

Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

January 19, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Gus Cepero, Authorized Representative
Okeelanta Power Limited Partnership
P.O. Box 9
South Bay, FL 33493

Re: Project No. 0990332-013-AC
Air Permit No. PSD-FL-196L
Okeelanta Power L.P. - Cogeneration Plant
Request to Add Natural Gas as a Supplemental Fuel

Okeelanta Power L.P. operates a biomass cogeneration plant located near Highway 27, approximately 6 miles south of South Bay in Palm Beach County, Florida. Okeelanta Corporation operates a sugar mill and refinery at an adjacent location. For the purposes of the Department's Prevention of Significant Deterioration (PSD) and Title V operating permit programs, the two plants are considered to be a single facility. On June 20, 2000, Okeelanta Power L.P. applied to the Department for a modification of Permit No. PSD-FL-196 to add natural gas as a supplemental fuel to the biomass boilers to increase reliability and availability. The Department has reviewed the available information and approves the request as summarized in the attached Technical Evaluation. The Department determined that the cogeneration boilers qualified as electric utility steam generating units. Therefore, the applicant is allowed to project "representative actual annual emissions" in accordance with Rule 62-210.200(12)(d), F.A.C. and 40 CFR 52.21(b)(33). According to the applicant's projected emissions, the project will not result in a PSD significant net emissions increase after the change. Original Permit No. PSD-FL-196 is hereby modified as follows.

Add the following specific permit condition:

29. Natural Gas Firing: The permittee is authorized to modify each biomass cogeneration boiler to add natural gas as a supplemental fuel in accordance with the following specific conditions.
- The total heat input from the new natural gas fired burners shall not exceed 605 mmBTU per hour for each boiler. The burners shall be a low-NOx design rated for no more than 0.15 pounds of NOx per mmBTU of heat input. The preliminary design indicates that a single burner will be installed in each corner of each boiler for a total of four burners, however this is subject to change.
 - Natural gas may be fired alone or as a supplemental fuel in combination with other authorized fuels. In accordance with Specific Condition Nos. 15 and 20 of this permit, total fossil fuel firing (including natural gas) shall not exceed 25% of the heat input on a calendar quarter basis.
 - The biomass boilers shall comply with each limit established in Specific Condition No. 20 when firing natural gas in combination with wood, bagasse, and/or distillate oil. For the brief periods

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when natural gas is fired alone, the biomass boilers shall comply with the lowest specified emission standards of any of the authorized fuels.

- d. Within 180 days of completion of construction, the permittee shall submit a report summarizing at least 30 days of operational data that includes gas firing. For each day of operation, the report shall summarize data collected from the continuous monitors for each biomass boiler for opacity, CO emissions, NOx emissions, and SO2 emissions. It shall also include the average heat inputs from each fuel, the average power generation, and the hours of operation for each day.
- e. Before March 1st of each year, the permittee shall submit a report summarizing operations for the previous year in accordance with the following conditions.
 - (1) The report shall calculate the actual annual emissions of CO, NOx, PM/PM10, SO2, and VOC in accordance with methodology provided in the letter application for this project and generally described as follows. Emissions of CO, NOx, and SO2 shall be based on the sum of the daily averages computed by the continuous emissions monitoring systems and the heat inputs for each fuel type. Emissions of PM/PM10 and VOC shall be calculated based on the required annual emissions performance tests conducted during the year and the heat inputs for each fuel type. The calculations and supporting data shall be provided for each biomass boiler. The permittee may use other methods approved in advance by the Department.
 - (2) The report shall summarize emissions and compare the representative actual annual emissions to the past actual annual emissions for all three biomass boilers as indicated in the following table.

Operating Hours	Heat Input mmBTU/year	Annual Emissions, Tons Per Year				
		CO	NOx	PM/PM10	SO2	VOC
<i>Past Actual Emissions Prior to Project</i>						
20,170	10,725,416	1526.07	753.56	172.50*	133.23	44.20
<i>PSD Significant Emission Rates (Table 212.400-2, F.A.C.)</i>						
----	----	100	40	25/15	40	40
<i>Future Actual Emissions, Above Which May Trigger PSD Review</i>						
----	----	1626.0	793.5	172.5*	173.2	84.2
<i>Representative Actual Emissions for _____ Calendar Year</i>						
----	----					
<i>Do the representative actual annual emissions trigger PSD review?</i>						
----	----	Yes / No	Yes / No	Yes / No	Yes / No	Yes / No

* Potential emissions used due to non-compliance issues.

As shown, the report shall indicate whether or not the project resulted in a PSD-significant net emissions increase as defined in Table 212.400-2 of Chapter 62-212, F.A.C. The permittee shall utilize the "representative actual annual emissions" methodology, defined at Rule 62-210.200(12)(d), F.A.C., and the provisions of 40 CFR 52.21(b)(33), adopted by state rule, in its demonstration. The permittee may exclude any portion of the actual emissions after the change that could have been accommodated by the unit and that is unrelated to the particular change, including increased capacity utilization due to electricity demand growth for the utility system as a whole. However, the permittee shall identify and quantify the excluded emissions and present a justification for the exclusion.

- (3) If the natural gas project results in a PSD-significant emissions increase, or if the permittee fails to submit the required information, the biomass boilers shall be subject to the requirements of PSD at that future time, which shall include a BACT determination for each PSD-significant pollutant.
 - (4) Reports shall be submitted to the Palm Beach County Health Department and the Department's New Source Review Section and South District Office. The reports shall be submitted for five separate years that are representative of normal post-change operations after completing construction of the natural gas burner systems. The five reports shall be submitted within the 10-year period following the completion of construction for the last biomass boiler. The reports shall start with the first full calendar year following the completion of construction of the final biomass boiler.
- f. The permittee shall comply with the following NSPS Subpart Da requirements.
- (1) When firing natural gas, SO₂ emissions shall be less than 0.20 lb/mmBTU of heat input. Compliance with this condition shall be demonstrated by obtaining a quarterly analysis of the sulfur content from the natural gas vendor and calculating the emission rate in terms of "pounds of SO₂ / mmBTU of heat input". {Permitting Note: The SO₂ emissions when firing pipeline-quality natural gas is estimated to be approximately 0.05 lb/mmBTU based on 20 grains of sulfur per 100 SCF of natural gas. Pipeline-quality natural gas in Florida typically contains less than 1 grains per 100 SCF.}
 - (2) NO_x emissions shall not exceed 0.15 lb/mmBTU of heat input from firing natural gas based on a 30-day rolling average. Because natural gas is being added as a supplemental fuel, compliance with this limit shall be demonstrated by the current continuous NO_x emissions monitoring requirements of this permit. {Permitting Note: The current permit limit when firing biomass fuels and distillate oil is also 0.15 lb/mmBTU of heat input, as controlled by urea injection.}

[Design; Applicant Request; Permit No. PSD-FL-196; Rules 62-4.070(3), 62-210.200(12), 62-210.200(109), 62-212.300(1)(d), and 62-212.400, F.A.C.; 40 CFR 52.21(b)(33); 40 CFR 60, Subpart Da]

This permit modification is issued pursuant to Chapter 403, Florida Statutes. This modification shall supplement conditions imposed by previous permitting actions on Permit No. PSD-FL-196. Attached is original Permit No. PSD-FL-196 and a brief permitting history (Attachment A). A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Any party to this order (permit modification) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Howard L. Rhodes, Director
Division of Air Resources Management

9952 541 0000 04E 6602

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
Article Sent To: Mr. Gus Cepero	
Postage \$	Postmark Here
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Name (Please Print Clearly) (to be completed by mailer) Mr. Gus Cepero	
Street, Apt. No., or PO Box No. PO Box 9	
City, State, ZIP+4 South Bay, FL 33493	
PS Form 3800, July 1999 See Reverse for Instructions	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY						
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<table border="1"> <tr> <td>A. Received by (Please Print Clearly) <i>Kathy Yorkes</i></td> <td>B. Date of Delivery <i>1/23/91</i></td> </tr> <tr> <td>C. Signature <i>Kathy Yorkes</i></td> <td><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</td> </tr> <tr> <td>D. Is delivery address different from item 1? If YES, enter delivery address below:</td> <td><input type="checkbox"/> Yes <input type="checkbox"/> No</td> </tr> </table>	A. Received by (Please Print Clearly) <i>Kathy Yorkes</i>	B. Date of Delivery <i>1/23/91</i>	C. Signature <i>Kathy Yorkes</i>	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee	D. Is delivery address different from item 1? If YES, enter delivery address below:	<input type="checkbox"/> Yes <input type="checkbox"/> No
A. Received by (Please Print Clearly) <i>Kathy Yorkes</i>	B. Date of Delivery <i>1/23/91</i>						
C. Signature <i>Kathy Yorkes</i>	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee						
D. Is delivery address different from item 1? If YES, enter delivery address below:	<input type="checkbox"/> Yes <input type="checkbox"/> No						
<p>1. Article Addressed to:</p> <p>Mr. Gus Cepero Okeelanta Power Limited Partnership P. O. Box 9 South Bay, FL 33493</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>						
<p>2. Article Number (Copy from service label) 7099 3400 0000 1453 2566</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>						

Florida Department of
Environmental Protection

Memorandum

To: Howard L. Rhodes
Through: Clair Fancy *CTD*
Al Linero *AL*
From: Jeff Koerner *JK*
Date: January 19, 2001
Project: Okeelanta Power Limited Partnership
Cogeneration Plant – Addition of Natural Gas
Project No. 0990332-013-AC
Final Permit No. PSD-FL-196L

BAR

Attached is the Final Permit to add natural gas as a supplemental fuel for the biomass boilers at the Okeelanta Power L.P.'s cogeneration plant located near South Bay in western Palm Beach County. Similar to the waste-to-energy plants, the biomass boilers were determined to be "electric utility steam generating units". As such, the applicant has projected that future representative actual annual emissions will not trigger any PSD significant emissions rates as a result of this project. Therefore, the project is not subject to PSD at this time. However, the applicant is required to submit reports for five representative years of normal operations after completion of construction to ensure that the actual annual emissions do not exceed the PSD significant emissions rates as a result of this project. If the actual emissions do exceed the PSD significant emissions rates, the project is subject to PSD at that time and BACT must be determined for each significant pollutant.

The addition of natural gas is not expected to result in increased hourly emissions. However, applicable requirements of NSPS Subpart Da were included because natural gas becomes a new regulated fuel under this subpart. Because no increases in hourly or annual emissions are expected, no additional air quality analysis was required.

The applicant published the required Public Notice and provided the proof of publication. The applicant also requested minor changes to the permit. No other comments were received. Minor changes are summarized in the attached Final Determination.

I recommend your approval and signature. Day 90 is April 1, 2001.

CHF/AAL/jfk
Attachments

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this permit modification was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 1/24/01 to the person(s) listed:

Mr. Gus Cepero, Okeelanta Power L.P.*
Mr. James Meriwether, Okeelanta Power L.P.
Mr. Ricardo Lima, Okeelanta Corporation
Mr. David Dee, Landers & Parsons
Mr. David Buff, Golder Associates
Mr. James Stormer, PBCHD
Mr. Ron Blackburn, SD
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

Clerk Stamp

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

Charlotte J. Hayes 1/24/01
(Clerk) (Date)

FINAL DETERMINATION
Okeelanta Power L.P. – Addition of Natural Gas
Palm Beach County

NOTICE AND PUBLICATION

The Department distributed a public notice package on December 4, 2000 for a project that will add natural gas as a supplemental fuel to the biomass boilers at Okeelanta Power L.P.'s cogeneration plant located 6 miles south of South Bay on U.S. Highway 27. The applicant published the required notice of the project in The Palm Beach Post on December 20, 2000. The Department received the proof of publication on January 3, 2000.

APPLICANT'S COMMENTS

On December 21, 2000, the Department received comments from the applicant regarding the Draft Permit. The following summarizes the comments and the Department's responses.

1. Typographical Error: The applicant noted that "natural as" should be corrected to "natural gas" throughout the Cover Letter, Intent to Issue Air Construction Permit, and Public Notice.

Response: The Department agrees and corrected the error.

2. Permit Conditions Revision Letter:

29.a The applicant notes that the approval indicates the gas burners would be located in the "upper" corners, but the exact position has not yet been determined. The applicant requests removal of the word "upper".

Response: The Department agrees to the correction.

29.e(2) The applicant notes that the past actual SO₂ emissions should be 133.23 tons per year and not 169.98 tons per year based on the latest information submittal (11/14/00).

Response: The Department agrees to this correction and will remove the related "permitting note" regarding past actual SO₂ emissions. Also, the order of the rows were changed.

The applicant notes that the summary table indicates future PM/PM₁₀ emissions will be higher than the previous potential emissions.

Response: The Department will correct this error in the summary table. The cogeneration boilers were not in compliance with the particulate matter standards and can not benefit from non-compliance. The following note was added to clarify, "Potential emissions used due to non-compliance issues."

29.f(1) The applicant does not believe that NSPS Subpart Da establishes an emission limit for SO₂ when firing natural gas, only that "zero reduction" is required when firing a gaseous fuel with SO₂ emissions less than 0.20 lb/mmBTU.

Response: The Department believes that NSPS Subpart Da establishes both the emissions standard and the percent reduction. No change was made.

3. Technical Evaluation and Preliminary Determination:

2.0 Proposed Project: The applicant states that the note regarding coal firing has no bearing on the project and should be deleted. Also, the word "upper" should be deleted from the description of the new gas burner locations.

Response: The Department retained the note regarding coal firing because it reiterates the Department's previously stated position regarding coal. The word "upper" was deleted from the description of the new gas burner locations.

FINAL DETERMINATION

Okeelanta Power L.P. – Addition of Natural Gas
Palm Beach County

3.0 Emissions: The applicant notes that the permit limit (Table 3.0a) for lead when firing wood should be $16,000 E^{-07}$. As described previously, the actual SO₂ emissions (Table 3.0b and 4.3a) should be 133.23 tons per year, so the future actual SO₂ emissions above which may trigger PSD review should be 173.2 tons per year.

Response: The Department agrees and will correct the lead emissions limit and SO₂ emissions rates.

OTHER COMMENTS

The Department did not receive any comments from EPA Region 4, the National Parks Service, the South District Office, the Palm Beach County Health Department, or the public. To clarify the PSD review implications, the Department added the following descriptive text to the first paragraph of the Revision Letter:

“The Department determined that the cogeneration boilers qualified as electric utility steam generating units. Therefore, the applicant is allowed to project “representative actual annual emissions” in accordance with Rule 62-210.200(12)(d), F.A.C. and 40 CFR 52.21(b)(33). According to the applicant’s projected emissions, the project will not result in a PSD significant net emissions increase after the change.”

CONCLUSION

The final action of the Department is to issue the permit with the changes mentioned above and to correct minor typographical errors. As detailed in the previously issued Technical Evaluation and Preliminary Determination, the cogeneration boilers are considered electric utility steam generating units. In accordance with Rule 62-210.200(12)(d), F.A.C. and 40 CFR 52.21(b)(33), the applicant projects that the net emissions increase will not be PSD significant. Therefore, no determinations of the Best Available Control Technology (BACT) were required. Additional details of this analysis may be obtained by contacting the project engineer at 850/488-0114 or the Department’s Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

ATTACHMENT A - PERMITTING HISTORY THROUGH JANUARY 2001

Air Permit No. PSD-FL-196: Department issued original PSD permit on 09/27/93.

Project No. 0990332-001-AC (PSD-FL-196A): OkPLP requested a limit on yard trash of 30% by weight to avoid most of the applicable requirements of 40 CFR 60, Subpart Ea. Department issued modification on 02/20/96, which added specific condition 12A.

Project No. 0990332-002-AC (PSD-FL-196B): OkPLP requested an extension of time for the simultaneous operation of the cogeneration boilers with the sugar mill boilers in order to perfect the steam interconnection. Department issued modification on 06/14/96. Specific condition nos. 17 and 18 were revised to extend simultaneous operation beyond the first year of commercial startup of the cogeneration boilers to April 1, 1997. The permit required the sugar mill boilers to be rendered incapable of operation no later than January 1, 1999.

Project No. 0990332-003-AC (PSD-FL-196C): OkPLP requested approval to fire tire derived fuel. Department issued modification on 01/22/97 to allow for a demonstration period to collect emissions data.

Project No. 0990332-004-AC (PSD-FL-196D): OkPLP requested a revision to the emission standard and testing requirements for sulfuric acid mist. Department issued modification on 04/18/97, which retained the emission standard, but revised the test method to 8 (modified).

Project No. 0990332-005-AC (PSD-FL-196E): OkPLP requested an extension of time for the simultaneous operation of the cogeneration boilers with the sugar mill boilers in order to perfect the steam interconnection. Department issued modification on 04/05/97. Specific condition nos. 17 and 18 were revised to extend simultaneous operation to April 1, 1998. The permit required the sugar mill boilers to be rendered incapable of operation no later than January 1, 1999.

Project No. 0990332-006-AC (PSD-FL-196F): OkPLP requested a modification of the emissions standards for carbon monoxide, lead, and mercury. Department issued modification on 10/24/97.

Project No. 0990332-007-AC (PSD-FL-196G): OkPLP requested amendment to specific condition #11 to clarify the performance test schedule. Department issued modification on 05/08/97.

Project No. 0990332-008-AC (PSD-FL-196H): OkPLP requested a revision to the 24-hour rolling average for determining peak electrical generation. Application was withdrawn on 02/03/97.

Project No. 0990332-009-AC (PSD-FL-196I): OkPLP requested an extension of time for the simultaneous operation of the cogeneration boilers with the sugar mill boilers in order to provide additional time to ensure that the interconnections (bagasse fuel and steam systems) were commercially and operationally reliable. Department issued modification on 06/16/98. Specific condition nos. 17 and 18 were revised to extend simultaneous operation to April 1, 2000. The permit required the sugar mill boilers to be rendered incapable of operation no later than April 1, 2001.

Project No. 0990332-010-AC (PSD-FL-196J): OkPLP requested a revision to the CO emissions standard. Department issued modification of the CO averaging period on 06/24/99.

Project No. 0990332-011-AC (PSD-FL-196K): OkPLP requested a modification to extend operation of Okeelanta Corporation's sugar mill boilers as standby units for the cogeneration boilers due to litigation with FPL. Department issued modification on 11/06/00.

Project No. 0990332-012-AC: OkPLP requested approval to install particulate dust collectors prior to the electrostatic precipitators. Department issued approval letter on 12/22/99. Approval incorporated into modification PSD-FL-196K.

Project No. 0990332-012-AC (PSD-FL-196L): OkPLP requested to add natural gas as a supplemental fuel to the biomass boilers. Department issued Final Permit in January 2001.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

In the matter of an
Application for Permit by:

DER File No. AC50-219413
PSD-FL-196
Palm Beach County

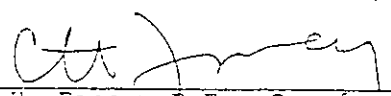
Mr. Gus Cepero, Vice President
Okeelanta Power Limited Partnership
P. O. Box 86
South Bay, Florida 33493

Enclosed is construction Permit Number AC50-219413 (PSD-FL-196) for a 74.9 megawatt (MW) electric cogeneration facility to be constructed at the Okeelanta Corporation sugar mill located 6 miles south of South Bay, off U.S. Highway 27 in Palm Beach County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

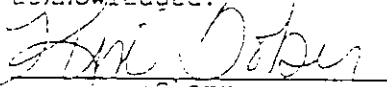

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2500 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on Sept 24, 1993 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
(120.52(1)), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.


(Clerk)

9-27-93
(Date)

Copies furnished to:
David Knowles, SD
Isidore Goldman, SED
James Stormer, PBCHD
Jewell Harper, EPA
John Bunyak, NPS
David Buff, KEN

Final Determination

Okeelanta Power Limited Partnership
South Bay, Palm Beach County, Florida

74.9 Megawatt (MW) Electric Cogeneration Facility

Permit No.: AC 50-219413
PSD-FL-196

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

September 17, 1993

FINAL DETERMINATION

The Technical Evaluation and Preliminary Determination for a permit to construct (AC 50-219413/PSD-FL-196) a 71.25 megawatt (MW) electric cogeneration facility for Okeelanta Power Limited Partnership, P.O. Box 86, South Bay, Florida 33493, was distributed on June 3, 1993. The cogeneration facility will be built at Okeelanta Corporation's sugar mill located 6 miles south of South Bay, off U.S. Highway 27, Palm Beach County, Florida. The Notice of Intent to Issue was published in the Palm Beach Post on June 9, 1993. Copies of the evaluation were available for public inspection at the Department offices in Tallahassee, Ft. Myers, and West Palm Beach, and at the Palm Beach County Health Department office in West Palm Beach.

The Environmental Protection Agency and National Park Service had no negative comments on the proposed permit.

In letters dated July 2 and August 11, 1993, the applicant requested that the plant be allowed to generate 74.9 megawatts (MW) of electricity as proposed in the application, that they be allowed to burn small quantities of treated wood that may escape detection by their inspection program provided the air pollution standards are not exceeded, that the prohibition on the burning of "special waste" be deleted from the permit, that they not be required to analyze the ash, that the permit be reworded to state that the fossil fuel heat input to the boilers will be less than 25 percent on a quarterly basis instead of 25 percent on an annual basis, that the nitrogen oxide emissions be corrected from 873.1 to 862.5 tons per year (TPY), that a 3-hour sulfur dioxide emission limit for coal be added to the permit, that a visible emission standard be added to the permit, that they not be required to test the emissions from all allowed fuels during the first 180 days of operation, that they be allowed to use other test methods than the ones listed in the permit, that they be allowed more than 2 hours for excess emissions during startup conditions, and that they not be required to cover the inactive coal storage pile. Except for the request to not cover the inactive coal pile or analyze the ash, the Department finds their comments acceptable and have made the following changes, along with minor editorial changes to the proposed permit:

Specific conditions Nos. 1, 11, and 15, the project description, and the BACT and RACT determinations were revised from 71.25 to 74.9 MW, 1-hour average, except during emission compliance and equipment performance tests. This change does not increase allowable heat input or emissions of any air pollutant.

Specific condition No. 12 was revised to incorporate a plan to minimize treated/painted wood from being burned in the cogeneration facility. Limits on metals associated with treated wood needed to prevent the Acceptable Ambient Concentration from being exceeded were added to the permit.

Specific Condition No. 17 was revised to allow limited operation of both existing bagasse boilers and new cogeneration boilers during the first year while the cogeneration facility is being debugged.

Specific condition No. 18 was revised to allow additional time for excess emissions during startup. Limits on the number of startups during a time period were added to the permit.

Specific condition No. 20 was revised to include a visible emission standard and a 3-hour sulfur dioxide standard for coal based on the new source performance standard for electrical utility steam generating units.

Specific condition No. 21 was revised to allow the use of additional EPA approved compliance test methods.

Specific condition No. 23 was corrected to require a 15 day notice instead of 10 days as listed in the proposed permit prior to any scheduled compliance test.

The final action of the Department will be to issue construction permit No. AC 50-219413 (PSD-FL-196) as proposed in the Technical Evaluation and Preliminary Determination except for the changes noted above.



Florida Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

PERMITTEE:
Okeelanta Power Limited
Partnership
P. O. Box 86
South Bay, FL 33493

Permit Number: AC50-219413
PSD-FL-196
Expiration Date: July 1, 1996
County: Palm Beach
Latitude/Longitude: 26°35'00"N
80°45'00"W
Project: Cogeneration Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-210, 212, 272, 275, 296, and 297; and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and specifically described as follows:

A 74.9 megawatt (gross) electric, (1-hour average), cogeneration facility (biomass--bagasse and wood waste material as the primary fuel, No. 2 fuel oil as a supplementary fuel, and low sulfur coal as an alternate fuel) located at Okeelanta Corporation's sugar mill that is 6 miles south of South Bay, off U.S. Highway 27, Palm Beach County, Florida. The cogeneration facility contains three Zurn spreader-stoker or equivalent steam boilers with a design heat input for each boiler of 715 MMBtu/hr on biomass and 490 MMBtu/hr on fossil fuels. Each boiler will produce approximately 455,400 lbs/hr of steam at 1,500 psig and 975°F. Particulate matter, nitrogen oxides, and mercury emissions from each boiler will be controlled by Research-Cottrell (or equivalent) electrostatic precipitator, Thermal DeNO_x (or equivalent) selective non-catalytic reduction system, and an activated carbon injection system (or equivalent), respectively. Auxiliary equipment includes feed and ash handling systems, steam turbines and condensers, electric generators, cooling towers, and stacks that are 8.0 ft. in diameter and a minimum 199 ft. high.

The UTM coordinates of this facility are Zone 17, 824.9 km E and 2940.1 km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application received September 30, 1992.
2. DER letter dated November 3, 1992.
3. KBN letter dated December 4, 1992.
4. Carlton letter dated December 23, 1992.
5. KBN letter dated February 17, 1993.
6. KBN letter dated May 25, 1993.
7. KBN letter dated July 2, 1993.
8. KBN letter dated August 11, 1993.

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1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a

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reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

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11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- (x) Determination of Prevention of Significant Deterioration (PSD)
- (x) Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

Construction Details

1. Construction of the proposed cogeneration facility shall reasonably conform to the plans described in the application. The facility shall be designed, constructed, and operated so that its gross generating capacity shall not exceed 74.9 megawatt (MW), 1-hour average, except during scheduled emission compliance and equipment performance tests. Equipment performance testing in excess of 74.9 shall be limited to a total of 24 hours (cumulative) during the 180-day calendar period after initial firing of each boiler.

The permittee shall provide detailed engineering plans, 30 days after they become available, demonstrating that the steam electric generating system will not produce more than 74.9 MW at design maximum steam conditions. Such demonstration may include plans for installation of a steam pressure relief valve. If the steam electric generating system is designed with a pressure relief valve, such valve shall be installed and maintained as a requirement of this permit.

2. Boilers No. 1, 2 and 3 shall be of the spreader stoker type with a maximum heat input of 715 MMBtu/hr with biomass fuel and 490 MMBtu/hr with fossil fuels.

3. Each boiler shall have an individual stack, and each stack must have a minimum height of 199 feet. The stack sampling facilities for each stack must comply with F.A.C. Rule 17-297.345.

4. Each boiler shall be equipped with instruments to measure the fuel feed rate, steam production, steam pressure, and steam temperature.

5. Each boiler shall be equipped with a:

- Electrostatic precipitator (ESP) designed for at least 98 percent removal of particulate matter;
- Selective non-catalytic reduction (SNCR) system designed for at least 40 percent removal of NO_x; and
- Carbon injection system (or equivalent) for mercury emissions control.

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6. The permittee shall install and operate continuous monitoring devices for each main boiler exhaust for opacity, nitrogen oxides (NO_x), sulfur dioxide (SO_2), oxygen (O_2), and carbon monoxide (CO).

The monitoring devices shall meet the applicable requirements of Section 17-297.500, F.A.C., and 40 CFR 60.47a. The opacity monitor shall be placed in the duct work between the electrostatic precipitator and the stack or in the stack.

An oxygen meter shall be installed for each unit to continuously monitor a representative sample of the flue gas. The oxygen monitor shall be used with automatic feedback or manual controls to continuously maintain air/fuel ratio parameters at an optimum. Operating procedures shall be established based on the initial emission compliance tests required by Specific Condition No. 21 below. The document "Use of Flue Gas Oxygen Meter as BACT for Combustion Controls" shall be used as a guide. An operating plan shall be submitted to the Department within 90 days of completion of such tests.

7. For the electrostatic precipitator, the selective non-catalytic reduction process (SNCR), and the activated carbon injection mercury control system (equivalent controls allowed):

- a. The permittee shall submit to the Department copies of technical data pertaining to the selected PM, NO_x , and mercury emission controls within thirty (30) days after it becomes available. These data should include, but not be limited to, guaranteed efficiency and emission rates and major design parameters.

8. For the fly ash handling and mercury control system reactant storage systems:

- a. The particulate matter filter control system for the storage silos shall be designed to achieve a 0.01 gr/acf outlet dust loading. The permittee must submit to the Department copies of technical data pertaining to the selected particulate emissions control for the mercury control system reactant storage silos within thirty (30) days after it becomes available. These data should include, but not be limited to, guaranteed efficiency, emission rates, and major design parameters.
- b. The fly ash handling system (including transfer points and storage bin) shall be enclosed. The ash shall be wetted in the ash conditioner to minimize fugitive dust prior to it being discharged into the disposal bin.

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9. Prior to operation of the source, the permittee shall submit to the Department an operation and maintenance plan that will allow the permittee to monitor emission control equipment efficiency and enable the permittee to return malfunctioning equipment to proper operation as expeditiously as possible

10. During land clearing and site preparation, wetting operations or other soil treatment techniques appropriate for controlling unconfined particulates, including grass seeding and mulching of disturbed areas, shall be undertaken and implemented. Any open burning of land clearing debris on this site shall be performed in compliance with Department regulations.

Operational and Emission Restrictions

11. The proposed cogeneration facility steam generating units shall be constructed and operated in accordance with the capabilities and specifications described in the application. The facility shall not exceed 74.9 (gross) megawatt generating capacity, 1 hour average, except during emission compliance and equipment performance tests. Equipment performance testing shall be limited to a 180-day calendar period after initial firing of each boiler. The hourly average generation rate shall be recorded in a log and the log retained for at least 2 years. The maximum heat input rate for each steam generator shall not exceed 715 MMBtu/hr when burning 100 percent biomass and 490 MMBtu/hr when burning 100 percent No. 2 fuel oil or low sulfur coal. Maximum heat input to the entire facility (total all three boilers) shall not exceed 11.5×10^{12} Btu per year. Steam production of each boiler shall not exceed an average of 455,418 lbs/hr at 1,500 psig, 975°F.

12. The primary fuel for the facility shall be biomass--bagasse and wood waste material. Authorized wood waste material is clean construction and demolition wood debris, yard trash, land clearing debris, and other clean cellulose and vegetative matter.

The biomass fuel used at the cogeneration facility shall not contain hazardous substances, hazardous wastes, biomedical wastes, or garbage. The fuel used at the cogeneration facility shall not contain special wastes, except wood, lumber, trees, tree remains, bagasse, cane tops and leaves, and other clean vegetative and cellulose matter.

The permittee shall perform a daily visual inspection of any wood waste or similar vegetative matter that has been delivered to the facility for use as fuel. Any shipment observed to contain prohibited materials shall not be used as fuel, unless such materials can be readily segregated and removed from the wood waste and vegetative matter.

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The permittee shall design and implement a management and testing program for the wood waste and other materials delivered to the facility for fuel. The program shall be designed to keep painted and chemically treated wood, household garbage, toxic or hazardous non-biomass and non-combustible waste material, from being burned at this plant. This program shall be submitted to the Department's Bureau of Air Regulation for review and approval at least 60 days before the commencement of operations of the cogeneration facility. At a minimum, the program shall provide for the routine inspection and/or testing of the fuel at the originating wood yard sites as well as at the cogeneration site, to ensure that the quantities of painted or chemically treated-wood in the fuel are minimized. Fuel scheduled for burning shall be inspected daily. Fuel tests shall be conducted weekly for the first year of operations at the facility and monthly thereafter, if the Department determines on the basis of the prior test results that less frequent testing is appropriate. A representative sample of ash for the biomass burned during each month for the first year of operation shall be analyzed for copper, chromium and arsenic by appropriate analytical procedures per 40 CFR 261, Appendix III, described in SW-846, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods. Wood waste containing more than 70.7 ppm arsenic or 83.3 ppm chromium or 62.8 ppm copper shall not be burned based on an analysis of a composite sample.

13. Any fuel oil burned in the facility shall be "new" No. 2 fuel oil with a maximum sulfur content of 0.05 percent sulfur as determined by the appropriate test method listed in 40 CFR 60.17. "New" oil means an oil which has been refined from crude oil and has not been used in any manner that may contaminate it.

14. Any coal burned in the facility shall be low sulfur coal with a maximum sulfur content of 0.70 percent and a maximum potential emission equivalent to 1.2 lb SO₂/MMBtu.

15. The consumption of No. 2 fuel oil shall be less than 25 percent of the total heat input to each boiler unit in any calendar quarter. Not more than 73,714 tons of coal shall be burned at this facility during any 12-month period. The combined heat input for coal and oil shall be less than 25 percent of the heat input on a calendar quarter basis.

16. The permittee shall maintain a daily log of the amounts and types of fuels used. The amount, heating value, beryllium content (coal only), sulfur content, and equivalent SO₂ emission rate (in lbs/MMBtu) of each fuel oil and coal delivery shall be kept in a log for at least two years. For each calendar month, the calculated SO₂ emissions and 12-month rolling average shall be determined (in tons) and kept in a log.

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17. During the first three years of commercial cogeneration facility operation, the existing Boilers Nos. 4, 5, 6, 10, 11, 12, 14, and 15 (Permit Nos. A050-169210, 190690, 175414, 190693, 175411, 169215, 189904, and 209094, respectively) may be retained for standby operation. During the period from initial firing to commercial operation, all three cogeneration boilers can be operated simultaneously with the existing boilers. Only biomass and No. 2 fuel oil may be used in the cogeneration boilers during this period. If more than 910,836 lb/hr steam is generated in the cogeneration boilers, steam in excess of 910,836 lb/hr must be sent to the Okeelanta sugar mill, and the existing boiler's steam production reduced by an equivalent amount. This period shall not exceed a total duration of 12 months. During this 12-month period, simultaneous operation of the existing boilers and the cogeneration boilers shall not occur on more than a total of 90 calendar days. After the first year of cogeneration facility operation, the existing boilers may be operated only when all three cogeneration boilers are shutdown. During operation, the existing boilers must meet all requirements in the most recent construction and operation permits for the boilers. These existing boilers shall be shutdown and rendered incapable of operation within three (3) years of commercial startup of the cogeneration facility, but no later than January 1, 1999.

18. Boiler No. 16 (AC50-191876) may be retained as a standby boiler for the cogeneration facility provided its permit is amended to authorize standby use. Boiler No. 16 may be operated during initial startup, debugging, and testing of the cogeneration facility for a period not to exceed 12 months following initial firing of fuel in the new boilers. After the first year of cogeneration operation, this boiler may be operated only when one or more of the three cogeneration boilers are shutdown. During operation, this boiler must meet all requirements in the current construction or operating permit for the boiler.

19. For the biomass, coal, fly ash, and mercury control system reactant handling facilities:

- a. All conveyors and conveyor transfer points shall be enclosed to preclude PM emissions (except those directly associated with the stacker/reclaimers, for which enclosure is operationally infeasible).
- b. Inactive coal storage piles shall be shaped, compacted, and oriented to minimize wind erosion. Sod, wetting agents, synthetic or other appropriate materials shall be used to cover those portions of the inactive coal pile that are prone to wind or water erosion.

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- c. Water sprays or chemical wetting agents and stabilizers shall be applied to storage piles, handling equipment, unenclosed transfer points, etc. during dry periods and as necessary to all facilities to maintain an opacity of less than or equal to 5 percent, except when adding, moving or removing coal from the coal pile, which would be allowed no more than 20 percent opacity.
- d. The mercury control system reactant storage silos shall be maintained at a negative pressure while operating with the exhaust vented to a filter control system. Particulate matter emissions from each of the three silos shall not exceed a visible emission reading of 5 percent opacity. A visible emission test is to be performed annually on each silo.

20. Visible emissions from any boiler shall not exceed 20 percent opacity, 6-minute average, except up to 27 percent opacity is allowed for up to 6 minutes in any 1-hour period. Based on a maximum heat input to each boiler of 715 MMBtu/hr for biomass fuels and 490 MMBtu/hr for No. 2 fuel oil and coal, stack emissions shall not exceed any limit shown in the following table:

Pollutant:	Emission Limit (per boiler) ²						Total All ³ Three Boilers (TPY)
	Biomass		No. 2 Oil		Bit. Coal		
	(lb/MMBtu)	(lb/hr)	(lb/MMBtu)	(lb/hr)	(lb/MMBtu)	(lb/hr)	
Particulate (TSP)	0.03	21.5	0.03	14.7	0.03	14.7	172.5 <i>20.5 = 27.5</i>
Particulate (PM ₁₀)	0.03	21.5	0.03	14.7	0.03	14.7	172.5
Sulfur Dioxide							
3-hour average	---	---	---	---	1.2	582.0	---
24-hour average	0.10	71.5	0.05	24.5	1.2	582.0	---
Annual average	0.02 ²	---	---	---	1.2 ²	---	1,184.5 ³ <i>20.5 = 27.5</i>
Nitrogen Oxides							
Annual average	0.15 ²	107.25	0.15 ²	70.50	0.17 ²	83.35	861.5 <i>20.5 = 27.5</i>
Carbon monoxide							
3-hour average	0.35	250.7	0.1	49.0	0.2	98.0	1,012.5 <i>20.5 = 27.5</i>
Volatile Organic Compounds							
Annual average	0.05	35.7	0.03	14.7	0.03	14.7	172.5 <i>20.5 = 27.5</i>
Lead	2.5 x 10 ⁻⁵	1.79	2.5 x 10 ⁻⁵	0.0004	2.5 x 10 ⁻⁵	0.001	0.17 <i>20.5 = 27.5</i>
Mercury	2.5 x 10 ⁻⁶	0.000179	2.5 x 10 ⁻⁶	0.00004	2.5 x 10 ⁻⁶	0.0001	0.00017 <i>20.5 = 27.5</i>

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Beryllium	---	---	3.5×10^{-7}	0.00017	5.9×10^{-6}	0.0029	0.0052
Fluorides	---	---	4.3×10^{-6}	0.003	0.024	11.8	21.2
Sulfuric Acid Mist	0.003	2.15	0.0015	0.74	0.036	17.6	34.6

^aCompliance based on 30-day rolling average, per 40 CFR 60, Subpart Da.

^bEmission limit for bagasse. Subject to revision after testing pursuant to Specific Conditions Nos. 24 and 25.

^cEmission limit for wood waste. Subject to revision after testing pursuant to Specific Conditions Nos. 24 and 25.

^dThe emission limit shall be prorated when more than one type of fuel is burned in a boiler.

^eLimit heat input from No. 2 fuel to less than 25% of total heat input on a calendar quarter basis, coal to 73,714 tons during any 12-month period, and the combination of oil and coal to less than 25% of the total heat input on a calendar quarter basis.

^fCompliance based on a 12-month rolling average.

The permittee shall comply with the excess emissions rule contained in F.A.C. Rule 17-210.700. In addition, the permittee is allowed excess emissions during startup conditions, provided such excess emissions do not exceed a duration of four hours, and such emissions in excess of two hours do not exceed six (6) times per year.

Compliance Requirements

21. Stack Testing

- a. Within 60 calendar days after achieving the maximum capacity at which each unit will be operated, but no later than 180 operating days after initial startup, the permittee shall conduct emission compliance tests for all air pollutants listed in Specific Condition No. 20 (including visible emissions). Tests shall be conducted during normal operations (i.e., within 10 percent of the permitted heat input). The permittee shall furnish the Department a written report of the results of such performance tests within 45 days of completion of the tests. The emission compliance tests will be conducted in accordance with the provisions of 40 CFR 60.46a.
- b. Compliance with emission limitations for each fuel stated in Specific Condition No. 20 above shall be demonstrated using EPA Methods, as contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources), or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants), or any other method as approved by the

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Department, in accordance with F.A.C. Rule 17-297.620. A test protocol shall be submitted for approval to the Bureau of Air Regulation at least 90 days prior to testing.

<u>EPA Method*</u>	<u>For Determination of</u>
1	Selection of sample site and velocity traverses.
2	Stack gas flow rate when converting concentrations to or from mass emission limits.
3 or 3A	Gas analysis when needed for calculation of molecular weight or percent O ₂ .
4	Moisture content when converting stack velocity to dry volumetric flow rate for use in converting concentrations in dry gases to or from mass emission limits.
5	Particulate matter concentration and mass emissions.
201 or 201A	PM ₁₀ emissions.
6, 6C, or 19	Sulfur dioxide emissions from stationary sources.
7 or 7E	Nitrogen oxide emissions from stationary sources.
8	Sulfuric acid mist.
9	Visible emission determination of opacity. - At least three one hour runs to be conducted simultaneously with particulate testing. - At least one truck unloading into the mercury reactant storage silo (from start to finish).
10	Carbon monoxide emissions from stationary sources.
12	Determination of inorganic lead emissions from stationary sources.
13A or 13B	Fluoride emissions from stationary sources.
18 or 2E	Volatile organic compounds concentration.
101A	Determination of particulate and gaseous mercury emissions.
104	Determination of beryllium emissions from stationary sources.
106	Determination of particulate and gaseous arsenic emissions.

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EMTIC Test Chromium and copper emissions.
Method
CTM-012.WPF

*Other approved EPA test methods may be substituted for the listed method unless the Department has adopted a specific test method for the air pollutant.

22. Emission compliance tests shall be conducted under such conditions as the Department shall specify based on representative performance of the facility. The permittee shall make available to the Department such records as may be necessary to determine the conditions of the emission compliance tests.

23. The permittee shall provide 30 days notice of the equipment performance tests or 15 working days for stack tests in order to afford the Department the opportunity to have an observer present.

24. Stack tests for particulates, NO_x, SO₂, sulfuric acid mist, CO, VOC, lead, mercury, beryllium, fluorides, arsenic, chromium, copper, and visible emissions shall be performed once every six months during the first two years of facility operation in accordance with Specific Conditions Nos. 21, 22, and 23 above. If the test results for the first two years of operation indicate the facility is operating in compliance with the terms of approval and of applicable permits and regulations, the tests will thereafter occur according to the following schedule:

-Annually for particulates, sulfur dioxide,* sulfuric acid mist,* NO_x, CO, VOC, mercury, arsenic, chromium, copper and visible emissions.

-Once every five years (at permit renewal time) for SO₂, sulfuric acid mist, lead, beryllium, and fluorides.

*Test required only during years coal is burned in the boilers.

25. After conducting the initial stack tests required under Specific Condition No. 24 above, a fuel management plan shall be submitted to the Department and Palm Beach County within 90 days specifying the fuel types and fuel quantities to be burned in the facility in order to not exceed the facility annual mercury, lead, beryllium, and fluorides emission limits specified in Condition 20.

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above. The plan shall include mercury emission factors based on stack testing, and may include revised mercury emission factors and baseline emission estimates for the existing Okeelanta facility.

Reporting Requirements

26. Stack monitoring, fuel usage, and fuel analysis data shall be reported to the Department's South and Southeast District Offices and to the Palm Beach County Health Unit on a quarterly basis commencing with the start of commercial operation in accordance with 40 CFR, Part 60, Sections 60.7 and 60.49a, and in accordance with Section 17-297.500, F.A.C.

27. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

28. An application for an operation permit must be submitted to the South District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this 27 day
of September, 1993

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Virginia B. Wetherell
Virginia B. Wetherell, Secretary
Department of Environmental
Protection