

**Golder Associates Inc.**

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December 18, 2000

Florida Department of Environmental Regulation  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Attention: Mr. A. A. Linero, P.E.

SUBJECT: DEP FILE NO. 0990332-013-AC; PSD-FL-196L, OKEELANTA POWER L.P.  
REQUEST TO ADD NATURAL GAS AS SUPPLEMENTAL FUEL

Dear Mr. Linero:

Okeelanta Power L.P. has received the Department's intent to issue and draft permit for the addition of natural gas as a supplemental fuel for the three cogeneration boilers, dated December 4, 2000. We have reviewed the draft permit and supporting documents and have the following comments.

Cover Letter

In the first sentence, the phrase "natural as" should be replaced with "natural gas".

Intent To Issue Air Construction Permit

In the first paragraph, fourth line, the phrase "natural as" should be replaced with "natural gas".

Public Notice of Intent To Issue Air Construction Permit Modification

In the first paragraph, second line, the phrase "natural as" should be replaced with "natural gas".

Permit Conditions Revision Letter

29.a. It was not stated in the application that the burners would be located in each "upper" corner of the boiler. In the application, it was stated that the burners would be located "in each of the four corners of each boiler." The exact positioning was not specified, and will not be determined until final engineering is completed.

29.e(2). Based on our November 14, letter to the Department, the past actual SO<sub>2</sub> emissions should be 133.23 TPY, not 169.98 TPY.

This table also indicates that the current PM/PM<sub>10</sub> emission limit for the facility of 172.50 TPY can be exceeded (up to 197.5/187.5 TPY for PM/PM<sub>10</sub>, respectively) without triggering PSD review. Is the Department's intent to revise the current PM/PM<sub>10</sub> emission limit for the facility to 197.5/187.5 TPY?

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29.f(1). Subpart Da does not set an emission limit for SO<sub>2</sub> when burning gaseous fuels. In 60.43a(b)(2), the requirement is zero percent reduction when emissions are less than 0.20 lb/MMBtu heat input. Since burning pipeline natural gas will always yield SO<sub>2</sub> emissions less than 0.20 lb/MMBtu, the only requirement is zero percent reduction. An emission limit for SO<sub>2</sub> is not required and is unnecessary.

Technical Evaluation & Preliminary Determination

2.0 Proposed Project

Regarding the "Note" adjacent to the first paragraph: this application for natural gas has no bearing on coal firing, and this note should be deleted.

Third paragraph, first sentence—delete the word "upper" from this sentence. The exact location will be determined during final engineering.

3.0 Emissions

Table 3.0a – Permit limit for Pb for wood firing should be 16,000 E<sup>-07</sup>.

Table 3.0b – Based on the November 14 submittal, actual SO<sub>2</sub> emissions should be 47.11, 38.32, and 47.80 TPY for Boilers A, B and C, respectively. The total SO<sub>2</sub> emissions should be 133.23 TPY. Estimated emissions increases should be 54.4 TPY for NO<sub>x</sub>, instead of 62.3 TPY. For SO<sub>2</sub>, the emission increase should be 9.62 TPY instead of 12.28 TPY, based on the revised actual emissions.

Table 4.3a – SO<sub>2</sub> actual emission should be 133.23 TPY, and future actual emissions, above which may trigger PSD review, should therefore be 173.2 TPY.

Again, the Department should clarify if the intent is to increase the permitted PM/PM<sub>10</sub> emissions for the facility to 197.5/187.5 TPY.

Thank you for consideration of these comments. If you should have any questions, please call me at (352) 336-5600.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P.E., Q.E.P.  
Principal Engineer  
Florida P.E. #19011  
SEAL

DB/jkw

cc: James Meriwether  
Gus Cepero  
Bill Tarr  
David Dee

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*O. Kallman*  
*D. Knowlton, SD*  
*O. Gonzalez, DBC HD*  
EPA  
NPS

Golder Associates

LANDERS & PARSONS, P.A.

ATTORNEYS AT LAW

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JAN 03 2001

BUREAU OF AIR REGULATION

January 2, 2001

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VIA HAND DELIVERY

Clair Fancy  
Department of Environmental Protection  
2600 Blair Stone Road, MS 48  
Tallahassee, Florida 32399

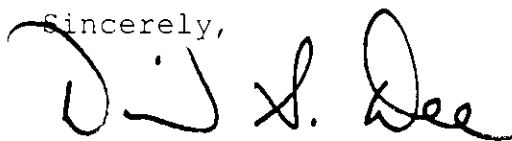
Re: Okeelanta Power Limited Partnership  
Intent to Issue Air Construction Permit Modification  
Proof of Publication  
Project No. 0990332-013-AC  
Draft Permit PSD-FL-196L

Dear Mr. Fancy:

Enclosed for your file is the original Proof of Publication for the public notice that was published on December 20, 2000, for DEP's Intent to Issue Air Construction Permit Modification in the above-referenced case. This notice was published in The Palm Beach Post, in Palm Beach County, Florida.

Please let me know if you have any questions.

Sincerely,



David S. Dee

DSD/nw

Enclosure

cc: ✓ Jeff Koerner

Bill Tarr

O. [unclear], SD

O. [unclear], RBCHD

EPA

NPS

# THE PALM BEACH POST

Published Daily and Sunday  
West Palm Beach, Palm Beach County, Florida

## PROOF OF PUBLICATION

STATE OF FLORIDA  
COUNTY OF PALM BEACH

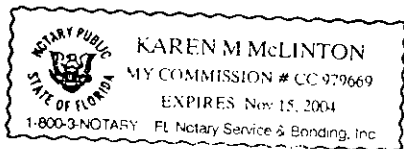
Before the undersigned authority personally appeared Tyler Dixon, who on oath says that she is Classified Advertising Manager, Inside Sales of The Palm Beach Post, a daily and Sunday newspaper published at West Palm Beach in Palm Beach County, Florida; that the attached copy of advertising, being a Notice in the matter of Intent to Issue Air Construction Permit Modification -- in the Court, was published in said newspaper in the issues of December 20, 2000.

Affiant further says that the said The Post is a newspaper published at West Palm Beach, in said Palm Beach County, Florida, and that the said newspaper has heretofore been continuously published in said Palm Beach County, Florida, daily and Sunday and has been entered as second class mail matter at the post office in West Palm Beach, in said Palm Beach County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she/he has neither paid nor promised any person, firm or corporation any discount rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before this 20 day of December A.D. 2000.

3/8  
[Signature]

Personally known XX or Produced Identification \_\_\_\_\_  
Type of Identification Produced \_\_\_\_\_



NO. 786193  
PUBLIC NOTICE OF INTENT  
TO ISSUE AIR CONSTRUCTION  
PERMIT MODIFICATION  
STATE OF FLORIDA  
DEPARTMENT  
OF ENVIRONMENTAL  
PROTECTION  
Okeelanta Power  
Limited Partnership  
Project No. 0990332-013-AC  
Draft Permit PSD-FL-196L  
Addition of Natural Gas  
to Biomass Boilers  
Emissions Units 001 - 003  
The Department of Environ-  
mental Protection (Depart-  
ment) gives notice of its intent  
to issue an air construction  
permit modification to Okeelanta  
Power Limited Partnership to  
add natural gas as a supplement-  
al fuel to the biomass boilers at  
the Okeelanta Cogeneration Plant  
located near the city of South Bay  
in western Palm Beach County.  
The applicant's authorized  
representative, Gus Capero,  
may be contacted at Okeelanta  
Power Limited Partnership, P.O. Box 9,  
South Bay, FL 33493.  
The addition of natural gas will  
increase the reliability and avail-  
ability of the biomass boilers,  
which could subject this project  
to Rule 62-212.400, F.A.C., the  
Prevention of Significant Deterioration  
(PSD) of Air Quality. However,  
the biomass boilers have been  
determined to be "electric utility  
steam generation 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 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 a determination of the  
Best Available Control Technology  
(BACT) must be determined for  
each significant pollutant in  
accordance with Rule 62-212.400,  
F.A.C.  
The addition of natural gas is not  
expected to result in increased  
hourly emissions. However, applicable  
requirements of NSPS Subpart D  
were included because natural gas  
becomes a new regulated fuel  
under this subpart. Because no  
increase in hourly or annual  
emissions are expected, no  
additional air quality analysis  
was required. The ambient air  
quality analysis performed for  
the original PSD permit applica-  
tion for the cogeneration plant  
indicated that emissions would  
not significantly contribute to,  
or cause a violation of, any state  
or federal ambient air quality  
standard. The Department will  
issue the Final Permit with the  
attached conditions 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 and requests  
for public meetings concerning  
the proposed permit issuance  
action for a period of 30 (thirty)  
days from the date of publication  
of this Public Notice of Intent  
to Issue Air Construction Permit.  
Written comments and requests  
for public meetings should be  
provided to the Department's  
Bureau of Air Regulation at  
2600 Blair Stone Road, Mail  
Station #5505, Tallahassee,  
FL 32399-2400. Any written  
comments filed shall be made  
available for public inspection.  
If written comments received  
result in a significant change  
in the proposed agency action,  
the Department shall revise  
the proposed permit and  
require, if applicable, another  
Public Notice.  
The Department will issue the  
permit with the attached con-  
ditions unless a timely petition

in this notice. Persons whose  
substantial interests will be af-  
fected by any such final decision  
of the Department on the applica-  
tion have the right to petition  
to become a party to the proceed-  
ing, in accordance with the re-  
quirements set forth above.  
A complete project file is  
available for public inspection  
during normal business hours,  
8:00 a.m. to 5:00 p.m., Mon-  
day through Friday, except legal  
holidays, at:  
Department of Environmental  
Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida, 32301  
Telephone: 850/488-0114  
Fax: 850/922-8979  
Department of Environmental  
Protection  
Southwest District Office-  
Air Resources  
3804 Coconut Palm Drive,  
Tampa, Florida 33619-6218  
Telephone: 813/744-6100  
Fax: 813/744-6084  
Palm Beach County  
Health Department  
EHE-Air Pollution  
Control Section  
P.O. Box 29  
(901 Evernia Street)  
West Palm Beach, FL  
33401-0029  
Telephone: 561/355-3138  
Fax: 561/355-2442  
The complete project file in-  
cludes the application, Techni-  
cal Evaluation and Preliminary  
Determination, Draft Permit,  
and the information submitted  
by the responsible official, ex-  
clusive of confidential records  
under Section 403.111, F.S.  
Interested persons may con-  
tact the Department's New  
Source Review Section at 111  
South Magnolia Drive, Suite 4,  
Tallahassee, Florida 32301, or  
call 850/488-0114, for addi-  
tional information.  
PUB: The Palm Beach Post  
December 20, 2000

for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

Motion is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes 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. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 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 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material facts. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts, the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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.

