

# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

February 16, 2009

*Sent by Electronic Mail – Received Receipt Requested*

Mr. David Mulvay, Authorized Representative  
City of Lake Worth Utilities  
1900 2<sup>nd</sup> Avenue North  
Lake Worth, Florida 33461

Re: Request for Additional Information  
Project No. 0990045-007-AC  
Tom G. Smith Power Plant  
Authorization to Re-tube Fossil Fuel Steam Generator Unit 3

Dear Mr. Mulvay:

On January 22, 2009, we received your application and sufficient fee for an air construction permit to re-tube the fossil fuel steam generator Unit 3 at the existing Tom G. Smith Power Plant due to external tube failures that occurred in May 2008. The facility is located in Palm Beach County at 117 College Street in Lake Worth, Florida. The application indicates that the project is subject to general preconstruction review pursuant to Rule 62-210.300 of the Florida Administrative Code (F.A.C.). The application is incomplete. In order to continue processing your application, please provide the additional information requested below. Should your response to any of the requested items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Provide an analysis of the baseline actual pollutant emissions with the projected actual or potential pollutant emissions.
2. When was the last compliance test conducted between 90 to 100 percent (%) of the permitted capacity of 325.1 million British thermal units (MMBtu) per hour? What were the results of the compliance test? Please provide a synopsis of the test results and include the heat input during each test performed. The Air Resource Management System (ARMS) data system shows the last compliance test to have been conducted on June 9, 2003, for nitrogen oxides (NOx) and the heat input was 131 MMBtu, which is only 40.3% of the permitted capacity of Unit 3.
3. Provide a synopsis of the pollutant compliance tests conducted on Unit 3 for the last ten years and include the heat input during each test performed.
4. Provide a detailed description of the actual work that will be performed on Unit 3. When is the work planned to be conducted?
5. Will the proposed re-tubing allow Unit 3 to regain lost capacity?
6. Provide any current operational data showing operation at permitted capacity.

The above information is requested pursuant to the following F.A.C. regulations: Rule 62-4.050 (Procedures to Obtain Permits and Other Authorizations; Applications); 62-4.055 (Permit Processing); 62-4.070 (Standards for Issuing or Denying Permits; Issuance; Denial); 62-4.120 (Construction Permits); 62-204.800 (Federal Regulations Adopted by Reference); 62-212.300 (Permits Required); 62-210.370 (Emissions Computations and Reporting); 62-210.900 (Forms and Instructions); 62-212.300 (General Preconstruction review); and 62-212.400 (Preventions of Significant Deterioration). All applications for a Department permit must be certified by a professional engineer registered in the State of Florida pursuant to Rule 62-4.050(3), F.A.C. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official.

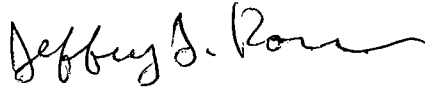
We will resume processing your application after receipt of the requested information. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or to provide a written request for an

REQUEST FOR ADDITIONAL INFORMATION

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additional period of time to submit the information. If you have any questions regarding this matter, please contact the project engineer, Bruce Mitchell, at (850)413-9198.

Sincerely,



Jeffery F. Koerner, Administrator  
New Source Review Section

This letter was sent to the following people by electronic mail with received receipt requested.

cc: Mr. David Mulvay, Authorized Representative, City of Lake Worth Utilities ([dmulvay@lakeworth.org](mailto:dmulvay@lakeworth.org))  
Mr. Mike Ridge, Application Contact, City of Lake Worth Utilities ([mridge@lakeworth.org](mailto:mridge@lakeworth.org))  
Mr. Kennard F. Kosky, P.E., Golder Associates, Inc. ([kkosky@golder.com](mailto:kkosky@golder.com))  
Mr. James Stormer, Palm Beach County Health Department ([james\\_stormer@doh.state.fl.us](mailto:james_stormer@doh.state.fl.us))  
Mr. Lennon Anderson, Southeast District Office ([lennon.anderson@dep.state.fl.us](mailto:lennon.anderson@dep.state.fl.us))  
Ms. Vickie Gibson, DEP BAR Reading File ([victoria.gibson@dep.state.fl.us](mailto:victoria.gibson@dep.state.fl.us))

JFK/rbm

## Livingston, Sylvia

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**From:** Livingston, Sylvia  
**Sent:** Monday, February 16, 2009 2:49 PM  
**To:** 'dmulvay@lakeworth.org'  
**Cc:** 'mridge@lakeworth.org'; 'kkosky@golder.com'; 'james\_stormer@doh.state.fl.us'; Anderson, Lennon; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)  
**Subject:** RAI -0990045-007-AC (City of Lake worth Utilities - Tom G. Smith Power Plant)  
**Attachments:** 0990045-007-AC.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

## Livingston, Sylvia

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**From:** Michael Ridge [MRidge@LakeWorth.org]  
**Sent:** Tuesday, February 24, 2009 9:22 AM  
**To:** Livingston, Sylvia  
**Subject:** RE: RAI -0990045-007-AC (City of Lake worth Utilities - Tom G. Smith Power Plant)

Responding for Dave Mulvay

Mike Ridge  
Env/Perf Spec.  
CLWU  
561-533-7379  
[mr ridge@lakeworth.org](mailto:mr ridge@lakeworth.org)

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**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Monday, February 16, 2009 2:49 PM  
**To:** Dave Mulvay  
**Cc:** Michael Ridge; kkosky@golder.com; james\_stormer@doh.state.fl.us; Anderson, Lennon; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)  
**Subject:** RAI -0990045-007-AC (City of Lake worth Utilities - Tom G. Smith Power Plant)

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Thank you,

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

## Livingston, Sylvia

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**From:** Michael Ridge [MRidge@LakeWorth.org]  
**Sent:** Monday, February 16, 2009 2:54 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: RAI -0990045-007-AC (City of Lake worth Utilities - Tom G. Smith Power Plant)

Mike Ridge  
Env/Perf Spec.  
CLWU  
561-533-7379  
[mr ridge@lakeworth.org](mailto:mr ridge@lakeworth.org)

---

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Monday, February 16, 2009 2:49 PM  
**To:** Dave Mulvay  
**Cc:** Michael Ridge; kkosky@golder.com; james\_stormer@doh.state.fl.us; Anderson, Lennon; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)  
**Subject:** RAI -0990045-007-AC (City of Lake worth Utilities - Tom G. Smith Power Plant)

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Division of Air Resource Management (DARM)  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

## Livingston, Sylvia

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**From:** Laxmana\_Tallam@doh.state.fl.us  
**Sent:** Monday, February 16, 2009 3:19 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: RAI -0990045-007-AC (City of Lake worth Utilities - Tom G. Smith Power Plant)

Document received.

~Laxmana

Laxmana Tallam, PE  
Palm Beach County Health Department  
561-355-3136 ext 1142

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**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Monday, February 16, 2009 3:10 PM  
**To:** Tallam, Laxmana  
**Cc:** Walker, Elizabeth (AIR)  
**Subject:** FW: RAI -0990045-007-AC (City of Lake worth Utilities - Tom G. Smith Power Plant)

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

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**From:** Livingston, Sylvia  
**Sent:** Monday, February 16, 2009 2:49 PM  
**To:** 'dmulvay@lakeworth.org'  
**Cc:** 'mridge@lakeworth.org'; 'kkosky@golder.com'; 'james\_stormer@doh.state.fl.us'; Anderson, Lennon; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)  
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Thank you,

## Livingston, Sylvia

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**From:** Anderson, Lennon  
**Sent:** Tuesday, April 07, 2009 1:10 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: RAI -0990045-007-AC (City of Lake worth Utilities - Tom G. Smith Power Plant)

Thanks!

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**From:** Livingston, Sylvia  
**Sent:** Monday, February 16, 2009 2:49 PM  
**To:** 'dmulvay@lakeworth.org'  
**Cc:** 'mridge@lakeworth.org'; 'kkosky@golder.com'; 'james\_stormer@doh.state.fl.us'; Anderson, Lennon; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)  
**Subject:** RAI -0990045-007-AC (City of Lake worth Utilities - Tom G. Smith Power Plant)

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