



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

December 13, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Don Schaberg
General Manager
Osceola Power, LP
Post Office Box 606
Pahokee, Florida 33476

Re: DRAFT Permit Amendment No. 0990331-003-AC (PSD-FL-197C)
Osceola Cogeneration Plant Tire Derived Fuel Project

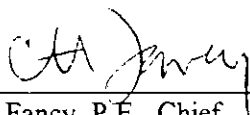
Dear Mr. Schaberg:

Enclosed is one copy of the Draft Air Construction Permit Amendment to conduct a performance test while burning Tire Derived Fuel (TDF) at the Cogeneration Plant located near Pahokee, Palm Beach County. The Department's Intent to Issue Air Construction Permit Amendment and the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT" are also included. Such a test may provide reasonable assurance consistent with Rule 62-4.070, F.A.C. that TDF may be burned without contravening Department standards, rules or present permit conditions.

The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT" must be published within 30 (thirty) days of receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please contact Mr. Willard Hanks or Mr. Linero at 904/488-1344.

Sincerely,


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

•CHF/aal/l

Enclosures

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

In the Matter of an
Application for Permit Amendment by:

Osceola Power Limited Partnership
Post Office Box 606
Pahokee, Florida 33476 /

DRAFT Permit Amendment No.: 0990331-003-AC
PSD-FL-197C
Osceola Cogeneration Plant
Palm Beach County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit amendment (copy of DRAFT Permit Amendment attached) for the proposed project, detailed in the DRAFT Permit Amendment specified above, for the reasons stated below.

The applicant, Osceola Power Limited Partnership, applied on May 16, 1996, to the Department for a air construction permit modification for its Cogeneration Plant located near Pahokee, Palm Beach County. The request is to burn a blend of Tire Derived Fuel (TDF) with bagasse and wood chips.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that a permit amendment is required to conduct a performance test to provide reasonable assurance that subsequent issuance of a permit modification allowing permanent use of TDF will not result in contravention of Department standards, rules, or permit conditions.

The Department intends to issue this air construction permit amendment based on the belief that reasonable assurances have been provided to indicate that operation of these emission units during the performance test will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT". The notice shall be published one time only within 30 (thirty) days in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 904/488-1344; Fax 904/ 922-6979) within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit amendment pursuant to Rule 62-103.150 (6), F.A.C.

The Department will issue the FINAL Permit Amendment, in accordance with the conditions of the enclosed DRAFT Permit Amendment unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed DRAFT Permit Amendment issuance action for a period of 14 (fourteen) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT." Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a

significant change in this DRAFT Permit Amendment, the Department shall issue a Revised DRAFT Permit Amendment and require, if applicable, another Public Notice.

The Department will issue the permit amendment with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., or a party requests mediation as an alternative remedy under Section 120.573 F.S. before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 904/488-9730, fax: 904/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A person whose substantial interests are affected by the Department's proposed permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information: (a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any; (b) A statement of the preliminary agency action; (c) A statement of the relief sought; and (d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following: (a) The names, addresses, and telephone numbers of any persons who may attend the mediation; (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time; (c) The agreed allocation of the costs and fees associated with the mediation; (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation; (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen; (f) The name of each party's representative who shall have authority to settle or recommend settlement; and (g) The signatures of all parties or their authorized representatives.

As provided in Section 120.573 F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by Sections 120.569 and 120.57 F.S. for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under Sections 120.569 and 120.57 F.S. remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

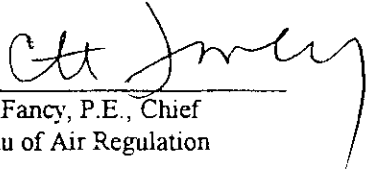
In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.


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


CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT (including the PUBLIC NOTICE and the DRAFT permit amendment) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 12-13-96 to the person(s) listed:

Mr. Don Schaberg, Osceola Power LP*
Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. David Knowles, SD
Mr. Jim Stormer, Palm Beach County PHU
Mr. David Buff, P.E., KBN
Ms. Kathy Anderson, DEP

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk) 12-13-96
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DRAFT Permit Amendment No.: 0990331-003-AC, (PSD-FL-197C)
Osceola Cogeneration Plant
Palm Beach County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit amendment to Osceola Power Limited Partnership to conduct a sixty (60) day performance test while burning a blend of Tire Derived Fuel (TDF) with bagasse and/or wood wastes at the Cogeneration Plant located near Pahokee, Palm Beach County. A Best Available Control Technology (BACT) determination was not required for any pollutants pursuant to Rule 62-212.400, F.A.C., and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The amendment will not cause a violation of any state or federal ambient air quality standards or increments. The applicant's name and address are: Osceola Power LP, Post Office Box 606, Pahokee, Florida 33476.

The plant is already permitted to burn bagasse and wood wastes as well as coal. Burning TDF as planned is not expected to significantly increase emissions compared with burning coal as permitted. Emission controls consist of electrostatic precipitators for control of particulate matter, selective non-catalytic reduction for nitrogen oxides and carbon injection for mercury. The test may provide the Department with reasonable assurance that the plant can burn TDF without contravening Department standards, rules or permit conditions. The Department will consider the results of the test burn in evaluating whether to issue a future permit modification to Osceola Power LP. Any such action will require another public notice.

The Department will issue the FINAL Permit Amendment, in accordance with the conditions of the DRAFT Permit Amendment unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed DRAFT Permit Amendment issuance action for a period of 14 (fourteen) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Amendment, the Department shall issue a Revised DRAFT Permit Amendment and require, if applicable, another Public Notice.

The Department will issue FINAL Permit Amendment with the conditions of the DRAFT Permit Amendment unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S. or a party requests mediation as an alternative remedy under Section 120.573 before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 904/488-9370, fax: 904/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the Department's action or proposed action addressed in this notice of intent.

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The agreement to mediate must include the following: (a) The names, addresses, and telephone numbers of any persons who may attend the mediation; (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time; (c) The agreed allocation of the costs and fees associated with the mediation; (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation; (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen; (f) The name of each party's representative who shall have authority to settle or recommend settlement; and (g) The signatures of all parties or their authorized representatives.

As provided in Section 120.573 F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by Sections 120.569 and 120.57 F.S. for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under Sections 120.569 and 120.57 F.S. remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida, 32301
Telephone: 904/488-1344
Fax: 904/922-6979

Department of Environmental Protection
South District
2295 Victoria Avenue, Suite 364
Ft. Myers, Florida 33901
Telephone: 941/332-6975
Fax: 941/332-6969

Palm Beach County Public Health Unit
901 Evernia
West Palm Beach, Florida 33401
Telephone: 407/355-3070
Fax: 407/355-2442

The complete project file includes the Draft Permit Amendment, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 904/488-1344, for additional information.

DRAFT

January XX, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Don Schaberg
General Manager
Osceola Power Limited Partnership
Post Office Box 606
Pahokee, Florida 33476

Re: Osceola Power LP
TDF Permit Amendment
AIRS ID No. 0990331-003-AC, PSD-FL-197C

Dear Mr. Schaberg:

The Department has reviewed the request from Osceola Power Limited Partnership received on May 16, 1996, and the supplementary information dated July 17, and October 8, 1996 concerning the burning of a blend of tire derived fuel (TDF) and biomass in your cogeneration facility located near Pahokee, Palm Beach County, Florida.

You are hereby authorized to conduct performance tests on one boiler at this or a similar (Okeelanta Power LP) facility while it is burning a blend of up to 25 percent TDF (by weight) for the regulated air pollutants and metals for a period not to exceed 60 days, and within 90 days from the first day TDF is burned in the boiler. Test results must include a material balance (fuels, emissions, bottom ash, and fly ash) of the metals in the fuels. All conditions of permit No. AC 50-269980/PSD-FL-197B related to air pollution emission limits and control equipment remain in force during the test burn.

The performance test shall be conducted in order to gather data regarding air pollutant emissions, any operation limitations on burning a blend of up to 25 percent by weight TDF in the boiler, and to determine the metal content in the bottom and fly ash. The test results and any changes to the current request to permanently be allowed to burn TDF in this facility shall be sent to the Department's Bureau of Air Regulation, South District, and the Palm Beach County Public Health Unit within 45 days of completion of the tests.

DRAFT

The performance test shall be subject to the following conditions:

1. The permittee shall notify the Palm Beach County Public Health Unit, the DEP South District, and the Bureau of Air Regulation at least one day prior to burning TDF and 15 days prior to commencement of the performance test. A written test report shall be submitted to these offices within 45 days of completion of the last test run.
2. The maximum TDF content of the fuel shall not exceed 25 percent by weight. Performance testing shall be conducted in 60 calendar days and completed within 90 days of when the TDF is first introduced into the boiler.
3. Stack emissions due to TDF firing shall not exceed any limit for coal firing in the construction permit No. PSD-FL-197B for this unit.
4. As-burned fuel samples (biomass and TDF), bottom ash, and fly ash shall be collected and analyzed for total metals content (chromium, copper, arsenic, cadmium, zinc oxide, mercury, lead, and beryllium) throughout the test burn of the blended fuel. Weekly composite of daily samples shall be required as well as analyses of a composite sample collected during the particulate matter tests.
5. A material balance of the metals in the fuel, emissions, bottom, and fly ash shall be reported based on the test/analytical data.
6. The maximum feed rate of tires to each boiler at the Osceola cogeneration plant shall not exceed 23,871 lbs/hr or 25 percent by weight of the total feed rate, whichever is less.
7. Besides the currently regulated pollutants, test the emissions for hydrochloric acid, arsenic, cadmium, chromium, zinc oxide, benzene, PCB, and dioxins/furans.
8. Emission tests shall be conducted for sulfur dioxide, nitrogen oxides, carbon monoxide, and visible emissions from the boiler during the test burn.
9. Based on the data collected during the test burn, estimate the actual and potential emissions that will occur if the maximum amount of TDF requested is burned in the facility.
10. Any performance test shall be conducted using EPA Reference Methods, as contained in 40 CFR 60 (Standards of Performance for New Stationary Sources), 40 CFR 61 (National Emission Standards for Hazardous Air Pollutants), and 40 CFR 266, Appendix IX (Multi-metals), or any other method approved by the Department, in writing, in accordance with Chapter 62-297, F.A.C.
11. The existing construction permit is extended until July 1, 1997, to allow time to complete the performance test. If additional time is needed, the permittee shall request an extension of time and provide the Department with documentation of the progress accomplished to date and shall identify the work required to complete the performance test.
12. Daily records (i.e., mass feed rates of each fuel, heat input, steam production, pressure, temperature, MW, fuel input rates, etc.) of the boiler operations when firing the TDF blend during the tests shall be maintained.

DRAFT

13. For rule applicability determination, calculate any change in emissions (lbs/hr and TPY) for all air pollutants that would result from the firing of a blend of TDF compared with presently permitted scenarios.
14. The authorized TDF test burn performance test shall not result in the release of objectionable odors pursuant to Rule 62-296.320(2), F.A.C.
15. Performance testing shall cease as soon as possible if the test boiler operations are not in accordance with the conditions in the air permit No. PSD-FL-197B, or this authorization protocol. Performance testing shall not resume until appropriate measures to correct the problem(s) have been implemented.
16. This Department action is only to authorize the TDF blend performance test. Any firing of tire derived fuel beyond the 60 calendar day of testing approved to conduct such tests will be deemed a violation of permit No. PSD-FL-197C.
17. The Palm Beach County Public Health Unit, the Department's South District and Bureau of Air Regulation shall be notified within 5 days, in writing, upon completion of the final test.
18. The testing series shall include emissions test for the maximum TDF blend (25 percent) with the boiler operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the capacity allowed by Permit No. PSD-FL-197B.
19. A test protocol, specifying the pollutants to be tested and the sampling and analysis methods, including fuel and ash, shall be submitted to the Bureau of Air Regulation, with copies to the Palm Beach County Public Health Unit and Department's South District, for approval prior to commencement of testing.

This letter must be attached to permit No. PSD-FL-197B and shall become a part of the permit.

Sincerely,

Howard L. Rhodes, Director,
Division of Air Resources Management

HLR/wh/h

P 265 659 106

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

| | |
|---|----|
| Sent to | |
| Don Schaberg | |
| Street & Number | |
| Osceola Power | |
| Post Office, State & ZIP Code | |
| Pahokee, FL | |
| Postage | \$ |
| Certified Fee | |
| Special Delivery Fee | |
| Restricted Delivery Fee | |
| Return Receipt Showing to Whom & Date Delivered | |
| Return Receipt Showing to Whom, Date, & Addressee's Address | |
| TOTAL Postage & Fees | \$ |
| Postmark or Date | |
| 12-13-96 | |
| 0990331-003-AC | |
| PSD-FI-197C | |

PS Form 3800, April 1995

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 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:

Don Schaberg, Gen Tug
Osceola Power, LP
P O Box 606
Pahokee, FL 33476

5. Signature (Addressee)

6. Signature (Agent)

Cahin Briscoe

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address

2. ☐ Restricted Delivery

Consult postmaster for fee.

4a. Article Number

P 265 659 106

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

12/16/96

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

PS Form 3811, December 1991

U.S. GPO: 1993-352-714

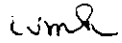
DOMESTIC RETURN RECEIPT

Florida Department of
Environmental Protection

Memorandum

TO: Clair Fancy

THROUGH: Al Linero

FROM: Willard Hanks 

DATE: December 6, 1996

SUBJECT: Okceelanta Power LP, PSD-FL-196A
Osceola Power, LP, PSD-FL-197C

Attached for your approval are draft letters amending the construction permits for two biomass/coal/oil fired cogeneration facilities located at sugar mills in Palm Beach County. The proposed amendments authorize limited performance tests on the facilities while they are burning a blend of tire derived fuel (TDF) and biomass. The information will help us evaluate their request to burn TDF on a permanent basis.

The plants are already permitted to burn bagasse and wood wastes as well as coal. The TDF will be burned in lieu of coal and is not expected to significantly increase emissions compared with burning of coal. Emission controls consist of electrostatic precipitators for control of particulate matter, selective non-catalytic reduction for nitrogen oxides and carbon injection for mercury. The test may provide the Department with reasonable assurance that the plant can burn TDF without contravening Department standards, rules or permit conditions.

I recommend your approval and signature.

CHF/wh/h