/2003	13:17	2.6
1/22/2003	13:18	4.2
1/22/2003	13:19	2.4
1/22/2003	13:20	2.4
Final Average*		2.4
Maximum*		4.2
Minimum*		2.1

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 04/07/05 12:30

Company:	Okeelanta CoGen		Period Start:	01/22/03	14:03
Plant:			Period End:	01/22/03	15:06
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 1		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
1/22/2003	14:03	2
1/22/2003	14:04	2.3
1/22/2003	14:05	2
1/22/2003	14:06	2
1/22/2003	14:07	2
1/22/2003	14:08	1.9
1/22/2003	14:09	1.9
1/22/2003	14:10	2
1/22/2003	14:11	2
1/22/2003	14:12	2
1/22/2003	14:13	2.3
1/22/2003	14:14	2.2
1/22/2003	14:15	2.2
1/22/2003	14:16	2
1/22/2003	14:17	2
1/22/2003	14:18	2
1/22/2003	14:19	2.2
1/22/2003	14:20	2.1
1/22/2003	14:21	2.3
1/22/2003	14:22	2
1/22/2003	14:23	2
1/22/2003	14:24	2
1/22/2003	14:25	2
1/22/2003	14:26	1.9
1/22/2003	14:27	1.9
1/22/2003	14:28	1.8
1/22/2003	14:29	1.9
1/22/2003	14:30	2
1/22/2003	14:31	1.9
1/22/2003	14:32	1.9
1/22/2003	14:33	1.9
1/22/2003	14:34	2
1/22/2003	14:35	2.1
1/22/2003	14:36	2
1/22/2003	14:37	2.2
1/22/2003	14:38	2.2
1/22/2003	14:39	2.3
1/22/2003	14:40	2.1
1/22/2003	14:41	2
1/22/2003	14:42	2
1/22/2003	14:43	2
1/22/2003	14:44	2.1
1/22/2003	14:45	2
1/22/2003	14:46	2.1
1/22/2003	14:47	2.2
1/22/2003	14:48	2.2
1/22/2003	14:49	2.1
1/22/2003	14:50	2.3
1/22/2003	14:51	2.1
1/22/2003	14:52	2.2
1/22/2003	14:53	2
1/22/2003	14:54	1.9
1/22/2003	14:55	2.3
1/22/2003	14:56	2.2
1/22/2003	14:57	2.2
1/22/2003	14:58	2.1
1/22/2003	14:59	2.1
1/22/2003	15:00	2
1/22/2003	15:01	2.6
1/22/2003	15:02	2.2
1/22/2003	15:03	2.3
1/22/2003	15:04	8.1
1/22/2003	15:05	2.8
1/22/2003	15:06	2.5
Final Average*		2.2
Maximum*		8.1
Minimum*		1.8

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 04/07/05 12:33

Company:	Okeelanta CoGen		Period Start:	01/23/03	10:58
Plant:			Period End:	01/23/03	12:01
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 2		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
1/23/2003	10:58	3.6
1/23/2003	10:59	3.7
1/23/2003	11:00	3.6
1/23/2003	11:01	3.6
1/23/2003	11:02	3.8
1/23/2003	11:03	3.7
1/23/2003	11:04	4
1/23/2003	11:05	3.6
1/23/2003	11:06	3.6
1/23/2003	11:07	3.7
1/23/2003	11:08	4.9
1/23/2003	11:09	3.7
1/23/2003	11:10	3.7
1/23/2003	11:11	3.6
1/23/2003	11:12	3.6
1/23/2003	11:13	3.6
1/23/2003	11:14	3.6
1/23/2003	11:15	3.7
1/23/2003	11:16	3.7
1/23/2003	11:17	3.6
1/23/2003	11:18	3.9
1/23/2003	11:19	3.6
1/23/2003	11:20	3.6
1/23/2003	11:21	3.6
1/23/2003	11:22	3.7
1/23/2003	11:23	3.7
1/23/2003	11:24	3.8
1/23/2003	11:25	3.7
1/23/2003	11:26	3.8
1/23/2003	11:27	3.8
1/23/2003	11:28	3.8
1/23/2003	11:29	3.7
1/23/2003	11:30	3.7
1/23/2003	11:31	3.8
1/23/2003	11:32	3.8
1/23/2003	11:33	3.7
1/23/2003	11:34	3.6
1/23/2003	11:35	3.7
1/23/2003	11:36	3.6
1/23/2003	11:37	3.8
1/23/2003	11:38	3.8
1/23/2003	11:39	3.6
1/23/2003	11:40	3.9
1/23/2003	11:41	3.8
1/23/2003	11:42	3.7
1/23/2003	11:43	4
1/23/2003	11:44	4
1/23/2003	11:45	3.8
1/23/2003	11:46	3.6
1/23/2003	11:47	3.7
1/23/2003	11:48	3.6
1/23/2003	11:49	3.6
1/23/2003	11:50	3.6
1/23/2003	11:51	3.6
1/23/2003	11:52	4.1
1/23/2003	11:53	3.6
1/23/2003	11:54	3.7
1/23/2003	11:55	3.6
1/23/2003	11:56	3.6
1/23/2003	11:57	3.6
1/23/2003	11:58	3.9
1/23/2003	11:59	3.7
1/23/2003	12:00	3.6
1/23/2003	12:01	4.1
Final Average*		3.7
Maximum*		4.9
Minimum*		3.6

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 04/07/05 12:35

Company:	Okeelanta CoGen		Period Start:	01/23/03	12:31
Plant:			Period End:	01/23/03	13:34
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 2		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
1/23/2003	12:31	3.6
1/23/2003	12:32	3.6
1/23/2003	12:33	3.6
1/23/2003	12:34	3.6
1/23/2003	12:35	3.5
1/23/2003	12:36	3.6
1/23/2003	12:37	3.5
1/23/2003	12:38	3.6
1/23/2003	12:39	3.6
1/23/2003	12:40	3.6
1/23/2003	12:41	3.6
1/23/2003	12:42	3.6
1/23/2003	12:43	3.6
1/23/2003	12:44	3.6
1/23/2003	12:45	3.6
1/23/2003	12:46	3.6
1/23/2003	12:47	3.6
1/23/2003	12:48	3.6
1/23/2003	12:49	3.5
1/23/2003	12:50	3.5
1/23/2003	12:51	3.6
1/23/2003	12:52	3.5
1/23/2003	12:53	3.6
1/23/2003	12:54	3.5
1/23/2003	12:55	3.5
1/23/2003	12:56	3.6
1/23/2003	12:57	3.6
1/23/2003	12:58	3.6
1/23/2003	12:59	3.4
1/23/2003	13:00	3.6
1/23/2003	13:01	3.5
1/23/2003	13:02	3.6
1/23/2003	13:03	3.5
1/23/2003	13:04	3.6
1/23/2003	13:05	3.5
1/23/2003	13:06	3.6
1/23/2003	13:07	3.5
1/23/2003	13:08	3.6
1/23/2003	13:09	3.8
1/23/2003	13:10	4.8
1/23/2003	13:11	3.7
1/23/2003	13:12	3.7
1/23/2003	13:13	3.7
1/23/2003	13:14	3.6
1/23/2003	13:15	3.7
1/23/2003	13:16	3.7
1/23/2003	13:17	3.8
1/23/2003	13:18	3.7
1/23/2003	13:19	3.6
1/23/2003	13:20	3.7
1/23/2003	13:21	3.6
1/23/2003	13:22	3.6
1/23/2003	13:23	3.6
1/23/2003	13:24	3.5
1/23/2003	13:25	3.5
1/23/2003	13:26	3.6
1/23/2003	13:27	3.6
1/23/2003	13:28	4.2
1/23/2003	13:29	7.5
1/23/2003	13:30	6.2
1/23/2003	13:31	7
1/23/2003	13:32	4.8
1/23/2003	13:33	4.2
1/23/2003	13:34	4.4
Final Average*		3.8
Maximum*		7.5
Minimum*		3.4

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 04/07/05 12:36

Company:	Okeelanta CoGen		Period Start:	01/23/03	14:01
Plant:			Period End:	01/23/03	15:04
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 2		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
1/23/2003	14:01	3.3
1/23/2003	14:02	3.3
1/23/2003	14:03	3.5
1/23/2003	14:04	3.3
1/23/2003	14:05	3.2
1/23/2003	14:06	3.5
1/23/2003	14:07	3.5
1/23/2003	14:08	3.7
1/23/2003	14:09	3.6
1/23/2003	14:10	3.7
1/23/2003	14:11	3.7
1/23/2003	14:12	3.8
1/23/2003	14:13	3.7
1/23/2003	14:14	3.6
1/23/2003	14:15	3.4
1/23/2003	14:16	3.4
1/23/2003	14:17	3.4
1/23/2003	14:18	3.4
1/23/2003	14:19	3.6
1/23/2003	14:20	3.4
1/23/2003	14:21	3.4
1/23/2003	14:22	3.4
1/23/2003	14:23	3.4
1/23/2003	14:24	3.4
1/23/2003	14:25	3.3
1/23/2003	14:26	3.4
1/23/2003	14:27	3.3
1/23/2003	14:28	3.6
1/23/2003	14:29	3.6
1/23/2003	14:30	3.5
1/23/2003	14:31	3.6
1/23/2003	14:32	3.4
1/23/2003	14:33	3.2
1/23/2003	14:34	3.2
1/23/2003	14:35	3.1
1/23/2003	14:36	3.1
1/23/2003	14:37	3.1
1/23/2003	14:38	3.3
1/23/2003	14:39	3.3
1/23/2003	14:40	3.3
1/23/2003	14:41	3.2
1/23/2003	14:42	3.5
1/23/2003	14:43	3.4
1/23/2003	14:44	3.3
1/23/2003	14:45	3.3
1/23/2003	14:46	3.3
1/23/2003	14:47	3.3
1/23/2003	14:48	3.6
1/23/2003	14:49	3.5
1/23/2003	14:50	3.5
1/23/2003	14:51	3.5
1/23/2003	14:52	4.1
1/23/2003	14:53	3.6
1/23/2003	14:54	3.6
1/23/2003	14:55	3.8
1/23/2003	14:56	3.8
1/23/2003	14:57	3.8
1/23/2003	14:58	3.6
1/23/2003	14:59	3.7
1/23/2003	15:00	3.5
1/23/2003	15:01	6.5
1/23/2003	15:02	4
1/23/2003	15:03	3.8
1/23/2003	15:04	4.1
Final Average*		3.5
Maximum*		6.5
Minimum*		3.1

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 04/07/05 12:39

Company:	Okeelanta CoGen		Period Start:	01/21/03	12:16
Plant:			Period End:	01/21/03	13:21
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 3		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
1/21/2003	12:16	0.2
1/21/2003	12:17	0
1/21/2003	12:18	-0.1
1/21/2003	12:19	-0.1
1/21/2003	12:20	-0.1
1/21/2003	12:21	0
1/21/2003	12:22	0.1
1/21/2003	12:23	-0.1
1/21/2003	12:24	-0.1
1/21/2003	12:25	-0.1
1/21/2003	12:26	-0.1
1/21/2003	12:27	-0.2
1/21/2003	12:28	0
1/21/2003	12:29	-0.2
1/21/2003	12:30	-0.1
1/21/2003	12:31	0
1/21/2003	12:32	-0.1
1/21/2003	12:33	-0.2
1/21/2003	12:34	-0.1
1/21/2003	12:35	-0.1
1/21/2003	12:36	0
1/21/2003	12:37	-0.2
1/21/2003	12:38	-0.1
1/21/2003	12:39	-0.1
1/21/2003	12:40	-0.1
1/21/2003	12:41	-0.2
1/21/2003	12:42	-0.2
1/21/2003	12:43	-0.2
1/21/2003	12:44	-0.3
1/21/2003	12:45	0.2
1/21/2003	12:46	1
1/21/2003	12:47	0.2
1/21/2003	12:48	0
1/21/2003	12:49	0
1/21/2003	12:50	0.5
1/21/2003	12:51	-0.1
1/21/2003	12:52	0
1/21/2003	12:53	-0.1
1/21/2003	12:54	0
1/21/2003	12:55	0.1
1/21/2003	12:56	0.2
1/21/2003	12:57	-0.1
1/21/2003	12:58	-0.1
1/21/2003	12:59	-0.1
1/21/2003	13:00	-0.1
1/21/2003	13:01	-0.2
1/21/2003	13:02	-0.2
1/21/2003	13:03	-0.1
1/21/2003	13:04	0.1
1/21/2003	13:05	0.1
1/21/2003	13:06	-0.2
1/21/2003	13:07	-0.1
1/21/2003	13:08	-0.1
1/21/2003	13:09	0
1/21/2003	13:10	0.2
1/21/2003	13:11	-0.1
1/21/2003	13:12	0
1/21/2003	13:13	0
1/21/2003	13:14	0.1
1/21/2003	13:15	0.1
1/21/2003	13:16	0.6
1/21/2003	13:17	-0.1
1/21/2003	13:18	-0.1
1/21/2003	13:19	0
1/21/2003	13:20	0.3
1/21/2003	13:21	0.8
Final Average*		0
Maximum*		1
Minimum*		-0.3

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 04/07/05 12:40

Company:	Okeelanta CoGen	Period Start:	01/21/03	14:07
Plant:		Period End:	01/21/03	15:10
City/St:	South Bay, FL	Validation Type:	1/1 min	
Source:	Stack 3	Averaging Period:	1 min	
		Type:	Block Avg	

Period Start		Average Opacity_1 %
1/21/2003	14:07	-0.1
1/21/2003	14:08	-0.1
1/21/2003	14:09	-0.2
1/21/2003	14:10	-0.1
1/21/2003	14:11	-0.1
1/21/2003	14:12	-0.2
1/21/2003	14:13	-0.2
1/21/2003	14:14	-0.1
1/21/2003	14:15	0.1
1/21/2003	14:16	-0.1
1/21/2003	14:17	-0.1
1/21/2003	14:18	0.2
1/21/2003	14:19	-0.2
1/21/2003	14:20	0.8
1/21/2003	14:21	0
1/21/2003	14:22	-0.3
1/21/2003	14:23	-0.3
1/21/2003	14:24	-0.3
1/21/2003	14:25	0.1
1/21/2003	14:26	-0.1
1/21/2003	14:27	0.1
1/21/2003	14:28	0
1/21/2003	14:29	-0.3
1/21/2003	14:30	-0.2
1/21/2003	14:31	-0.2
1/21/2003	14:32	-0.1
1/21/2003	14:33	-0.2
1/21/2003	14:34	-0.3
1/21/2003	14:35	0
1/21/2003	14:36	-0.1
1/21/2003	14:37	-0.2
1/21/2003	14:38	-0.3
1/21/2003	14:39	-0.2
1/21/2003	14:40	-0.3
1/21/2003	14:41	-0.2
1/21/2003	14:42	-0.2
1/21/2003	14:43	-0.3
1/21/2003	14:44	-0.2
1/21/2003	14:45	-0.4
1/21/2003	14:46	-0.4
1/21/2003	14:47	-0.3
1/21/2003	14:48	-0.3
1/21/2003	14:49	-0.3
1/21/2003	14:50	-0.4
1/21/2003	14:51	-0.4
1/21/2003	14:52	-0.3
1/21/2003	14:53	-0.3
1/21/2003	14:54	-0.4
1/21/2003	14:55	-0.4
1/21/2003	14:56	-0.4
1/21/2003	14:57	-0.3
1/21/2003	14:58	-0.5
1/21/2003	14:59	-0.3
1/21/2003	15:00	-0.4
1/21/2003	15:01	-0.3
1/21/2003	15:02	-0.5
1/21/2003	15:03	-0.4
1/21/2003	15:04	-0.2
1/21/2003	15:05	-0.3
1/21/2003	15:06	0
1/21/2003	15:07	-0.3
1/21/2003	15:08	-0.2
1/21/2003	15:09	0.3
1/21/2003	15:10	-0.2
Final Average*		-0.2
Maximum*		0.8
Minimum*		-0.5

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 04/07/05 12:42

Company:	Okeelanta CoGen		Period Start:	01/21/03	16:13
Plant:			Period End:	01/21/03	17:24
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 3		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
1/21/2003	16:13	1.6
1/21/2003	16:14	0.8
1/21/2003	16:15	1.3
1/21/2003	16:16	0.8
1/21/2003	16:17	4
1/21/2003	16:18	4
1/21/2003	16:19	0.1
1/21/2003	16:20	-0.1
1/21/2003	16:21	0
1/21/2003	16:22	-0.1
1/21/2003	16:23	-0.1
1/21/2003	16:24	0.1
1/21/2003	16:25	0
1/21/2003	16:26	-0.1
1/21/2003	16:27	0.3
1/21/2003	16:28	0
1/21/2003	16:29	0.2
1/21/2003	16:30	-0.1
1/21/2003	16:31	-0.1
1/21/2003	16:32	-0.1
1/21/2003	16:33	0.3
1/21/2003	16:34	0
1/21/2003	16:35	-0.3
1/21/2003	16:36	-0.3
1/21/2003	16:37	-0.4
1/21/2003	16:38	-0.3
1/21/2003	16:39	-0.3
1/21/2003	16:40	-0.4
1/21/2003	16:41	-0.3
1/21/2003	16:42	-0.1
1/21/2003	16:43	-0.3
1/21/2003	16:44	-0.3
1/21/2003	16:45	-0.2
1/21/2003	16:46	-0.1
1/21/2003	16:47	-0.2
1/21/2003	16:48	-0.3
1/21/2003	16:49	-0.1
1/21/2003	16:50	0
1/21/2003	16:51	-0.2
1/21/2003	16:52	0
1/21/2003	16:53	0
1/21/2003	16:54	0
1/21/2003	16:55	0
1/21/2003	16:56	0.1
1/21/2003	16:57	0
1/21/2003	16:58	0
1/21/2003	16:59	-0.1
1/21/2003	17:00	-0.2
1/21/2003	17:01	-0.1
1/21/2003	17:02	0.2
1/21/2003	17:03	-0.1
1/21/2003	17:04	-0.1
1/21/2003	17:05	-0.2
1/21/2003	17:06	-0.1
1/21/2003	17:07	-0.1
1/21/2003	17:08	0
1/21/2003	17:09	0.1
1/21/2003	17:10	0.2
1/21/2003	17:11	0.2
1/21/2003	17:12	0.1
1/21/2003	17:13	0.1
1/21/2003	17:14	0.1
1/21/2003	17:15	0.1
1/21/2003	17:16	0.1
1/21/2003	17:17	0.2
1/21/2003	17:18	0.1
1/21/2003	17:19	0.2
1/21/2003	17:20	0.1
1/21/2003	17:21	0.7
1/21/2003	17:22	0.6
1/21/2003	17:23	0.2
1/21/2003	17:24	0
Final Average*		0.2
Maximum*		4
Minimum*		-0.4

*Does not include Invalid Averaging Periods ("N/A")

2002

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Average Values Report
Generated: 04/07/05 13:12

Company:	Okeelanta CoGen	Period Start:	02/13/02	10:16
Plant:		Period End:	02/13/02	11:19
City/St:	South Bay, FL	Validation Type:	1/1 min	
Source:	Stack 1	Averaging Period:	1 min	
		Type:	Block Avg	

Period Start		Average Opacity_1 %
2/13/2002	10:16	4.6
2/13/2002	10:17	4.5
2/13/2002	10:18	5.1
2/13/2002	10:19	4.8
2/13/2002	10:20	5.5
2/13/2002	10:21	6.7
2/13/2002	10:22	5.1
2/13/2002	10:23	4.2
2/13/2002	10:24	4.5
2/13/2002	10:25	4.4
2/13/2002	10:26	4.4
2/13/2002	10:27	5.4
2/13/2002	10:28	5
2/13/2002	10:29	5.4
2/13/2002	10:30	4.9
2/13/2002	10:31	5.2
2/13/2002	10:32	4.9
2/13/2002	10:33	5.4
2/13/2002	10:34	5.5
2/13/2002	10:35	5.3
2/13/2002	10:36	4.6
2/13/2002	10:37	4.8
2/13/2002	10:38	5.5
2/13/2002	10:39	4.5
2/13/2002	10:40	4.5
2/13/2002	10:41	4.9
2/13/2002	10:42	4.5
2/13/2002	10:43	4.3
2/13/2002	10:44	4.5
2/13/2002	10:45	4.6
2/13/2002	10:46	4.8
2/13/2002	10:47	6
2/13/2002	10:48	4.8
2/13/2002	10:49	4.9
2/13/2002	10:50	4.9
2/13/2002	10:51	4.6
2/13/2002	10:52	5
2/13/2002	10:53	4.7
2/13/2002	10:54	5.6
2/13/2002	10:55	22.4
2/13/2002	10:56	6.8
2/13/2002	10:57	5.8
2/13/2002	10:58	5.9
2/13/2002	10:59	5.7
2/13/2002	11:00	6.2
2/13/2002	11:01	5.3
2/13/2002	11:02	5.5
2/13/2002	11:03	5.4
2/13/2002	11:04	5.9
2/13/2002	11:05	6
2/13/2002	11:06	5.7
2/13/2002	11:07	6.2
2/13/2002	11:08	6.4
2/13/2002	11:09	6
2/13/2002	11:10	5.1
2/13/2002	11:11	5.5
2/13/2002	11:12	7.2
2/13/2002	11:13	6.3
2/13/2002	11:14	6
2/13/2002	11:15	4.9
2/13/2002	11:16	5.3
2/13/2002	11:17	5
2/13/2002	11:18	5.2
2/13/2002	13:20	2.4
Final Average*		5.5
Maximum*		22.4
Minimum*		4.2

*Does not include Invalid Averaging Periods ("N/A")

GE Energy Services NetDAHS©
Average Values Report
Generated: 04/07/05 13:15

Company:	Okeelanta CoGen		Period Start:	02/13/02	12:09
Plant:			Period End:	02/13/02	13:13
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 1		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
2/13/2002	12:09	4
2/13/2002	12:10	3.9
2/13/2002	12:11	4.4
2/13/2002	12:12	3.6
2/13/2002	12:13	3.7
2/13/2002	12:14	3.5
2/13/2002	12:15	3.5
2/13/2002	12:16	3.5
2/13/2002	12:17	3.6
2/13/2002	12:18	3.7
2/13/2002	12:19	3.7
2/13/2002	12:20	3.9
2/13/2002	12:21	4.3
2/13/2002	12:22	3.7
2/13/2002	12:23	3.7
2/13/2002	12:24	3.8
2/13/2002	12:25	3.7
2/13/2002	12:26	3.9
2/13/2002	12:27	3.8
2/13/2002	12:28	3.8
2/13/2002	12:29	3.7
2/13/2002	12:30	3.6
2/13/2002	12:31	3.7
2/13/2002	12:32	4.1
2/13/2002	12:33	5.1
2/13/2002	12:34	3.9
2/13/2002	12:35	3.8
2/13/2002	12:36	3.7
2/13/2002	12:37	3.7
2/13/2002	12:38	3.8
2/13/2002	12:39	3.9
2/13/2002	12:40	3.7
2/13/2002	12:41	3.7
2/13/2002	12:42	3.6
2/13/2002	12:43	3.8
2/13/2002	12:44	3.9
2/13/2002	12:45	3.6
2/13/2002	12:46	3.6
2/13/2002	12:47	3.8
2/13/2002	12:48	4.1
2/13/2002	12:49	4.1
2/13/2002	12:50	3.9

Period Start		Average Opacity_1 %
2/13/2002	12:51	6
2/13/2002	12:52	4.3
2/13/2002	12:53	4.9
2/13/2002	12:54	4.6
2/13/2002	12:55	5.4
2/13/2002	12:56	4.4
2/13/2002	12:57	4.1
2/13/2002	12:58	4
2/13/2002	12:59	4.5
2/13/2002	13:00	4
2/13/2002	13:01	4.2
2/13/2002	13:02	4
2/13/2002	13:03	4.1
2/13/2002	13:04	4
2/13/2002	13:05	32.6
2/13/2002	13:06	13.9
2/13/2002	13:07	5.9
2/13/2002	13:08	5.6
2/13/2002	13:09	4.9
2/13/2002	13:10	5
2/13/2002	13:11	4.6
2/13/2002	13:12	4.9
2/13/2002	13:13	4.5
Final Average*		4.7
Maximum*		32.6
Minimum*		3.5

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 04/07/05 13:17

Company:	Okeelanta CoGen	Period Start:	02/13/02	13:44
Plant:		Period End:	02/13/02	14:48
City/St:	South Bay, FL	Validation Type:	1/1 min	
Source:	Stack 1	Averaging Period:	1 min	
		Type:	Block Avg	

Period Start		Average Opacity_1 %
2/13/2002	13:44	3.9
2/13/2002	13:45	4
2/13/2002	13:46	3.9
2/13/2002	13:47	4.2
2/13/2002	13:48	3.8
2/13/2002	13:49	3.7
2/13/2002	13:50	3.6
2/13/2002	13:51	3.5
2/13/2002	13:52	3.8
2/13/2002	13:53	3.6
2/13/2002	13:54	3.8
2/13/2002	13:55	3.9
2/13/2002	13:56	3.7
2/13/2002	13:57	4.4
2/13/2002	13:58	3.6
2/13/2002	13:59	3.5
2/13/2002	14:00	3.4
2/13/2002	14:01	3.5
2/13/2002	14:02	3.6
2/13/2002	14:03	3.5
2/13/2002	14:04	3.5
2/13/2002	14:05	3.7
2/13/2002	14:06	3.9
2/13/2002	14:07	4
2/13/2002	14:08	3.6
2/13/2002	14:09	3.5
2/13/2002	14:10	3.4
2/13/2002	14:11	3.5
2/13/2002	14:12	3.5
2/13/2002	14:13	3.6
2/13/2002	14:14	3.6
2/13/2002	14:15	3.5
2/13/2002	14:16	22.3
2/13/2002	14:17	7.8
2/13/2002	14:18	5.2
2/13/2002	14:19	4.5
2/13/2002	14:20	4.3
2/13/2002	14:21	4.1
2/13/2002	14:22	4.2
2/13/2002	14:23	4.3
2/13/2002	14:24	4.2
2/13/2002	14:25	4
2/13/2002	14:26	3.8
2/13/2002	14:27	4.4
2/13/2002	14:28	4
2/13/2002	14:29	4
2/13/2002	14:30	3.9
2/13/2002	14:31	4.1
2/13/2002	14:32	4
2/13/2002	14:33	4
2/13/2002	14:34	4.5
2/13/2002	14:35	4.4
2/13/2002	14:36	3.9
2/13/2002	14:37	4.1
2/13/2002	14:38	4.1
2/13/2002	14:39	3.9
2/13/2002	14:40	3.9
2/13/2002	14:41	3.8
2/13/2002	14:42	3.9
2/13/2002	14:43	3.6
2/13/2002	14:44	3.7
2/13/2002	14:45	3.9
2/13/2002	14:46	3.9
2/13/2002	14:47	3.7
2/13/2002	14:48	3.7
Final Average*		4.2
Maximum*		22.3
Minimum*		3.4

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 04/07/05 13:19

Company:	Okeelanta CoGen	Period Start:	02/14/02	09:35
Plant:		Period End:	02/14/02	10:39
City/St:	South Bay, FL	Validation Type:	1/1 min	
Source:	Stack 2	Averaging Period:	1 min	
		Type:	Block Avg	

Period Start		Average Opacity_1 %
2/14/2002	9:35	4.8
2/14/2002	9:36	5
2/14/2002	9:37	4.6
2/14/2002	9:38	5.2
2/14/2002	9:39	4.8
2/14/2002	9:40	4.7
2/14/2002	9:41	5.1
2/14/2002	9:42	4.7
2/14/2002	9:43	4.6
2/14/2002	9:44	4.5
2/14/2002	9:45	4.7
2/14/2002	9:46	4.8
2/14/2002	9:47	4.8
2/14/2002	9:48	4.8
2/14/2002	9:49	4.8
2/14/2002	9:50	5
2/14/2002	9:51	5.5
2/14/2002	9:52	5.2
2/14/2002	9:53	4.9
2/14/2002	9:54	5.1
2/14/2002	9:55	5.4
2/14/2002	9:56	6.3
2/14/2002	9:57	5.7
2/14/2002	9:58	5.3
2/14/2002	9:59	5
2/14/2002	10:00	4.7
2/14/2002	10:01	5.1
2/14/2002	10:02	5.1
2/14/2002	10:03	4.8
2/14/2002	10:04	5.4
2/14/2002	10:05	5
2/14/2002	10:06	5.2
2/14/2002	10:07	5.7
2/14/2002	10:08	5.2
2/14/2002	10:09	5.3
2/14/2002	10:10	5.2
2/14/2002	10:11	5.4
2/14/2002	10:12	6.1
2/14/2002	10:13	5.1
2/14/2002	10:14	5
2/14/2002	10:15	4.7
2/14/2002	10:16	4.8
2/14/2002	10:17	4.8
2/14/2002	10:18	5
2/14/2002	10:19	5.5
2/14/2002	10:20	5
2/14/2002	10:21	5.1
2/14/2002	10:22	5.3
2/14/2002	10:23	4.7
2/14/2002	10:24	5.6
2/14/2002	10:25	5.3
2/14/2002	10:26	4.8
2/14/2002	10:27	5.1
2/14/2002	10:28	5.1
2/14/2002	10:29	5.1
2/14/2002	10:30	5.1
2/14/2002	10:31	5.4
2/14/2002	10:32	5.3
2/14/2002	10:33	5.4
2/14/2002	10:34	5.3
2/14/2002	10:35	4.8
2/14/2002	10:36	5.5
2/14/2002	10:37	5.4
2/14/2002	10:38	5.4
2/14/2002	10:39	3.7
Final Average*		5.1
Maximum*		6.3
Minimum*		4.5

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 04/07/05 13:20

Company:	Okeelanta CoGen		Period Start:	02/14/02	11:10
Plant:			Period End:	02/14/02	12:15
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 2		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
2/14/2002	11:10	4.5
2/14/2002	11:11	4.3
2/14/2002	11:12	4.1
2/14/2002	11:13	4.3
2/14/2002	11:14	4.1
2/14/2002	11:15	5.4
2/14/2002	11:16	4.2
2/14/2002	11:17	4.3
2/14/2002	11:18	4.2
2/14/2002	11:19	4.3
2/14/2002	11:20	4
2/14/2002	11:21	4.2
2/14/2002	11:22	4
2/14/2002	11:23	3.9
2/14/2002	11:24	3.8
2/14/2002	11:25	4.1
2/14/2002	11:26	4.7
2/14/2002	11:27	4.3
2/14/2002	11:28	3.9
2/14/2002	11:29	4
2/14/2002	11:30	4.2
2/14/2002	11:31	4.2
2/14/2002	11:32	4.1
2/14/2002	11:33	4.3
2/14/2002	11:34	4
2/14/2002	11:35	4
2/14/2002	11:36	4
2/14/2002	11:37	4.2
2/14/2002	11:38	4.5
2/14/2002	11:39	4.1
2/14/2002	11:40	4.2
2/14/2002	11:41	6.7
2/14/2002	11:42	4.3
2/14/2002	11:43	9.9
2/14/2002	11:44	4.7
2/14/2002	11:45	4.1
2/14/2002	11:46	4.1
2/14/2002	11:47	4
2/14/2002	11:48	4.1
2/14/2002	11:49	4.1
2/14/2002	11:50	3.9
2/14/2002	11:51	3.9
2/14/2002	11:52	4
2/14/2002	11:53	3.9
2/14/2002	11:54	4.1
2/14/2002	11:55	4.1
2/14/2002	11:56	4.1
2/14/2002	11:57	4
2/14/2002	11:58	3.9
2/14/2002	11:59	4.1
2/14/2002	12:00	4.2
2/14/2002	12:01	4.5
2/14/2002	12:02	4.1
2/14/2002	12:03	4
2/14/2002	12:04	3.9
2/14/2002	12:05	4
2/14/2002	12:06	4.2
2/14/2002	12:07	4.4
2/14/2002	12:08	4.2
2/14/2002	12:09	4.1
2/14/2002	12:10	4.4
2/14/2002	12:11	4
2/14/2002	12:12	4
2/14/2002	12:13	4.2
2/14/2002	12:14	4.3
2/14/2002	12:15	4.3
Final Average*		4.3
Maximum*		9.9
Minimum*		3.8

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 04/07/05 13:20

Company:	Okeelanta CoGen		Period Start:	02/14/02	12:49
Plant:			Period End:	02/14/02	13:54
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 2		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
2/14/2002	12:49	4.1
2/14/2002	12:50	4.1
2/14/2002	12:51	4
2/14/2002	12:52	4.2
2/14/2002	12:53	4.9
2/14/2002	12:54	4.2
2/14/2002	12:55	4
2/14/2002	12:56	4.1
2/14/2002	12:57	4
2/14/2002	12:58	4.1
2/14/2002	12:59	4
2/14/2002	13:00	3.9
2/14/2002	13:01	3.8
2/14/2002	13:02	3.6
2/14/2002	13:03	3.6
2/14/2002	13:04	3.6
2/14/2002	13:05	3.8
2/14/2002	13:06	3.9
2/14/2002	13:07	3.7
2/14/2002	13:08	3.6
2/14/2002	13:09	3.7
2/14/2002	13:10	3.8
2/14/2002	13:11	3.8
2/14/2002	13:12	3.6
2/14/2002	13:13	3.5
2/14/2002	13:14	3.5
2/14/2002	13:15	3.6
2/14/2002	13:16	3.6
2/14/2002	13:17	3.6
2/14/2002	13:18	3.9
2/14/2002	13:19	3.8
2/14/2002	13:20	3.6
2/14/2002	13:21	3.7
2/14/2002	13:22	3.7
2/14/2002	13:23	3.6
2/14/2002	13:24	3.6
2/14/2002	13:25	3.5
2/14/2002	13:26	3.6
2/14/2002	13:27	3.6
2/14/2002	13:28	3.7
2/14/2002	13:29	3.7
2/14/2002	13:30	3.9

Period Start		Average Opacity_1 %
2/14/2002	13:31	4
2/14/2002	13:32	3.8
2/14/2002	13:33	3.5
2/14/2002	13:34	4.1
2/14/2002	13:35	4.1
2/14/2002	13:36	5.2
2/14/2002	13:37	4.8
2/14/2002	13:38	3.9
2/14/2002	13:39	3.8
2/14/2002	13:40	3.9
2/14/2002	13:41	4
2/14/2002	13:42	3.8
2/14/2002	13:43	4.1
2/14/2002	13:44	3.7
2/14/2002	13:45	3.7
2/14/2002	13:46	3.7
2/14/2002	13:47	3.6
2/14/2002	13:48	3.8
2/14/2002	13:49	3.5
2/14/2002	13:50	3.5
2/14/2002	13:51	3.6
2/14/2002	13:52	3.7
2/14/2002	13:53	3.7
2/14/2002	13:54	4.3
Final Average*		3.8
Maximum*		5.2
Minimum*		3.5

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 04/07/05 13:24

Company:	Okeelanta CoGen		Period Start:	02/12/02	10:14
Plant:			Period End:	02/12/02	11:19
City/St:	South Bay, FL		Validation Type:	1/1 min	
Source:	Stack 3		Averaging Period:	1 min	
			Type:	Block Avg	

Period Start		Average Opacity_1 %
2/12/2002	10:14	3.7
2/12/2002	10:15	3.8
2/12/2002	10:16	3.9
2/12/2002	10:17	3.8
2/12/2002	10:18	3.6
2/12/2002	10:19	3.6
2/12/2002	10:20	3.6
2/12/2002	10:21	3.6
2/12/2002	10:22	3.5
2/12/2002	10:23	3.6
2/12/2002	10:24	3.6
2/12/2002	10:25	3.6
2/12/2002	10:26	3.7
2/12/2002	10:27	3.6
2/12/2002	10:28	3.6
2/12/2002	10:29	3.8
2/12/2002	10:30	3.6
2/12/2002	10:31	3.7
2/12/2002	10:32	3.8
2/12/2002	10:33	4
2/12/2002	10:34	3.7
2/12/2002	10:35	6.5
2/12/2002	10:36	4.5
2/12/2002	10:37	4.2
2/12/2002	10:38	4
2/12/2002	10:39	4.2
2/12/2002	10:40	4.2
2/12/2002	10:41	45.5
2/12/2002	10:42	14.1
2/12/2002	10:43	9.7
2/12/2002	10:44	7.6
2/12/2002	10:45	6.7
2/12/2002	10:46	6.5
2/12/2002	10:47	5.7
2/12/2002	10:48	5.6
2/12/2002	10:49	5.3
2/12/2002	10:50	5
2/12/2002	10:51	5
2/12/2002	10:52	5.1
2/12/2002	10:53	4.7
2/12/2002	10:54	4.5
2/12/2002	10:55	4.8
2/12/2002	10:56	4.8
2/12/2002	10:57	4.6
2/12/2002	10:58	4.4
2/12/2002	10:59	4.4
2/12/2002	11:00	4.4
2/12/2002	11:01	4.5
2/12/2002	11:02	4.2
2/12/2002	11:03	4.1
2/12/2002	11:04	3.9
2/12/2002	11:05	4.2
2/12/2002	11:06	4
2/12/2002	11:07	4
2/12/2002	11:08	4
2/12/2002	11:09	4.1
2/12/2002	11:10	3.9
2/12/2002	11:11	3.9
2/12/2002	11:12	3.9
2/12/2002	11:13	3.8
2/12/2002	11:14	4.2
2/12/2002	11:15	4
2/12/2002	11:16	3.9
2/12/2002	11:17	3.8
2/12/2002	11:18	4
2/12/2002	11:19	3.9
Final Average*		5.1
Maximum*		45.5
Minimum*		3.5

*Does not include Invalid Averaging Periods ("N/A")

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Average Values Report
Generated: 04/07/05 13:25

Company:	Okeelanta CoGen	Period Start:	02/12/02	12:35
Plant:		Period End:	02/12/02	13:39
City/St:	South Bay, FL	Validation Type:	1/1 min	
Source:	Stack 3	Averaging Period:	1 min	
		Type:	Block Avg	

Period Start		Average Opacity_1 %
2/12/2002	12:35	3
2/12/2002	12:36	2.9
2/12/2002	12:37	3
2/12/2002	12:38	3
2/12/2002	12:39	3.1
2/12/2002	12:40	3
2/12/2002	12:41	3
2/12/2002	12:42	2.9
2/12/2002	12:43	2.9
2/12/2002	12:44	2.8
2/12/2002	12:45	2.7
2/12/2002	12:46	3
2/12/2002	12:47	2.9
2/12/2002	12:48	3
2/12/2002	12:49	3.1
2/12/2002	12:50	3.1
2/12/2002	12:51	3.1
2/12/2002	12:52	3
2/12/2002	12:53	3
2/12/2002	12:54	2.9
2/12/2002	12:55	3.1
2/12/2002	12:56	3
2/12/2002	12:57	3.1
2/12/2002	12:58	3
2/12/2002	12:59	3
2/12/2002	13:00	3.1
2/12/2002	13:01	3.2
2/12/2002	13:02	3
2/12/2002	13:03	3
2/12/2002	13:04	3
2/12/2002	13:05	2.9
2/12/2002	13:06	3.4
2/12/2002	13:07	3.5
2/12/2002	13:08	3.3
2/12/2002	13:09	3.3
2/12/2002	13:10	3.5
2/12/2002	13:11	3.3
2/12/2002	13:12	3.3
2/12/2002	13:13	3.4
2/12/2002	13:14	3.3
2/12/2002	13:15	3.4
2/12/2002	13:16	3.2
2/12/2002	13:17	3.4
2/12/2002	13:18	3.3
2/12/2002	13:19	3.2
2/12/2002	13:20	3.3
2/12/2002	13:21	3.1
2/12/2002	13:22	3
2/12/2002	13:23	3.4
2/12/2002	13:24	3.2
2/12/2002	13:25	3.1
2/12/2002	13:26	3
2/12/2002	13:27	3.2
2/12/2002	13:28	3.1
2/12/2002	13:29	3.1
2/12/2002	13:30	3.1
2/12/2002	13:31	3
2/12/2002	13:32	3.2
2/12/2002	13:33	3
2/12/2002	13:34	3.3
2/12/2002	13:35	3.3
2/12/2002	13:36	3.2
2/12/2002	13:37	3.1
2/12/2002	13:38	3.2
2/12/2002	13:39	3.3
Final Average*		3.1
Maximum*		3.5
Minimum*		2.7

*Does not include Invalid Averaging Periods ("N/A")

GE Energy Services NetDAHS©
Average Values Report
Generated: 04/07/05 13:27

Company:	Okeelanta CoGen	Period Start:	02/12/02	14:11
Plant:		Period End:	02/12/02	15:15
City/St:	South Bay, FL	Validation Type:	1/1 min	
Source:	Stack 3	Averaging Period:	1 min	
		Type:	Block Avg	

Period Start		Average Opacity_1 %
2/12/2002	14:11	3.1
2/12/2002	14:12	2.8
2/12/2002	14:13	3
2/12/2002	14:14	2.8
2/12/2002	14:15	2.8
2/12/2002	14:16	2.8
2/12/2002	14:17	2.8
2/12/2002	14:18	2.9
2/12/2002	14:19	2.9
2/12/2002	14:20	2.9
2/12/2002	14:21	3
2/12/2002	14:22	2.7
2/12/2002	14:23	2.8
2/12/2002	14:24	2.8
2/12/2002	14:25	3.1
2/12/2002	14:26	3
2/12/2002	14:27	3.1
2/12/2002	14:28	3.1
2/12/2002	14:29	2.9
2/12/2002	14:30	2.8
2/12/2002	14:31	3
2/12/2002	14:32	2.8
2/12/2002	14:33	3.1
2/12/2002	14:34	3.2
2/12/2002	14:35	3.3
2/12/2002	14:36	3
2/12/2002	14:37	3.1
2/12/2002	14:38	3.4
2/12/2002	14:39	3.5
2/12/2002	14:40	3.3
2/12/2002	14:41	3.3
2/12/2002	14:42	3.1
2/12/2002	14:43	3.5
2/12/2002	14:44	3.2
2/12/2002	14:45	3.4
2/12/2002	14:46	3.5
2/12/2002	14:47	3.7
2/12/2002	14:48	3.2
2/12/2002	14:49	3.5
2/12/2002	14:50	3.7
2/12/2002	14:51	3.6
2/12/2002	14:52	3.7
2/12/2002	14:53	3.7
2/12/2002	14:54	3.8
2/12/2002	14:55	3.8
2/12/2002	14:56	3.7
2/12/2002	14:57	4
2/12/2002	14:58	3.6
2/12/2002	14:59	3.6
2/12/2002	15:00	3.7
2/12/2002	15:01	3.9
2/12/2002	15:02	3.9
2/12/2002	15:03	3.8
2/12/2002	15:04	3.6
2/12/2002	15:05	3.8
2/12/2002	15:06	4.3
2/12/2002	15:07	4
2/12/2002	15:08	4.1
2/12/2002	15:09	4.2
2/12/2002	15:10	4
2/12/2002	15:11	3.9
2/12/2002	15:12	4.1
2/12/2002	15:13	4.3
2/12/2002	15:14	4.2
2/12/2002	15:15	4.2
Final Average*		3.4
Maximum*		4.3
Minimum*		2.7

*Does not include Invalid Averaging Periods ("N/A")