



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

May 24, 2002

## CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. James Meriwether, Environmental and Safety Manager  
Palm Beach Power Corp.  
P.O. Box 606  
Pahokee, FL 33476

Re: Request for Additional Modeling Information  
Re-permitting of Osceola Cogeneration Plant  
File No. 0990331-009-AC (PSD-FL-329)

Dear Mr. Meriwether:

The Department is in receipt of your PSD application to permit the Osceola Cogeneration Plant as a new facility, install a new package boiler and shutdown certain sugar mill boilers at the adjoining Osceola Farms. The application remains incomplete. In order to continue processing your application, the Department will need the additional information below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form. The following items are specifically related to the cogeneration boilers, unless additionally applicable to the package boiler.

1. Since Palm Beach Power Corp is requesting simultaneous operation of the Osceola Cogeneration Plant and the Osceola Farms sugar mills (up to 120 days or 2880 hours) during the crop season for at least one year (October through April), please do a significant impact analysis for SO<sub>2</sub>, PM<sub>10</sub>, NO<sub>x</sub> and CO for the case of simultaneous operation of the Osceola Cogeneration Plant and the Osceola Farms sugar mill boilers during the crop season. The predicted significant impact areas for each pollutant should then be used in the applicable annual and short-term ambient air quality standards (AAQS) and PSD increment analyses. In addition, quantified fugitive emissions should be included in the PM<sub>10</sub> analyses.
2. In Table 3-4 in footnote b a factor of 1.32 is applied to the predicted lead annual impact. What is the basis of this factor.
3. Please provide the derivation of the current actual short-term fluoride and lead emissions shown in Table 6-3 and used in the modeling analysis. In addition, please provide the derivation of the current actual short-term CO emissions from the Osceola Farms sugar mill boilers. These emissions would be used in the significant impact analysis requested in Item 1.
4. Rule 62-212.400(5)(h) 5, F.A.C. requires the applicant to provide information relating to the air quality impact of, and the nature and extent of, all general commercial, residential, industrial and other growth which has occurred since August 7, 1977, in the area the facility or modification would affect. Please provide this information. The additional impacts section 8.0 does not adequately address this requirement.
5. Please provide building structure information used in the modeling to determine downwash impacts. This information should include building dimensions and BPIP files for all buildings used in any of the modeling analyses. In addition, please provide a detailed plot plan to scale of the facility showing the exact location in meters from the modeling origin of each building and stack. All stacks and buildings should be labeled. In

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addition, a grid with 50 meter spacing should be overlaid over this plot plan so that the information on the plot plan can be easily correlated with the information in the BPIP files.

6. Additionally, should the EPA or the NPS review cause further requests for information, these will be handled as they arise.

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please note that per Rule 62-4.055(1): *"The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department..... Failure of an applicant to provide the timely requested information by the applicable date shall result in denial of the application."*

If you have any questions, please call Cleve Holladay at 850/921-8986.

Sincerely,



Cleve Holladay, Meteorologist  
FDEP/DARM  
New Source Review Section

David A. Buff, P.E. Golder Associates  
James Stormer, Palm Beach County Health Department  
Ron Blackburn, DEP-SDO  
Mr. John Bunyak, NPS  
Mr. Gregg Worley, EPA