

J. ALAN COX

ATTORNEY AT LAW

909 EAST PARK AVENUE
TALLAHASSEE, FLORIDA 32301-2647

(904) 222-4480
FACSIMILE: 561-1188

OF COUNSEL TO:
MACLEAN AND EMA
POMPANO BEACH, FLORIDA

RECEIVED

JUL 26 1995

Bureau of
Air Regulation

TO: Patty Adams (*By hand delivery*)

FROM: J. Alan Cox *JAC*

DATE: July 26, 1995

RE: **Osceola Power Limited Partnership Application
to Modify Osceola Mill Boilers (Current Permit No. AC 50-219795,
PSD-FL 197)**

MEMORANDUM

Please include my name as an interested party in the above-referenced application and provide me with copies of all future Department correspondence and/or notices in this matter. I am particularly interested in receiving a copy of the Department's notice of proposed agency action when that is issued.

Your kind attention to this request is greatly appreciated. Please let me know if anything further is required at this time in order for me to receive timely notice from the Department.

JAC/jpt



June 20, 1995

RECEIVED
JUN 22 1995

Bureau of
Air Regulation

Mr. Willard Hanks
Florida Department of Environmental Protection
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Re: Osceola Power - Amended PSD Application

Dear Mr. Hanks:

Based on our recent discussion concerning the above referenced application, I am providing the following information. The proposed emission limits for NO_x, CO and VOC for No. 2 fuel oil firing are different than these found in AP-42 because they are based upon vendor data. For NO_x, the No. 2 fuel oil factor is based as an emission rate to not trigger PSD review for NO_x and achievable with an ammonia system (0.12 lb/mm btu). For CO and VOC the proposed limits are based on fossil fuel firing (either coal or oil), although a lower rate may be obtainable for oil as compared to coal. It is also pointed out that the proposed limits are the same as these approved in the original PSD permit application for No. 2 oil firing.

It is my understanding that the Osceola application was deemed complete on May 27, 1995. Please let me know if you have any other questions.

Sincerely,

David A. Buff / mb
David A. Buff, P.E.
Principal Engineer

cc: Don Schaberg

14380A/2

KBN ENGINEERING AND APPLIED SCIENCES, INC.

6241 Northwest 23rd Street,
Suite 500
Gainesville, Florida 32653-1500
904-336-5600 FAX 904-336-6603

5405 West Cypress Street,
Suite 215
Tampa, Florida 33607
813-287-1717 FAX 813-287-1716

1801 Clint Moore Road, Suite 105
Boca Raton, Florida 33487
407-994-9910
FAX 407-994-9393

7785 Baymeadows Way,
Suite 105
Jacksonville, Florida 32256
904-739-5600 FAX 904-739-7777

1616 'P' Street N.W., Suite 450
Washington, D.C. 20036
202-462-1100
FAX 202-462-2270



STATE OF FLORIDA
DEPARTMENT OF HEALTH AND REHABILITATIVE SERVICES

June 1, 1995

Willard Hanks, Permit Engineer
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

JUN 6 1995

Bureau of
Air Regulation

RE: PSD PERMIT MODIFICATION REVIEW FOR OSCEOLA POWER CORPORATION

Dear Mr. Hanks:

I have completed my review of the above referenced application and offer the following comments from the local air program in Palm Beach County:

(1) Air Quality Impact Analysis

I have little experience in performing the elaborate modeling analysis required by this modification and leave the details in your capable hands. However, I would like to note the following items:

- It appears that all of the major sources in our county have been included for modeling purposes;
- The method and rationale for using Mesopuff-2 to refine emission impacts on the Everglades National Park (ENP) Class I area appeared reasonable; however, the consultant still points out that the modified cogeneration project will contribute 1.13 ug/m^3 to the predicted highest, second-highest concentration which is still greater than the National Park Service's recommended 24-hour Class I significance level of 0.07 ug/m^3 . What has the National Park Service commented on this matter? What is the responsibility of the Department in considering the National Park Service's recommendations?

- (2) Please remind the applicant that the previous conditions of zoning remain intact and differ slightly from that of the modification as summarized below:

POLLUTANT	ANNUAL COUNTY EMISSIONS (TPY) REQUIREMENT	ANNUAL MODIFIED ALLOWABLE EMISSIONS (TPY)	COMMENTS
Carbon Monoxide	5895.4	1436.4	OK
Mercury	0.0141	0.0168	19% higher than County's
Nitrogen Oxides	478.9	477.14	OK
Particulate Matter	311.3	123.12	OK
Volatile Organic Compounds	218.1	219.15	0.5% higher than County's
Sulfur Dioxide, _a	1500, max. 1300, 5 year avg.	1493.29, _c	OK
Sulfur Dioxide, _b	1700, max. 1500, 5 year avg.	1493.29, _c	OK

Footnotes

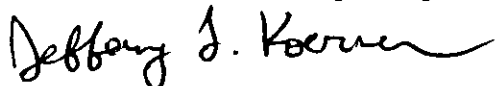
- a - Valid if Palm Beach County SWA provides 200,000 tons of biomass or more for the year and is the sum of SO_2 emissions from the Okeelanta Power cogeneration project and the modified Osceola Power cogeneration project.

- b - Valid if Palm Beach County SWA does not provide 200,000 tons of biomass or more for the year and is the sum of SO₂ emissions from the Okeelanta Power cogeneration project and the modified Osceola Power cogeneration project.
 - c - This figure is the sum of SO₂ emissions allowed by permit at the Okeelanta Power cogeneration project and the modified Osceola Power cogeneration project.
- (3) The modification is based on an annual coal usage of 18,221 tons per year. The current permit limit on coal usage is 20,065 tons per year which should be modified to reflect the reduction stated in the application for modification.
- (4) Based on the information provided, this facility would also be major for hydrochloric acid (19.42 tons per year) while firing the maximum amount of coal (5.4%). The Health Unit requests that stack testing be conducted for HCl if and when coal handling and firing capabilities are installed at this facility.
- (5) The following emissions units were detailed in this application and should be included in the modified permit:
- **Fuel oil storage tank** (50,000 gallon, fixed roof); subject to record keeping requirements of 40 CFR 60, NSPS Subpart Kb;
 - **Fly ash silo with baghouse;**
 - **Activated carbon silo with baghouse;** and
 - **Boiler house vent controlled by baghouse.**
- Note: The Health Unit requests that all baghouse exhausts comply with a 5% opacity standard and that annual visible emissions test be performed.
- (6) Just for future reference, how does the fact that this facility is defined as a "resource recovery facility" change or affect the emission limiting standards?

Thank you for the opportunity to comment on this application. If you have any questions regarding these comments, please contact me at the numbers below.

Sincerely,

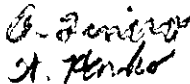
For the Division Director
Environmental Science and Engineering



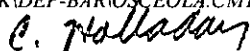
Jeffery F. Koerner, Permit Engineer
Air Pollution Control Section

Phone: (407) 355-4549 FAX: (407) 355-2442 SunCom: 273-4549

cc: S. Donald Schaberg, P.E., Osceola Power Corporation



C:\95_JFK\DEP-BAR\OSCEOLA.CMT



HRS / PALM BEACH COUNTY PUBLIC HEALTH UNIT
DIVISION OF ENVIRONMENTAL SCIENCE AND ENGINEERING
Air Pollution Control Section

FACSIMILE TRANSMITTAL COVER SHEET

DATE: June 1, 1995

FROM: Jeff Koerner, Engineer
Phone #: (407) 355-4549, SunCom 273-4549
FAX #: (407) 355-2442

TO: Willard Hanks, Permit Engineer
Bureau of Air Regulation, FDEP
FAX #: 904-922-6979

Total Pages: 3 (including this cover sheet)

OSCEOLA POWER LTD.
ALSO - 257A5 / PSD-FL-A7

COMMENTS:

Sorry I didn't get this out sooner — I'm a
slow reader.

JFK



May 3, 1995

RECEIVED

MAY 4 1995

Bureau of
Air Regulation

Mr. Cleveland Holladay
Bureau of Air Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Osceola Power - Amended PSD Application - ISCST2 and Mesopuff Files

Dear Cleve:

Please find enclosed one hard copy and 1 disk copy (on 2 disks) for the amended PSD Application for Osceola Power. Disk output and summary files are compressed using the utility PKZIP. A sheet describing the contents of each ZIP file is attached and is also included as a READ.ME file on each disk. Should you have any questions about the modeling files, please call me at (904) 336-5600. Thank you.

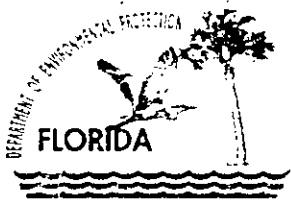
Sincerely,

Steven R. Marks
Senior Meteorologist

Enclosures

SRM/ehj

cc: David A. Buff, KBN
File (2)



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

April 26, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Randy Stricklin
A & R Fibre
P. O. Box 467
Belle Glade, FL 33430

Dear Mr. Stricklin:

In response to your March 30 FAX, please be advised that Osceola Power L.P. and Okeelanta Power L.P. are allowed by permits to burn clean construction and demolition wood debris, yard trash, land clearing debris, and other clean cellulose and vegetative matter in their boilers. They are required to perform a daily inspection of any wood waste or similar vegetative matter delivered to the facility for use as fuel.

If the screening process is effective at separating the wood chips from the other materials in the used floor covering from a horse stable, the Department's air permits would not prohibit the clean wood chips from being burned in Osceola Power L.P. and Okeelanta Power L.P. boilers. Other boilers at the sugar mills in the area may need to have their permits amended prior to burning the separated wood chips.

If you have any questions on this matter, please write to me or call Willard Hanks at (904) 488-1344.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

cc: Mr. David Knowles, SD
Mr. Ajaya Stagal, PBCHD
Mr. Gus Cepero, Osceola Power L.P.

CF/wh/h

SENDER:

Complete items 1 and/or 2 for additional services.
 Complete items 3, 4a & b.
 Print your name and address on the reverse of this form so that we can return this card to you.
 Attach this form to the front of the mailpiece, or on the back if space does not permit.
 Write "Return Receipt Requested" on the mailpiece below the article number.
 The Return Receipt will show to whom the article was delivered and the date delivered.

3. Article Addressed to:
 Randy Stricklin
 A + R Fibre
 P.O. Box 467
 Belle Glade, FL 33430

4a. Article Number:
 Z 311 902 923

4b. Service Type:
☒ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery:
 5-2-95

5. Signature (Addressee):
 [Signature]

6. Signature (Agent):
 [Signature]

PS Form 3811, December 1991 U.S. GPO: 1993-352-714 DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service

Z 311 902 923



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

PS Form 3800, March 1993

Sent to
 Randy Stricklin
 Street and No.
 A + R Fibre
 P.O., State and ZIP Code
 Belle Glade, FL

Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	4-27-95